



Stockport Homes Building Safety Policy

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Stockport Homes Building Safety Policy

1 Introduction

1.1 Stockport Homes Group (SHG) manage circa. 11,000 domestic properties on behalf of Stockport Metropolitan Borough Council (SMBC). SHG also manage a number of other assets of behalf of SMBC including community centres and garages. SHG also own (in their own right) and manage approx. 530 domestic properties.¹

1.2 SHG currently manages 24 HRB's (Higher Risk Buildings) on behalf of SMBC, which are captured under the new regulatory reporting and compliance requirements.

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

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 already occupied HRB's.

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 key objective of this policy is to describe how SHG will meet the required statutory, legislative, and regulatory requirements in relation to Building Safety. It will also cover how the SMBC, as Duty Holder, will receive assurance of statutory, legislative, and regulatory compliance.

¹ At the time of policy approval

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 Fire Safety Order 2005, Health and Safety at Work 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 determination of a breach of the Home 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).

2.5 SHG will apply the key principles for Building Safety to all properties, This also includes extending good practice which will be embedded for the existing 24 SHG managed HRB’s, to additional multi-occupancy buildings that will be identified by the Head of Compliance and Building Safety as “Buildings of Concern”. A Building of Concern is where it does not meet the criteria for registration as a HRB with the BSR but due to specified factors will be treated the same as such. As per recommendations from Penningtons and GMFRS, current identified Buildings of Concern are:

- Clarkethorne Terrace – 11m + building with complex multi-level layout
- The Bentleys – 11m + building with complex multi-level layout.

3 Roles and Responsibilities

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

SMBC - The Principle	Has overall responsibility for this policy, delegating responsibility for its implementation, monitoring its effectiveness at high level and receiving assurance of
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Accountable Person (PAP)	compliance. SMBC The PAP will also ensure that there is a system in place that provides adequate protection from detrimental treatment or victimisation for anyone making disclosures that they genuinely believe to be necessary in the interests of Building Safety
The Audit and Risk Committee	Responsible for supporting to ensure SMBC (the PAP) and the SHG Board receives the assurance it requires
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
Head of Development	Responsible for the construction of new HRB's, must ensure the preparation and issuing of a Completion Certificate, prior to handover/ occupation. The Head of Development is responsible for ensuring that there is a 'golden thread' of information is created before and during any new developments. They will ensure that they follow the 'Gateway Approval Process' during design and construction and applying the key principals to all other new developments
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 obtaining Building Assessment Certificates

<p>SHG Building Safety Manager</p>	<p>Acts for the Accountable Person (AP) , in relation to responding to the obligations for SMBC (as the Principal Accountable Person (PAP). They will be expected to discuss building safety issues with the regulator and have authority relating to the safety of the building. They will take overall responsibility for the delivery of the Policy commitments described in the Data, Key Activities to Manage Risk and Communications sections of this Policy. The AP is responsible for ensuring the registration of buildings with the new Building Safety Regulator and overseeing Building Safety for all HRB's. All potential, material non-compliance or serious is responsible for monitoring the structural safety of high-risk buildings and acting as point of contact for residents in regards to fire or safety-related issues. The Building Safety Manager will oversee the compliance programmes (i.e. safety inspections for fire equipment), as well as the implementation and coordination of fire safety management arrangements, such as effective evacuation strategies. Safety concerns will be reported to the CEO/ ELT irrespective of whether this relates to a KPI scrutinised by the ELT or other groups</p>
<p>Responsible Person(s)</p>	<p>As described within each statutory compliance SHG policy documents, will be the named responsible person for ensuring compliance with the relevant legislation</p>
<p>Competent Person(s)</p>	<p>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</p>
<p>Accountable Person (AP)</p>	<p>SHG is identifiable as the Accountable Person. The AP is responsible for assessing and managing the risks posed to people in and about the building from structural failure or the spread of fire in the parts of the building they are responsible for</p>
<p>Principal Accountable Person (PAP)</p>	<p>SMBC is identifiable as the Principal Accountable Person (PAP) for all SMBC owned HRB's.</p> <p>As the registered building owner, SMBC has the legal obligation to repair the structure and exterior of the buildings and are fully accountable for all fire and structural safety risks. SHG as an Arm's Length Management Organisation (ALMO) operates under a management agreement with SMBC to carry out all necessary works and meet the statutory and regulatory obligations on SMBC behalf.</p>

