

Higher-risk Building Safety Management System

Plan:

Understand the organisation including building safety risks and opportunities. Establish building safety objectives, policy, processes and resources required to deliver results in accordance with legislation.

Do:

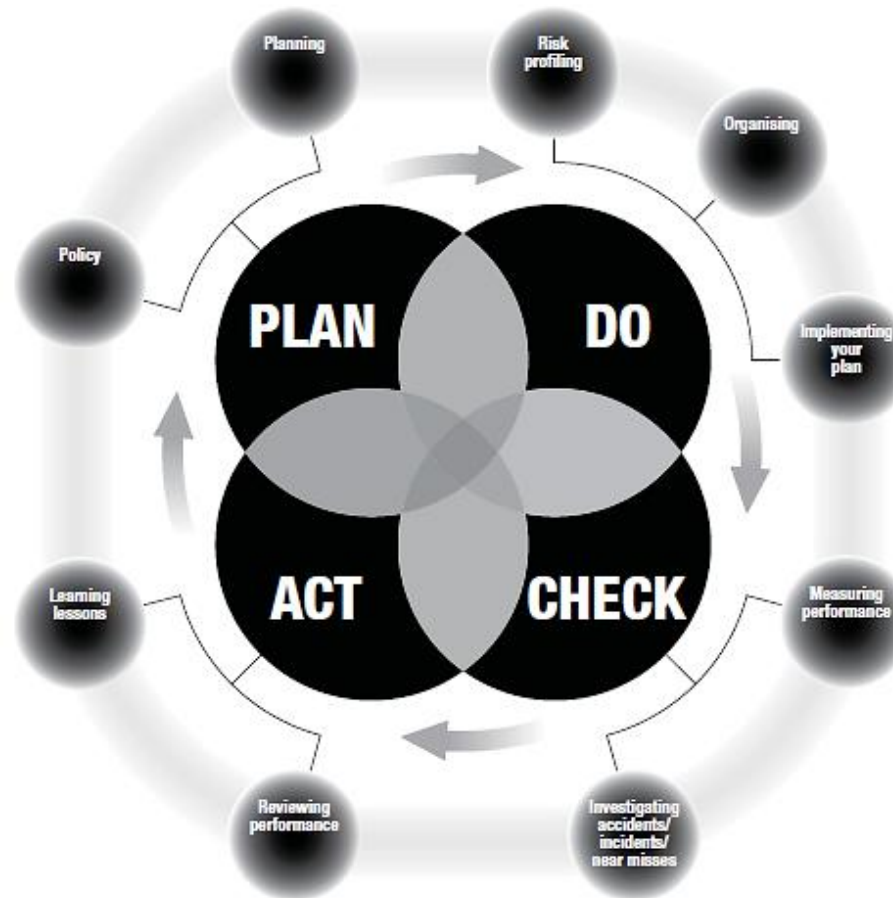
Implement the processes as planned to include stakeholder participation, hazard identification and emergency preparedness.

Check:

Audit, monitor, measure and evaluate activities and processes.

Act:

Take actions to continually improve including findings of incident investigations, addressing non-conformances and audit findings.



Higher-Risk Building Safety Management System (HRBSMS) V 1 January 2024 PLAN-DO-CHECK-ACT (PDCA)			Delivery Planning Blue shading = in progress with end date Green shading = completed or started and open-ended				
PDCA Sections	Elements	Descriptor	Delivery	Champion	Start	End	Output
Section 1 PLAN Policy and planning	1. Understanding of the organisation and context	Key issues that can affect residential building safety in Council’s higher-risk buildings	Capture in policy statement (see Elements 2, 3, 4, 5, 8 and 10e) (completed)				Signed policy statement or equivalent documented commitment
	2. Definitions and terms	Regulatory definitions and terms reflecting building safety legislation	Capture in policy statement (see Elements 2, 3, 4, 5, 8 and 10e) (completed)				Signed policy statement or equivalent documented commitment
	3. Scope of HRBSMS	The intent and parameters within which the HRBSMS can be used to attain its intended outcomes	Capture in policy statement (see Elements 2, 3, 4, 5, 8 and 10e) (completed)				Signed policy statement or equivalent documented commitment See:
	4. Statutory obligations	Statutory obligations set out in (not exhaustive): a) The Building Safety Act 2022; b) The Fire Safety Act 2021; c) The Fire Safety (England) Regulations 2022; d) The Regulatory Reform (Fire Safety) Order 2005; e) The Social Housing (Regulation) Act 2023; f) The Housing Act 2004; g) The Building Safety (Leaseholder Protections) (England) Regulations 2022;	Establish policies/ arrangements/ procedures to fulfil legal responsibilities to manage structural and fire safety risks in higher-risk buildings (completed)				Policies, including a legal index, and delivery plan For legal index see https://www.gov.uk/guidance/the-building-safety-act-secondary-legislation

