

Building Safety Policy London Borough of Hounslow

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1. PURPOSE

- 1.1 The purpose of this Building Safety Policy is to outline London Borough of Hounslow's comprehensive approach to ensuring the safety and well-being of residents, staff, and stakeholders across all buildings managed or owned by the LBH. This policy supersedes any previous versions and incorporates legislative requirements, including the Building Safety Act 2022, Fire Safety Act 2021, and related regulations.
- 1.2 This policy seeks to protect life and property by defining and executing building safety strategies that align with regulatory requirements and reflect lessons learned from significant incidents, such as the Grenfell Tower tragedy, which spurred transformative changes in building safety legislation.
- 1.3 The policy aims to foster a culture of safety, transparency, and proactive risk management, ensuring all high-risk buildings meet stringent safety standards throughout their lifecycle.

2. SCOPE

- 2.1 This policy applies to all employees, contractors, and partners involved in the management, maintenance, and occupation of London Borough of Hounslow's higher-risk buildings.
- 2.2 The policy covers buildings defined as 'higher risk' under the Building Safety Act, which includes residential properties at least 18 metres or seven storeys in height containing two or more residential units.
- 2.3 This policy also applies to other buildings deemed complex or high-risk based on factors such as building use, resident profile, and structural characteristics.
- 2.4 London Borough of Hounslow will incorporate updates from evolving building safety legislation and adjust the scope as needed to cover additional buildings.

3. DEFINITIONS

The Act

The Building Safety Act 2022, which became law in April 2022, was developed following Dame Judith Hackitt's independent review of building regulations and fire safety, commissioned after the Grenfell Tower tragedy in 2017. The Act introduces comprehensive reforms to support building safety across the industry, covering design, construction, and management of residential blocks classified as higher-risk buildings.

Accountable Person (AP) or Principal Accountable Person (PAP)

The duty holder legally responsible for a higher-risk building's compliance with the Act or the specific part of the building for which they are responsible. The PAP's key duty is to prevent and mitigate the severity of building safety incidents related to fire or structural failure.

Building Assessment Certificate

A Building Assessment Certificate is a formal document issued by the Building Safety Regulator, confirming that the Principal Accountable Person (PAP) has complied with the necessary legal requirements for managing building safety in a higher-risk building (HRB). The certificate is required when directed and serves as evidence that the PAP has submitted key safety-related documentation, including the safety case report, resident engagement strategy, mandatory occurrence reporting strategy, and agreements with other relevant accountable persons. Once granted, the Building Assessment Certificate must be displayed prominently within the building and is subject to renewal every five years to ensure continued compliance with building safety regulations.

Building Safety Case (BSC)

A comprehensive body of evidence demonstrating the identification, escalation, and resolution of fire and structural risks within an HRB, managed on an ongoing basis. The BSM oversees the management and review of the BSC on behalf of the PAP. A summary, known as the safety case report, is submitted to the Building Safety Regulator under specific conditions.

Building Safety Fund

A government-led fund aimed at protecting leaseholders from the costs associated with addressing fire safety risks stemming from unsafe non-ACM cladding systems on high-rise residential buildings. The fund is supported by the building safety levy.

Building Safety Levy

A government-imposed levy on developers of higher-risk buildings in England, designed to generate revenue for replacing defective cladding and remediating historical building safety defects.

Building Safety Manager (BSM)

A role, though not a specific requirement of the Act, which supports the PAP in developing building safety cases, implementing engagement strategies, and managing building safety risks. The BSM provides oversight of processes related to the management of higher-risk buildings.

Building Safety Regulator (BSR)

The regulatory arm of the Health and Safety Executive (HSE) established under the Act to oversee building safety across design, construction, and occupation. The BSR sets direction, monitors performance, and influences competence standards within the building control profession.

Duty holders

Individuals or entities appointed to maintain safety and quality standards relevant to higher-risk buildings. They ensure health, safety, and compliance through all stages of the building lifecycle.

Fire Safety Act

The Fire Safety Act 2021 clarifies and extends the scope of the Fire Safety Order 2005, applying it to building structures, external walls (including cladding and balconies), and flat entrance doors in multi-occupied residential buildings. Its requirements complement those of the Building Safety Act 2022 and the Fire Safety (England) Regulations 2022.

Gateways

A set of three approval stages overseen by the BSR for higher-risk buildings:

- **Gateway 1:** Planning approval, effective since 1 August 2021.
- **Gateway 2:** Transition from planning to construction.
- **Gateway 3:** Completion of construction, expected to be fully enforced by October 2023.

