

Housing Management Strategy for occupied Higher Risk Buildings

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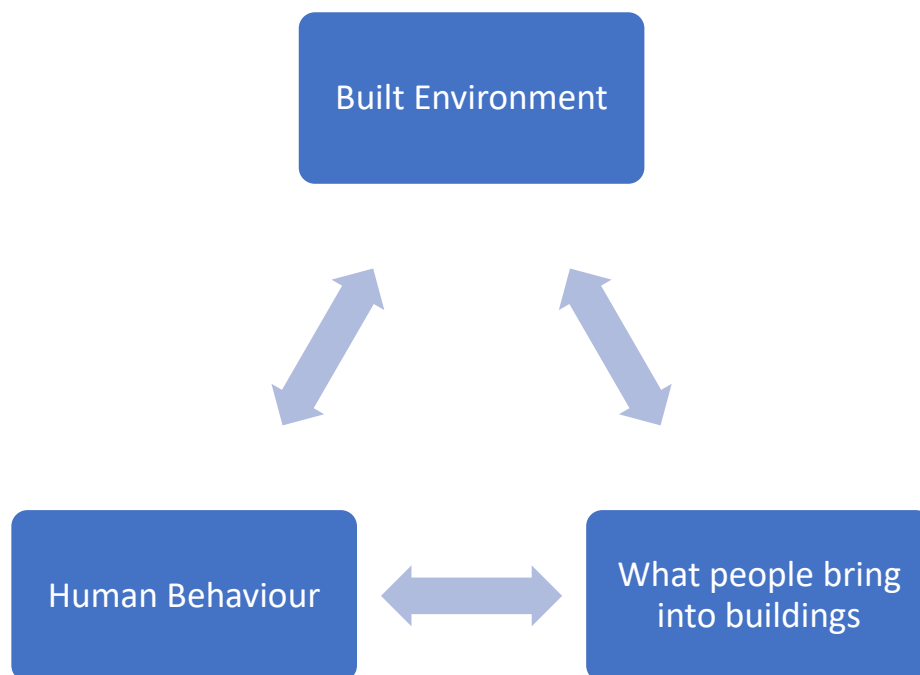
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1.Introduction

1.1 Aims of the Strategy

This document sets out the approach by the Housing Management Service in making an effective and compliant contribution to the Council's Building Safety Policy in the context of occupied higher risk buildings within its ownership and management. These buildings are set out in Appendix 1 – Schedule of Higher Risk Buildings. This Strategy, and the accompanying Delivery Plan, has been developed to ensure that the Council is fully compliant with the Building Safety Act 2022, the Social Housing Regulation Act 2023 and other legislative and regulatory obligations which at their heart are designed to ensure that our residents are 'fire safe' and 'fire aware'.

The Strategy details how the Service dovetails through a whole organisation approach to ensuring that people and property across our in-scope buildings are effectively managed so that our residents are kept safe. The Strategy picks up on and takes forward the twin tracking of operational practices which have a clear focus on 'people' and 'property' in the context of fire safety. This strategy supports our work in delivering compliant buildings but has a clear focus on ensuring our residents are safe. This necessitates proactive management activity aligned to what people bring into our buildings and how they behave. **In this Strategy, compliant buildings are viewed as the 'safety net' when behavioral risks are not effectively mitigated.**



1.2 Scope of the Strategy

This Strategy applies to staff groups across the Housing Management Service and is applicable to all Council owned high-rise residential blocks as defined in the Building Safety Act 2022. This currently defines high-rise buildings [also referred to as 'higher risk' or 'in-scope' buildings] of 18m+ in height or 7+ storeys. This includes both tenanted and leasehold stock.

It is anticipated that in future years the buildings that are within the scope of the Act may change (for example to include buildings over 11m+ in height) and this strategy will be reviewed and updated accordingly to ensure it remains fit for purpose.

Based upon the current requirements of the Act, this Strategy applies to 11 council owned and managed occupied 'higher-risk residential blocks as of January 2025.

1.3 Principles of the Strategy

Key drivers for the delivery of the Strategy are:

- To ensure the safety of all residents, irrespective of tenure or occupation arrangement, living in the Council's high-rise residential buildings
- To make an effective contribution to the Council's Building Safety Policy in the context of legislative compliance applicable to occupied high-rise residential buildings
- To ensure that residents are involved in decisions regarding 'safety related matters' associated with their homes and the buildings in which they live and
- To ensure a positive communication culture based upon transparency and treating residents with respect and which values their feedback

1.4 Housing Management Safety Management System

As part of fulfilling its role as outlined in this Strategy, the Housing Management Service will adopt a simple management system for managing the safety risks it has direct responsibility for. This system will be based on the 'Plan, Do, Check, Act' approach. This model covers:

- **Plan** – determine your policy and plan for implementation
- **Do** – assess risks and implement your plan
- **Check** – measure performance
- **Act** – review performance and act on lessons learned

1.5 Key objectives of the Strategy

To achieve the principles of the Strategy, the Housing Management Service is committed to:

- Improving the effectiveness of existing compliance management, including the need for an effective quality assurance framework which supports staff in doing the right thing at the right time to the agreed quality threshold
- Ensure clear and transparent monitoring and reporting to demonstrate compliance, including the development of appropriate performance measures
- Improving the measuring and reporting of resident satisfaction with the safety of their home
- Ensuring that an effective and sustained contribution is made to support the delivery of the principles of the 'golden thread' of information
- Ensuring there is clarity around respective roles, responsibilities and accountabilities

- Ensuring the training and development needs of relevant staff are met and that appropriate refresher training is delivered
- Support the ongoing need to embed a safety culture across Housing Management, residents and other stakeholders

1.6 Links to Corporate Strategies

This Strategy seeks to support the delivery of the Council's Building Safety Strategy which sets out Hillingdon Council's approach to preparing for and implementing the building safety regime as set out in the Building Safety Act 2022. Keeping residents safe in their homes is the key priority underpinning the Council's Corporate Building Safety Strategy. Within this Strategy is clear reference to the Council as owner and manager of 'higher risk buildings' within its social housing portfolio. The Housing Management Strategy for occupied higher risk buildings therefore complements and supports the aims and objectives within the overarching Corporate Strategy.

1.7 Resourcing the Strategy

The Housing Management Service will strengthen front line resources across teams who have a direct role in supporting the successful delivery of this Strategy. This includes ensuring that there is Housing Officer to total number of properties in management ratio which supports a more intensive level of management across the Council's in-scope buildings and a dedicated management lead to ensure effective management oversight of the Delivery Plan. Sufficient resources will also be available from the Resident Engagement & Involvement Team to ensure that the voice of our residents is heard and acted upon and that our tailored Resident Engagement Strategies for our in-scope buildings are up to date, meet the needs of our residents and are compliant with the Building Safety Regulator's expectations.

2. Regulatory Framework

2.1 The Building Safety Act 2022

The Building Safety Act 2022 takes forward the government's stated commitment to fundamentally reform building safety. The Act establishes a building safety regime in England with the introduction of a Building Safety Regulator and sets out a legislative framework for those who procure, design, plan, manage and undertake building work in relation to higher-risk buildings. The focus of this Strategy is the management of occupied higher-risk buildings.

The Act establishes a duty holder regime which includes a statutory requirement for a Principal Accountable Person [PAP], supported by an Accountable Person [AP], to provide a 'Safety Case Report' which demonstrates how occupied residential buildings' safety risks are being identified, mitigated and managed on an ongoing basis. The Act's core theme is that there is a whole building approach to safety and that the Accountable Person considers fire and structural building safety risks and their mitigation.

The Act also introduces the requirement to maintain the 'golden thread' of information throughout the life cycle of in-scope buildings. This must be provided to the Building Safety Regulator at key gateways. Critically the Act requires the

creation of a Resident Engagement Strategy and places a legal obligation on the PAP to ensure that residents are involved in the decisions that concern the Safety of their building.

It can therefore be seen how Housing Management is best placed to deliver core aspects of the Building Safety Act 2022 to occupied higher risk buildings. This approach also supports the Council's approach to fire safety which includes a dual focus on 'property' and 'people'.

