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# Sovereign Network Homes Fire & Building Safety Policy November 2023

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Owner: Director of Compliance and Planned Works	Last reviewed: November 2023	Date of next review: November 2024

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#### **Version Control**

**Guidance:** When a document has undergone **major changes** requiring approval, the version number must change - e.g., from V1.0 to V2.0. When a document has undergone **minor changes**, not requiring approval, only the number after the decimal point must change - e.g. from V1.1 to V1.2. When a document is reviewed but no changes are made, the number after the decimal point must still change.

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#### Introduction

On 1<sup>st</sup> October 2023 Network Homes changed its name to Sovereign Network Homes (SNH) when it merged with Sovereign to become Sovereign Network Group (SNG). This was the existing policy in operation for former Network Homes stock which has been updated to reflect changes in legislation. This policy relates solely to former Network Homes stock as a separate policy remains in operation for former Sovereign stock.

This policy is designed to detail how Sovereign Network Homes (SNH) proactively manages fire and building safety across its buildings. This policy applies to the entire portfolio where SNH ('we, us') have duty of care and applies to those buildings managed by SW9 Community Housing.

#### **Policy Statement**

SNH have a duty of care and are committed to ensuring customers, employees and visitors can use the relevant buildings and facilities safely. This extends to mitigating the risks associated with fire and structural risk in its properties.

SNH' duties are set out primarily in the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety Regulations 2022, the Health and Safety at Work etc. Act 1974, the Building Safety Act 2022, the Higher-risk Buildings (England) Regulations 2023 and all relevant and applicable regulations.

Detailed list of relevant regulations, guidance and industry best practice is set out in section 16.

# **Policy Objectives**

Fire can result in loss of lives or cause severe harm to people, property and reputation. To ensure effective management of fire risks, in all managed buildings, SNH have identified the following objectives:

- Comply with the relevant fire and building safety legislation, regulations, standards and best practices.
- Provide adequate fire prevention, protection, response measures and management processes.
- Ensure all high rise buildings have a satisfactory building safety case published from October 2023 that is completed to a standard that will be certified by the Building Safety Regulator when called for.
- Provide a safe and secure environment for the residents, staff and visitors of our properties, by conducting regular fire risk assessments of all relevant buildings,

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- implementing appropriate fire prevention and protection measures, and providing adequate fire and building safety information and training to relevant persons.
- Ensure adequate records and quality monitoring systems are implemented.
- Monitor and review the fire and building safety performance by collecting and analysing fire incident data, conducting audits and inspections, and reporting on the effectiveness of our fire safety management system.
- Establish and agree fire and building safety management key performance indicators (KPIs) with the Board and Executive team.
- Report to the Board and Executive team on the progress against KPIs
- Continuously improve the fire safety standards and practices by identifying and addressing any gaps or weaknesses in the safety management system, engaging with relevant stakeholders and partners, and adopting best practices and innovations in fire and building safety.

## **Roles and Responsibilities**

## **Responsible Person**

In accordance with fire safety legislation there is a requirement to have an identified 'Responsible Person'. This can be a named person or organisation. In this instance, SNH Limited is deemed the 'Responsible Person'. The key teams involved with leading fire safety compliance are:

#### The Board

- Review and be familiar with the policy.
- Proactively seek robust assurance that SNH meet its fire and building safety regulatory requirements and implement measures in this policy.
- Review safety compliance reports against KPIs.
- Ensuring their business complies with the Regulator's Home Standard and all consumer protection duties.

#### **Deputy Chief Executive**

- Retains the overall responsibility for the implementation of this policy.
- Review safety compliance reports against KPIs
- Delegate strategic management of fire and building safety to nominated Executive leadership team.

#### **Executive Director of Operations**

- Act as the nominated person for fire and building safety.
- Ensure adequate resources are made available to implement measures in this policy and any associated procedures and processes.
- Review safety compliance reports against KPIs

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• Delegate operational management of fire and building safety to nominated Director.

