

# **RUNNYMEDE BOROUGH COUNCIL**

## **Building Safety Policy** **(For properties in scope of** **the Building Safety Act 2022)**

Review due: tbc (six-monthly)

## 1. Introduction

- 1.1 This policy outlines Runnymede Borough Council's (the Council) commitment to fulfilling the responsibilities within the Building Safety Act 2022 (the Act). This policy applies to all tenants and leaseholders under the management of the Council in buildings within the scope of the Act.
- 1.2 The Council is committed to providing a safe place to live for our residents and a safe place to work for our staff and contractors. To ensure this we will implement all aspects of the Act and deliver a “Best Practice” approach to the management of our buildings and related fire safety assets that are critical to managing the buildings.

### Table of Definitions

BSA	The Building Safety Act 2022
BSR	Building Safety Regulator
FSA	The Fire Safety (England) Act 2022
RRFSO	The Regulatory Reform (Fire Safety) Order 2005 – Amended by Fire Safety Act
HRRB	Higher Risk Residential Building – Over 18 Metres in height
DLUHC	Department for Levelling Up, Housing & Communities
FRA	Fire Risk Assessment
UPRN	Unique Property Reference Number
SIB	Secure Information Box
PCFRA	Person-Centred Fire Risk Assessment
PIB	Premises Information Box
SFRS	Surrey Fire & Rescue Service

## 2. Aim

- 2.1 This policy sets out how the Council proposes to meet the requirements of the BSA, the FSA and other legislative and regulatory changes introduced.
- 2.2 The aim of this policy is to;
- Effectively manage risks identified and 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 mitigate these risks to ensure the Council complies with its legal requirements and the requirements of the BSR.
  - Ensure the Council effectively engages with residents through its Building Safety Engagement Strategy.
  - Provide clear lines of responsibility across the Council for the effective management of Resident and Building Safety for its Higher Risk Residential Building (HRRB), Surrey Towers.

## 3. Buildings in Scope

- 3.1 The BSA clearly defines the scope of buildings to which it applies, these are identified as being over 18 metres in height.
- 3.2 To meet the current requirements of the act, the Council has registered Surrey Towers, Addlestone, with the BSR. The Council has developed a building safety case and will keep this updated as required for the lifetime of the building.

## **4. Legislation & Guidance**

- 4.1 We have given regard to the following legislation and guidance in preparing this policy.
- The Building Safety Act 2022
  - The Fire Safety (England) Act 2022
  - The Regulatory Reform (Fire Safety) Order 2005 – Amended by Fire Safety Act
  - 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)
  - Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002
  - Furniture and Furnishings (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
  - Workplace (Health Safety & Welfare) Regulations 1992
  - Health & Safety Executive INDG236 – “Maintaining Portable Electric Equipment”
  - All relevant British Standards

## **5. Golden Thread**

- 5.1 The BSA, creates a legal duty on duty holders and Accountable Persons to create, obtain, store and share documents and information about our buildings 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.
- 5.2 The Council will retain specific building information to be “digital by default” and further ensure this meets the “golden thread” of information requirements.
- 5.3 A more detailed breakdown of information required for the Golden Thread is attached as Appendix B

## 6. Roles & Responsibilities

- 6.1 The Building Safety Act identifies new duty holders, who will be known as “Accountable Persons
- 6.2 The Roles & Responsibilities of key stakeholders across the Council are:
- **Principal Accountable Person:** Runnymede Borough Council
  - **Chief Executive:** Will need to ensure that adequate resources are made available to ensure the Council will be able to comply with the requirements of legislation. The Chief Executive will discharge their responsibilities to the Assistant Chief Executive (Place), Assistant Chief Executive and Section 151 Officer and the Corporate Head of Housing.
  - **Corporate Leadership Team:** Will review reports that provide progress updates to ensure that the Council is meeting the requirements of the BSA, FSA, this policy and the Council’s Housing Fire Risk Management Policy.
  - **Council’s Housing Committee:** Will receive regular reports on Health and Safety compliance.
  - **Head of Housing Technical Services:** Is responsible for the overall implementation of the policy. The Head of Housing Technical Services will monitor and track performance to ensure the Council remains compliant with current legislative requirements. The Head of Housing Technical Services will work closely with all departments across the Council to deliver the requirements of this policy and to ensure buildings within the scope of the BSA remain safe. The Head of Housing Technical Services will work closely with the Compliance Manager, Senior Contracts Manager and Housing Development Manager to ensure the Council meets these legislative requirements. The Head of Housing Technical Services will provide regular updates to the Head of Housing Operations, Corporate Head of Housing and Corporate Leadership Team.
  - **Compliance Manager:** Is responsible for managing all compliance activities, including fire, and informing the Head of Housing Technical Services of any compliance-related issues which may affect the safety of buildings in scope. The Compliance Manager acts as the link between the BSR and the Council concerning building safety, ensuring the Building Safety Case for relevant properties is updated.
  - **Compliance Inspector:** Will support the Compliance Manager in ensuring compliance with the BSA, through technical inspections, data management, using the Risk Management application (NEC) and ensuring that the Building Safety Case is up to date.

