

Neighbourhoods & Housing – High Risk Building Safety Policy

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Neighbourhoods & Housing – High Risk Building Safety Policy

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1. Introduction

- 1.1 As part of Hull City Council's (HCC) Community Plan HCC are committed to providing safe and welcoming neighbourhoods, which includes ensuring a safe place to live for our residents and a safe place to work for our staff and contractors. This policy sets out HCC's approach to ensuring the buildings within scope are safe and meet regulatory requirements set out in The Building Safety Act (BSA).
- 1.2 The objectives of this Policy are to:
- Effectively manage all risks and hazards identified and to ensure effective action plans are in place to reduce the risks as soon as reasonably practicable for all residents living in these buildings, employees who will work in and around these buildings and members of the public
 - Develop and introduce effective policies and procedures to help manage and mitigate these risks to ensure HCC complies with its legal requirements and the requirements of the BSR
 - Effectively engage with all residents and share building safety information with them via a Resident Engagement Strategy
 - Provide clear lines of responsibility for the effective management of Resident and Building Safety in our High-Risk Buildings
 - Set out how HCC shall work with the Building Safety Regulator (BSR) and provide them with the information they need
- 1.3 The BSA, creates a legal duty on duty holders and Accountable Persons to create, obtain, store and share documents and information about the buildings in scope, in a prescribed format, this includes the six main principles of:
- Kept Digitally
 - Kept Securely
 - A Building's Single Source of Truth
 - Available to people who need the information to do a job
 - Available when the person needs the information
 - Presented in a way that people can use

2. Scope

The Building Safety Act (BSA) clearly defines the scope of High-Risk Buildings (HRB) to which it applies, these are identified as being seven or more storeys or, over 18 meters in height. The buildings within scope owned and managed by HCC are:

- Bathurst Street – Block 1
- Bathurst Street – Block 2
- Bayswater Court
- Cambridge Street (1 to 112)
- Cambridge Street (113 to 224)
- Denaby Court

- Gatwick House (1 to 79)
- Great Thornton Street (226 to 448)
- Great Thornton Street (450 to 672)
- Great Thornton Street (674 to 896)
- Lindsey Place (1 to 112)
- Melville Street – Block 1
- Melville Street – Block 2
- Muswell Court
- New Michael Street
- Padstow House 1 to 179
- Valiant Drive (2 to 96)
- Valiant Drive (98 to 192)
- Valiant Drive (194 to 288)

2.2 This Policy applies to all HCC staff and any collaborative partners delivering services on HCC behalf to the buildings within scope.

2.3 This Policy includes all tenures within the HRB's listed above including; leasehold, shared ownership, social, affordable, market rent and privately rented accommodation.

3. Legislative Context

Regard has been given to the following legislation and guidance in producing this Policy

- The Building Safety Act 2022
- The Fire Safety Act 2021
- The Fire Safety (England) Regulations 2022
- The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025
- The Regulatory Reform (Fire Safety) Order 2005 – Amended by Fire Safety Act 2021
- LACoRS – Fire Safety Guidance (Local Authorities Coordinators of Regulatory Services)
- Fire Safety in Specialised Housing – National Fire Chiefs Council Guidance
- Fire Safety in Purpose Built Blocks of Flats – Local Government Association
- Housing Act 2004, which introduced the Housing Health & Safety Rating System (HHSRS)
- Housing Act 1985 , (powers of entry)
- Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002
- Furniture and Furnishing (Fire Safety) Regulations 1988
- Gas Safety (Installation and Use) Regulations 1998

- Electrical Equipment (Safety) Regulations 1994
- Equality Act 2010
- Building Regulations – Approved Document B
- Health & Safety at Work Act 1974 – As amended
- Management of Health & Safety at Works Regulations 2006
- Social Housing Regulation Act 2023
- Workplace (Health Safety & Welfare) Regulations 1992

4. Relevant Consumer Standards

- 4.1 The Social Housing (Regulation) Act 2023 came into effect on 1 April 2024. The Act aims to improve the quality of life of tenants living in Social Housing and brought in four consumer standards to raise the level of service which tenants receive and promoting a positive culture of putting tenants front and centre. The Consumer Standards which are relevant for the purpose of this Policy are:

- Safety & Quality Standard [April 2024 - Safety and Quality Standard FINAL.pdf](#)
- Transparency, Influence & Accountability [April 2024 - Transparency Influence and Accountability Standard FINAL 1 .pdf](#)