2.2 The Social Housing (Regulation) Act 2023

This Act supports and complements the Building Safety Act in that it legislates to ensure all social housing residents are safe in their homes, know how their landlord is performing in relation to building safety, and that their voice is heard.

The Regulator of Social Housing has issued consumer standards against which landlords will be inspected. The transparency, influence and accountability standard requires landlords to be open with tenants and treat them with fairness and respect. The Tenant Involvement and Empowerment Standard requires local authority landlords to "treat all tenants with fairness and respect" and "demonstrate that they understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs". There is a specific expectation that landlords will "demonstrate how they respond to those needs in the way they provide services and communicate with tenants".

The Housing Ombudsman Complaints Handling Code 2024 states Landlords "must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process" and also "Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk."

2.3 Fire Safety Act (2021) and Fire Safety Regulations (2022)

The 2002 regulations came into force in January 2023 and supplemented the duties contained in the Regulatory Reform (Fire Safety) Order 2005. The Act clarifies that the responsible persons for multi-occupied residential buildings must manage and reduce the risk of fire for the structure and external walls of the building, including cladding, balconies, windows and entrance doors to individual flats that open onto common parts.

These Regulations introduced additional requirements on Responsible Persons, aimed at identifying and communicating fire risk information regarding evacuation procedures to residents in a format they will understand. This Strategy will build upon these fire risk and information requirements as part of our approach to undertaking person centered fire risk assessments and disseminating timely and tailored fire safety information.

3. Meeting the Regulatory Requirements

3.1 Managing safety

The Council, including the Landlord Service, has already put in place measures

to meet the requirements of the Building Safety Act and the Fire Safety Act. Much of the ongoing development work is to improve our systems and processes to better demonstrate levels of compliance. This Strategy builds upon these workstreams by re-focussing the Housing Management Service on:

- **Information management** – accurate data is required to enable the Service to effectively manage the raft of occupation arrangements which exist across its tower block portfolio, ensure vulnerable households are identified and tailored interventions delivered / reasonable adjustments brought forward to mitigate presenting risks, to drive robust inspection / re-inspection regimes and to enforce standards swiftly and appropriately. A single source of data will support the ‘golden thread’ of information.
- **Compliance management** – the provision of an appropriate and robust system to maintain and report on all Housing Management compliance activities, including enforcement activities applicable to tenant and leaseholder obligations, is key to maintaining a safe environment for our residents, staff, contractors and visitors, supported by up to date operational practices.
- **People and culture** – establishing an effective compliance culture that sets the basis of expected behaviour and accountability across the Housing Management Service (staff, managers and residents) will facilitate reductions in fire safety risks and foster the provision of safer homes for our residents. A key component will be the training and development of staff, as well as residents who want to work more closely with us, to incorporate the levels of understanding and competency necessary for the professional and compliant management of fire safety in residential buildings.
- **Resident engagement and communication** – improving the landlord tenant relationship, building trust, treating residents with respect and improving levels of resident empowerment and engagement will help to facilitate improved levels of adherence with practices and processes to facilitate reductions in fire safety risks. A successful communication strategy, supported by an effective digital platform, will ensure core messages are shared in a timely and consistent way to ensure residents are ‘fire safe’ and ‘fire aware’.
- **Safety Case Reports** – will demonstrate the interrelationships of managing property and people related risks in the context of fire safety. The Housing Management Service will make an effective contribution to the development, review and amendment of Safety Case Reports to ensure that all material behavioural risks are appropriately considered and mitigated and that reliance is not centred on building structure to prevent or minimise the risk of harm.
- **The Golden Thread of Information** – will provide Regulatory bodies, our governance structure and residents with the confidence that a ‘single source of truth’ exists for each building in scope and that key information on property and people is up to date and secure. This will support staff to improve decision making and bring forward better and safer outcomes for tenants in the context of fire safety.

3.2 Housing Management Offer

Taking a ‘whole building’ approach to fire safety requires a transparency, the development of new relationships and the improvement of existing ones with each and every household. As part of this Offer to residents living in our tower blocks, the Council is committing to more personal contact with residents,

more inspections, more information sharing and improved channels of communication. The Council knows that the people living in our high-rise blocks are our greatest source of information about our buildings and must be listened to. Through our housing management offer the Council is seeking to 'get the balance right' between safety, the level of intrusion and cost. The delivery of the Housing Management Offer is key in ensuring that our residents are fire safe and Fire aware and sets out:

- A more intensive approach to housing management with dedicated Housing Officers as a key point of contact
- An inspection regime covering shared areas of the building, flat entrance door checks and property inspections.
- The need to gather relevant information about residents who live in our higher risk buildings to ensure that any presenting risks, including vulnerabilities, can be managed and to improve the effectiveness of our communication.
- Clear guidance for 'staying put' and carrying out partial or total evacuation of buildings following direction by the fire and rescue service.
- How residents can participate in matters relating to building safety as part of a documented approach to engagement.
- A commitment to provide safety related information to residents.
- A dedicated Complaints system for residents living in tower blocks.
- The rights and duties of all households who reside in tower blocks including tenants, resident leaseholders and those who rent their home from a leaseholder.
- How new lettings are restricted to tenants and household members who can self-evacuate in the event of being ordered to do so by the emergency services.

3.3 Fire Safety Regulations

The effective delivery of the Housing Management Offer is a key component in ensuring that our buildings are safe and includes a matrix of inspection activities, the provision of tailored information and planned contact with residents. These include:

- New resident visits
- Provision of tailored fire safety information packs
- Person centred fire risk assessments
- Planned reviews of Personal Emergency Evacuation Plans [PEEPs]
- Flat entrance door inspection regime
- Whole flat and balcony inspection regime
- Shared area inspection regime
- Updating vulnerability information within the Premises Information Box [PIB]

3.4 Building Safety Case

This report summarises the measures in place to manage building safety risks and demonstrates that the accountable person has taken 'all reasonable steps' to prevent and mitigate those risks. The reports for each in-scope building are required to be submitted to the Building Safety Regulator.

The Housing management Service recognises that building safety risks are not confined to the spread of fire or smoke in the building, or structural failure of the building. The Housing Management Service will work with the Principal Accountable Person to go above and beyond the requirements of the Building Safety Regulator and ensure that behavioural and other management risks are properly reflected in Building Safety Case Reports alongside robust approaches to mitigating those risks. This includes the production and planned review of Building Safety Case reports and triggering the need for unplanned reviews linked to a material change in presenting circumstances associated with the management of the building.

Where the Housing Management Service identify new or increased risks associated with the management of the building, they will retain responsibility for identifying, implementing and reviewing the effectiveness of further mitigation measures to manage those risks.

4. Vulnerable Residents

As reflected in our Vulnerable Residents & Reasonable Adjustments Policy the Landlord Service is committed to ensuring that vulnerable residents experience fair and equitable outcomes when delivering landlord related services. This commitment extends to the provision of Housing Management services to residents living across our tower block portfolio where particular safety related risks present.

This Strategy not only explains how the council will achieve good outcomes for our vulnerable tower block residents but also commits to listening to their views and opinions. We will develop approaches and mechanisms to ensure that vulnerable residents take part in opportunities to get engaged, influence decision-making and can easily complain about the quality of services delivered across our tower block portfolio.

4.1 The Golden Thread

The scope of the 'golden thread' of information reflected in the Building Safety Act 2022 is considerable and should be sufficient to serve as the basis for the Building Safety Case Report. This includes but is not limited to; plans, maintenance documents, materials documentation, certifications and risk assessments. The expectation is that these records are maintained digitally, be current, relevant and accessible, allowing proper retention, security and version control to be maintained.

The Housing Management Service has a key role to play in this context. With responsibility for the management of 'people related risks' and ensuring that vulnerable residents receive fair and equitable outcomes in relation to fire safety, it is essential that the Service follows the core principles of the 'golden thread' duties across all its records and processes associated with keeping residents fire safe and fire aware. Central to this is our customer insight data. Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the General Data Protection Regulations. More information on the type of data we collect is set out within the

4.2 Customer Insight Data

In order to influence what we do and how we do it, it is essential that we develop a better understanding of who lives in our tower blocks. Accurate and relevant information about our tower block residents will support us to personalise our service offer, respond to the changing needs of residents and above all, ensure our residents are fire safe and fire aware. The Housing Management Service therefore recognises that accurate and relevant customer insight data is a core element of the 'Golden Thread' and is key to the effective management of risk.

