Stockport Homes Building Safety Policy

Stockport Homes Building Safety Policy

1 Introduction

1.1 Stockport Homes Group (SHG) manages approximately 11,387 residential properties on behalf of Stockport Metropolitan Borough Council (SMBC). In addition, SHG manages a range of other assets for SMBC, including community centres and garages. SHG also owns and manages approximately 563 residential properties in its own right.

1.2 SHG currently manages 25 HRBs (Higher-risk buildings) on behalf of SMBC. These buildings are subject to the regulatory reporting and compliance requirements introduced under the Building Safety Act and associated legislation.

1.3 Section 65 of the Building Safety Act 2022 defines an HRB during occupation as a building that is at least 18 metres in height or has at least seven storeys and contains at least two residential units. SHG have referred to The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 to determine any key points/exclusions to the definition.

1.4 The applicable buildings are:

Bowdon House	Hollow End Towers	Mottram Towers	Pendlebury Towers	Voewood House
Palatine House	Romney Towers	Millbrook Towers	Stonemill Terrace	Heaton Towers
Lancaster House	Lenham Towers	Lincoln Towers	The Longsons	Norris Towers
Radnor House	Dunton Towers	Ratcliffe Towers	Conway Towers	Hollywood Towers
Hanover Towers	Brecon Towers	Beaver House	Ludlow Towers	The Bentleys

1.5 SMBC and SHG recognise the role and importance of the Regulator of Social Housing (RSH) and the obligation and requirement as a Registered Provider (RP) to comply with its Consumer Standards. The Consumer Standards Measures relevant to this policy are detailed in Section 3 of the Internal Controls.

1.7 This policy applies only to occupied HRBs.

1.8 The policy will be supported by a Building Safety Management Plan providing more detailed Guidance and Procedures.

2 Statement of Intent

2.1 The purpose of this policy is to establish how SHG will discharge its duties as an Accountable Person and support SMBC in discharging its duties as Principal Accountable Person for the occupied higher-risk buildings covered by this policy.

2.2 SHG will comply with all current and relevant statutory obligations related to building and resident safety, as detailed in Section 3 of the Internal Controls.

2.3 SHG's primary objective is to ensure that customers, contractors, staff and visitors remain safe in their homes/premises (both Domestic and Non-Domestic). Failure to properly discharge our legal responsibilities may also result in:

- Prosecution under the Building Safety Act 2022, Regulatory Reform (Fire Safety) Order 2005, Health and Safety at Work etc. Act 1974, Corporate Manslaughter and Corporate Homicide Act 2007
- Regulatory intervention by the Building Safety Regulator
- Regulatory intervention by the Regulator of Social Housing resulting from a potential breach of the Safety and Quality Standard.
- Formal enforcement and Compliance Notices with punishable offences,
- Reputational damage
- Loss of confidence by stakeholders in the organisation.

2.4 This Policy Statement establishes the broad framework for meeting the requirements of the key statutory and regulatory obligations. In respect to specific areas of building and resident health and safety - this policy should be read in conjunction with the wider, directly related SHG compliance policy documents (Gas, Electrical, Fire, Asbestos, Water and Lifts).

3 Roles and Responsibilities

3.1 Detailed roles and responsibilities will be documented within the Building Safety Management Plan and associated Operational Guidance. The overarching roles and responsibilities are as follows:

SMBC - The Principal Accountable Person (PAP)	SMBC is the Principal Accountable Person for the occupied higher-risk buildings covered by this policy because it holds the relevant legal estate in, or relevant repairing obligation for, the structure and exterior of those buildings. SMBC retains responsibility for the duties assigned specifically to the Principal Accountable Person.
SHG - Accountable Person (AP)	SHG is an Accountable Person for the occupied higher-risk buildings covered by this policy because it has relevant repairing obligations in relation to the common parts of those buildings. SHG will assess and manage the building-safety risks arising from the spread of fire and structural failure in the parts of each building for which it is responsible. SHG will cooperate and coordinate with SMBC as Principal Accountable Person and with any other relevant Accountable Person or Responsible Person.

