



BUILDING SAFETY STRATEGY

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Prepared by:	Steve Leonard
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Lead officer:	Steve Leonard

1 INTRODUCTION

1.1 The Strategy is designed to deliver new and ongoing building safety responsibilities. It sets out SHG's objectives following changes in fire safety requirements, in response to the Grenfell Tower inquiry, the recommendations of the Hackitt Review, and new legislation.

1.2 The aim of this Building Safety Strategy is to ensure that buildings in SHG's management are safe for occupation by residents and that buildings in scope of the Building Safety Bill are awarded an assurance certificate by the safety regulator.

2 BACKGROUND

2.1 SHG has a track record of investing in fire safety measures, particularly where significant incidents in other parts of the country have identified the need for action. SHG responded to the Lakanal House fire, which occurred in a large social housing block in Southwick, London in 2009 and resulted in the death of six people. It was found that breaches in the properties compartmentation enabled the fire to spread, in response SHG commissioned intrusive fire risk assessments (type 4 fire risk assessments) to all blocks classified as higher risk which identified where similar breaches were located which were then sealed. SHG responded to a fire at Shirley Towers in Southampton in 2010, which resulted in the death of two firefighters who were caught up in electrical cable dislodged during the fire, as a result SHG continues to ensure that all wiring in high-rise communal areas is clipped in with fire resistant restraints. The actions by SHG were not legal requirements but they were undertaken to ensure a proactive approach to fire safety.

2.2 On 14th June 2017, a fire broke out at Grenfell Tower, a 24-storey residential tower block in West Kensington, London. Starting on the Tower's fourth floor, the fire quickly spread throughout the building and took 24 hours for firefighters to bring under control. The fire resulted in the tragic death of 72 people. The fire spread rapidly up the exterior of the building which was due mainly to the buildings Aluminium Composite rainscreen Cladding (ACM) which has subsequently been found to be highly combustible.

2.3 Following the Grenfell Tower fire, the Government commissioned an Independent Review of Building Regulations and Fire Safety, led by Dame Judith Hackitt. The report into building safety standards is known as the Hackitt Review.

2.4 SHG has a good record of investing in fire and building safety risk measures within the housing stock. Since its inception SHG has fully complied with the requirements of The Regulatory Reform (Fire Safety) Order 2005 (RRO) with communal areas of multi-occupied buildings having a Fire Risk Assessment carried out at regular intervals. SHG was the first housing organisation in Greater Manchester, and one of only a few nationally, to

undertake type four assessments and works before the Grenfell tragedy happened.

3 NATIONAL CONTEXT

3.1 The Hackitt Review made 53 recommendations, calling on the Government to:

- Create a more effective regulatory and accountability framework to provide greater oversight of the building industry
- Introduce clearer standards and guidance
- Put residents at the heart of a new system of building safety, empowering them with more information, engaging them on how risks are managed in their building and ensuring effective routes for raising and escalating safety concerns
- Help to create a culture change and a more responsible building industry, from design, through to construction, management, maintenance and refurbishment

3.2 The Government accepted all the Hackitt Review's findings and recommendations which it has incorporated into the new draft Building Safety Bill. One of the key elements of the Bill, is a more stringent regulatory regime for higher-risk residential buildings. Multi-storey blocks above 18 meters or more than 6 stories in height are "in scope" as at March 2021. SHG has 22 blocks which fall into the scope of the Bill.