#### **Director of Compliance and Planned Works**

- Ensures operational delivery and implementation of this policy and associated procedures and processes.
- Plan and implement measures in this policy.
- Establish, consult and agree on KPIs. Produce performance reports on KPIs to the Board and Executive team.
- Delegate day-to-day operational responsibility and management of this policy.
- Arrange for liaison and consultation with relevant cross-functional teams to implement this policy.

#### Fire & Building Safety Contracts Manager

- Ensure the day-to-day fire and building safety operational tasks are completed.
- Ensure delivery of operational requirements set out in legislation.
- Ensure staff across the business are appropriately trained in contributing to the management of fire and building safety management.
- Maintaining relationships with the Fire & Rescue Services.
- Manages the day-to-day fire and building safety compliance.

#### **Building Safety Case Manager**

- Ensure all high-rise buildings are recorded and records are reviewed and maintained.
- Ensure high rise buildings are registered with the regulator where SNH is responsible.
- Ensure key building information is submitted to the regulator where SNH is responsible.
- Ensure that third parties are meeting their obligations where SNH is not responsible.
- Create and maintain a safety case for each high rise building where SNH is responsible.

# **Principal Accountable Person (PAP)**

Under legislation all buildings classified as 'high rise residential building' (HRRB) are required to have a 'Principal Accountable Person' identified, this can be different to the 'Responsible Person' and can be a named person or organisation. Like the 'Responsible Person' SNH is classified as the 'Principal Accountable Person' for buildings they manage with the Deputy Chief Executive and the SNG Board having ultimate responsibility and control for fire safety within SNH buildings.

Where SNH manage properties which are not owned by SNH, the 'Principal Accountable Person' will be set out in the terms of the management agreement or lease. If SNH are not the 'Principal accountable Person', we will be identified as an 'Accountable Person' and therefore still have responsibility to ensure that the 'Principal Accountable Person' for that property is meeting all legislative requirements were required and follow processes dictated in legislation e.g. mandatory occurrence reporting.

# Non managed / owned properties

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Where SNH own dwellings within buildings where we are not the freeholder that are not managed by SNH, the 'Responsible Person/Principal Accountable Person' would be responsible for fire and building safety requirements within the building, unless specified otherwise in the lease or management agreement.

# **Head Leased Properties**

SNH will ensure that written agreements are in place for properties where it holds a head lease that clearly define responsibility for fire safety within the building.

Where SNH holds a head lease but is not responsible for fire safety within the building. SNG will ensure that the Responsible Person meets all legislative requirements and may consider taking legal action should they not meet these requirements.

#### 1. Our Commitments

SNH will ensure that:

- 1.1 We are compliant with the requirements of the Regulatory Reform (Fire Safety) Order 2005, article 24 of the Fire Safety (England) Regulations 2022 and Fire Safety Act 2021. This includes ensuring that fire risk assessments are completed for all relevant accommodation we own, manage, or occupy, to identify the risks to which customers are exposed and take appropriate measures to minimise the risk to life and property from fire. These assessments now incorporate an assessment of the structure, external walls including balconies, windows and doors.
- 1.2 In line with the Building Safety Act 2022 and Higher-Risk Buildings (England) Regulations 2023, we will ensure all buildings over 18m and/or 7 stories in height are registered with the Building Safety Regulator (BSR) and that there is a comprehensive building safety case produced to support the management of each building.
- 1.3 We are committed to ensuring the golden thread is maintained through the lifecycle of the building, and residents have access to all necessary information relevant to the building they live within.
- 1.4 All buildings applicable to the Fire Safety Regulations (England) 2022 have a Building Safety Case, which is up to date and relevant. Building Safety Cases for all HRRBs on SNH stock have been created as of 1<sup>st</sup>October 2023 and are now live documents. We have a running programme of inspections and assessment to fill gaps in the safety cases. This programme has a target for completion by April 2025.
- 1.5 We are also committed to introducing and maintaining mandatory occurrence reporting procedures and an emergency incident plan in our high-rise buildings. We have a target for introducing these documents of 1<sup>st</sup> April 2024.