We will ensure systems and processes support and enable vulnerable residents to disclose their needs and help staff spot signs of vulnerability, ensuring that systems can effectively note and retrieve information about a residents' needs. In addition, staff will be empowered to escalate where standard processes and procedures do not provide the right outcome for vulnerable residents in the context of fire safety.

4.3 Personal Emergency Evaluation Plans [PEEPs]

On 2nd December 2024 the government issued a response to the Emergency Evacuation Information Sharing Plus (EEIS+) consultation which was held in 2022 to seek views on new proposals to support the fire safety of residents who would need support to evacuate in an emergency situation. Government, in its response at that time, confirmed that legislation would be introduced to deliver Personal Emergency Evacuation Plans (PEEP) for residential settings which would be known as a 'Residential PEEP'. The scope of Residential PEEPs would go beyond that of the consultation. It was stated that Regulations would mandate Residential PEEPs for all high-rise residential buildings and for residential buildings between 11 and 18 metres with simultaneous evacuation strategies in place. All 'higher risk' buildings are the subject of a 'stay put' strategy.

Notwithstanding the government's future intentions for mandating PEEPs in higher risk buildings, the Housing Management Service will:

- Make reasonable endeavours to identify vulnerable residents who require 'Person Centred Fire Risk Assessments' [PCFRAs] and potential mitigations which are practical and proportionate.
- At the end of the Person-Centred Fire Risk Assessment process, the resident and the Housing Management Service need to be clear on what the resident would do in the event of a fire affecting them. The Housing Management Service will be responsible for recording and summarising this output in a Residential PEEP statement.
- PEEPs will be reviewed annually unless otherwise stated or as a result of a material change in circumstances
- Ensure information on vulnerable residents in high-rise buildings is maintained and can be made readily available to the Fire & Rescue Service in a digital format on request

- Meet the cost of reasonable adjustments arising from PCRFA's within tenant's homes where practical and proportionate to do so
- Where a leaseholder is the only beneficiary of a reasonable adjustment within the home, the cost to implement measures will be charged to them.
- Where the Council determines that it is appropriate for all leaseholders to fund a measure (for example, a common-area measure of benefit to many residents), those leaseholders will have the opportunity to challenge costs they deem unreasonable via existing leaseholder law mechanisms.
- The practice of identifying vulnerable households and developing and reviewing person centred 'personal emergency evacuation plans [PEEPs] and undertaking reasonable adjustments will be documented in the 'Housing Management Offer'.

In summary terms the Housing Management Service will follow the following five Step approach:

- Step 1: Define the building evacuation strategy
- Step 2: Identification of those needing support to evacuate
- Step 3: Undertake Person-Centred Fire Risk Assessment and develop PEEP
- Step 4: Share information with the local Fire & Rescue Service on request
- Step 5: The Fire & Rescue Service access and use this information via the Premises Information Box [PIB] in the event of a fire

4.4 Premises Information Boxes [PIBs]

Premises Information Boxes [PIBs] are secure metal boxes located to the front of all higher risk buildings which are accessible to the Fire & Rescue Service. They contain a range of building and resident related information. The Housing Management Service is responsible for maintaining all resident related information in line with the Code of Practice for the Provision of Premises Information Boxes in Residential Buildings.

All residents who are the subject of a PEEP will be recorded as 'category 1' households within the 'premises information box'. The Housing Management Service will also annotate within the PIB any resident who is receiving oxygen therapy and has oxygen cylinders stored within their flat. Use and storage of oxygen cylinders will also be clearly marked adjacent to the flat entrance door.

This resident focussed information located within the PIB provides the Fire & Rescue Service with key information 'at a glance' regarding residents who are unable to self-evacuate unaided, in addition to resident-related issues which could present as 'high risk' in the event of a real fire situation.

5. Delivering our objectives

5.1 Roles & Responsibilities under the Strategy

The Director of Operational Assets holds the statutory role of Principal Accountable Person [PAP] for the Council's portfolio of higher risk buildings under the Building Safety Act 2022. The PAP is also the named Health & Safety lead under the social housing regulatory framework. In the context of managing building safety and behavioural risks, the PAP is supported by an Accountable Person [AP] who has a clear focus on the effective management of behavioural

risks and ensuring engagement and communication with residents is aligned with the expectations of the Building Safety Regulator. The statutory AP role will provide management oversight, advice and support to the Housing Management Service to ensure that the commitments set out in this Strategy are met.

The Head of Housing Management will ensure the necessary allocation and deployment of resources from across the Housing Management Service to make an effective and sustained contribution to the Housing Management Delivery Plan for Occupied Higher Risk Buildings with the overarching objective of ensuring residents within the scope of The Building Safety Act 2022 remain fire safe and fire aware. This will include; the appointment of a Neighbourhood Housing Manager to take a lead role in relation to the Occupied Higher Risk Buildings, ensuring that there are sufficient staff resources to deliver a more intensive level of Housing Management and ensuring that staff receive appropriate levels of training and development to deliver their roles effectively and confidently under this Strategy.

5.2 Governance & Performance Management

Fire Safety Board is an integral part of the Council's Landlord Service governance structure. Its overriding purpose is to ensure that, as a responsible social landlord, our residents are 'fire safe' and 'fire aware'. Fire Safety Board will have strategic oversight of all workstreams which have a direct or indirect link to fire safety across the managed housing portfolio. It provides assurance to Landlord Board, Corporate Management Team Leads and Cabinet Member leads that, in the context of fire safety, the Council is self-aware, Compliant and is striving to put the safety of residents first.

The 'ownership' of the Fire Safety Policy [including related Standards] and the Building Safety Strategy [which included occupied higher risk buildings] is vested in Fire Safety Board to ensure the effectiveness of strategic guidance and oversight of operational delivery.

The terms of reference of Fire Safety Board include the 'exercise of strategic oversight of the management of 'higher risk' buildings, including the discharge of all statutory functions'. Fire Safety Board will therefore exercise oversight and monitoring of the content and delivery of the workplan linked to the Housing Management Strategy for occupied higher risk buildings and will provide regular updates to Landlord Board, Corporate Management Team Leads, Cabinet Member leads and residents

5.3 Staff Resources

The Landlord Service has made significant and ongoing investment in its people and property. These are stated strategic objectives within our [draft] Landlord Strategy. We want to manage homes that are safe and which residents can be proud of. In order to achieve this, and meet the commitments set out within this Strategy, we will continue to ensure that levels of staff resources are sufficient and receive appropriate and ongoing training and development.

5.4 Competencies, Training and Development

A key area of the Building Safety Act 2022 is to ensure that anyone undertaking

works is competent to work in buildings that are in-scope. Mirroring this approach the Housing Management Service are committed to investing in the professionalisation of managers and staff groups and this extends to those who have specific operational, managerial and strategic responsibilities for the management of in-scope buildings. We will ensure that staff receive appropriate training and development to ensure that they are competent and confident in fulfilling their roles and responsibilities and are aware of changes in Regulations and emerging good practice in the context of managing higher risk buildings.

5.5 Resident Engagement & Communication

The resident voice and resident engagement are key areas of the Building Safety Act 2022 and the Social Housing Regulatory regime. Transparency, influence and accountability is a 'golden thread' running through the Regulator's Consumer Standards. The Landlord Service recognises that successful resident engagement is therefore critical to achieving the outcomes which this strategy is designed to achieve.

The Building Safety Act 2022 requires the creation of a tailored Resident Engagement strategy and places a legal obligation on the PAP to ensure that residents are involved in safety related decisions and receive information regarding safety related matters which affect their building.