The Audit and Risk Committee	Provides oversight and assurance to SMBC and the SHG Board on the effectiveness of building-safety governance, risk management and internal control. The Committee will receive significant audit findings, material non-compliance and assurance relating to the discharge of AP and PAP duties.
The Chief Executive Officer (CEO)	Responsible for the implementation of the policy and will allocate responsibilities within the Executive Leadership Team (ELT) and ensure that there is adequate management, monitoring and visibility of performance. The CEO will recommend this Policy to SMBC on behalf of ELT
SHG Director of Property	Takes overall responsibility for planning and implementing the assurance activities described in this Policy and for the effective reporting of performance. The Director of Property will attend the Building Safety steering Group meeting and ensure that any issues arising from assurance activities are discussed, and that areas of non-performance are reported and escalated where required. The director of property will also chair the Building Safety Steering Group. They will use this group for the dissemination of information, problem solving and decision making for matters regarding Building Safety
Assistant Director of Assets and Development	Supports the Director of Property in the planning, coordination, and delivery of building safety assurance activities described in this Policy. They will oversee the operational implementation of assurance tasks, monitor performance against agreed standards, and report any issues or risks to the Director. The Assistant Director will attend the Building Safety Steering Group to provide updates, highlight operational issues, support problem-solving, and ensure that actions agreed at the group are effectively implemented across teams. They will also facilitate communication and information sharing across operational teams and provide recommendations for continuous improvement in building safety delivery
Head of Development	Responsible for ensuring that all required building-control applications and supporting information are prepared and submitted for new higher-risk buildings and relevant work to existing higher-risk buildings. The Head of Development will ensure that occupation does not take place until the required completion certificate has been issued by the Building Safety Regulator. The Head of Development will also ensure that accurate and controlled golden-thread information is created and

	maintained throughout design and construction and that the applicable Gateway and change-control requirements are followed.
Head of Compliance and Building Safety	Takes responsibility for ensuring that all building safety standards are met and that staff and contractors they employ are competent and are able to deliver on the commitments outlined in the policy. The Head of Compliance and Building Safety is responsible designing and implementing building safety procedures, ensuring periodic reviews are undertaken, including compilation of the Building Safety Cases, and Supporting Documents, and coordinating the preparation and submission of the information required to support applications for Building Assessment Certificates on behalf of the Principal Accountable Person.
SHG Building Safety Manager	The Building Safety Manager is SHG's delegated operational lead for coordinating the management of building-safety risks and the delivery of this policy. The role supports the relevant Accountable Person and Principal Accountable Person but does not, solely by virtue of the appointment, constitute an Accountable Person under the Building Safety Act 2022. The Building Safety Manager will coordinate building-safety risk management, regulatory submissions, safety-case activity, performance reporting, escalation and communication with the Building Safety Regulator under appropriate delegated authority.
Responsible Manager(s)	As described within each statutory compliance SHG policy documents, will be the named responsible manager for ensuring compliance with the relevant legislation
Competent Person(s)	Will have a responsibility to identify any concerns about their own competency for the task that they are being asked to undertake and recommend additional competency is procured where required
'Single Point of Contact'	SMBC's **Director of Place Management** is the 'Single Point of Contact' for the Building Safety Regulator
Stockport Homes	Put measures in place to prevent building safety risks happening and reduce the severity of any incident that does happen. Report safety occurrences to the BSR and report them on the Mandatory Occurrence Reporting System.

	Engage with customers about building safety in line with Resident Engagement Strategy. Keep and update certain information about each HRB (also known as the 'Golden Thread of Information'). Provide building information to relevant individuals and organisations.

4 Management Plan

4.1 SHG will ensure that a Management Plan is created and will include maintaining a Building Safety Management Plan and associated Operational Guidance which shall:

- Provide additional guidance on how the commitments outlined within this Policy will be implemented
- Provide clear lines of responsibility for the management of Building Safety key activities
- Set out key Operational Processes – including implementation of a Building Safety Inspection regime and embedding general management activity which will ensure key controls are in place (e.g. protecting the means of escape, permit to work schemes)
- Ensure that a clear and consistent process is in place to obtain access to Properties where this is required. This will include pro-active assessment of available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement action will be used where required
- Detail competency requirements for both internal and external staff and contractors
- Maintain a process for dealing with unsafe situations
- Outline the approach to developing and embedding Resident Engagement Strategies.

4.2 All staff who have roles identified in the Building Safety Management Plan will receive associated training appropriate to their role.

5 Data

5.1 SHG will maintain a robust approach to identifying the assets and components for which it has responsibility. SHG will:

- Maintain a register of all multi-occupancy buildings recording height in metres and number of storeys
- Maintain an up-to-date master database of all properties identifying their higher-risk-building status and whether a safety case report is required. SHG will maintain and provide the assessments, evidence and

information relating to the parts of the building for which it is responsible, to support SMBC as Principal Accountable Person in preparing and revising the safety case report.