5. Definitions and Terminology

- 5.1 **High Risk Building (HRB):** Defined in the Building Safety Act (BSA) as a residential building that is at least 18 metres or seven storeys high and contains two or more residential units. Secondary legislation further defining such buildings came into force on 6 April 2023. All HRBs will need to be registered with the Building Safety Regulator (BSR) by the principal accountable person (PAP), have a dedicated engagement strategy and building safety case, and adhere to the principles of the Golden Thread (see 5.10).
- 5.2 **Collaborative Partner:** This may be any external organisation and/or area within Hull City Council but outside of Neighbourhoods and Housing providing services to the buildings within scope.
- 5.3 **Accountable Person (AP):** An AP in an organisation who owns or has a legal obligation to repair any common parts of the Building. Hull City Council is the AP.
- 5.4 **Principal Accountable Person (PAP):** Each building must have one clearly identifiable AP, known as the PAP. Hull City Council is the PAP for each of the buildings listed at 2.1.
- 5.5 **Single Point of Contact (SPOC):** If the PAP/AP is an organisation, then someone from the organisation may be the SPOC for the Building Safety Regulator. This individual should have authority or duties relating to the safety of the building. The Building Safety Manager is the SPOC for each of the buildings listed at 2.1.
- 5.6 **A Safety Occurrence:** Is an incident involving, or a risk that could cause;

structural failure of the building, the spread of fire or smoke in the building, or something else which if not remedied could cause serious harm to people when the building is in use.

- 5.7 **Hot Works:** Involves open flames or produces heat and/or sparks capable of initiating fires or explosions. Examples of hot work include: welding, cutting, grinding, drilling, soldering, brazing, torch-applied roofing
- 5.8 **Building Safety Decision:** is a decision made by HCC about the management of the building in connection with the performance of HCC duties as the accountable person (AP) or under regulations contained in the Building Safety Act (BSA).
- 5.9 **The Golden Thread:** A principle for storing, managing, and sharing building information and documents over a building's lifecycle, from design and construction through to occupation and disposal. The Golden Thread ties directly into the body of evidence needed to create and maintain building safety cases (see 7.16)
- 5.10 **KIM:** Knowledge and Information Management: the effective collection, storage, sharing, and use of data and knowledge.
- 5.11 **The Building Safety Act 2022 (BSA):** became law in April 2022. The Act was developed following Dame Judith Hackitt's independent review of building regulations and fire safety, commissioned after the Grenfell Tower tragedy in 2017. It introduces wide scale reforms to support building safety across the industry through design, construction, and management of residential blocks classed as higher risk buildings.
- 5.12 **The Fire Safety Act 2021 (FSA):** The Fire Safety Act 2021 clarifies the scope of building safety measures set out in the Regulatory Reform (Fire Safety) Order 2005. It highlights how the order applies to the structure, external walls (including cladding and balconies), and individual flat entrance doors of multi-occupied residential buildings. The requirements of the Building Safety Act 2022 are in addition to those of the Fire Safety Act 2021 and subsequent Fire Safety (England) Regulation 2022.
- 5.13 **The Regulatory Reform (fire Safety) Order 2005 (RRFSO)** – Primary legislation governing Fire Safety in England and Wales. Amended by the Fire Safety Act 2021.
- 5.14 **Building Safety Regulator (BSR):** The regulatory arm of the Health and Safety Executive (HSE) for building safety across design, construction and occupation introduced in the Building Safety Act 2022. The Building Safety Regulator monitors industry performance to inform priorities, set direction, facilitate improvement in competence of both industry and the building control profession, and influence their operational standards. The Building Safety Regulator (BSR) will move from the Health and Safety Executive (HSE) to a new arm's length body of the Ministry of Housing, Communities and Local Government (MHCLG).
- 5.15 **Fire Risk Assessment (FRA):** A building assessment that identifies any fire hazards, evaluates the risk of those hazards, and recommends action that should be taken to remove, reduce or manage the risk.
- 5.16 **Humberside Fire & Rescue Service (HFRS).** Local fire services for Hull.

- 5.17 **Senior Management Team (SMT).** A group comprised of the Assistant Director Neighbourhoods & Housing and Heads of Service, responsible for the overall direction and management of the Neighbourhoods & Housing Service.
- 5.18 **Personal Emergency Evacuation Plan (PEEP).** A plan designed for individuals who may need assistance evacuating a building during an emergency, such as a fire will be implemented when The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 comes into effect on 6th April 2026.
- 5.19 **Multi-Storey Living Group (MSLG):** A resident group specifically made up of residents from HRB's
- 5.20 **Vulnerability:** A vulnerable person can be defined as a person (or households in which there is a person), whose characteristics, personal circumstances and/or individual needs means they may be disproportionately impacted and/or, makes them more susceptible to experiencing harm or the risk of harm. As a result, HCC will offer situation based reasonable adjustments, to deliver a tailored service which ensures they are not disadvantaged. Certain individuals may be impacted by multiple vulnerabilities, and HCC recognise that this is a dynamic state, which can change over time.