This statutory engagement strategy must include a complaints system to ensure residents' safety concerns are heard and dealt with. Residents also have the ability to escalate complaints to the Building Safety Regulator. To ensure that prompt and efficient action is taken to resolve, all building safety complaints raised by residents living in one of the Council's in-scope buildings will be recorded and acknowledged within 24 hours and assigned, as appropriate, to the designated Housing Management or Building Safety lead as the principal investigator. All building safety complaint types will be responded to in accordance with the Council's Complaints Policy. Safety related complaints from residents living in higher risk buildings will be specifically referenced within the Annual Complaints and Improvement Report produced by the Landlord Service.

In relation to work with residents across our in-scope buildings the Landlord Service is working on two levels; the production of a Resident Empowerment & Influence framework at strategic level in addition to the more local specific engagement that will take place with residents in each of our in-scope blocks. This will ensure a building specific Resident Engagement Strategy is produced for each of our high-rise, high-risk buildings.

The building specific Resident Engagement Strategies will be aligned to and adopt the overarching principles of the Resident Empowerment & Influence framework and will be regularly reviewed and adopted for all buildings that fall within the scope of Building Safety Act now or in the future.

Our building specific Resident Engagement Strategies will:

- include how we will share information about building safety with residents
- set out those building safety decisions residents will be asked about

- when residents will be asked about planned works and how to minimise disruption
- how opinions will be collected and used
- show how communication needs have been considered
- set out how we will measure and review participation
- provide a route to enable residents to raise safety concerns formally
- include the ability to capture formal and informal feedback
- detail the ways in which we will engage with residents and how we will ensure their diverse needs are considered
- acknowledge the role of residents and their responsibilities to support safety.
- be reviewed every two years in conjunction with residents
- include how consultations will be undertaken and over what period
- be distributed to all residents aged 16 years and over living in the building and be published on the Council's website

5.6 Data Management & Information systems

It is recognised that the scope of the 'golden thread' of information must include a raft of building related data. The expectation is that these records are maintained digitally, be current, relevant and accessible, allowing proper retention, security, and version control to be maintained.

As part of this Strategy the Housing Management Service consider resident insight data as an integral part of that body of information which constitutes the 'golden thread' and which is necessary to effectively manage the building, mitigate presenting risks and deliver fairer and better outcomes for residents. Key to this is documenting a single view of the resident and their household.

The Housing Management Service use NEC Housing to record resident, household and vulnerability information. NEC Housing has a pop-up flagging function that alerts Officers prior to reading the tenant details. Accurate recording and management of vulnerability data is essential for providing appropriate support to our residents. The NEC Housing system is configured with specific data fields designed to capture relevant information, ensuring consistency and preventing the entry of irrelevant data. Our staff use these predefined fields when recording vulnerabilities to maintain data integrity and protect resident privacy.

Information held regarding a person's vulnerability within an in-scope building will be reviewed annually unless there is a material change in circumstances to ensure that it is up to date and accurate.

5.7 Quality Assurance

Integral to the actions and workstreams contained in the Delivery Plan supporting the Housing Management Strategy for Occupied Higher Risk Buildings, the Service will develop a Quality Assurance Framework. This QAF will be developed in conjunction with residents and used as a management tool to ensure that the right task is being undertaken by staff at the right time and to the agreed quality standard. Outcomes from the QAF will be shared with residents.

5.8 Review of the Strategy [and Delivery Plan]

The Housing Management Service, in conjunction with residents, will carry out a review of the Strategy and delivery plan every two years to make sure that it remains properly aligned to regulatory requirements and the needs of residents. In the event of any material secondary legislation being introduced, a review will take place in advance of the review period.

The review process will also enable us to assess how well we have delivered against the priorities and targets set and identify areas for improvement. It will also enable us to use feedback received from residents and latest best practice to ensure that our Strategy for occupied higher risk buildings and associated Delivery Plan remains fit for purpose.

6. Communication

6.1 Engagement strategies

In conjunction with residents the Council will co-create, document and publish details on how all residents aged 16 years and over can participate in the management of the building at a pace and level which suits them.

These tailored engagement strategies will support our overall approach to transparency, information and accountability and the 'social contract' between the Council and all residents residing in our higher risk buildings.

6.2 Tailored Fire Safety Information

All residents will be given a 'Fire Safety Information Pack'. The content of the pack will be explained to residents by their Housing Officer. All packs will be tailored to individual tower blocks and individual property types.

'Fire safety Information Packs' will be reviewed and updated in the light of any material changes to the building, Statutory / Regulatory changes and feedback from residents.

We will agree with residents what information they would like us to publish and make available on the Council's website. This can include:

- Full and summary versions of the Housing Management Offer to residents living in our in-scope buildings
- Service contracts – including a summary of specification, frequency and compliance
- Fire Risk Assessments – including due dates, completed dates and summary outcomes
- Building Registration and Building Assessment certification
- Safety Case Reports – which document building safety risks and the steps taken / being taken to reduce and control those risks
- Mandatory occurrence reporting - specific issues which must be reported to the Building Safety Regulator
- Details of Accountable Persons who are responsible for ensuring that fire and structural safety is being managed for each and every tower block

- Fire safety concerns and complaints – details of how to raise fire safety concerns, make a complaint and details of the complaints procedure operated by the Building Safety Regulator
- Dates for shared area inspections and the outcomes from shared area inspections

6.3 Complaints

A tailored complaints handling process has been introduced by the Council for residents living in tower blocks. This is to make sure effective action is taken where concerns are raised in relation to building safety and compliance risks. The Council will continue to work with residents to ensure this process:

- Clearly defines a ‘relevant complaint’ associated with building safety risks and compliance matters.
- Sets out who can make a complaint and how.
- States the timeframe to consider and responded to a complaint.
- Sets out the circumstances when a complaint must be referred to the Regulator [Health & Safety Executive] and
- Commits to sharing information including the outcomes of ‘relevant complaints’ with residents.

In its offer to residents living in tower blocks the Council has provided an element within the complaints procedure that focuses on ‘building safety concerns’. Residents can report and identify a specific tower block when reporting their concerns. This feature within the complaints handling procedure allows for notifications to be sent directly and immediately to the appropriate service team for investigation, resolution and response. We will work with residents to review formal complaints in order to influence how we deliver services and improve outcomes for residents living in our in-scope buildings.

6.4 Resident Obligations

The Building Safety Act 2022, in addition to tenancy and lease conditions, place obligations on the Council, tenants, leaseholders and other occupiers of in-scope buildings. As owner and manager of the building the Council’s approach to housing management is for all parties with a vested interest in building safety to rely upon the ‘enforcement’ of rights and obligations as a last resort rather than a first response. In all cases the Council’s preferred option is to work with residents through a ‘social contract’ which reflects the rights, duties and obligations of all parties to maintain safe, clean and well managed buildings and estate environments. As building owner and manager, the Council accepts its full range of statutory and contractual obligations associated with the management and maintenance of in-scope buildings. Our housing management offer reflects the Council’s commitment to all residents regarding its approach to meeting these obligations. To support engagement in a ‘social contract’ it is also important that tenants, leaseholders and other residents meet their obligations too. In order for the Council to meet its obligations, it is important that all residents:

- Provide access to the Council following reasonable notice for the purpose of inspection, survey or to undertake work. This includes but is not limited to gas and electrical safety testing

- Keep in repair and proper working order any safety related item which is the responsibility of the resident. In the case of leaseholders and leaseholders who have sublet their flat, this will include gas and electrical installations
- Take care not to interfere with, damage or allow to be damaged any safety related item in the building
- Cooperate in relation to the provision of relevant information needed by the Council to assess risks and take reasonable steps to prevent major incidents in the building
- Refrain from storing any items on the internal shared areas of the building and on private balconies which would add to the fire load
- Participate in the management of the building and building safety decisions as part of the Council's engagement strategy with all residents

Gas Safety is important to everyone. This includes the Council in its capacity as a landlord and building manager, resident leaseholders who have gas appliances and gas heating and leaseholders who have sublet their flat and are therefore also landlords. The implications associated with failures in gas safety can be serious and far reaching. In the context of keeping everyone safe it is therefore important that all residents and parties play their part.