<p>‘Single Point of Contact’</p>	<p>SMBC’s Director of Place Management is the ‘Single Point of Contact’ for the Building Safety Regulator</p>
<p>Stockport Homes</p>	<p>Put measures in place to prevent building safety risks happening and reduce the severity of any incident that does happen.</p> <p>Report safety occurrences to the BSR and report them on the Mandatory Occurrence Reporting System.</p> <p>Engage with customers about building safety in line with Resident Engagement Strategy.</p> <p>Keep and update certain information about each HRB (also known as the ‘Golden Thread of Information’).</p> <p>Provide building information to relevant individuals and organisations.</p>

4 Management Plan

4.1 SHG will ensure that a Management Plan is created and will include maintaining a Building Safety Management System 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 meters and number of storeys
- Maintain an up-to-date Master Database of all Properties that will indicate HRB status and where it has responsibility to prepare Building Safety Cases (BSC) i.e. 18m in height or have at least 7 storeys and contain at least 2 residential units
- 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 a 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 share point 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/Serviceing Frequencies; Last Date Completed; and Next Date Due. Records of at least the last two completions of each Activity/Equipment Type will be held. These will generally be held electronically but there may be instances where a hard copy is kept on site
- 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 Through data capture and maintaining records up to date SHG will seek to develop and maintain a 'golden thread' of information for all building related activity for multi-occupancy buildings. 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 HRB's. In accordance with the Building Safety Act 2022 this will include assessing the risk of two major hazards including the (1) Spread of Fire and (2) 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. SHG may also apply the same robust assessment of risks to other buildings within its portfolio, including the application of the key principals of the Building Safety Act.

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 principals 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 All SMBC HRB's managed by SHG have been registered with the Building Safety Regulator.

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 SCR's 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
- All assets that Gas Installations are maintained in accordance with the Gas Safety Policy, including the completion of Landlord Gas Safety Records (LGSR) where appropriate
- 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 On behalf of the PAP, SHG as the AP will operate a Building Safety Inspection Regime for all HRB's, to routinely check for hazards, monitor activity within the building, test and inspect equipment, ensure the means of escape is kept free from obstruction. Inspection procedures, performance and monitoring, regime and scope are defined within SHG's Block Inspection Procedure.

Permit to Work

6.10 SHG will implement a Permit to Work Scheme for all HRB's, 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 HRB's and further detail as to its operation can be found in the Building Safety Management System.

Resident Engagement Strategy

6.12 In line with BSA 2022, SHG will on behalf of the PAP, develop and implement a Resident Engagement Strategy (RES) for each HRB (as per BSR guidance). Each RES will take account of the needs and preferences of the customers living within each HRB. 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

- Ensures SHG are accountable for 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 customers feedback following engagement
- Ensure customers understand their responsibilities in make sure their homes remain 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 HRB's, buildings of concern and any other multi-occupancy buildings for which it is responsible, where. 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 arising from further surveys / investigations shall have clear a risk rating with an associated date for remediation to be completed by. Any proposed changes to the risk rating and / or completion date need to be agreed by the competent person hand proposed to the Head of Compliance and Building Safety and Director of Property for approval.

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 Person for a specific aspect of building safety risk mitigation/control – will provide full oversight and assurance for the completion of all Remedial Works within HRB's.

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 HRB's 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 HRB’s 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 HRB’s 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 (spread) 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:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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 HRB's) (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 HRB's, 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 On behalf of the PAP, SHG as the AP will operate a Mandatory Occurrence Reporting System (MORS) in line with the Building Safety Act 2022. A 'mandatory occurrence reporting system' is a means of giving information to the AP and the BSR, once a building safety risk is identified, SHG must provide notice to the BSR as soon as is reasonably practicable. A full report must be provided to the Regulator within 10 days of it coming to the AP's attention, beginning with the day it came to the AP's attention. Further details are contained in SHG's Mandatory Occurrence Report (Building Safety) Policy.

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 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 HRB's 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 to 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 Working 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	<p>SHG will encourage maintaining high standards of Building Safety by the following actions:</p> <ul style="list-style-type: none"> •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 Responsible Persons	Comply fully with Section 3 of the Building Safety Act 2022 to ensure where SHG are considered jointly responsible for a HRB, it will fully cooperate and consult relevant parties, including sharing information, to ensure the safety of relevant persons.
Building Safety Regulator	<p>We will maintain communication with the Building Safety Regulator in accordance with all relevant requirements. In particular this may include for example:</p> <ul style="list-style-type: none"> •Principal Accountable Person will notify the Regulator of any changes to the HRB registration information within 28 days of becoming aware of the change. This is a requirement of the Building Safety (Registration of Higher-Risk Buildings and Review of Decisions) (England) Regulations 2023 •The Regulator is expected to make contact with SHG to invite an application for a Building Assessment Certificate

	<p>(this is projected to take place between April 2024 and March 2029). The Building Assessment Certificate is a regulatory requirement under The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023. SHG will fully cooperate with the Regulator in line with any direction given for the application process</p> <ul style="list-style-type: none"> •Make contact in regard to Mandatory Occurrence Reporting as stated in 4.9 •Matters regarding Building Control applications for planned works •Contact in relation to Compliance Notices from the Regulator.
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8 Assurance

8.1 The following assurance activities will be undertaken:

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

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**.