Vulnerable people may be identified by a number of potential risk factors. However, these are not determinative as not everyone who experiences the identified risk factors will be considered vulnerable in all situations. Therefore, reasonable adjustments for vulnerable tenants are to be addressed using professional judgement, based on characteristics, personal circumstances, and individual needs in relation to the specific housing service being delivered.

6. Roles and Responsibilities

- 6.1 The Building Safety Act (BSA) sets out new duty holders, known as 'Accountable Persons'. The Roles and Responsibilities across HCC are:
 - 6.1.1 **Accountable Person (AP)/Principle Accountable Person (PAP):** In relation to this policy and the implementation of the Building Safety Act, Hull City Council is the PAP/AP. See Appendix A for the PAP/AP duties and responsibilities.
 - 6.1.2 **Single Point of Contact (SPOC):** In relation to this policy the Building Safety Manager is the SPOC for the BSR.
 - 6.1.3 **Director of Legal Services & Partnerships:** Will ensure that adequate resources are made available to ensure HCC are able to comply with the requirements of legislation.
 - 6.1.4 **Service Improvement Board (SIB):** The SIB is charged with the ongoing improvement and oversight of service delivery within Neighbourhoods & Housing, the services delivered to its tenants and customers from within Neighbourhoods & Housing, and by its partners and suppliers – it is chaired at the Chief Executive level. SIB shall oversee the implementation of this policy

and shall receive reports providing progress updates to ensure that HCC is meeting the requirements of the Building Safety Act, Fire Safety Act and this policy.

- 6.1.5 **Communities Overview and Scrutiny Commission:** Deal with any matters which have an impact on more than one area of scrutiny and considers matters which have regional or national strategic significance. The Commission receives quarterly reports on all aspects of the Neighbourhoods & Housing Service which includes building safety responsibilities.
- 6.1.6 **Senior Management Team (SMT):** Will review and record a consolidated report that provides progress updates to ensure that HCC is meeting the requirements of the Building Safety Act, Fire Safety Act and this policy. It will refer issues to SIB as / where appropriate, on a regular basis, with regard Building Safety Compliance, and provide quarterly updates to Communities Overview and Scrutiny Commission.
- 6.1.7 **Building Safety Manager:** Is also responsible for the overall implementation of this policy and the development and delivery of associated projects:
- They will monitor and track performance, developing a safety dashboard to ensure HCC remains compliant with current legislative requirements, future legislation and best practice guidance.
 - They will work closely with all departments across HCC as required to ensure the above listed buildings remain safe. Including, reviewing and overseeing building risks in a building safety case and submission of those reports to the BSR when required.
 - They will ensure that all day-to-day operations are completed and provide regular comprehensive updates to SMT, and the MSLG.
 - They will be responsible for managing all compliance activities, contract management and informing SMT of any compliance related issues which may affect the safety of the buildings listed above.
 - They will have overall responsibility for the undertaking and recording of completed fire door inspections, ensuring that they are uploaded to NEC Document Management System, and that outcomes and issues of concern are immediately acted upon.
- 6.1.8 **Resident Engagement Strategy Manager:** Is responsible for engagement with residents and other stakeholders (such as contractors, and Humberside fire and rescue service) to develop and implement HRB specific resident engagement strategies.
- 6.1.9 **High Rise Team:** A team dedicated to the day-to-day tenancy and estate management of the buildings within the scope of this policy, conducting Residential PEEP's (see section 7.5) and providing advice as appropriate, and keeping vulnerable resident information updated in the Premises Information Boxes (see section 7.7)
- 6.1.10 **Housing Facilities Officers (HFO's):** HFO's sit within the High Rise Team and are responsible for conducting daily, weekly and monthly inspections of all communal areas within the buildings in the scope of this policy, to ensure these areas remain sterile, any defects or building safety hazards are reported

or removed.