The Gas Safety (Installation & Use) Regulations 1998 as amended deals with the installation, maintenance and use of gas appliances, fittings and flues in domestic premises. They place duties on landlords to ensure that gas appliances, fittings and flues provided for tenants' use are safe.

In summary terms the Council will require landlords to:

- Ensure gas fittings and flues are maintained in a safe condition
- Gas appliances must be serviced annually
- Ensure an annual gas safety check is carried out on each appliance / flue
- Inform tenants of where to turn off the gas and what to do in an emergency
- Keep records of the gas safety check
- Issue a copy of the latest safety check record to the existing tenant

All servicing and checks must be undertaken by an appropriate Gas Safe Registered engineer.

Annual servicing to ensure that gas appliances, fittings and flues are in safe and proper working order is equally important to resident leaseholders.

In order for the Council to meet its obligations it will:

- Require all tenants to provide access to ensure that the annual gas service can take place
- Require all leaseholders who have sub-let their flat to provide the Council with evidence each year that it has completed an annual gas safety check by a Gas Safe registered engineer in their capacity as a landlord
- Check with all sub-tenants to ensure that they have received a copy of the latest gas check safety report

- Require all resident leaseholders to show that they have had their gas installations serviced each year by a Gas Safe registered engineer

British Standards – BS7671 require all electrical installations to undergo inspection and testing at regular intervals. The industry agreed standard is 5 years for rented property or a change of tenant. This requirement applies to the Council in its capacity as a landlord and to leaseholders who have sub-let their flats.

British Standards also require landlords to have a mains wired smoke detector installed on the escape routes for each floor, a detector in the lounge (or principal habitable room), and a mains wired heat detector in the kitchen. All landlords are also required to ensure a carbon monoxide alarm is installed in every room where there is a fixed combustion appliance (including a gas boiler). Where a new fixed combustion appliance is installed, a carbon monoxide alarm will be required to be installed by law.

Landlords are legally required to repair or replace smoke and carbon monoxide alarms once they have been informed that they are faulty. Testing of alarms remains the tenant's responsibility.

6.5 Contravention Notice

The Housing Management Service will develop, and share with residents, operational practices associated with the use of Contravention Notices. The Building Safety Act 2022 gives Accountable Persons (APs) the power to issue contravention notices to residents and owners of residential units who breach their building safety duties. APs can also request access to premises to carry out their duties. If necessary, a County Court can grant an order for access.

APs can issue contravention notices if they believe a resident or owner is:

- Causing a building safety risk
- Interfering with a safety item
- Failing to comply with a request for information
- The notice requires the recipient to remedy the breach or pay a sum within a specified period
- If the recipient is not the owner, the AP must provide a copy of the notice to the owner

6.6 Digital Notice Boards

The Housing Management Service will work with residents to pilot and potentially roll-out 'digital notice boards' across its tower block portfolio, save for those blocks scheduled for demolition under the Hayes regeneration programme.

Engaging with and keeping residents informed in relation to key messages and ensuring they are properly sign-posted in relation to core services is key to the Council's approach in ensuring that residents remain 'fire safe' and 'fire aware'. Under the Building Safety Act 2022 the Council has a statutory duty to bring forward tailored Resident Engagement Strategies for each of its 'higher risk' buildings. Digital notice boards, with the potential for real time updates' has potential to support a tailored approach to the ongoing development of these

strategies in line with expectations laid down by both the Regulator of Social Housing and the Building Safety Regulator.

Our rationale for piloting the installation of digital notice boards include:

- **Fire Safety information:** regular updates on fire safety protocols, emergency procedures and reminders for residents to check smoke alarms and not to use for storage or clutter fire escape routes. Signposting residents to tailored resources on the London Fire Brigade website.
- **Anti-Social Behaviour issues:** Timely notifications about ongoing ASB issues within the building including unauthorised entry, reporting procedures [including when and how to report to the Police] and support resources for affected residents.
- **Tenancy Management updates:** reminders regarding applicable tenancy conditions including access for gas and electrical compliance checks, reminders regarding planned visits in relation to the housing management offer for residents in 'higher risk' buildings, notifying change of circumstances associated with vulnerability / ability to self-evacuate, upcoming meetings / how to be involved and resources available for tenants to report 'safety related concerns.'
- **Repair and maintenance work notifications:** including FAQ information about planned work such as timelines and anticipated disruption, routine servicing to active fire precautions and other installations such as lifts and pumps to ensure residents are aware and prepared.

Governance			
Effective from:	31/03/2025	Review Date:	31/03/2028
Policy Owner:	Head of Housing Management		
Policy Author:	Housing Landlord Programme Manager and Accountable Person		
Agreed by	Landlord Board 20/03/2025		
Approved by:	Cllr Tuckwell – Cabinet Member for Planning, Housing & Growth 28/03/25		
Version Number:	V0.01		

Appendix 1: Schedule of 'in scope buildings

Building Address	Flats	No of storeys
Harding House, Addison Way, Hayes, Middx, UB3 2DH	Harding House 2-96 (evens)	13
Sutcliffe House, Addison Way, Hayes, Middx, UB3 2DJ	Sutcliffe House 134-228 (evens)	13
Melbourne House, Yeading Lane, Hayes, Middx, UB4 9LJ	Melbourne House 1-96	13
Skeffington Court, 51 Silverdale Road, Hayes, Middx, UB3 3BY	Skeffington Court 1-75	14
Wellings House, 236 Avondale Drive, Hayes, Middx, UB3 3PN	Wellings House - 1-48	13
Fitzgerald House, 237 Avondale Drive, Hayes, Middx, UB3 3PW	Fitzgerald House 1-48	13
Glenister House, 238 Avondale Drive, Hayes, Middx, UB3 3PP	Glenister House 1-48	13
Fairlie House, Pantile Walk, Uxbridge, Middx, UB8 1LT	Fairlie House - 1-72	11
The Gouldings, Pantile Walk, Uxbridge, Middx, UB8 1LR	The Gouldings - 1-72	11
Rabbs Mill House, 14 Chiltern View Road, Uxbridge, Middx, UB8 2PB	Rabbs Mill House 1-79	14

Cavenham Court, 18 Millington Road, Hayes, Middx, UB3 4FZ	Cavenham Court 1 - 113	7
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Appendix 2: Glossary of terms

Term or reference in Strategy	Definition
'In-scope' and 'higher risk' buildings.	A residential building of at least 18m in height or over 6 storeys, whichever is reached first
Building Safety Regulator	The 'Regulator' in respect of duties and responsibilities for 'higher risk' buildings is the Health & Safety Executive
Principal Accountable Person [PAP]	A position defined in law with statutory responsibilities for occupied higher risk buildings including fire and structural safety
Accountable Person [AP]	A position defined in law with statutory responsibilities for occupied higher risk buildings. The post holder is answerable to the Principal Accountable Person
Building Safety Certificate	Are issued by the Regulator when satisfied that the Council is fully compliant and has not breached any relevant duty in respect of its management of a 'higher risk' building
Tenancy Management Officer [High Rise Living]	The Tenancy Management Officer (High Rise Living) is the 'point of contact' responsible for the delivery of a more intensive form of housing management service to all residents living in the Council's tower block portfolio
Building safety risks	These are safety related risks associated with the building which must be identified, regularly reviewed and effectively managed
Building Safety Case Report	This report summarises the measures in place to manage building safety risks and demonstrates that the AP has taken "all reasonable steps" to prevent and mitigate those risks
Building Assessment Certificate	After a higher-risk residential building (at least 7 storeys or 18 metres high with 2 or more residential units) in England is registered, the Building Safety Regulator will ensure the building's Principal Accountable