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		h) The Building Safety (Registration of Higher-Risk Buildings and Review of Decisions) (England) Regulations 2023 as amended by The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023; i) The Higher-Risk Buildings (Keeping and Provision of Information) (England) Regulations 2023; j) The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023					
	5. Higher-Risk Building Safety Policy Statement	Statement of intent setting the framework to manage building safety within higher-risk buildings; approved by senior leadership	Capture in policy statement (see Elements 2, 3, 4, 5, 8 and 10e) (completed)				Signed policy statement or equivalent documented commitment
	6. Stakeholder (interested parties) engagement	Persons involved in delivery (staff); third parties (contractors, services, etc) regulatory bodies (LFB, Building Safety Regulator)	Identify key stakeholders and establish arrangements for active participation				Structure/role chart; third party contracts; records of meetings with regulatory bodies
	7. Resident/ leaseholder engagement	Participation of residents/leaseholders in decisions about their building's safety	Establish resident/leaseholder engagement procedures in harmony with corporate approaches (contact Research and Inclusion Team; Complaints & Member Enquiries Team).				Resident engagement strategy and delivery plan Consultation with third parties protocols

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							Tenancy contracts and sign-up records Leases and sign-up records
	8. Leadership and commitment	Critical to the success of the HRBSMS is leadership and commitment from senior leaders; expectation is that they will be champions of the HRBSMS providing the necessary resources	Obtain written commitment to policy and delivery plan (CEO sign policy statement?) (completed)				Signed policy statement or equivalent documented commitment
	9. Structure (roles, responsibilities, accountabilities and authorities)	Organisation of human resources to manage residential building safety. Identification of Accountable Persons (APs) and the Principal Accountable Person (PAP)	Scope and establish Building Safety structure; name and brief APs/PAP; identify and secure human resources				Structure/role chart; register of APs/PAP; recruitment to roles
	10. Building safety objectives	The core objectives of the HRBSMS: a) Buildings are safe and stay safe b) Residents voices are heard c) Council puts in place suitable and sufficient organisation and structure to deliver the HRBSMS d) Data systems are established to hold digital building safety	Capture in policy statement (see Elements 2, 3, 4, 5, 7 and 9e) (completed)				Signed policy statement or equivalent documented commitment

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		information (Golden Thread) e) Policy and strategy approved to establish commitment to the HRBSMS					
	11. Status assessment	Current compliance and roadmap(s) for enhanced performance	Leadership briefings/ Management updates (completed)				Report/ presentations to senior leaders/ boards/ committees
	12. Provision of resources & support	Who and what is required to achieve stated objectives	Identify and establish resources required to deliver the plan, including human resources				Structure chart/inventory of resources
	13. Competence and capability	Training, instruction, specialist advice to ensure competency of participants	Identify competencies and behaviours required to achieve the objectives				Competency framework; learning matrices; job/role descriptions
	14. Setting Key Performance Indicators (KPIs)	Measures of performance. #MORs (lagging) #Fire equipment breakdowns (lagging) #Fire door inspections (leading) %Blocks with gas safety info (leading) %action plan actions delivered (leading) #Bowtie updates (leading) #Managers trained in building safety (leading)	Identify active (leading) indicators as well as reactive (lagging) indicators.				KPI lists Linked with Element 31

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		#Resident communications (leading)					
	15. Registration of higher-risk buildings (HRBs) with the Regulator	Registration required by October 2023	87 HRBs registered (completed)				Registration documentation
	16. Building Assessment Certificate (BAC)	Certification by the Building Safety Regulator that the accountable person(s) for a higher-risk building are complying with their duties under part 4 of the Building Safety Act 2022	Apply for building assessment certificates once directed to do so by the Building Safety Regulator				Building assessment certificates
	17. Safety Cases and Reports	Part 4 of the Building Safety Act 2022 requires submission of a safety case report when applying for a building assessment certificate	Create a safety case and report for each higher-risk building				Safety cases and reports
	18. Golden thread information	A digital record (on one or more digital systems) of crucial building information – starting from the design phase and continuing throughout the building's life-cycle	Identify and establish digital data systems to allow golden thread information to be stored and managed and enable people to access and share and the information for occupied buildings				Digital data systems in operation