The Golden Thread

A principle for managing, storing, and sharing building information throughout a building's lifecycle, from design and construction to occupation and disposal. It serves as the definitive record for maintaining safety cases.

Higher-Risk Building (HRB)

A residential building defined in the Act as being at least eighteen metres or seven storeys high and containing two or more residential units. Secondary legislation, effective from 6 April 2023, mandates that HRBs must be registered with the BSR and comply with engagement and safety case requirements.

Regularisation

The process for certifying previously unauthorised building work without initial building regulation approval. The current regularisation procedure will apply to HRBs, with the BSR acting as the building control authority instead of the local authority.

4. POLICY

4.1 POLICY STATEMENT

London Borough of Hounslow is committed to:

- Full compliance with the Building Safety Act 2022, Fire Safety Act 2021, and other relevant regulations.
- A robust safety management system aligned with the “Golden Thread” principle for comprehensive building information management.
- Transparent and proactive resident engagement to foster trust and participation in safety measures.
- Developing and maintaining high levels of competence among staff and contractors involved in building safety.

4.2 Key Principles of the Act

4.2.1 Higher-Risk Buildings (HRBs):

Where applicable under the Act, London Borough of Hounslow will ensure that relevant duty holders for HRBs will:

- Conform to duty holder requirements and maintain competencies through design, construction, and occupation phases.
- Meet construction product requirements during construction, refurbishment, and remediation.
- Implement mandatory occurrence reporting processes for significant safety incidents during construction and occupation.
- Follow construction control plans and change control requirements throughout construction, refurbishment, and remediation.
- Maintain and update the Golden Thread for managing and sharing building information from design through to occupation.
- Follow the gateway submission and approval process during design and construction to ensure compliance.
- Possess valid completion or partial completion certificates before transitioning to occupation.
- Ensure a principal accountable person (PAP) is identified at handover and throughout occupation.
- Register HRBs with the Building Safety Regulator before occupation.
- Display valid building assessment certificates within the HRB, updating them every five years.
- Implement dedicated resident engagement strategies during occupation.
- Maintain a comprehensive building safety case and submit safety case reports as required by the Building Safety Regulator.

4.2.2 The Building Safety Regulator:

The Act empowers the Building Safety Regulator with enhanced enforcement capabilities, including imposing penalties for breaches of building regulations

under section 35 of the Building Act 1984, with maximum fines and prison sentences of up to two years. London Borough of Hounslow will:

- Meet all requirements outlined by the Regulator and respond promptly to any regulatory requests or compliance checks.
- Cooperate with enforcement actions and implement required remedial measures without delay.

4.2.3 Approved Construction Products:

London Borough of Hounslow will ensure governance procedures are in place to verify that contractors use approved construction products, as mandated by the National Regulator of Construction Products. This ensures that only products meeting established standards are applied throughout design, construction, refurbishment, and remediation.

4.2.4 The Golden Thread:

London Borough of Hounslow will undertake necessary measures to comply with the Golden Thread requirements, which provide a continuous, comprehensive record of building information. The Golden Thread will serve as the single source of truth for safety information throughout a building's lifecycle, supporting the development and ongoing management of safety cases.

4.2.5 Mandatory Occurrence Reporting:

A mandatory occurrence reporting process will be maintained to inform the Building Safety Regulator of any significant safety-related incidents concerning fire and structural issues in HRBs. This process will be outlined in specific policy guidelines, ensuring:

- Consistent identification and reporting of incidents.
- Review and update of reporting protocols as per the Regulator's guidance.
- Integration with the building safety management system.

4.2.6 Holding Developers to Account:

The Act introduces a revised limitation period for defect claims against developers under the Defective Premises Act. This extends the claim period to 15 years for new claims and up to 30 years for retrospective claims prior to 28 April 2022. London Borough of Hounslow will:

- Hold developers accountable for identified safety defects through remediation contracts and legal claims where necessary.
- Ensure leaseholder protections are applied during the remediation process to prevent undue financial burden.

4.2.7 **Enforcement:**

London Borough of Hounslow will adhere to and respond proactively to enforcement actions initiated by the Building Safety Regulator:

Design and Construction:

- Recognise increased penalties for non-compliance, including unlimited fines and prison terms.
- Address breaches under the Building Act 1984, ensuring corrective actions are taken within the prescribed 10-year period.
- Comply with compliance and stop notices issued by the Regulator or local authorities to halt non-compliant work.