- Where a requirement for a BSC exists, hold full electronic copies of the current and previous (therefore requiring a consistent approach to version control) Case Reports and Supporting Documents (e.g. Structural Surveys, PAS 9980 Assessments, Building Plans, Fire Strategy etc). The BSC status will be held in the Master Database including the Unique Property Reference Number (UPRN), Date of Last BSC Report; Review Frequency; and Date of Next Review
- When an HRB is registered with the Building Safety Regulator, a record of all data submitted at the time of registration, including 'Key Building Information' (KBI) will be held on file for reference in a secure sharepoint folder
- Where Fire Safety Equipment/ Lifting Equipment (including Fire Fighting Lifts)/ Heating Systems and Mechanical & Electrical equipment exists – in line with SHG 'Big 6' Policies - hold reportable and auditable information including but not limited to: UPRN; Type of Equipment; Manufacturers' Requirements and Instructions (where available); Associated Testing/Servicing Frequencies; Last Date Completed; and Next Date Due. Records will be retained for the periods required by legislation, regulatory requirements and SHG's approved retention arrangements. Information necessary to demonstrate how building-safety risks have been assessed and managed over time will be retained as controlled golden-thread information.
- Maintain current and auditable records of all Remedial Works arising from Servicing/ Maintenance or other Building Safety-related Inspection or Testing. The records will include UPRN; Address and Risk Profile of the Property; Detail of the Work Item required; Priority and Target Completion Date; Person Responsible; Completion Date and Associated Sign-Off; and Evidence of Completion.

5.2 SHG will maintain accurate, current, accessible, secure and controlled building-safety information in accordance with the applicable golden-thread requirements. SHG will ensure that all building safety related information is held digitally, and controls are in place to effectively manage the data/ records/ life cycles. Data will be held securely and reconciled and validated.

5.3 SHG will also capture and retain information in order to maximise the effectiveness of its Resident Engagement in regard to matters of building safety, to include for example: preferred method of communication; language; and vulnerability. Data will be refreshed at the time of change of occupancy/ via proactive survey data and staff engagement.

6 Key Activities to Manage Risk

Risk Assessment for Major Hazards

6.1 SHG will identify building safety risks in HRBs. In accordance with the Building Safety Act 2022 this will include assessing the risk of two major hazards including the Spread of Fire and Structural Failure.

6.2 The causes and mitigation and control measures for these hazards will be prepared for each individual HRB. SHG recognises that the risk will vary for each building due to different factors, such as building construction/design and customer profile.

6.3 SHG will also consider all risks that exist within Multi-Occupancy Buildings, and this will be captured within the SHG Risk Register.

6.4 SHG will also work to the prescribed principles for the management of building safety risks as outlined in The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 (Regulation 4).

Building Registration & safety case reports

6.5 SMBC, as PAP, retains responsibility for the duties assigned specifically to the PAP. SHG, as AP, will provide the information, evidence and operational support required in relation to the parts of the building for which it is responsible.

6.6 A safety case report (SCR) will be prepared for each qualifying building, in accordance with the requirements set out by the BSR, as part of a Building Assessment Certificate (BAC) application. The PAP is responsible for ensuring that the SCRs are prepared in accordance with the guidelines at https://www.gov.uk/guidance/preparing-a-safety-case-report.

Servicing/Inspection/Risk Assessment

6.7 SHG has committed in its management of compliance risks to undertake all relevant Servicing/Inspection/Risk Assessments. Such as:

- Fire Risk Assessments undertaken in accordance with the Fire Policy requirements
- All Fire Safety Equipment to be tested and maintained in accordance with regulatory and statutory requirements and considering manufacturer's requirements
- All assets have satisfactory Electrical Installation Condition Reports (EICR) in accordance with the Electrical Safety Policy
- Asbestos Management Survey Re-Inspections
- Legionella Risk Assessments undertaken in accordance with the Water Safety Policy

- LOLER inspections undertaken for all Passenger Lifts/ Fire-Fighting Lifts/ Lifting Equipment, Automatic Doors/ Gates/ Barriers.

6.8 This will include the completion of all essential Remedial Works requirements identified during the Testing/Inspection activity.

Building Safety Inspection Regime

6.9 SHG will discharge its duties as an Accountable Person and undertake agreed operational activities in support of SMBC as Principal Accountable Person by operating a Building Safety Inspection Regime for all occupied HRBs. The regime will routinely identify hazards, monitor activity within the building, inspect relevant equipment and check that means of escape remain free from obstruction. The scope, frequency, monitoring and reporting arrangements will be defined within SHG's Block Inspection Procedure.