	Persons (PAPs) and Accountable Persons (APs) are managing relevant risks and are working to keep all residents safe. The Building Safety Regulator will regularly carry out assessments and, if all standards are met, they will provide a Building Assessment Certificate to those PAPs that have been asked to apply for one. The certificate aims to highlight the building's performance and show that the Accountable Persons are correctly managing the residential building. The certificate must be displayed in an area where it can be immediately visible by residents and visitors.
Residents' Engagement Strategy	Is a statutory plan produced by the owner and manager of the 'higher risk' building which sets how all residents can participate in the management of the building.
Building safety charge	Is a statutory element within the service charge payable by leaseholders which relates to all costs associated with building safety work
Stay put strategy	A strategy based on the design principle that only the residents of the flat of fire origin need to escape initially, while other residents may remain in their own flats unless their flat is affected by smoke or fire, they feel threatened, or they are instructed to leave by the Fire & Rescue Service. A stay put strategy does not preclude residents, who are aware of a fire within a building but not directly affected by it, from deciding to evacuate.
Personal emergency evacuation plan [PEEP]	An evacuation is the process whereby people leave the building in the event of an incident. A rescue is where a person receives physical assistance to get clear of the area involved in the incident. A PEEP will be developed where a person is unable to self-evacuate unaided. The plan is intended to be executed without relying upon intervention by the Fire & Rescue Service
Personal Emergency Plan [PEP]	Contains an assessment of risk [in the context of fire safety] and a corresponding

	mitigation plan to control or eliminate the presenting risks identified.
Privacy Notice	A document that the Council publishes to explain how personal data relating to residents is processed. It has two aims: to promote transparency and to give individuals more control over the way their data is collected and used
Relevant Complaint	Are Complaints associated with associated with building safety risks and compliance matters rather than day to day service provision

Translations

If you would like to receive this information in another language please contact us on 01895 277 038

اگر آپ یہ معلومات کسی دوسری زبان میں حاصل کرنا چاہتے ہیں تو برائے مہربانی ہم سے ٹیلیفون 308 277 01895 پر رابطہ کریں۔

Urdu translation.

ਜੇ ਤੁਸੀਂ ਇਹ ਜਾਣਕਾਰੀ ਕਿਸੇ ਹੋਰ ਭਾਸ਼ਾ ਵਿੱਚ ਪ੍ਰਾਪਤ ਕਰਨਾ ਚਾਹੁੰਦੇ ਹੋ ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ 01895 277 038 'ਤੇ ਸੰਪਰਕ ਕਰੋ।

Punjabi Translation.

જો તમે આ માહિતી બીજી ભાષામાં પ્રાપ્ત કરવા માંગતા હો, તો કૃપા કરીને અમારો સંપર્ક કરો ટેલિફોન 01895 277 038

Gujrati traditional.

यदि आप यह जानकारी किसी अन्य भाषा में प्राप्त करना चाहते हैं तो कृपया हमसे टेलीफोन 01895 277 038 पर संपर्क करें

Hindi

Hadii aad rabto macluumaad dheerad ah, oo habkale loo dhigey fadlan nala soo xidhiidh nambarka 01895 277 038

Somalia



HOUSING MANAGEMENT STRATEGY FOR OCCUPIED HIGHER RISK BUILDINGS – DELIVERY PLAN 2025/26 – 2026/27

The Housing Management Strategy for Occupied Higher Risk Buildings sets out the approach by the Housing Management Service in making an effective and compliant contribution to the Council’s Building Safety Policy in the context of occupied higher risk buildings within its ownership and management. This Strategy, and the Delivery Plan, has been developed to ensure that the Council is fully compliant with the Building Safety Act 2022, the Social Housing Regulation Act 2023 and other legislative and regulatory obligations which at their heart are designed to ensure that our residents are ‘fire safe’ and ‘fire aware’.

The Housing Management Service, in conjunction with residents, will carry out a review of the Strategy and delivery plan every three years to make sure that it remains properly aligned to regulatory requirements and the needs of residents. In the event of any material secondary legislation being introduced, a review will take place in advance of the stated review period. The review process will also enable us to assess how well we have delivered against the priorities and targets set and identify areas for improvement. It will also enable us to use feedback received from residents and latest best practice to ensure that our Strategy for occupied higher risk buildings and associated Delivery Plan remains fit for purpose.

Version 1- March 2025	Date completed / Approved
Rod Smith – Housing Landlord Programme Manager / Accountable Person	18 March 2025
Gary Penticost, Director of Operational Assets - Principal Accountable Person	20 March 2025
Sam Strong – Head of Housing Management	20 March 2025

Quarterly Control Update	Date
Rod Smith – Housing Landlord Programme Manager / Accountable Person	

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
1. Improve levels and quality of data to ensure a ‘single source of the truth’ associated with all forms of occupation arrangement in order to effectively contribute towards the ‘golden thread’ of information and to improve outcomes for residents.					
1.0 Achieve a ‘single view of the tenant’ and household members which supports the effective management of higher risk buildings and which can be used to improve decision making and bring forward better outcomes for residents	Scope the extent of household information needed for tower block residents over and above that needed for the general needs portfolio.	SN	April ‘25		
	Engage in the Tenant Profile project workstream to ensure data is uploaded for all residents across the higher risk buildings portfolio and includes appropriate ‘flags’.	SN	Mar ‘26		
	Where data is not forthcoming for any household, ensure action is taken outside of the project to achieve 100% coverage.	SB	Mar ‘26		
	Introduce operational practices to capture relevant household data across leasehold properties [including those which are sub-let] as an integral part of delivering the ‘housing management offer’ for occupied higher risk buildings.	BG	Q1		
	Introduce operational practices which supports the adopted standard for refreshing household data across the higher-risk buildings portfolio making effective use of ‘touch points’ set out in the ‘housing management offer’ for occupied higher risk buildings.	SB	Q2		
1.1 Ensure data held within premises information boxes [PIBs] meets the current requirements of the ‘Code of Practice for the Provision of Premises Information Boxes in Residential Buildings’	Document procedural guidance for the population and maintenance of data supplied to PIBs by Housing Management	SB	Q2		
	Ensure accurate and up to date digital records are in place to ‘back-up’ hard copy records held within PIBs which can be made available to the Fire & Rescue services on demand.	SB	Q1		
	Use NEC to extract system based reports on households who are flagged as being category 1 or category 2 residents and / or residents who are receiving oxygen therapy.	SN	Q2		
	Introduce and promote approaches, including digital approaches, to support residents across higher-risk buildings in self-identifying and reporting physical, sensory and mental impairments which could impact their ability to appropriately respond and react to a real fire situation.	SN	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
1. Improve levels and quality of data to ensure a ‘single source of the truth’ associated with all forms of occupation arrangement in order to effectively contribute towards the ‘golden thread’ of information and to improve outcomes for residents.					
	Demonstrate a robust approach to evidencing that all residents who are recorded as category 1 are the subject of a Personal Emergency Evacuation Plan.	SN	Q1		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
2. Ensure staff do the right thing at the right time to the right quality standard.					
2.0 Co-develop and implement a ‘Quality Assurance Framework’ [QAF] which supports the management role in monitoring the qualitative and quantitative aspects of delivering the ‘housing management offer’ for occupied higher risk buildings.	As part of the Housing Management restructure, bring forward a named manager to act as ‘service lead’ for Fire Safety with responsibility for operating the QAF.	SS	Q2		
	Scope and document the quantitative aspects of service delivery set out within the offer.	RS	Q2		
	Scope and document ‘quality standards’ for all key deliverables set out within the offer.	RS	Q2		
	Develop and implement a rolling programme of transactional surveys as an integral part of the QAF which includes; perceptions on engagement and information sharing and tests the understanding of key fire safety messages and how to raise a complaint.	SN	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
2. Ensure staff do the right thing at the right time to the right quality standard.					
	Incorporate performance measures as an integral part of the QAF to drive improvements in outcomes and behavioural change.	RS	Q2		
	Scope mandatory induction and refresher training for all Housing Management staff who have a direct responsibility for delivering the housing management offer for occupied higher risk buildings.	SN	Q1		
	Ensure relevant housing management staff are competent to undertake fire door checks.	SN	Q1		
	Make effective use of QAF outcomes to identify and document additional staff training needs.	SN	Q1 – Q4		
	Report quantitative and qualitative outcomes from the QAF on a rolling quarterly basis to residents and the Landlord Governance structure.	RS	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
3. Improve levels of resident empowerment, engagement and communication as part of improving the landlord tenant relationship, building trust, treating residents with respect and ensuring residents are ‘fire safe’ and ‘fire aware’.					
3.0 In conjunction with residents, review and refresh the current Resident Engagement Strategies for all in-scope buildings and bring forward a new Resident Engagement Strategy for Cavenham Court, 18 Millington Road.	Undertake a self-assessment exercise of existing strategies using ‘BSR Building Assessment Certificate Application Assessment Record: Residents’ Engagement Strategy’ to identify potential gaps and areas for improvement.	MF	Q1		
	Ensure reviewed and refreshed engagement strategies are comprehensive and cover all areas reflected in; Preparing a resident engagement strategy - GOV.UK	MF	Q2		
	Include the 5 principles of ‘How to engage with residents’ as set out by the BSR – within revised strategies: 1. Understand who lives in each building 2. Engage via multiple channels	MF	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
3. Improve levels of resident empowerment, engagement and communication as part of improving the landlord tenant relationship, building trust, treating residents with respect and ensuring residents are ‘fire safe’ and ‘fire aware’.					
	3. Communicate information effectively 4. Listen to residents 5. Be inclusive				
	With each strategy, ensure residents are clear about: - the information the Council provide to residents - building safety decisions residents will be asked about - how residents can make a complaint	MF	Q2		
	As part of refreshing and reviewing the current Engagement Strategies with reference to published good practice and the BAC assessment criteria [see objective 7] opportunities need to be explored to raise the profile of online reporting of ‘safety related concerns’ to residents living across the tower block portfolio	MF	Q2		
	Evidence that revised and refreshed strategies are tailored to the needs of residents within each in-scope building.	MF	Q2		
	Publicise each strategy and ensure it can be evidenced that a copy is provided to all residents aged 16 years and over occupying a flat within a higher-risk building.	SN	Q3		
3.1 Introduce and make effective use of digital notice boards across the higher-risk building portfolio	Document the business case for the extended roll out of digital notice boards across all higher-risk buildings using feedback from residents involved in the pilot approach.	SN	Q2		
	Establish an editorial board of residents to co-design a standard for use of digital notice boards, including processes to approve core messages.	MF	Q2		
	Document operational practices to upload, amend and review information displayed on digital notice boards.	SB	Q2		
3.2 Ensure all residents occupying a flat within a higher risk building has a Fire Safety information pack tailored to the flat and building in which they live.	Document processes to ensure and evidence that all new tenants, leaseholders and their subtenants receive a tailored copy of a Fire Safety Information Pack relevant to their flat and building.	SB	Q2		
	Document processes to ensure that effective use is made of solicitor’s enquiries to ensure that, ahead of any planned assignment of a leasehold interest, the prospective leaseholders is made aware of and receives	BG	Q1		