3.3 The more stringent regulatory regime involves:

- The introduction of an Accountable Person who will have accountability and statutory responsibilities for managing risks across the design, construction, and occupation of buildings on an ongoing basis.
- Gateway points (stop/go decision points) which will provide rigorous inspection of regulatory requirements to help ensure building safety risks are considered during planning, design and construction
- Requiring a 'golden thread' of building information to be created, stored and updated throughout the building's lifecycle in a building safety file.
- Requiring mandatory reporting to the new Building Safety Regulator of fire and structural safety occurrences which could cause a significant risk to life safety.
- Building registration and certification that confirms a building is fit for occupation and provides transparency on the assessment and findings at the time of certification
- A statutory requirement for the Accountable Person to provide a 'Building Safety Case Report' which demonstrates how building

safety risks are being identified, mitigated and managed on an ongoing basis

- Requiring the Accountable Person to appoint a competent Building Safety Manager to support them in managing fire and structural safety risks in the building day-to-day
- The Accountable Person will need to demonstrate the competence of people designing, managing, maintaining or refurbishing a high-risk building
- Requirement to engage and develop a strong partnership with residents to keep the building safe through greater transparency and effective complaints handling

3.4 The Grenfell Tower Fire and the Hackitt Review has influenced the review of the Reform (Fire Safety) 2005 Order (RRO) which has led to the new Fire Safety Act 2021. The Hackitt review has also influenced the current Housing White Paper which has an emphasis on resident engagement, safety, compliance and accountability.

3.5 Although the current focus of the legislation is multi-storey blocks it is expected that the regulator in time will include other high-risk buildings such as sheltered, temporary accommodation and supported housing schemes.

4 SHG CONTEXT

4.1 Following the tragic events at the Grenfell Tower, SHG undertook an in-depth review of fire safety within all high-rise buildings. This included joint inspections with Greater Manchester Fire and Rescue Service (GMFRS) at all sites. These inspections confirmed that the high-rise blocks met all current regulatory requirements and later, tests carried out by the Building Research Establishment confirmed that none of the cladding on the blocks was the same as the Grenfell Tower cladding.

4.2 Later in June 2017 the Greater Manchester Mayor set up the High-Rise Task Force with the aims to provide fire safety reassurance to all residents. SHG are active members of the task force.

4.3 SHG also has a Partnership Agreement with GMFRS which was developed in September 2007 and was subsequently revised in October 2017.

4.4 Fire safety guidance and advice is communicated to all residents at periodic intervals using the following methods:

- Sign up packs;
- SHG website with links to social media
- Letters to tenants including site specific fire action advice
- Articles in resident newsletters on fire safety
- Instant information posted on electronic notice boards in the blocks
- Working in partnership with Schools and Local Communities.
- Activities through the Partnership Agreement with GMFRS.

4.5 As well as on-going fire risk programmes such as the replacement of fire doors and type 4 fire risk works commenced in the Summer of 2019 to install sprinkler systems across all 22 high-rise tower blocks.

4.6 The sprinkler installation was expected to be completed in March 2021 however, the Covid-19 lockdown means completion was delayed until Autumn 2021. Sprinkler systems are also being installed in all new developments where necessary, for example extra care and supported housing schemes. Plans are also being investigated to extend the use of sprinklers to other existing high-risk schemes such as sheltered, temporary accommodation and supported housing.

4.7 Although SHG has a good track record of addressing and responding to fire safety issues the new Building Safety Bill and the 2021 Fire Safety Act and the Housing White Paper places more emphasis on accountability, compliance and data gathering and analysis. The work of the building safety team will ensure SHG address changes coming out of the Fire Safety Act and the Housing White Paper

4.8 The 22 tower blocks across SHG's portfolio which are currently classed as being "in scope" means all individual tower blocks will require a building safety case report to be delivered to the building safety regulator.

4.9 In preparation for the legislative changes, SHG have appointed a Head of Building Safety who is responsible for the management of a small building safety team. The team will meet the duties of the Safety Manager as identified in the Building Safety Bill.

4.10 At the time of writing this Strategy the appointment of the Accountable Person has not yet been made, however discussions are underway with the Council to ascertain who will take on this role, however, the lack of an Accountable Person is not preventing progress. The Head of Building Safety and the building safety team are working on a 12 months pilot project which started in March 2021. The pilot is concentrating on six tower blocks at Lancashire Hill and Mottram Street. After the 12 months pilot SHG will have a draft building safety case for Lancashire Hill and Mottram Street tower blocks. Learning from the pilot will then be used to formulate building safety cases for the remaining tower blocks and will help formulate future safety cases for other buildings should they become in scope.