Permit to Work

6.10 SHG will implement a Permit to Work Scheme for all HRBs, to ensure control of contractors for all aspects of Remedial Work/s or any building alterations/ construction related work.

6.11 This is a key, fundamental safety-related control in the context of HRBs and further detail as to its operation can be found in the Building Safety Management Plan.

Resident Engagement Strategy

6.12 SMBC, as Principal Accountable Person, is responsible for ensuring that a Resident Engagement Strategy is prepared and implemented for each occupied HRB. SHG will provide the necessary information and operational support and may coordinate the development, implementation and review of each strategy under delegated authority. Each strategy will take account of the needs and communication preferences of residents living within the relevant building. The overall aim of each RES is:

- To ensure all customers feel safe in their building and home
- Give customers a voice on how building safety is managed in their building
- Ensure that SHG explains and is accountable for relevant building-safety decisions.

6.13 SHG will achieve these aims as follows:

- Promote customer engagement in building safety measures
- Ensure customers are aware of the building safety information that they can request

- Consult with customers on building safety decisions that affect their building through regular communication and customer panels
- Listen to customer feedback following engagement
- Ensure customers understand their responsibilities for helping to keep their homes and buildings safe
- Empower customers to raise building safety concerns or a complaint if they feel they are not being listened to.

6.14 To ensure each RES remains effective, SHG will review:

- At least every two years
- After each consultation period held on the strategy
- After a Mandatory Occurrence Report is submitted to the BSR
- After the completion of significant material alterations to the building
- Records of reviews carried out will be detailed within the version control at the end of each strategy until the full strategy review date.

Further Surveys / Inspections

6.15 SHG will pro-actively undertake, where required, further surveys/investigations to all HRBs, for which it is responsible. This may include, but is not limited to:

- Retrospective Fire Strategy (RFS)
- Fire Risk Appraisal of External Walls (FRAEW)
- Structural Survey
- Compartmentation Survey
- Door Surveys.

6.16 Such further investigations will be recommended by the FRA, GMFRS or where SHG is not satisfied it has appropriate assurance around the design, installation or maintenance of a building component. SHG will maintain a programme of these investigations prioritised by building risk profile and / or after prescribed period of time. SHG will ensure all surveys / inspections are carried out by suitably qualified, competent and experienced consultancies / individuals.

Remedial Actions

6.17 All remedial actions will have a recorded source, risk rating, named owner and target date. A risk rating may only be changed following competent reassessment supported by evidence. Any extension to a target date must be documented, authorised and supported by suitable interim measures. High-risk or materially overdue actions will be escalated. Actions will not be closed until suitable completion evidence and, where required, competent verification are available.

Remedial Works

6.18 All Remedial Work should be carried out in accordance with the relevant British Standard, approved Code of Practice or associated Good Practice Guidance. The 'Big 6' Policies will define where contractors are required to have Third Party Accreditation and retain specific Competency requirements/thresholds – and this will include specialist Fire Safety works.

6.19 The Responsible Manager for a specific aspect of building safety risk mitigation/control – will provide full oversight and assurance for the completion of all Remedial Works within HRBs.

6.20 Large Remediation Programmes following further investigations may be delivered as planned programme works as distinct from individual remedial actions.

Repairs and Maintenance (R&M) Activity

6.21 There is a risk that Repairs and Maintenance activity impacts on Fire Safety and other aspects of building safety. Owing to the volume and nature of Repair Works it is not practicable to undertake specific Risk Assessments of all jobs. SHG will manage this risk by ensuring that all contractors must obtain prior permission before working on any of its properties, and that R&M contractors (internal and external) have a general awareness of Fire Safety in order to inform Dynamic Risk Assessment when undertaking Responsive Repairs that may have an impact on Fire Safety. Repairs will be carried out in accordance with the relevant British Standard, Approved Code of Practice or associated Good Practice Guidance and by Third Party Accredited contractors where required.

6.22 Any contractors (internal or external) undertaking Hot Works as part of repairs activity must have an approved Hot Works Procedure. This should include avoidance of Hot Work unless no alternative method is feasible. The Contracts Register and associated Contract Management Plan will identify if a contractor has such a Procedure and is permitted to undertake such works.

6.23 HRBs will be assigned as Permit to Work areas in order to manage the work to a particular element, area, or of a certain type. SHG will review the need for the operation of a Permit to Work Scheme for other properties on scheme-by-scheme basis. This approach is further detailed in the Building Safety Management Plan.