## 7. Fire Risk Assessments

- 7.1 FRAs will be conducted annually across all buildings in scope of the BSA. FRAs will involve the Compliance Manager & Compliance Inspector escorting external assessors on each FRA to ensure suitable access is available, to share feedback and evidence on completed works. They will also ensure that any urgent issues identified are addressed, with mitigation or remedial actions implemented without delay.

## 8. Management of Building Safety Risks

- 8.1 The Council has assessed the building safety risks of its HRRB (Surrey Towers) and will review that assessment at regular intervals, and at any time that it has reason to suspect that the current assessment is no longer valid, or at the direction of the BSR and within the specified period.
- 8.2 The Council will take all reasonable steps to prevent a building safety risk materialising and all reasonable steps to reduce the severity of any incident resulting from such a risk materialising.

## **9. Mandatory Occurrence Reporting Requirements**

- 9.1 The Council acknowledges its 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. The Council will establish and operate an effective mandatory occurrence reporting system which complies with the prescribed requirements.

## **10. Person Centred Fire Risk Assessment (PCFRA)**

- 10.1 The Council will provide training to all Housing Officers, Maintenance Inspectors, and any staff who interact directly with residents. In cases where the Council is informed that a resident may have difficulty safely evacuating their home, a PCFRA will be completed.
- 10.2 PCFRAs help to identify residents who are at higher risk from fire in their own home, whether this is due to their household makeup or their ability to respond and escape from a fire, for example, a resident with disabilities.
- 10.3 The PCFRA focuses on three key areas;
1. An increased fire risk. An example might be a resident with mobility issues who is a smoker.
  2. Ability to react to a fire or fire alarm.
  3. Ability to respond and escape a fire.
- 10.4 Following the completion of a PCFRA, there may be a need to develop a Personal Emergency Evacuation Plan (PEEP) and or implement mitigation measures to ensure additional safety for identified vulnerable residents.

## **11. Fire Door Management**

- 11.1 The new legislation requires the Council to undertake regular inspections of all Fire Doors within our housing stock, this includes the following categories of Fire Door:-
- Flat Entrance Doors – Including Leasehold Flats, Riser Cupboard Doors
  - Cross Corridor/Communal Doors
  - Electrical Intake Doors
  - Storage Cupboard Doors (If they open onto common parts)
- 11.2 To fulfil the duty in this area, the Council will conduct quarterly inspections on all Fire Doors in common parts and an annual inspection of Flat Entrance Doors.

## **12. Premises Information Boxes / Secure Information Boxes (SIB)**

12.1 It is a requirement that all the buildings that are in scope of the act, have a SIB fitted, that can easily be located by the SFRS upon attendance.

12.2 These boxes must contain: -

- 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. Location information for keys/fob to all doors on all floors, other than Flat Entrance Doors.

12.3 The Council has already installed a SIB at Surrey Towers and will regularly review and update the information stored within the SIB.

## **13. Surrey Fire & Rescue Service Liaison (SFRS)**

13.1 The act requires the Council to maintain a relationship with the SFRS and to cooperate fully with all requests for information.

13.2 This may also include supporting site visits from various staff (Watches) to facilitate a clear understanding of the building layout and how SFRS would manage any emergency.

13.3 The Council has established a good relationship with the SFRS and will continue to cooperate with all requests for information.

## **14. Fire Signage / Wayfinding Signage**

14.1 Approved Document “B” of Building Regulations has been updated to clearly define what type of Fire and Waypoint Signage is required in buildings in scope of the act.

14.2 In compliance with this, the Council will ensure the prescribed Wayfinding Signage is in place and monitored, pointing residents in the direction of Fire Exits. The Council will also install floor number signage at low levels in stairwells, to assist SFRS in identifying which floor they are on if vision in the stairwell is impaired by smoke.