5 STRATEGY OBJECTIVES

5.1 Stockport Homes Group has developed four strategic objectives on building safety. The objectives reflect the context, values and ambitions of the Group and the opportunities to ensure best practice is maintained on building safety. Each objective is accompanied by a set of actions that act as a starting point but given the current developments on building safety it is anticipated that further actions will be required as the Strategy is delivered. Any such actions will be added to the action plan as and when they are identified.

Objective one – Engage and involve residents in the fire safety of their homes and blocks.

5.2 One of the key objectives of the Building Safety Team is to visit all residents in the tower blocks and ascertain vulnerabilities which may impact their ability to be evacuated in the event of a major incident.

5.3 All residents in tower blocks covered by the safety pilot are being visited, and their personal circumstances assessed to see if they are classed as vulnerable and may need assistance to evacuate in case of an emergency. The vulnerability information will be shared with Greater Manchester Fire and Rescue (GMFRS) with permission from the resident, enabling GMFRS to identify and evacuate vulnerable people if a major incident occurs. The need for Personal Emergency Evacuation Plans (PEEPs) is currently being assessed by the Home Office should this become a requirement SHG will implement them across the high-rise stock.

5.4 The Building Safety Bill requires all Accountable Persons to produce a Resident Engagement Strategy to promote the participation of residents in the decision-making about building safety risks in their home and communal areas. SHG is, at the time of writing this Strategy, in the process of developing a Resident Engagement Strategy that will enable residents to flag up any safety matters, influence actions to mitigate safety risk and scrutinise SHG's safety legislation compliance measures. The engagement strategy will be supported by a resident panel that will act in an advisory role and be involved in endorsing the building safety case submission to the regulator.

5.5 The Building Safety Bill places an obligation on Accountable Persons to have transparent, clear and effective complaints process for residents to use when things go wrong. Complaints are reviewed by the Building Safety Manager and residents have the right to complaint directly to the safety regulator if concerns are not being addressed. There are opportunities for the information to be even more readily available including the use of a downloadable app for residents to access the most up-to-date building safety data.

5.6 SHG operates a "stay safe, stay put" policy in the event of a fire occurring in a block, which is an approach endorsed by GMFRS. There may however be exceptions to this approach and a whole-block could be required to be evacuated if ordered by the Fire Service attending an incident. SHG has a role in preparing residents for such a possible evacuation so evacuation advice leaflets are being provided for each individual dwelling in a tower, including designated markings and assembly points. The information has been shared with and endorsed by GMFRS. The evacuation approach may be supported by the installation of block evacuation alarm systems using capital investment programmes and SHG is investigating such solutions.

5.7 Should a mass evacuation of a tower block be triggered by the fire service SHG's emergency plan and the local authorities civil contingency plan would be instigated to offer residents support and advice.

Objective two – Understand and address potential fire risks

5.8 SHG receives information from the GMFRS on incidents related to SHG properties. The information provides a valuable insight into the types of incidents that are reported by residents. SHG marketing team uses the information to create campaigns for residents it also provides useful insight into the potential causes of fire. The success of the fire safety awareness campaigns and the partnership with GMFRS will be monitored to assess the impact of such approaches.

5.9 The Regulatory Reform (Fire Safety) Order 2005 (RRO) requires that Fire Risk Assessments (FRA's) are carried out in communal areas of sheltered schemes, high-rise, medium rise, low rise blocks, HMO's and supported housing. SHG ensures that all Fire Risk Assessments are undertaken by an independent fire risk assessor who is a member of the Chartered Institute of Fire Engineers. The Regulatory Reform Order (RRO) has recently been reviewed by the Home Office which has led to the introduction of the Fire Safety Act 2021. The new act incorporates the requirements of the 2005 RRO but now incorporates the external cladding of the building and balconies for inspection by the Fire Risk Assessor. SHG and the Risk Assessor are incorporating changes required by the new Fire Safety Act 2021.