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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.

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	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 – 25/06/25 – Decision ELT – 09/07/25 – Decision
	Effective Date - the date of sign-off	9 th July 2025
	Next Full Review Date i.e. 3 years after effective date, with an annual light touch review	8 th July 2028

3	Regulatory Standards	Please list the Consumer, Governance, Viability standards and outcomes this policy meets
	Standard/s / Legislation	Required outcome
	Consumer Standards	
	Safety and Quality Standard	<p><u>1.1 Stock Quality</u> 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.</p> <p><u>1.2 Decency</u> 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.</p> <p><u>1.3 Health and Safety</u> 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.</p> <p><u>1.4 Repairs, maintenance and planned improvements</u></p>

	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	
	<ul style="list-style-type: none"> • The Building Safety Act 2022 (Primary Legislation) • Secondary legislation made under the Building Safety Act 2022: <ul style="list-style-type: none"> ○ 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 • The Regulatory Reform (Fire Safety) Order (RRFSO) 2005 • The Fire Safety (England) Regulations 2022 • 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 • Building Regulations 2010 • The Building Regulations etc. (Amendment) (England) Regulations 2023 • Homes (Fitness for Human Habitation) Act 2018.

4	Linked policies/strategies	
		SHG Compliance policy documents: Gas Safety Electrical Fixed Wire Testing Fire Risk Assessment Smoke/Heat Alarm and CO2 Detector Meter Capping Asbestos Management Asbestos Management Plan Powered Lifting Equipment Legionella Management Mechanical and Electrical Planned Maintenance SHG Mandatory Occurrence Reporting (Building Safety)

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.
		N/A

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 2	SHG and the Council are not adequately prepared for a proactive inspection of the Consumer Standards by the Regulator of Social Housing
	Corporate Risk 5	SHG is not adequately prepared for a major change in government / housing policy
	Corporate Risk 6	SHG does not deliver excellent customer services in the way that customers require them
	Corporate Risk 16	SHG is not able to meet the long-term stock investment needs of the stock, including maintaining all legal and statutory compliance requirements for homes, communal areas and neighbourhoods
	Corporate Risk 18	Building Safety Cases are not of sufficient quality to obtain a Building Assessment Certificate from the Building Safety Regulator (BSR)
	Corporate Risk 20	Health and safety obligations to customers aren't fulfilled, including gas safety, electrical safety, fire safety, legionella, lift safety, asbestos and carbon monoxide

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

	<p>Safety related Tenant Satisfaction Measures which are a requirement of the Regulator of Social Housing.</p> <ul style="list-style-type: none"> • HRB's Registered with the Building Safety Regulator (Total Number and % of Total HRB's) • HRB Building Safety Cases Reports submitted within the 28 Day Notice Period to the Building Safety Regulator • Building Safety Regulator Request for Further Information, responses issued within the 7 Day Notice Period • HRB Fire Equipment service/ inspections completed within target for Fire Safety as a % of Total HRB's (i.e. Fire Alarms/ Emergency Lighting/ AOVs/ Dry Risers/ FFE) • HRB Communal Fire Door inspections completed within target as a % of Total HRB's • HRB Flat Entrance Door inspections completed within target as a % of Total HRB's • HRB's 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-working day timescale. • Building Safety Related Complaints (within the reporting period) • HRB Structural Surveys completed within Target (5 yearly Review) as a % of Total HRB's • HRB External Surveys completed within Target (5 yearly Review) as a % of Total HRB's. <p>The KPIs will be reviewed periodically by the Building Safety Steering Group and additional/amended measures may be recommended.</p> <p>Where appropriate, KPIs will include the Total Number of Actions or Buildings required and the Total Number within Target as well as percentage figure.</p> <p>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</p>
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		<p>the reporting period that were undertaken before and after their due date.</p> <p>A detailed PI and KPI suite will be defined within the Management Plans.</p>
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