Occupation:

- Respond promptly to compliance notices mandating corrective action within set timeframes.
- Implement urgent actions in cases where non-compliance poses an immediate threat to residents.
- Ensure adherence to enforcement protocols and document all responses and outcomes.

4.2.8 **Appeals Process:**

London Borough of Hounslow will maintain an internal review and appeals process to address disputes related to regulatory decisions. If required, appeals can be escalated to the First-tier Tribunal, ensuring due process is followed in all cases.

4.3 **Specific Initiatives**

- **External Wall Assessment Programme:** Conducting detailed inspections, including invasive testing, to identify and address risks posed by external cladding and other façade elements.
- **Fire Door Management Strategy:** Routine checks and documentation of fire door conditions, ensuring compliance with current regulations and prompt repairs.
- **Premises Information Boxes (PIBs):** Installation and regular updates to PIBs to provide critical building information for emergency responders.
- **Wayfinding Signage:** Ensuring clear, visible, and compliant signage for evacuation and fire safety purposes.
- **Safety Case Compilation:** Developing and maintaining comprehensive safety cases for all higher-risk buildings, documenting safety strategies and risk mitigation measures.

- **Waking Watch and Temporary Alarm Systems:** Deploying interim safety measures where necessary, transitioning to long-term solutions like integrated alarm systems.
- **Annual Building Safety Audits:** Conducting in-depth annual audits of each higher-risk building, reviewing risk management strategies, and recommending improvements.
- **Engagement Strategy Development:** Creating tailored engagement plans that incorporate resident feedback, ensure transparent communication, and maintain regular updates.
- **Golden Thread Implementation:** Leveraging digital tools to maintain an up-to-date, detailed record of building information and safety procedures, serving as a single source of truth throughout the building's lifecycle.
- **Construction and Refurbishment Controls:** Applying rigorous oversight to any construction or refurbishment work, with comprehensive change control procedures and coordination with the Building Safety Regulator.
- **Leaseholder Protections:** Adhering to leaseholder protection regulations to prevent undue financial burdens related to building safety remediation.

5. RESPONSIBILITIES

5.1 The Board:

Provides strategic oversight, ensures policy adherence, reviews performance, and allocates resources to support safety initiatives.

5.2 Executive Management Team (EMT):

Integrates this policy into strategic plans, oversees compliance, and coordinates with heads of service to maintain building safety.

5.3 Heads of Service:

Implement this policy within their departments, manage training programmes, and ensure compliance with safety procedures.

5.4 Building Safety Manager (BSM):

- Manages the execution of building safety policies and daily operational oversight.
- Maintains building safety cases and ensures compliance checks are performed regularly.
- Liaises with the Building Safety Regulator and other authorities to report progress and compliance.
- Provides expert guidance and conducts staff training.

5.5 Fire Safety Coordinator:

- Assists the BSM with administrative duties, documentation, and scheduling inspections.
- Ensures records are updated and accessible in the building information management system.

5.6 **Contractors and External Service Providers:**

- Must be pre-qualified to demonstrate competence in building safety tasks.
- Are required to adhere to London Borough of Hounslow's safety protocols and participate in compliance audits.

5.7 **All Managers:**

Facilitate training, monitor staff adherence to safety protocols, and ensure that safety duties are clearly defined.

5.8 **All Staff:**

Follow safety protocols, attend mandatory training sessions, and report potential hazards immediately.

5.9 **Residents:**

Are encouraged to participate in safety briefings, follow safety guidance provided, and report safety concerns.

6. **RESIDENT ENGAGEMENT**

6.1 **Resident Engagement Strategy:**

- Regular safety updates through newsletters, digital platforms, and community meetings.
- Establishing resident liaisons to act as points of contact for safety discussions.
- Integrating resident feedback into policy reviews and safety improvements.

6.2 **Feedback Mechanisms:**

- Multiple channels for resident feedback, including online portals, helplines, and designated community representatives.
- A documented process for responding to and acting on feedback, ensuring transparency and accountability.

6.3 **Education and Awareness:**

- Ongoing safety education through workshops, fire safety demonstrations, and digital tutorials.
- Distribution of comprehensive safety guides and visual resources outlining essential safety protocols.
- Creation of tailored educational programmes for residents with specific needs.

7. EQUALITIES

- 7.1 London Borough of Hounslow is dedicated to ensuring equality of access and treatment for all, adhering to the Equality Act 2010. Special provisions will be made for those requiring adjustments to participate in safety initiatives.
- 7.2 Communications will be provided in alternative formats upon request, including translations, large print, and audio formats.
- 7.3 An Equality Impact Assessment will be conducted for significant policy changes.