7. Key Principles

- 7.1 To meet the current requirements of the BSA, HCC has registered all HRB's in scope (detailed at 2.1) with the BSR and the compilation of building safety cases (see 7.16) for them is ongoing.
- 7.2 **Certification:** All registered HRB's will require a valid building assessment certificate following a review by the Building Safety Regulator which shall be clearly displayed in the relevant building and will provide the PAP details, the current building assessment certificate and copies of any compliance notices relating to the building which are still in force. If the BSR puts a special measures order in force for the building at any point, the building assessment certificate will be removed.
- 7.3 **Fire Risk Assessments (FRAs)** are conducted annually across all buildings in scope of the BSA (detailed at 2.1). The Building Safety Manager will liaise directly with the appointed contractor to ensure suitable access is available. The appointed contractor will ensure that any urgent issues identified are recorded and raised directly with the Building Safety Manager who will then ensure mitigation or remedial actions are implemented. Any issues of concern will also be escalated as required. The FRA's also detail the individual evacuation strategy for the HRB.
- 7.4 **Mandatory reporting.** HCC acknowledge our responsibility under the BSA to give prescribed information that relates to building safety to the regulator by the prescribed time and in the way specified, and HCC will establish and operate an effective reporting system which complies with the prescribed requirements. A mandatory occurrence notice and report must be submitted to the BSR when a safety occurrence has caused, or is likely to cause (even if the safety occurrence is remedied immediately):
- The death of a significant number of people
 - Serious injury of a significant number of people

Building safety incidents and risks involve at least one of the following:

- structural failure of the building
 - the spread of fire or smoke in the building
- 7.5 **Vulnerability and Residential Personal Emergency Evacuation Plans (PEEPs).** During resident engagement events/activities and other touchpoints throughout the life of the tenancy, HCC will ask residents to self-refer disabilities, impairments and vulnerabilities relating to the ability to self-evacuate a higher risk building if required to do so. Where HCC are informed that a resident may have difficulty in safely evacuating their home, HCC will complete a PEEP. These PEEPs help to identify residents who are at higher risk from fire in their own home due to their ability to respond and escape from a fire, for example a resident with disabilities. Any person residing within a

building in scope of this policy whom self-referred a disability, impairment or vulnerability relating to the ability to self-evacuate shall be entitled to:

- A person-centred fire risk assessment - a conversation between the responsible person and the resident, if one is requested by the resident to understand their particular risks and identify how their fire safety and evacuation can be improved.
- an emergency evacuation statement of what the resident should do in the event of a fire.
- Information shared with HFRS so they know where those residents requiring evacuation assistance are located in an emergency situation (see section 7.7 and 8.3).
- An ongoing duty to review the person-centred fire risk assessment/emergency evacuation statement and the building emergency evacuation plan.

HCC shall use the information and resources made available by the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 in the delivery of the above. [Residential Personal Emergency Evacuation Plans \(Residential PEEPs\) - GOV.UK](#)

7.6 Fire Door Survey and Management. Legislation requires regular inspections of all Fire Doors within HCC's housing stock, this includes the following categories of Fire Door:

- Flat Entrance Doors – Including Leasehold Flats
- Riser Cupboard Doors
- Service Cupboard Doors (If they open onto common parts)
- Communal doors

To fulfil HCC's duties in this area quarterly inspections on all Fire Doors in common parts and an annual inspection of Flat Entrance Doors shall be carried out. At the time of the initial survey, each door has been given a unique identifying reference number. The date relating to the door and inspection outcome will be stored on appropriate systems. If following the inspection of a door, it is found not to meet the required standards, HCC will carry out repairs to the door, if this is not possible, HCC will replace the door, with a new door leaf or set.

7.7 Secure Information Boxes. It is a requirement that all of the buildings that are in scope of the act (as detailed at 2.1), have a Secure Information Box fitted, HCC have installed these boxes to the ground floor of each of the buildings within scope to enable access to Humberside Fire & Rescue Service upon attendance. HCC review and update information stored within these boxes on 5-week cycle. These boxes must contain:

- Current Floor Plans for each floor, with key information clearly identified. This includes, the colour coding of these floor plans in red,

amber and green to indicate residents whom may require assistance from HFRS in an emergency.

- Keys / Fob to all communal doors on all floors, and service cupboard doors, other than Flat Entrance Doors.