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Section 2 DO Risk management, organisation, implementation and operation	19. Delivery plan	Action planning to deliver statutory obligations and policy requirements	Team working with identified participants				Completed action plans
	20. Identification of hazards, opportunities and risks	Bowtie risk assessment is becoming the preferred method for managing risks amongst the Housing sector. The 7 Elements of a Bowtie Risk Assessment are Hazard, Top Event, Consequences, Threats, Mitigative Barriers, Preventative Barriers, and Degradation Factors	Complete bowtie risk assessments covering fire spread and structural failure risks across all 87 higher-risk buildings (completed)				Bowtie risk assessments – risk profiling using Bowtie completed Linked with Element 28
	21. Refurbishment/ construction products	Conform to construction products requirements through refurbishment and remediation	Identify relevant construction product regulations including published product standards prior to works				Documented policies, procedures and guidance
	22. Refurbishment/ construction control	Produced by the principal contractor, a construction control plan describes how building safety and Building Regulations compliance will be maintained and how change will be controlled and recorded in the design and construction phase	Identify construction control plan duties prior to works				Documented policies, procedures and guidance
	23. Competence and capability	Skilled, trained, and performing team	Train and instruct to ensure participants are competent; supervise to ensure arrangements are followed				Training records

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	24. Stakeholder engagement	Active participation of interested parties	Consult with residents; engage key Council staff; appoint and brief third parties; liaise with regulatory bodies				Records of active engagement/consultation
	25. Refurbishment/ construction works – control of safety	It is a requirement of legislation to demonstrate building safety through a new system of gateway points during refurbishment works	Deliver a construction control plan and change control requirements for refurbishment and remediation works				Gateway documentation
	26. Contractor oversight and control	Contractors working on HRBs adhere to established standards to work safely and leave building in safe state	Working with contractors policy and procedures developed/embedded (completed)				Safer Maintenance Procedure
	27. Mandatory occurrence reporting (MOR) system	A system which principal duty holders must establish and maintain to enable prompt reports of information regarding safety occurrences by the reporting person/s to the principal duty holders	Establish and operate an effective mandatory occurrence reporting (MOR) system meeting the prescribed requirements (completed)				MOR policy, procedure and tracker approved by BSB April 2024
	28. Manage building safety risks	Eliminate hazards and reduce risks	Take all reasonable steps to manage building safety risks and ensure mitigations/emergency measures are available should they be required				Bowtie risk assessments/risk profiling completed Three blocks fitted with aircraft warning red lights DSEAR assessments

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							Cadent building management reports Structural Assessments Linked with Element 20
	29. Handover certification	Before new-build/refurbished buildings can be occupied a completion certificate must be issued by the Building Safety Regulator	Ensure a valid certificate is received before handover and occupation and displayed in relevant building				Certificates
Section 3 CHECK Performance measurement and monitoring	30. Auditing (internal and external)	The examination or inspection of safety system elements by an auditor to make sure that participants are following the documented safety system	Engage auditors, conduct audits, act on findings.				Audit plan
	31. Monitor Key Performance Indicators (KPIs)	Measures of performance.	Monitor active (leading) indicators as well as reactive (lagging) indicators.				KPI lists Linked with element 14
	32. Top management review	A formal, structured meeting which takes place at intervals and involves top management; a critical and required part of running a recognised Safety Management System	Review reports to top management (completed)				Review documentation and record of meetings

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	33. Monitoring of changes in legislation and statutory obligations	Legislation pertaining to residential building safety is evolving as a more stringent regulatory regime is established	Subscribe to legislation update services and evaluate/act upon relevant changes (completed)				Timely updates
	34. Monitoring systems (including inspection, bowtie risk assessment review, sampling and surveys)	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review
	35. Monitoring of procurement, outsourcing and contractors	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review
	36. Effectiveness of information, data and communications management	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review
	37. Monitoring of competence and capability, including behaviours	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them	Develop Critical Friend Review process				Documented Critical Friend Review

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		confidence that the project is on track					
	38. Review of effectiveness of leadership, resources and support	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review
	39. Review of Mandatory Occurrence Reporting system	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review
	40. Evaluation of legislative (and other) compliance	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review
	41. Evaluation of competence and capability (including behavioural)	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review

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	42. Monitoring of Building Safety objectives	Feedback opportunity to provide structured advice and support to delivery teams, stakeholders and policy drivers giving them confidence that the project is on track	Develop Critical Friend Review process				Documented Critical Friend Review
	43. Review performance	Learn from incidents, monitoring data, errors and relevant experience, including from other organisations	Identify root causes of incidents and errors and act on findings				Revised plans Benchmarking with other housing providers
Section 4 ACT Evaluation and Continual Improvement	44. Lessons learned	Take action on lessons learned, including from audit, critical friend reviews and mandatory occurrence reporting	Revisit plans, policy documents and risk assessments to see if they need updating				Mandatory Occurrence Reporting policy, procedure and tracker Revised plans
	45. Emergency preparedness	Emergency management and business continuity	Co-ordinate with Council Emergency Response Service to establish incident response procedures (Completed)				Incident response procedures plus fire strategy