5.10 There is a requirement under the new building safety bill to produce a safety case for each block over 18 meters high, which involves carrying out safety risk assessments. These are different to the fire risk assessments as the safety assessments focus on the whole building rather than specific key components such as fire doors. The favoured risk assessment method used in high-risk industries such as the Chemical, Nuclear and Aviation industry is the Bowtie risk assessment methodology. The Bowtie risk assessment provides a concise, visual depiction of risk. As part of the preparation for drawing up a building safety case each building in scope will have a bowtie risk assessment carried out with hazards, threats and barriers to mitigate the hazards identified. The risk assessments will be reviewed and updated on a regular basis and will form an important part of safety activities and may influence potential future investment.

Objective three – Provide safe buildings for SHG residents

5.11 SHG has a duty of care and a legal responsibility to ensure that all buildings and properties under its control are maintained so that they remain safe places for customers to live. There are six core areas of compliance - Electric, Legionella, Asbestos, Gas, Fire Safety and Lift servicing and maintenance. The purpose of the Compliance Framework is to provide the leadership team, Board and the council, as those with ultimate accountability for compliance, assurances that the organisation's compliance obligations are being met. The Social Housing White Paper includes details of adherence, recording and monitoring of the six core areas of compliance, which will form a crucial part of the building safety case. SHG has a robust system of compliance and record keeping in place however officers are examining even better ways of data gathering, storage and transparency of the information which will be made available to residents. An asset tagging system is being

introduced, where key components such as fire doors will be tagged with a Bar or QR code. The code will enable inspectors to scan the component therefore proving an inspection has taken place and necessary remedial measures have been enacted. In time the asset tagging system will allow residents, via a downloadable app, to access the information about the inspection regime of the component by scanning the Bar or QR code.

5.12 The External Fire Wall Review (EWS1) provides a way for owners of residential building owners above 18 meters in height to prove to lenders and valuers that the external cladding has been assessed by an expert. SHG has secured the services of a fire engineering company that is experienced in carrying out external wall finishes and delivering EWS1 forms. All 22 tower blocks under SHG's management will be assessed with the aim of achieving a minimum B1¹ EWS1 rating. The EWS1 form is valid for five years and once complete all information will be published to ensure transparency.

5.13 The Building Safety Bill requires the examination of the whole building for potential safety hazards rather than focusing solely on fire safety matters. SHG is carrying out external drone and structural investigations of tower blocks to ensure all buildings remain safe and where any defects are identified that remedial action is taken. SHG are commissioning surveys, which will provide 3D computer aided drawings of the in-scope blocks.

5.14 In February 2021 a Building Safety Competence Framework was endorsed by the Government. All SHG staff, contractors and consultants working in the buildings in scope of the building safety bill will need to demonstrate competencies associated with their role and responsibilities. Individual competence will need to be established and monitored on a regular basis to ensure the organisation and its workforce remain competent in its function to deliver safety and manage risks effectively. This will be an important factor when developing and setting out the requirements of the safety case regime and meeting the wider regulatory requirements, ensuring that SHG has robust systems, processes and a well-trained competent workforce aligned with a positive culture that puts residents at the centre of all decision making. This in turn will provide improved assurance to residents, members of the public, the council, board, and regulators. SHG's Learning and Development Team and Health and Safety Manager will examine how the requirements of the competency framework can be captured and implemented for key staff working on building safety and compliance related matters.

5.15 SHG are developing a Fire Risk Management Strategy for each building in scope of the Building Safety Bill which will identify fire risks and risk mitigation measures for the building in one document. In addition, officers are examining the introduction of a Building Safety Management System which captures all the organisations policies, procedures and processes for addressing safety risk; in due course it is possible that the Building Safety Management System could be submitted for BS-9997 accreditation.

¹ A B1 rating means that fire risk is sufficiently low that no remedial action is required.