- 7.8 **Humberside Fire & Rescue Service (HFRS) Liaison.** The act mandates that HCC have a relationship with the HFRS and that HCC co-operate with all requests for information. This may also include supporting site visits from various HFRS staff to facilitate a clear understanding of the building layout and how HFRS would manage any emergency. There is a requirement under The Fire Safety (England) Regulations 2022, regulation 7 to notify HFRS if lifts and/or essential firefighting equipment will be out of service for longer than 24 Hours. This is to ensure that HFRS can make alternative arrangements in the provision of equipment to carry out additional mitigation measures, until the equipment is back in service. HCC have a well-established relationship with the HFRS with partnership meetings taking place every two months, the HFRS attend the Multi Storey Living Group (resident) meeting and HCC have a reporting mechanism which includes a shared teams channel with the HFRS to aid the sharing of information and to advise of any asset issues, along with a clear timeline to bring that asset back into operational performance.
- 7.9 **Fire Signage.** To support the implementation of the Fire Safety England Regulations, Approved Document “B” of Building Regulations has been updated to clearly define what type of Fire and Wayfinding Signage is required in buildings in scope of the act. In addition to existing Fire Action Notices, HCC has installed clear Wayfinding Signage, pointing all persons within the building in the direction of Fire Exits. HCC have installed floor number signage at low level in stairwells, to assist HFRS in identifying which floor they are on, if the stairwell is engulfed in smoke.
- 7.10 **Contractor Management.** The BSA specifies that only “Competent Contractors” can work in or on buildings within the scope of the BSA. The Building Safety Manager will ensure that all contractors and operatives are competent to carry out specified works in/on the buildings in scope (detailed at 2.1) both at the point of procurement and beyond. HCC will develop and implement a “Permit to Work” scheme on all in-scope buildings, which will ensure that Method Statements for each piece of work have been reviewed and approved, prior to commencement of any works. If works are required to pass through or compromise existing compartmentation, then an appropriate Fire Risk Assessment must be carried out and an inspection by a suitably qualified person, check that the compartmentation has been suitably completed. No ‘Hot Works’ will be allowed in any in scope buildings, without prior approval from the Building Safety Manager. A detailed Method Statement will be required, which must include how a small initial fire in the local area will be extinguished.

7.11 **Resident Communication.** HCC must display, in a conspicuous part of the building a notice board containing all the information prescribed in the act.  The BSA also provides a requirement for HCC to communicate with all residents to ensure that they are aware of what to do in the event of a fire, aware of what Fire Safety Assets / Equipment is in place and the part that it plays in providing fire safety to residents, visitors, and to Humberside Fire & Rescue Service in the event of their attendance. HCC will deliver its responsibilities in this area by ensuring:

- At the time of signing up a new resident / family, HCC provide a site-specific document that highlights all this information, along with providing detailed information of how to report any concerns to HCC if a Fire Safety Asset is not working.
- Once a year, HCC will write to all residents in blocks that are in scope of the BSA and provide the above information again along with a fire safety leaflet.
- HCC are also developing the use of QR codes for those residents with smart devices. The QR code will provide a broad range of information not just limited to Fire Safety.

The aim of this is to regularly remind residents about Fire Safety information.

7.12 **Resident Engagement Strategy.** The BSA requires HCC to develop a resident engagement strategy specifically for all residents and any person who owns a residential unit in a building in scope of the BSA (as detailed at 2.1). The BSA places a legal obligation on the Accountable Person (HCC) to ensure residents are involved in all 'Building Safety Decisions'. To meet requirements under this part of the act, HCC has developed and implemented a resident engagement strategy which promotes residents' engagement and involvement in decision making about safety issues. HCC will provide individual resident engagement strategies to all residents in the buildings within scope (detailed at 2.1) that are over 16 years of age.

7.13 **Operation of a Relevant Complaints System.**  HCC shall operate a Complaint System which allows residents and other users of the building to raise a relevant complaint in respect of Building Safety which includes but is not limited to:

- Structural failure and spread of fire (building safety risks) such as; flammable cladding on the outside of building, fire doors or smoke extraction which are not working or missing that may increase the risk of fire spread, failure of the buildings structure i.e. parts of the building collapsing, cracks, or parts of the building falling off
- The performance of the AP (HCC) such as; HCC communications to residents, responses to raised concerns, how HCC manage building safety risks

7.14 **Resident Obligations and Access.** The BSA not only introduces duties on HCC, but for the first time introduces obligations on residents, to:

- Not act in a way that creates a significant risk of fire or structural failure.
- Not interfere with any relevant safety item.
- Comply with a request by the AP/PAP for information or access to reasonably perform their duties to assess and manage building safety risks.

Residents must comply with the conditions of their tenancy or lease to allow HCC (including its contractors) effective and unobstructed access to the property in a number of situations, this includes access to carry out flat door inspections.

Where HCC require access to some part of the building to carry out inspections, assess or manage a building safety risk or, to determine whether the duty on residents and owners of residential units in the building not to interfere with relevant safety items has been breached, HCC will request access in writing setting out the purpose for which access is being requested, HCC will explain why it is necessary to enter the premises for that purpose, HCC will make a request to access at a reasonable time, and will give at least the required amount of notice in accordance with the tenancy or lease. This shall be 24 hours' notice for properties occupied under a tenancy agreement and 3 days' notice for properties occupied under a lease. However, in the event of an emergency a lesser amount of notice may be given.