6.24 SHG will follow the relevant procedure in respect of notifying the Building Safety Regulator of any emergency works to HRBs during Project Work that meet the definition of 'Building Works' under The Building Regulations 2010 – in accordance with The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023.

6.25 All of the above practices, restrictions and controls also apply to issues of Structural Safety – with these issues to be considered in particular for Works which approximate to significant Refurbishment/Remodelling (see below re Planned/Major Works and Construction).

Planned and Major Works

6.26 Planned Maintenance or Upgrade Programmes commissioned by SHG to HRBs will be overseen by the Building Safety Manager, who must ensure the building is maintained safely throughout. Contract Managers will ensure that the necessary Risk Assessments are undertaken, to consider the impact on Fire and Structural Safety – and other risks that may affect customer safety or impact on the integrity of the building.

6.27 The Building Safety Regulator (BSR) introduced three key "Gateways" as part of the new building safety regime under the Building Safety Act 2022. These Gateways are critical checkpoints to ensure that building safety is considered and maintained throughout the lifecycle of higher-risk buildings (HRBs), especially high-rise residential buildings (18m+ or 7 storeys+, with at least 2 residential units). Gateway One is applicable to all HRB new builds. Gateway Two is applicable when applying for building control approval to do the following:

- carry out certain building work to an existing higher-risk building – this includes all planned non-emergency active and passive fire protection i.e. the replacement of fire doors.

Gateway One – Planning Stage	
When:	At the planning application stage
Applies:	All developments involving a high-rise residential building
Purpose:	To ensure that fire safety is considered at the earliest stage of design. This involves submitting a Fire Statement as part of the planning process
Key Requirements:	• Submission of a Fire Statement. • Demonstrate how fire safety has been integrated into the design. • Input from the Health and Safety Executive (HSE) as a statutory consultee.

Gateway Two – Pre-Construction Stage	
When:	Before construction begins
Applies:	Higher-risk buildings only (HRBs)
Purpose:	To prevent unsafe designs from being built. No construction can start until the BSR approves the application
Key Requirements:	• Full design submitted for Building Control Approval by the BSR.

	• Demonstration of how the building meets all relevant Building Regulations, especially around structure and fire safety. • Golden Thread of information begins here – digital record-keeping of key safety information.

Gateway Three – Completion Stage	
When:	Before occupation
Applies:	Higher-risk buildings
Purpose:	To ensure the building has been built as designed, safely and compliantly
Key Requirements:	• Submission of the as-built information to the BSR. • Confirmation that the building complies with Building Regulations. • The Accountable Person must be identified. • The building cannot be occupied until the BSR issues a Completion Certificate.

6.28 Works Programmes are likely to fall into one of three categories:

- Works subject to the Three key gateways
- Works not subject to the Three key gateways (non HRBs) (including those covered by the Building Regulations, but delivered by/under a Competent Person scheme) but where there is a foreseeable impact on Building Safety
- Works not subject to the Three key gateways where there is no foreseeable impact on Building Safety – subject to confirmation by a Competent Person.

6.29 For all other Works, SHG will ensure that prior to Works commencing a Competent Person will:

- Review the proposed work against the Fire Risk Assessment, Structural Safety Report and any Building Safety Case information
- Ensure anyone appointed to undertake Design or Construction activities can demonstrate the necessary competence to discharge their responsibilities relating to Building Safety. This will include Duty Holders identified in the Construction (Design and Management) Regulations 2015 (the Client, the Principal Designer, the Principal Contractor, Designers and Contractors)
- Request reasonable assurance that Duty Holders have demonstrated that resident safety can be assured during the Works or that a suitable Decanting Strategy is in place
- Engage with residents on Building Safety matters that affect them.

- Request reasonable assurance that Duty Holders have complied with the Building Regulations where required
- Request reasonable assurance that there is an appropriate Site Inspection and Sign-Off Programme in place for all the stages of the work.

6.30 During the Project and at its conclusion, SHG will make any updates to the FRA, Building Safety Case or other key Fire Safety information as required.

6.31 For certain Projects undertaken on HRBs, there will be additional requirements in relation to the notification and consent from the Building Safety Regulator which must be adhered to. These will be further referenced within SHG's Building Safety Management Plan.

6.32 SHG staff and contractors will support maintaining a 'Golden Thread' of each HRB's building information, which is further outlined in the Building Safety Management Plan.

Mandatory Occurrence Reporting

6.33 SHG, as an Accountable Person, will notify and report qualifying safety occurrences relating to the parts of the building for which it is responsible, through the building's mandatory occurrence reporting arrangements and in accordance with statutory timescales. SHG will coordinate with SMBC as Principal Accountable Person to support operation of the single mandatory occurrence reporting system.