Appendix 3 – Delivery Plan - Housing Management Strategy for Occupied Higher Risk Buildings

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
3. Improve levels of resident empowerment, engagement and communication as part of improving the landlord tenant relationship, building trust, treating residents with respect and ensuring residents are ‘fire safe’ and ‘fire aware’.					
	a copy of; the Housing Management Offer, the Resident Engagement Strategy and any relevant Standards and Regulations.				
3.3 In conjunction with residents, review and refresh the current ‘Housing Management Offer’ to residents living in Council owned and managed ‘higher risk buildings’.	Establish a mixed tenure working group of residents to review, amend and agree a refreshed Housing Management Offer which reflects the housing management contribution to ensuring that residents remain safe and fire aware.	MF	Q2		
	Ensure all commitments within the Housing Management Strategy for Occupied Higher Risk Buildings are appropriately referenced within the refreshed Housing Management Offer.	RS	Q2		
	Leasehold charges are referenced in the offer but lack clarity associated with post-Building Safety Act 2022 Regulation. Update the Housing Management Offer to reflect a clear approach to the extent of safety related charges which can be passed onto leaseholders and the statutory safeguards which are in place.	BG	Q2		
	Update the ‘Leaseholder Handbook’ to reflect the approach to safety related charges within higher risk buildings.	BG	Q2		
	Publish and make available a refreshed version of the Housing Management Offer, including a summary version.	SN	Q3		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
4. Develop a sector leading approach to residential PEEPs across the Council’s higher risk buildings which places vulnerable residents at the centre of a process which ensures they are safe, reasonable adjustments are made and presenting needs are regularly reviewed.					
4.0 Identify and record vulnerable households / household members occupying flats within higher risk buildings.	Document processes which capture physical, sensory or mental issues impacting residents living in higher risk buildings which negatively affects their ability to respond appropriately or as expected in a real fire situation.	SB	Q2		
	Identify and record on NEC as part of the ‘single view of the resident’ any ‘reasonable adjustments’ which may be necessary in the context of ensuring vulnerable residents are ‘fire safe’ and ‘fire aware’.	SB	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
4. Develop a sector leading approach to residential PEEPs across the Council's higher risk buildings which places vulnerable residents at the centre of a process which ensures they are safe, reasonable adjustments are made and presenting needs are regularly reviewed.					
	Identify and flag within the vulnerable group any resident who is unable to self-evacuate the building unaided and other than via the passenger lift within a reasonable period of time if directed by the fire and rescue services.	SB	Q2		
	Document processes to complete [and review] a person centred fire risk assessment [PCFRA] and bring forward a 'Residential Personal Emergency Evacuation Plan' [PEEP] and a Residential PEEPs statement that records what residents should do in the event of a fire. https://www.london-fire.gov.uk/safety/carers-and-support-workers/using-a-fire-risk-checklist/fire-risk-checklist/	SN	Q2		
	Evidence that all residents unable to self-evacuate are the subject of an approved Management Transfer and are being actively supported and monitored to move to suitable alternative accommodation.	SB	Q1 – Q4		
	Ensure data on residents unable to self-evacuate unaided is recoded within Premises Information Boxes [PIBs] as Cat 1 / 2 cases and is also available in a digital format which can be shared with the Fire & Rescue Service on demand.	SB	Q1		
	Ensure evidence is available to demonstrate reasonable endeavours to identify vulnerable residents who require 'Person Centred Fire Risk Assessments' [PCFRAs] and potential mitigations which are practical and proportionate as set out within PEEPs.	SN	Q2		
	In conjunction with residents document a service standard relating to 'reasonable adjustments' in the context of outcomes from PCFRAs which includes reasonable adjustments to tenanted and leasehold flats and communal areas.	RS	Q2		
	Following the Internal Audit of 'Emergency Evacuation Plans' during Q4 2024/25, develop a management plan to address and respond to all risks identified as medium and high and report progress quarterly.	RS	Q1		
	Develop and implement a QAF for the PEEP process as an integral part of the broader / overarching Higher-Risk Building QAF	RS	Q2		
	Update the PEEP QAF following the planned issue of government guidance in October 2025	RS	Q3		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
4. Develop a sector leading approach to residential PEEPs across the Council's higher risk buildings which places vulnerable residents at the centre of a process which ensures they are safe, reasonable adjustments are made and presenting needs are regularly reviewed.					
	Deliver PEEP refresher training to relevant staff and update the training delivered following the issue of government guidance	SN	Q1 and Q4		
	Work with DDT to bring forward workflow processes in connection with PEP assessments, PEEP development and review and 'welfare checks' across the tower block portfolio	SN	Q4		
	Progress the potential to incorporate success and activity measures associated with the Housing Management Offer onto the PowerBI reporting platform	RS	Q3		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
5. Maximise the potential for complaints to positively contribute to a culture of learning, improving outcomes for residents and shaping the way housing management services are delivered across higher risk buildings.					
5.0 Demonstrate that a variety of channels and approaches are being used to facilitate access to the complaints handing process.	Scope all communication and engagement opportunities and 'touch points' with residents where accessing complaints can be promoted.	RS	Q1		
	Document an approach to generate higher levels of formal complaints from residents residing within higher risk buildings.	RS	Q2		
	Within the documented approach, make effective use of digital notice boards in relation to promoting the role of complaints and access to the complaints handling process.	RS	Q1		
	Set stretch targets in relation to the number of formal complaints raised by residents which relate to building	SN	Q1		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
5. Maximise the potential for complaints to positively contribute to a culture of learning, improving outcomes for residents and shaping the way housing management services are delivered across higher risk buildings.					
	safety matters and matters associated with the management and maintenance of the building.				
	Undertake an analysis of all formal complaints received, feedback to residents and ensure opportunities for learning and change are reflected in the rolling quarterly analysis on complaints for the Landlord Service.	SN	Q1 – Q4		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
6. Residents, irrespective of tenure, are required to meet the same standards of behaviour and levels of compliance with safety obligations in order to make our tower blocks better places to live.					
6.0 Explore the potential for ‘Estate Regulations’ to support the management role in ‘levelling up’ obligations between tenures to support a more uniform and robust approach to compliance and enforcement.	Using engagement structures for the tower block portfolio, seek resident views / Leaseholder Association views on formally introducing ‘estate regulations’ into all long leases across the higher risk building portfolio which introduces a ‘level playing field’ associated with contractual issues which support the safety of all residents in higher-risk buildings.	RS	Q2		
	Subject to resident views and legal advice, develop a plan to introduce ‘estate regulations’ across the higher risk building leasehold portfolio which would be enforceable as if they were express terms of the lease.	RS	Q4		
	If implemented, ensure all communications and documentation makes explicit reference to the Regulations, their role and use.	BG	Q4		
6.2 Sect 38 Building Safety Act 2022 (BSA) gives Accountable Persons (APs) the power to issue contravention notices to residents and owners of residential units who breach their building safety duties. APs can also request access to	Document operational practices to support staff in effectively enforcing rights and obligations via the use of Contravention Notices.	SB	Q2		