Where such access is not provided HCC shall seek to secure effective access in accordance with the tenancy/lease. This may ultimately result in legal action to obtain access. In this event HCC shall seek to obtain an appropriate order from the court which may also require the resident to pay for the costs incurred in taking this action.

Where a resident contravenes their duty not to interfere with a relevant safety item, HCC will take action to include written notification that specifies how HCC believe they have interfered, tells them what they should do to remedy their contravention giving them a reasonable time to do so, tells them what they must not do in the future to avoid repeating the interference, and tells them what HCC may do further if they do not comply with the notice.

HCC may include a requirement for the resident to pay HCC the necessary cost to repair or replace the relevant safety item to rectify their interference. The cost HCC charge will not exceed the reasonable cost of repairing or replacing the relevant safety item.

The AP can apply for an appropriate court order where residents do not follow the contravention notice which may also require the resident to pay for the costs incurred in taking this action.

7.15 **External Wall Assessment.** HCC have undertaken intrusive External Wall Assessments, to establish the entire makeup of the external wall system. HCC

appointed specialist external consultants to carry these out on HCC behalf. Remedial actions arising have been completed and any additional outputs from these surveys, will be used to support HCC Building Safety Case for each HRB.

- 7.16 **Building Safety Case.** Under the BSA, HCC must provide a Building Safety Case for each of the HRBs every five years. The Safety Case will evidence how HCC have ensured that the building is safe and is required before the Regulator issues a licence. Whilst this licence is needed to occupy the building, HCC can continue tenancies within a block, whilst the licence is pending. HCC will prepare a building safety case report containing an assessment of the building safety risks and a brief description of any steps HCC take to manage or mitigate those risks. HCC will update that building safety case where further assessment of building safety risks are carried out and when HCC add further steps to the management of building safety risks. HCC will notify the regulator as soon as is reasonably practicable after a safety case is prepared or revised, and if the BSR asks us to.
- 7.17 **The Golden Thread.** HCC are undertaking reasonable measures to implement the requirements and principles of the Golden Thread for storing, managing, and sharing building information and documents over a HRB's lifecycle. The Golden Thread will apply from design and construction, through to occupation and disposal. It constitutes a 'single source of truth' for a HRB's safety information, and ties directly into requirements for the creation and management of building safety cases.
- 7.18 **Effective Knowledge and Information Management (KIM)** is essential for the management of building safety; it involves the collection, storage, sharing, and use of data and knowledge relating to safety in HRBs. HCC Neighbourhoods & Housing places high priority on KIM – as recommended by the Housing Ombudsman Service – and good practice within associated processes, including how KIM relates to the Golden Thread of building information.
- 7.19 **Emergency Evacuation Alarms.** It is a requirement of the BSA that in all new build residential properties over 18 metres, that a full emergency evacuation alert system is installed. This will allow HFRS in the event of an emergency to manage an evacuation of a property, in phases according to floors and or call a full evacuation. HCC does not own or manage any new build HRB's and at the point of developing this policy, it is not a requirement to retrospectively install an emergency evacuation alert system to existing buildings. HCC are however, exploring the options to introduce this to the HRB's and will continue to monitor any changes to legislation in this area and will update this policy should requirements change.
- 7.20 **Refurbishments.** Principles set out in the BSA relating to refurbishment works within higher risk buildings will be met. A stricter regime for major works including remediation and refurbishments has been put in place to ensure risks posed by changes to the structure and fabric of such buildings are

monitored and managed. These apply to schedule 3 and 3A works requiring appropriate schemes to be applied with appropriate oversight. During any changes or refurbishment, HCC shall take the opportunity to consider any additional reasonable steps which could be taken as part of the work. For example, an additional building safety measure may now be possible or reasonable due to technical advancements.

- 7.21 **Remediation.** HCC shall manage building safety through an ongoing programme to identify and remediate building safety defects. Upon a defect being identified HCC shall consult with specialists as required to understand whether temporary mitigation measures are required whilst HCC put in place relevant remediation works. HCC shall also consider if such temporary mitigation shall impact on the evacuation strategy for the HRB. The BSA also provides for remediation orders requiring remediation of any building safety defects in a HRB within a specified time where those responsible for managing repairs are not doing so. Remediation orders can be made through First Tier Tribunal on the application of an 'interested person' such as the regulator, local authorities, local fire and rescue services, leaseholders or any other person prescribed by law.