Resident Commissioned Works

6.34 SHG will maintain a consent process for any Resident Commissioned Works. The proposed Works will be evaluated by a Competent Person to consider if there is a foreseeable impact in relation to building safety risks. Approval will not be unreasonably withheld, although consent may be refused, or conditions imposed where appropriate.

6.35 Where unauthorised work with the potential to impact on building safety is discovered, SHG will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident. Legal Action will be taken where necessary to obtain assurance in the interests of the customer, other residents, staff and visitors.

Operational Safety Management

6.36 SHG will:

- Undertake routine building safety inspections to identify hazards and address any risks.

- Provide supporting information in preparation for Building Safety case reports.
- Enforce resident responsibilities where required, considering a balance of individual residents' rights with the need for effective, timely action where there is a risk to the safety of other residents.
- Undertake Fire Safety Checks in line with the Fire Safety Policy (i.e. prohibiting storage of items in Communal Areas and Escape Routes/ checking fire safety signage).

Construction Project (re Refurbishment/Remodelling of an existing HRB)

6.37 There are detailed requirements on SHG as a Client during new (build) construction projects and these are considered elsewhere.

6.38 However, in relation to Building Safety and HRBs which undergo significant Refurbishment/Remodelling (so as to represent a material change to the structure and fabric of the building), SHG will ensure:

- The Competent Person co-operates and shares information with stakeholders at key stages prior to, and during, construction
- that the people it employs are competent to do the work they are undertaking
- compliance with the Building Regulations, CDM Regulations and any other specific regulatory requirements (including the 2023 Building Higher-Risk Buildings Procedures Regulations) (see Management Plan)
- appropriate approvals are in place and that all information is handed over to all relevant parties (such as Housing Management or other operational colleagues) prior to any occupation
- that an FRA is undertaken prior to occupation
- Supporting documentation is collated and shared, including via updates to the Building Safety Case, and to support the 'Golden Thread'

7 Communication and Stakeholders

Internal	Operate a 'Building Safety Steering Group' comprising of a cross-organisation team of staff. Terms of Reference of the Group will be included in the Building Safety Management Plan.
Residents	SHG will encourage maintaining high standards of Building Safety by the following actions: •Establishing Resident Engagement Strategies and ensuring consultation and provision of information on Building Safety matters via preferred methods of communication. •Maintain a clear approach to gaining access to carry out inspections and undertake works and be clear that enforcement action may be taken when it is necessary to do so.

	•Maintain a clear Complaints Process and monitor and review complaints in relation to building safety. •Communicate with Leaseholders and Shared Owners annually to remind them of the importance of undertaking Periodic Electrical and Gas Safety Checks. •Ensure any private works undertaken by leaseholders are checked and copies of relevant certification sought where necessary.
Staff	Communicate with staff through Induction Training, Safety Briefings, appropriate Signage and the Intranet.
Other Duty Holders	SHG, as an Accountable Person, will cooperate and coordinate with SMBC and any other Accountable Person for the building. SHG will also cooperate with relevant Responsible Persons and will share the information necessary for each duty holder to discharge its statutory functions and support the effective management of building-safety risks.
Building Safety Regulator	SHG will maintain appropriate communication with the Building Safety Regulator in relation to its duties as an Accountable Person and any activities it is authorised to undertake on behalf of SMBC as Principal Accountable Person. SMBC, as Principal Accountable Person, will maintain the registration of each higher-risk building, keep registration and key building information up to date and apply for a Building Assessment Certificate when directed by the Building Safety Regulator. SHG will provide the information and evidence relating to its Accountable Person responsibilities and may coordinate regulatory submissions under delegated authority. SHG, as Accountable Person, will report qualifying safety occurrences relating to the parts for which it is responsible and will cooperate with SMBC in operating the building’s mandatory occurrence reporting arrangements. SHG will communicate with the Building Safety Regulator about building-control applications where it is the client or is authorised to act for the client. SHG will respond to regulatory requests, inspections, directions, compliance notices and enforcement matters addressed to it and will support SMBC in relation to matters addressed to the Principal Accountable Person.

8 Assurance

8.1 The following assurance activities will be undertaken:

Internal checking independent of the Operational Teams	Provides additional assurance around the accuracy of data and reporting. The approach will include sample testing of the accuracy of data and the operation of controls. The outcomes will be reported to the Asset Compliance Meeting.
Internal Audit	Provides independent assurance on the operation and effectiveness of controls. Frequency agreed as part of the Internal Audit Programme and reported to Audit and Risk Committee.
Works-based Quality Assurance/Quality Control (QA/QC)	Tests the quality of work delivered. This will be undertaken at the levels defined within the Building Safety Management Plan and reported to the Asset Compliance Group.