## **15. Contractor Management**

15.1 The act specifies that only “Competent Contractors” can work in or on buildings within the scope of the BSA.

15.2 The Housing Compliance team and contract managers will ensure that all contractors and operatives are competent to conduct specified works on our buildings.

15.3 The Council will ensure that Method Statements for each piece of work are reviewed and approved, prior to commencement of any works.

- 15.4 If works are required to pass through or compromise existing compartmentation, then an appropriate FRA must be conducted and an inspection by a suitably qualified person to check that the compartmentation has been suitably completed.
- 15.5 “Hot Works” will not be allowed in Surrey Towers, without prior approval. A detailed Method Statement will be required, which must include how a small initial fire in the local area will be extinguished.
- 15.6 The Council will develop a contractor management procedure specifically focused on building safety. This will include how the Council proposes to ensure contractors are competent to undertake the specified works and competent to work in 7storey/18m+ buildings and will include regular reviews of their competence throughout all applicable works.

## **16. Resident Communication and Resident Engagement**

- 16.1 The Council will display in a prominent area of the building a notice board containing all the information prescribed in the act. This will include information about the dates of servicing of all compliance and fire safety assets. This is to assure residents that all the fire safety equipment and assets are managed appropriately.
- 16.2 The BSA also provides a requirement for the Council 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 are in place and the part that they play in providing fire safety to residents, visitors and the SFRS in the event of their attendance.
- 16.3 The Council will deliver its responsibilities in this area by ensuring:
- At the time of onboarding a new resident/family, we will provide a site-specific document that highlights all this information, along with providing detailed information on how to report any concerns to the Council if a Fire Safety Asset is not working.
  - Once a year, the Council will write to all residents in blocks that are in scope of the BSA and provide the above information again. The aim of this is to regularly remind residents about Fire Safety information.
- 16.4 The BSA requires the Council 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.
- 16.5 The BSA places a legal obligation on the Accountable Person “Runnymede Borough Council” to ensure residents are involved in all “Building Safety Decisions.” A building safety decision is a decision made by the Council about the management of the building in connection with the performance of their duties as the accountable person or under regulations contained in the BSA.
- 16.6 To meet the requirements under this part of the act, the Council will:
- Develop and implement a resident engagement strategy that promotes residents’ engagement and involvement in decision-making about safety issues.
  - Establish a complaints system that ensures residents’ safety concerns are heard and dealt with.
  - Residents will also have the ability to escalate complaints to the BSR.

## **17. Resident Obligations**

- 17.1 The BSA not only introduces duties on the Council as the landlord / building owner, 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 Accountable Person for information or access to reasonably perform their duties to assess and manage building safety risks.
- 17.2 Where a resident or owner of a residential unit contravenes their duty not to interfere with a relevant safety item, the Council will give them a contravention notice that specifies how it believes they have interfered, explains 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 the Council will do further if they do not comply with the notice.
- 17.3 The Council may include in the notice a requirement for the relevant person to pay the necessary cost to repair or replace the relevant safety item to rectify their interference. The cost the Council charges will not exceed the reasonable cost of repairing or replacing the relevant safety item. When necessary, the Council may make an application to the county court to make an order in respect of the sum we have charged in relation to the relevant building safety item.
- 17.4 Where the Council requires access to some part of the building to 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, the Council will request access in writing setting out the purpose for which they are requesting access, they will explain why it is necessary for them to enter the premises for that purpose, they will make a request to access at a reasonable time, and will give at least 48 hours' notice. If the Council is denied access, the act provides them powers to make an application to the court for an order to grant access.

## **18. External Wall Assessment**

- 18.1 As part of the BSA that the Council will undertake an intrusive External Wall Assessment where required, to establish the entire makeup of the external wall system. The outputs from these surveys, will be used to support our Building Safety Case for any HRRB. At the time of writing this policy, the Council has only one building in scope – Surrey Towers, which has no external wall claddings installed.

## **19. Building Safety Case**

- 19.1 The Council will provide a Building Safety Case for Surrey Towers every five years. The Safety Case will evidence how the Council have ensured that the building is safe, and this is required before the Regulator will issue a licence. Whilst this licence is required to occupy the building, the Council can continue tenancies within a block, whilst the licence is pending.