Objective four – Achieve required building safety accreditation for all buildings in scope

5.16 The Board of SHG has overall responsibility for Health and Safety across the business, with the Audit and Risk Committee having a role in scrutinising delivery of business services. The Group Health and Safety Policy sets out that all Board Members must ensure that appropriate arrangements are in place to the delivery of health and safety obligations and a supporting culture. It is anticipated that the current arrangement will remain in place, however the impact the new legislation on the role of the board and its members is unclear. Similarly, the role of the council, the requirements of the Accountable Person and the sign off on the Building Safety Case prior to submission to the regulator remains unclear. The role of a resident's safety panels in influencing and scrutinising safety matters in their homes will need to be considered by board.

5.17 The Safety Bill requires information relating to the building in-scope to be captured and stored as a “golden thread” of Information in a building safety file. The information in the safety file must be held digitally and will ensure that the original design intent and any subsequent changes to the building are captured, preserved and used to support safety improvements. On new builds the duty holders (designers, engineers, contractors etc.) must start to collect the information during concept, design and construction stages. Once construction is complete, the information must be handed over to the Accountable Person.

5.18 On existing schemes SHG will collect all relevant information about individual tower blocks into bespoke building safety files. As information is gathered gaps in historic data will be identified and, where possible, information will be added. The safety file information will provide a secondary source of information for the building safety case and can be provided to the safety regulator as required.

5.19 Each building in scope will have a bespoke building safety case developed which will be submitted, as a Building Safety Report, by the Accountable Person on behalf of SMBC/SHG to the safety regulator setting out the case for granting a building assurance certificate. The Safety Case Report will be the vehicle through which the Accountable Person is able to demonstrate compliance with their ongoing duty to take all reasonable steps to prevent a major incident arising from the building safety risks and reduce the severity of any incident. The Safety Case Report can be reviewed and revised under the Accountable Person's own volition however the bill provides the power for the Building Safety Regulator to direct the Accountable Person to review the Safety Case Report.

5.20 The Building Safety Case Report will be submitted to the safety regulator to enable buildings in scope to be awarded a Building Assurance Certificate. A Building Assurance Certificate would not be issued by the Building Safety Regulator if the Accountable Person fails to meet the specified statutory obligations. Where an Accountable Person has failed or continues to fail to meet the statutory obligations under the Bill the regulator can issue a

series of compliance and enforcement notices. Ultimately, if the Accountable Person fails to adhere to the notices and the Building Safety regulator believes it is in the interests and safety of the residents a Special Measures Manager could be brought in to manage the building and ensure compliance with statutory obligations.

6 ACTION PLAN

6.1 The Strategy is supported by an action plan attached that will ensure delivery of the objectives. It will be reviewed over the life of the Strategy as more information is made available about the Government's specific intentions on building safety.

7 LINKS TO OTHER STRATEGIES AND POLICIES

7.1 This Strategy will influence and be influenced by several strategies and policies including the following:

- Group Health and Safety Policy
- Stockport Homes 30-year HRA Business Plan
- Stockport Homes 30 Year Asset Management Strategy
- Development Strategy
- Fire Safety Policy
- Multi-storey Fire Safety Policy
- Low-rise Fire Safety Policy
- Sheltered Schemes Fire Safety Policy
- GMFRS Partnership agreement

8 EQUALITY IMPACT ASSESSMENT

8.1 It is a key objective of this Strategy and the forthcoming legislation that residents are at the heart of building safety including the identification of vulnerable resident's needs.

8.2 One of the main actions of the Building Safety Team is to examine the vulnerability of residents which will be shared with GMFRS which in the event of a major incident, could identify people who need additional assistance from Greater Manchester Fire and Rescue Service. Vulnerability could include people with mobility issues, elderly, infirm, visually impaired for example.

8.3 All correspondence produced for customers will be in an easily understood format and in plain language ensuring vital information is easy to understand.

9 OWNERSHIP

9.1 The ownership of this Strategy is with the Operations Directorate and it falls under the remit of the Assistant Director of Assets and Development and the Head of Building Safety.