9 Competence

9.1 It is not possible to succinctly define competence requirements for all roles and activities outlined in this policy. In many areas, competence will be assessed based on skills, knowledge, experience and behaviours as opposed to a single qualification or standard. As defined above, SHG has a system of evaluating competence within the areas of responsibility and Competent Person(s) are required to highlight the limits of the competence.

9.2 In accordance with the prescribed principles for the management of building safety risks in The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 Regulation 4 (2) - Management of building safety risks: prescribed principles – SHG will ensure a person has the relevant competence for higher-risk buildings, and will apply these principles for all SHG properties i.e. persons must have relevant competence – where this is an 'individual' this will be determined by skills, knowledge, experience and behaviours necessary to perform the functions for the they are responsible for in a satisfactory manner. SHG will support individuals with training to develop competence - in accordance with the prescribed principles, these individuals will be supervised by a person with relevant competence when performing the function.

9.3 Also, in accordance with The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023, SHG will obtain a "Competence Declaration" statement, in relation to HRB work i.e. from the Principal Designer, Principal Contractor, or any other person appointed in relation to the work included in the building control application.

9.4 Furthermore, owing to the initial importance of Building Safety Requirements and closely related Fire Risk Assessments. SHG will:

- Ensure that FRAs are undertaken by **BAFE SP205-1 accredited organisations** and all FRAs are subject to validation
- Appoint an external Competent Person to provide retained support and advice in relation to Fire Safety. This will be (or include access to) a Chartered Fire Engineer and experienced Fire Risk Assessor – with particular experience on complex Residential Properties – who is listed on an Approved Register
- For buildings with combustible external wall materials in higher risk categories, the assessor should be part of a professional body that is within a scheme able to demonstrate third party accreditation or validation, from **UK Accreditation Service (UKAS)** or **UK Engineering Council (EngC)** – demonstrating ability to apply the Code of Practice PAS9980, which sets out methodology for competent professionals to undertake an appraisal of external walls
- Appoint a Qualified Structural Engineer for Structural Surveys, they should have a current **Engineering Council Professional Registration**.

9.5 Specific areas of competence relating to Risk Assessment, Servicing and Maintenance activity are listed within the Fire Safety Management Plan along with a Procedure for checking these.

9.6 The organisation's Training Matrix makes reference to various levels of training requirements by role, including mandatory basic level Fire Safety Awareness for all employees, specific training for persons responsible in staffed premises and offices, and role-specific training for example, for those involved in alterations in buildings/ refurbishments/ major works/ planned programmes, or delivering compliance related activity.

Stockport Homes Building Safety Policy

10 Internal Controls

1	**Version control** Version number will change every three years or at major review		
	Version No.	**Date**	**Change/s and reasons for change**
	1	March 2025	Creation of new policy
	2	May 2026	Updated to reflect the revised number of buildings classified as Higher-Risk Buildings (HRBs).
	3	July 2026	Updated following an independent peer review to strengthen governance, clarify statutory responsibilities and align the policy with current building safety legislative and regulatory requirements.

2	**Policy Owner** i.e. Executive Director	Director of Property Services
	Policy Author/s i.e. Head of Service	Head of Compliance and Building Safety
	Approved by/date	Property Management Meeting – 13 August 2026 – Decision
	Effective Date - the date of sign-off	13th August 2026
	Next Full Review Date i.e. 1 years after effective date	12th August 2027

3	Regulatory Standards	Please list the Consumer, Governance, Viability standards and outcomes this policy meets
	Standard/s / Legislation	**Required outcome**
	Safety and Quality Standard	1.1 Stock Quality 1.1.1 Registered providers must have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants. 1.2 Decency 1.2.1 Registered providers must ensure that tenants' homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard unless exempted by the regulator. 1.3 Health and Safety