8. Data Protection, Record Storage and Retention

- 8.1 Information retained as part of current projects will not refer to individuals. However, as the golden thread of information is developed this information may refer to individual flats but will not record any personal information on the residents.
- 8.2 Details will be retained of engagement and communication with residents regarding Building Safety and specific information that applies to their HRB. Individual responses to these communications will be retained.
- 8.3 Personal information about residents will not be stored in Secure Information Boxes, HFRS shall only be alerted to a resident(s) whom may require additional support to evacuate by marking property numbers in either red, amber or green to indicate the level of support required.

9. Equality & Diversity

- 9.1 This Policy will be applied in a way which ensures equality of treatment for all residents without discrimination, or victimisation on account of any protected characteristic as defined within the Equality Act 2010. In drafting this policy HCC has had regard to its public sector equality duties under s149 of the Equality Act 2010, namely the need to:
- eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Act.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The policy pays regard to diversities around access to and delivery of any services. An Equality Impact Assessment (EIA) has been undertaken on this policy and a copy of the EIA is available upon request.

10. Compliance and Monitoring

- 10.1 This policy will be reviewed every five years unless there are significant changes to legislation or regulation or, where there are changes to best practice identified. If this occurs, an immediate review will be initiated.
- 10.2 A key area of the BSA is to ensure that anyone undertaking works is competent to work in the buildings that are in-scope. Therefore, there will be learning and development requirements to ensure that the relevant qualifications, skills, and experience can be demonstrated at all times. HCC is already supporting colleagues in this regard with the funding of a Level 6 Diploma in Building Safety Management which commenced in 2024. Further training and qualifications may be required as new guidance and legislation is released. All staff involved in the management of HRB's will need to maintain suitable and sufficient system training. Staff in specific roles may require additional training and qualifications – for example those that are responsible for the inspection of fire doors.
- 10.3 HCC Neighbourhoods & Housing have formed a Building Safety Team who are responsible for the Building Safety of HRB's. The team consists of specialists in Building Safety Management to ensure the requisite skills, knowledge, experience and behaviours are present in the team to support safety improvements.
- 10.4 To ensure compliance through competence HCC have undertaken a process to review roles, responsibilities, and competencies across the business by liaising with relevant teams such as human resources and procurement to create a competency matrix.
- 10.5 Safety Management System. A key area of the BSA is robust management of safety processes within appropriate digital systems to ensure effective record keeping and proactive risk monitoring, management, and remediation. To achieve this, HCC Neighbourhoods & Housing operate the following systems:
 - NEC (formerly Northgate) – used to manage the service's social housing operations. It includes modules such as estates management, assets, allocations, estates, repairs etc. Additional modules are always being developed and onboarded
 - Housemark Photobook – an inspection management system used to perform and log inspections including resultant actions

A Business Change Team operates in HCC Neighbourhoods & Housing to identify business requirements for additional ICT solutions / modules should they arise, for example if additional functionality might be required that falls outside the scope of existing systems

- 10.6 This policy will be communicated internally to staff. Key stakeholders and key staff where this policy has specific impact will be briefed individually or collectively as required.

- 10.7 Performance will be reported to SIB, SMT and Communities Overview and Scrutiny Commission to demonstrate the progress against the various projects that are currently being delivered.
- 10.8 Regular performance reviews will be undertaken at a team level with the Building Safety Team.
- 10.9 External assurance activities shall also take place by way of the regular meetings with HFRS
- 10.10 Contractors who carry out specified works in/on the buildings in scope on behalf of HCC will be expected to undertake their own internal monitoring of quality of the works/services delivered and share the results with HCC. The Contractor will also be required to participate in joint post inspection visit with HCC. The Contractor will also be required to carry out its own quality assurance investigation, making sure quality of work is maintained to a proper standard. The outcome of these investigations should be made available to the HCC in a monthly report. Poor quality performance issues must be recorded by the Contractor and reported on a monthly basis to HCC. The details should also indicate where action has been taken to resolve future occurrences.
- 10.11 Regular progress meetings between HCC and Contractors shall also take place to allow HCC to; monitor and track work progress, measure compliance with Key Performance Indicators (KPI's) and to collaborate on resolutions, continued improvement and safety performance across projects