8. FEEDBACK AND CONTINUOUS IMPROVEMENT

- 8.1 Residents and stakeholders can provide feedback through the Group's Complaints and Compliments policy. This feedback will be used to review and improve safety practices.
- 8.2 A feedback loop will be established, where insights from residents and safety performance data inform future policy iterations.

9. MONITORING AND REVIEW

- 9.1 This policy will undergo an initial review every six months in its first year, followed by annual reviews to align with legislative updates and best practices.
- 9.2 Internal and external audits will be conducted, with results presented to the Board to monitor adherence and identify areas for improvement.
- 9.3 Key performance indicators (KPIs) will be established to track compliance and measure policy effectiveness.

10. RELEVANT LEGISLATION

- Building Safety Act 2022
- Fire Safety Act 2021
- Regulatory Reform (Fire Safety) Order 2005
- Health and Safety at Work etc Act 1974
- Approved Document B Vol 2
- Equality Act 2010

10.1 References

- HM Government. The Regulatory Reform (Fire Safety) Order 2005.
- Fire Safety Act 2021.
- Building Safety Act 2022 (and all associated Regulations).

- Approved Document B (ADB) - Fire Safety 2010 – Volume 1 Dwellings 2019 edition incorporating 2020 amendments – for use in England.
- BS 9999: 2017, Code of practice for fire safety in the design, management, and use of buildings.
- BS 9991: 2015, Fire safety in the design, management, and use of residential buildings - code of practice.
- BS 5839 Part 1: 2017, Fire detection and fire alarm systems for buildings. Code of practice for system design, installation, commissioning, and maintenance.
- BS 5839 Part 6: 2013, Fire detection and fire alarm systems for buildings. Code of practice for the design, installation, and maintenance of fire detection and fire alarm systems in dwellings.
- BS 5839-9: 2021, Code of practice for design, installation, commissioning, and maintenance of emergency voice communication systems in fire detection and fire alarm systems for buildings.
- BS 5266-1: 2016, Emergency lighting. Code of practice for the emergency escape lighting of premises.
- BS EN 12845: 2015 + A1: 2019, Fixed Firefighting Systems – Automated Sprinkler Systems.
- BS 9251: 2014, Fire sprinkler systems for domestic and residential occupancies. Code of practice.
- BS EN 1366-2: 2015, Fire resistance tests for service installations. Fire dampers.
- BS EN 13501-3: 2005 + A1: 2009, Fire classification of construction products and building elements. Classification using data from fire resistance tests on products and elements used in building service installations: fire-resisting ducts and fire dampers.
- BS 476 Part 6: 1989, Fire tests on building materials and structures. Method of test for fire propagation for products.
- BS 476: Part 24: 1987, Fire tests on building materials and structures: Method for determination of the fire resistance of ventilation ducts.
- BS 8519: 2010, Selection and installation of fire-resistant power and control cable systems for life safety and firefighting applications. Code of practice.
- BS EN 81-72: 2015, Safety rules for the construction and installation of lifts. Particular applications for passenger and goods passenger lifts. Firefighters' lifts.
- BS EN 81-73: 2015, Safety rules for the construction and installation of lifts. Particular applications for passenger and goods passenger lifts. Behaviour of lifts in the event of fire.
- BS 9920: 2015, Code of practice for non-automatic fire fighting systems in buildings.
- BRE Guide 187: 2014, External fire spread: building separation and boundary distances.
- BS ISO 3864 Part 1: 2011, Graphical symbols – Safety colours and safety signs – Part 1: Design principles for safety signs.
- BS 7974: 2001, Application of Fire Safety engineering principles to the design of buildings.

- BS PAS 911: 2007, Fire Strategies - guidance and framework for their formulation.
- BS PAS 7: Fire Risk Management System. Specification.
- BS 8300: 2009, Design of buildings and their approaches to meet the needs of Mobility Impaired People – Code of practice.

11. LINKS WITH OTHER POLICIES AND DOCUMENTS

- Building Safety Policy
- Fire Safety Policy
- Resident Engagement Strategy
- Health & Safety Policy
- London Borough of Hounslow Asbestos Policy
- Major Works Consultation Policy
- Complaints and Compliments Policy
- No Access Policy
- Fire Safety Communal Areas

DOCUMENT CONTROL

Version	Type of Change	Date	Revisions from Previous Issues
1.0	Initial Creation	05/03/2025	New Policy