- 19.2 The Council will prepare a building safety case report containing our assessment of the building safety risks and a brief description of any steps we take to manage or mitigate those risks. We will update that building safety case where we make further assessment of building safety risks and when we add further steps to our management of building safety risks.
- 19.3 The Council will submit their safety case and relevant updates to the regulator as required.

## **20. Emergency Evacuation Alarms**

- 20.1 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.
- 20.2 It is not a requirement to retrospectively install an emergency evacuation alert system in existing buildings.

## **21. Monitoring and performance management**

- 21.1 The BSA is intended to be enabling legislation and as such is subject to update and change, following guidance or regulation changes from DHLUC or the BSR.
- 21.2 In line with the BSA legislation, the Council will review this policy on a six-monthly basis.

## **22. Consultation**

- 22.1 *Details to be confirmed following consultation.*

## **23. Equalities Implications**

- 23.1 An Equality Impact Assessment screening (EIA) has been carried out for this policy.
- 23.2 An EIA is a way of assessing the impact, or likely impact, that a particular policy, procedure or decision will have on particular groups. This is used to assess whether in making a decision the Council has complied with its public sector equality duty under S149 of the Equality Act 2010 (as amended) to; eliminate discrimination and any other conduct that is prohibited under this act and to advance equality between those who share a protected characteristic.
- 23.3 The screening found that a full impact assessment is not required as this new policy is being put in place to have a positive impact on all tenants and future tenants (including leaseholders) living or owning relevant properties in the scope of the Building Safety Act. The policy's focus is on enhancing safety standards. There is no evidence that tenants or leaseholders with any of the nine protected characteristics will be negatively impacted by this policy. Rather, it is anticipated that this policy will promote equality.

## 24. Related strategies/Documents

- Fire Risk Management Policy
- Tenancy Policy
- Building Safety Engagement Strategy
- Tenant Engagement Strategy

## 25. Version Control

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
V1	August 2024			Stephan Scheiner	

## Appendix A – List of In-Scope Buildings

Name of Building	Address	Type
Surrey Towers	Garfield Road, Addlestone, Surrey, KT15 2NH	HRRB

This list of blocks is correct as of 1st August 2024. It will be further reviewed in February 2025, to establish if the scope of the Building Safety Act has increased, bringing buildings below 18 metres into scope.

The Council will continue to review its buildings to establish if they are in scope of the act, on a six-monthly basis.

## Appendix B – Principles of the Golden Thread

The below information is extracted from DHLUC publication “Golden Thread Definition”.

### Full Definition

- 1) The golden thread will hold the information that those responsible for the building require to identify, understand, manage and mitigate building safety risks to prevent or reduce the severity of the consequences of fire spread or structural collapse throughout the lifecycle of the building. The information stored in the golden thread will be reviewed and managed so that the information retained achieves this purpose.
- 2) The golden thread covers both the information and documents, and the information management processes (or steps) used to support building safety. The government has defined the information as including all the information necessary to understand and manage risks to prevent or reduce the severity of the consequences of fire spread or structural collapse in a building.
- 3) The golden thread information should be stored as structured digital information. It will be stored, managed, maintained and retained in line with the golden thread principles (see annex below). The Government will specify digital standards which will provide guidance on how the principles can be met.
- 4) The golden thread information management approach will apply through design, construction, occupation, refurbishment and ongoing management of buildings. It supports the wider changes in the regime to promote a culture of building safety.
- 5) Building safety should be taken to include the fire and structural safety of a building and the safety of all the people in or in the vicinity of a building (including emergency responders).

### Annex: Golden Thread Principles

- 1) **Accurate and Trusted:** the duty holder/Accountable Person/Building Safety Managers (BSM) and other relevant persons (e.g. contractors) must be able to use the golden thread to maintain and manage building safety. The Regulator should also be able to use this information as part of their work to assess the safety of the building and the operator’s safety case report, including supportive evidence, and to hold people to account. The golden thread will be a source of evidence to show how building safety risks are understood and how they are being managed on an ongoing basis. The golden thread must be accurate and trusted – it will not be used unless people trust that the information in the golden thread is accurate and up to date . The information produced will therefore have to be accurate, structured and verified, requiring a clear change control process that sets out how and when information is updated and who should update and check the information.
- 2) **Residents feeling secure in their homes:** residents will be provided information from the golden thread – so that they have accurate and trusted information about their home. This will also support residents in holding Accountable Persons and Building Safety Managers to account for building safety. A properly maintained golden thread should support accountable persons in providing residents the assurance that their building is being managed safely.
- 3) **Culture change:** the golden thread will support culture change within the industry as it will require increased competence and capability, different working practices,

updated processes and a focus on information management and control. The golden thread should be considered an enabler for better and more collaborative working.