11. Related Policies, Procedures and Forms

- HCC Tenancy Agreement [tenancy-agreement-complete-declaration](#)
- HCC Neighbourhoods & Housing Serious Incident Policy
- HCC Neighbourhoods & Housing Serious Incident Procedure
- HCC Neighbourhoods & Housing Tenancy Management Procedure (relevant section - Removal of Belongings from Communal Parts) [Removal of Belongings from Common Parts](#)
- Mobility Scooter Policy [Mobility Scooter Policy for Tenants and Leaseholders of General Needs Flats and Sheltered Schemes](#)
- HCC Neighbourhood & Housing – High Risk Building Relevant Complaint Procedure
- HCC Neighbourhoods & Housing – Mandatory Reporting Policy
- HCC Neighbourhoods & Housing Repairs & Maintenance Policy
- Building Safety Resident Engagement Strategy for High Rise Buildings [City-wide Building Safety - Resident Engagement Strategy for High Rise Buildings](#)
- Fire Risk Assessments for HRB's [High Rise Fire Risk Assessment | Hull](#)
- Fire Safety in Flats Leaflet



Neighbourhoods & Housing – High Risk Building Safety Policy
APPENDIX A – Principle Accountable Person / Accountable Person
Duties and Responsibilities

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1.	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. To do this AP's must: - Report Safety Occurrences to the BSR, using the mandatory occurrence reporting system - Carry out duties relating to the resident engagement strategy - Keep certain information about the building - Provide building information to the relevant individuals and organisations
2.	Ensure that the fire and structural risks are identified and assessed for each HRB building and these are effectively managed (spread of fire and/or structural failure) to: - ensure that they do not happen and - the severity of any incident that does happen is reduced
3.	Ensure relevant safety information for each HRB building is kept, updated and available, as required for life of building.
3.	Keep and update information about risk prevention and protective measures, including: - details of the original design and construction, including drawings - the current condition of the building - the types of refurbishment or other changes that have taken place.
4.	Ensure a reporting system is in operation to report certain fire and structural issues or incidents
5.	Ensure there is effective measures in place to engage with residents about each building's safety including: - operating a complaints system to investigate concerns about the building's safety risks or the performance of an accountable person - displaying required information and documentation clearly within the building - preparing and updating a residents' engagement strategy so that residents and owners can participate in making building safety decisions
6.	Notify the Building Safety Regulator if: - there is a change to the single point of contact for the BSR - building's safety risks - there are any changes to registration information, including copies of any updated certificates, within 14 days of becoming aware of the change safety case report
7.	Register each HRB with the Building Safety Regulator between April 2023 and October 2023. As part of the registration process: - submit structure and safety information about the building - notify the Building Safety Regulator of any changes to the information submitted at registration

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	- register all new buildings before occupation.
8.	Ensure BSR is provided with further key building information (KBI) as required by the regulator within 28 days of applying for registration.
9.	Prepare a safety case report for each HRB. This should show that: - all building safety risks (fire and structural) have been assessed and that all reasonable steps to control them have been taken
10.	Give the safety case report to BSR on request – BSR will examine it during the building assessment
11.	Apply for a building assessment certificate when directed by BSR
12.	Ensure a suitable and sufficient Fire Risk Assessment (FRA) has been completed for each building in scope
13.	Can ensure that the competency of the FRA assessor(s) can be demonstrated
14.	Ensure the actions arising from the FRA(s) has been addressed or, are in progress as far as reasonably practicable.
15.	Ensure the progression of the FRA(s) actions have been documented.
16.	Ensure reviews of FRA(s) are carried out within an acceptable timeframe.
17.	Ensure there is a suitable fire plan and evacuation strategy in place for each building(s) within scope and these have been shared with: - Residents - The local fire and rescue service (by electronic means e.g., email)
18.	Ensure there is a copy of the fire plan and evacuation strategy held on location in a suitable place (i.e., premises information/secure information box to prevent it being moved, tampered with and protected from damage).
19.	Ensure checks have been completed to ensure that fire safety instructions are displayed in obvious parts of the building(s)
20.	Ensure there a secure information box (Premises information box) in place at each building within scope and that this contains the following information: - Name, address and telephone number of the PAP/AP - Name and contact information for the other persons who are permitted and able to access the building(s) on behalf of the PAP/AP - Current Floor Plans for each floor, with key information clearly identified - A list of vulnerable residents, with additional information about flats that may contain medical gases. - Keys / Fob to all doors on all floors, other than Flat Entrance Doors

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21.	Ensure the secure information box (Premises information box); is maintained in a readily accessible location in or on the buildings in scope and that they are inspected at least annually, to ensure it remains secure, accessible and that the information therein is accurate and up to date.
22.	Ensure Humberside Fire and Rescue Service has been given the necessary details to gain access to the secure information box.

Change Log			
Section	Description of Change	Date	Change Made By

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[illegible]

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