		1.3.1 When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas. 1.4 Repairs, maintenance and planned improvements Registered providers must provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible.
	Legislation	
		• The Building Safety Act 2022 (Primary Legislation) • Secondary legislation made under the Building Safety Act 2022: ○ The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023 ○ The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 ○ The Building Safety (Registration of Higher-Risk Buildings and Review of Decisions) (England) Regulations 2023 ○ The Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023 • Regulatory Reform (Fire Safety) Order 2005 • The Fire Safety (England) Regulations 2022 • Fire Safety (Residential Evacuation Plans) (England) Regulations 2025; • Fire Safety Act 2021 • Landlord and Tenant Act 1985 • Health and Safety at Work Act 1974 • Housing Act 2004 • Housing Health and Safety Rating System 2006 • Furniture and Furnishings (Fire) (Safety) Regulations 1988 • Building Regulations 2010 • The Building Regulations etc. (Amendment) (England) Regulations 2023 • Homes (Fitness for Human Habitation) Act 2018. • Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024

4	**Linked policies/strategies**	
		SHG Compliance policy documents: Gas Safety Electrical Fixed Wire Testing

		Fire Safety Policy Smoke/Heat Alarm and CO2 Detector Meter Capping Asbestos Management Asbestos Management Plan Powered Lifting Equipment Legionella Management Mechanical and Electrical Planned Maintenance SHG Eyes Wide Open Commitment Block Inspection Procedure

5	**Equality, diversity and inclusion**	Describe how different experiences, characteristics, and approaches were considered during the formulation of the policy, e.g. neurodiversity, age, religion, sex/gender, financial/digital inclusion.
		SHG will also capture and retain information in order to maximise the effectiveness of its Resident Engagement in regard to matters of building safety, to include for example: preferred method of communication; language; and vulnerability. Data will be refreshed at the time of change of occupancy/ via proactive survey data and staff engagement.

6	**Customer/Colleague Voice**	Describe how the customer and/or colleague voice shapes and influences the policy and services
		This policy is based on legislative and regulatory requirements and as such consultation with customers has not taken place. There has been consultation with Teams within SHG.

7	**Risk management**	This policy helps to mitigate the following risks identified on the Corporate Risk Register
	Corporate Risk 1	The long-term stock investment needs of the stock cannot be met, including investment needs of high-rise blocks and all legal and statutory compliance requirements for homes, communal areas and neighbourhoods
	Corporate Risk 3	Building Assessment Certificates are not obtained from the Building Safety Regulator (BSR) for the High-Rise Buildings
	Corporate Risk 4	Health and safety obligations to customers aren't fulfilled (the Big 6) including damp and mould, gas safety, electrical safety, fire safety, legionella, lift safety, asbestos and carbon monoxide

	Corporate Risk 6	SHG does not deliver excellent customer services in the way that customers require them
	Corporate Risk 9	SHG and the Council are not able to demonstrate that they are meeting the Regulatory Standards set out by the Regulator of Social Housing
	Corporate Risk 14	SHG is not adequately prepared for a major change in government / housing policy

8	**Performance monitoring**	Please list the relevant performance indicators (including government TSMs (Tenant Satisfaction Measures))
		Performance Indicators (PIs) and Key Performance Indicators (KPIs) will be reported to the Asset Compliance Group, Executive Team or Board at the frequencies outlined within the Building Safety Management Plan. The KPIs incorporate two Building Safety related Tenant Satisfaction Measures which are a requirement of the Regulator of Social Housing. • HRBs Registered with the Building Safety Regulator (Total Number and % of Total HRBs) • Building Assessment Certificate applications submitted by the Principal Accountable Person within 28 calendar days of direction from the Building Safety Regulator. • Building Safety Regulator requests for further information responded to within the period specified by the Regulator. • HRB Fire Equipment service/ inspections completed within target for Fire Safety as a % of Total HRBs (i.e. Fire Alarms/ Emergency Lighting/ AOVs/ Dry Risers/ FFE) • HRB Communal Fire Door inspections completed within target as a % of Total HRBs • HRB Flat Entrance Door inspections completed within target as a % of Total HRBs • HRBs with Outstanding and Overdue FRA Remedial Actions • Number of Mandatory Occurrences (within the reporting period) reported to the Building Safety Regulator, MOR Report submitted within the 10-calendar day timescale. • Building Safety Related Complaints (within the reporting period)

		• HRB Structural Surveys completed within Target (5 yearly Review) as a % of Total HRBs • HRB External Surveys completed within Target (5 yearly Review) as a % of Total HRBs. The KPIs will be reviewed periodically by the Building Safety Steering Group and additional/amended measures may be recommended. Where appropriate, KPIs will include the Total Number of Actions or Buildings required and the Total Number within Target as well as percentage figure. Commentary will be provided for any Properties or Actions out of date to include the date they became overdue, days overdue, and the remedy/remedies proposed to bring them back into a compliant position. To provide additional context, commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date. A detailed PI and KPI suite will be defined within the Management Plans.