Appendix 3 – Delivery Plan - Housing Management Strategy for Occupied Higher Risk Buildings

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
6. Residents, irrespective of tenure, are required to meet the same standards of behaviour and levels of compliance with safety obligations in order to make our tower blocks better places to live.					
premises to carry out their duties. If necessary, a County Court can grant an order for access. APs can issue contravention notices if they believe a resident or owner is: - Causing a building safety risk - Interfering with a safety item - Failing to comply with a request for information - The notice requires the recipient to remedy the breach or pay a sum within a specified period - If the recipient is not the owner, the AP must provide a copy of the notice to the owner					
	Bring forward template documentation to underpin formal use of Sect 38 powers.	SB	Q2		
	Ensure appropriate updates are incorporated into all communications and documentation making explicit reference to Sect 38 powers in the event of any breakdown in the 'social contract' between the Council and residents occupying higher risk buildings.	SN	Q1 – Q4		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
7. When invited to apply for a Building Assessment Certificate by the Building Safety Regulator, ensure that the housing management contribution is comprehensive and can be evidenced in the form of up to date Resident Engagement Strategies and Safety Case Reports					
7.0 In line with the Housing Management Strategy for occupied higher risk buildings, ensure the housing management contribution to Building Assessment Certificates [BAC] is compliant and makes a positive contribution to the overall safety of the building and the mitigation of identified risks. [The BSR will assess; the resident engagement strategy , the mandatory occurrence reporting system and the safety case report as an integral part of assessment BAC applications. Current advice is that the BSR will invite Landlords to apply for a BAC on a 'risk-based approach' every 5 years].	Undertake a self-assessment of the resident engagement strategy against the published Assessment Criteria used by the BSR. Using the resultant gap analysis, ensure that all revised and published engagement strategies reflect the documented expectations of the BSR. All published documents should set out what the Council can do if someone needs information in a different language or in an alternative format. For example, large text, easy read, braille, or audio.	RS	Q2		
	Undertake a self-assessment of the Mandatory Occurrence Reporting System [MoR] against the published Assessment Criteria used by the BSR. Using the resultant gap analysis, ensure that all expectations	RS	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
7. When invited to apply for a Building Assessment Certificate by the Building Safety Regulator, ensure that the housing management contribution is comprehensive and can be evidenced in the form of up to date Resident Engagement Strategies and Safety Case Reports					
	for the MOR associated with residents is compliant including: • Involving and consulting with residents when establishing the MoR system • Referencing the MoR system in the engagement strategy • Ensuring residents understand the meaning of a 'building safety incident' • Documenting how residents can submit reports • Documenting the various channels through which reports can be made i.e. online, email, telephone. • How residents can report a 'building safety incident' via the established complaints system • How incident reports via the complaints system are reviewed, identified and processed as 'building safety incidents'. • Consider and document what to do if residents find it difficult to describe an incident and whether they could submit, for example, photo or video evidence that helps communicate what happened. • How you will make information about your MoR system easily available and accessible to residents. • When necessary, promoting that residents can appoint a representative to report an incident for them • Documenting joint reviews of the system with residents to ensure it remains 'fit for purpose' All published documents should set out what the Council can do if someone needs information in a different language or in an alternative format. For example, large text, easy read, braille, or audio.				
7.1 Demonstrate how the Housing Management Service is making a proactive and positive contribution to the review and content of Safety Case Reports in line with commitments set out in the Housing Management Strategy for occupied higher risk buildings. [A 'Safety Case Report' demonstrates how occupied residential buildings' safety risks are being identified, mitigated and managed on an ongoing basis]	Demonstrate the interrelationships of managing property and people related risks in the context of fire safety by ensuring that the review and amendment of Safety Case Reports properly capture all material behavioral risks and related mitigations and interventions and do not overly rely upon building structure to prevent or minimise the risk of harm.	RS	Q1 – Q4		
	Co-create and document a 'Higher risk building trigger' which sets out a clear threshold for new or increased behavioural risks which, if triggered, would lead to a: • formal review of the individual Safety Case Report	RS	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
7. When invited to apply for a Building Assessment Certificate by the Building Safety Regulator, ensure that the housing management contribution is comprehensive and can be evidenced in the form of up to date Resident Engagement Strategies and Safety Case Reports					
	- multi-agency response - documented management interventions to reduce or eliminate the presenting risk Ensure the trigger document includes an ‘appeals process’ where a resident has raised a ‘higher risk building trigger’ which has been rejected for not exceeding the agreed threshold. All published documents should set out what the Council can do if someone needs information in a different language or in an alternative format. For example, large text, easy read, braille, or audio.				
	Ensure residents and partners are aware of the process to initiate a ‘higher risk building trigger’ if they believe the agreed threshold has been exceeded.	RS	Q2		
	Publish the ‘Higher Risk Building Trigger’ and promote with residents and key partners. Ensure residents and partners are aware of the process to initiate a ‘higher risk building trigger’ if they believe the agreed threshold has been exceeded.	RS	Q3		
	Ensure comprehensive and up to date data is available on the resident profile of each higher risk building as part of the Safety Case Report. This will include for example any residents needing help to evacuate or have additional needs. [This data should be the same as that reflected in the related resident engagement strategy]	SN	Q1 – Q4		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
8. Provide clarity and transparency to leaseholders in the context of building safety costs associated with delivering safe and compliant higher risk buildings					
8.0 Ensure ‘building safety costs’ applicable to higher risk buildings are comprehensively identified and that the Council’s reasonable costs associated with its legal duties are passed onto leaseholders.	In conjunction with Place Directorate leads and Finance, scope and document a summary of ‘building safety costs’ which can legitimately and automatically be passed onto leaseholders via their service charge. Include the statutory protections which are in place generally regarding service charges and specifically in relation to ‘building safety costs’ applicable to higher risk buildings.	KS	Q2		

Objective	Actions to deliver objective	Lead	By	Comments/ status	RA G
8. Provide clarity and transparency to leaseholders in the context of building safety costs associated with delivering safe and compliant higher risk buildings					
	Engage with leaseholders and the Leasehold Association in relation to the introduction of 'building safety costs' to service charge demands across the higher risk building portfolio from 2026	BG	Q3		
	Engage with Legal Services and bring forward revised templates for leaseholds in higher risk buildings to ensure that service charge demands linked to 'building safety costs' are compliant.	BG	Q3		
	Brief CMT and Cabinet Member leads on the introduction of 'building safety charges'.	KS	Q4		
	Publish a summary of chargeable 'building safety costs' and update the Leasehold Handbook.	BG	Q4		