- 4) **Single point of truth:** the golden thread will bring all information together in a single place (potentially a Common Data Environment) meaning there is always a 'single point of truth'. It will record changes (i.e. updates to information/plans), including the reason for change, evaluation of change, date of change, and the decision-making process. This will reduce the duplication of information (email updates and multiple documents) and help drive improved accountability, responsibility and a new working culture.
- 5) **Secure:** the golden thread must be secure, with sufficient protocols in place to protect personal information and control access to maintain the security of the building or residents. It should also comply with current GDPR legislation where required.
- 6) **Accountable:** the golden thread will record changes (i.e. updates to information), when these changes were made and by who. This will help drive improved accountability. The new regime is setting out clear duties for the duty holders and the Accountable Person for maintaining the golden thread information to meet the required standards. Therefore, there is accountability at every level – from the Client/Accountable Person to those designing, building or maintaining a building. This will mean that changes can more easily be tracked, and this will support better building safety.
- 7) **Understandable/ Simple to access (accessible)/Consistent:** the golden thread needs to support the user in their task of managing building safety. The information in the golden thread must be clear, understandable and focused on the needs of the user. It should be presented in a way that can be understood and used by users. This also should consider that users have diverse needs. The information should be accessible so that people can easily find the right information at the right time. This means that the information needs to be stored in a structured way (i.e. like a library) so people can easily find, update and extract the right information. The Government will set out the digital standards which will apply to the golden thread. Storing information to digital standards would mean the information is stored in a structured way. To support this duty holders/Accountable person should where possible make sure the golden thread uses standard methods, processes and consistent terminology so that those working with multiple buildings can more easily access, understand and use the information consistently and effectively.
- 8) **Longevity/ Durability of information:** the golden thread information needs to be formatted in a way that can be easily handed over and maintained over the entire lifetime of a building. In practical terms this is likely to mean that it needs to align with the rules around open-source data – so that information can be handed over in the future and still be accessed. Information should be able to be shared and accessed by contractors who use different software and if the building is sold the golden thread information must be accessible to the new owner. This does not mean everything about a building and its history needs to be kept, the golden thread must be reviewed to ensure that the information within it is still relevant and useful.
- 9) **Relevant / Proportionate:** preserving the golden thread does not mean everything about a building and its history needs to be kept and updated from inception to disposal. The objective of the golden thread is building safety and therefore if information is no longer relevant to building safety it does not need to be kept. The golden thread, the changes to it and processes related to it must be reviewed periodically to ensure that the information comprising it remains relevant and useful.

## **Appendix C – Submitting mandatory occurrence notices and reports (Guidance)**

This guidance is for principal designers, principal contractors and accountable persons to report incidents or risks of structural failure, or the spread of fire to the BSR. It has been updated to include a section covering further guidance for principal designers and principal contractors.

Principal designers and principal contractors must submit mandatory occurrence notices and reports, during:

- Construction of a new higher-risk building.
- Work on an existing higher-risk building, including work that causes it to stop being a higher-risk building.
- Work on an existing building that will make it a higher-risk building.

A higher-risk building has at least:

- 7 storeys or is at least 18 metres high.
- 2 residential units or is a hospital or a care home.

A higher-risk building with at least two residential units must be registered with the BSR as a high-rise residential building before people live there.

Accountable persons must submit mandatory occurrence notices and reports for the parts of the high-rise residential building they are responsible for.

A mandatory occurrence notice must be submitted, and it must be reported when a safety occurrence has caused, or is likely to cause:

- The death of a significant number of people.
- Serious injury of a significant number of people.

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.

A safety occurrence is something which if not remedied, could cause serious harm to people when the building is in use.

A report must be submitted even if the safety occurrence is remedied immediately. The only exception is when a principal contractor remedies issues to ongoing building work, which are unlikely to risk significant numbers of death or serious injury. The guidance warns that it is an offence not to make a report, and this could lead to enforcement action being taken, including prosecution.

This guidance covers the following:

- Duties of principal designers and principal contractors.
- Duties of accountable persons.
- When to report to BSR.
- How to report to BSR.
- After submitting a report to BSR.

**HSE**  
**March 2024**