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- 1.6 We are committed to ensuring that all our high-rise residential buildings have an appropriate building risk assessment focused on the risk associated with spread of fire and structural failures and that a safety management system is in place to ensure safe occupation and operation of these buildings.
- 1.7 We have engaged in a Primary Authority Partnership with the London Fire Brigade and have positive working relationships with local fire authorities and local housing authorities. We work closely with them to comply with any orders they issue in writing and seek advice on the risks identified. Members of our Fire & Building Safety Team meet with fire authority representatives from their headquarters and local branches regularly and whenever requested to discuss best practice.
- 1.8 Fire safety is a paramount consideration whenever we build or acquire new homes. We employ specialist consultants or contractors to ensure that all passive and active fire protection are in place along with the appropriate fire strategy. We ensure that the data to evidence this is transferred to the correct parties at the right intervals to ensure a consistent approach to fire safety management.
- 1.9 We have stock condition data for approximately 95% of our tenanted stock. Sixty-five percent of that data is actual, with the remaining 30% being cloned. All data includes Housing Health & Safety Rating System (HHSRS) assessment of fire risks. Action is taken to rectify any identified hazards.
- 1.10 We are committed to ensuring we record and maintain a 'golden thread' of information on the lifecycle of our high rise building portfolio through the relevant 'Gateways' to store and maintain information on the construction.
- 1.11 We have a relevant resident engagement strategy which has been adapted for application to high rise residential buildings.
- 1.12 We are committed to providing residents within scope of the Fire Safety (England)
  Regulations with an annual communication containing fire safety information relevant to their buildings. This will include details of their fire strategy, information about fire doors and general fire safety information as a minimum.
- 1.13 As set out in section 14 of the policy, we are committed to ensure we do all that is reasonably practicable to identify and support our most vulnerable residents from fire safety risks.
- 1.14 We have accurate electronic recording-keeping of all servicing and maintenance of fire safety equipment and assessments, which we will share with the local fire authority, as required.

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1.15 All relevant staff will receive training appropriate to their duties under the Regulatory Reform (Fire Safety) Order 2005 and the Fire Safety Act 2021. Those with delegated responsibility for fire safety receive training on their roles and responsibilities.

#### 2. Staff Responsibilities

- 2.1 All staff should look out for danger signs and fire hazards. Any fire safety concerns must be reported immediately to the Fire & Building Safety Team.
- 2.2 All fire incidents should be reported to the Fire & Building Safety Team.

#### 3. Customer Responsibilities

- 3.1 The responsibility for fire safety in all individual private domestic properties that are not sheltered, intermediate shared accommodation (cluster properties) ,or supported housing lies with the individual, rather than on SNH, including carrying out regular tests of their individual fire detection system. However, we support our residents wherever we can and publicise the importance of fire safety to all customers, regardless of tenure.
- Those living in sheltered or supported accommodation, will have their part 6 fire detection tested every year by a SNH representative or contractor to ensure it is working as expected. Residents have a responsibility to inform SNH of any vulnerability they have which may affect their ability to respond to a fire.

#### Oxygen Storage

- 3.4 The actions of customers may affect the fire safety of a building. Some customers will have stored oxygen in their properties for medical reasons. Oxygen aids combustion, therefore, sources of heat or open flames in the vicinity should be minimised. It is the responsibility of the customer to inform us of the presence of oxygen equipment in their residence.
- 3.5 Where we are aware that oxygen is stored at the property and where a customer has not already done so, we will notify the relevant fire authority of the presence of stored oxygen. Where appropriate, signs posting a warning against smoking or other high-risk activities in the area will be used.

Items in communal areas

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- 3.6 Customer's items left in communal areas can be a source of ignition and support combustion, as well as potentially blocking escape routes. For this reason, SNH has a zero-tolerance policy in buildings where there is no on site presence and storage of items in these communal areas is not allowed without our express prior permission.
- 3.7 TORT notices are displayed within the communal areas of all purpose-built blocks of flats.

  The TORT Notice is issued to residents living in converted properties confirming SNH' zero tolerance to items in communal areas. This TORT Notice enables us to remove any items that are left without permission, without prior notice.
- 3.8 In the event there are items on an individual's balcony or terrace which is deemed a fire risk by SNH' legal proceedings will be followed to obtain an injunction to remove the items, or to seek procession for a breach of their lease or tenancy. SNH will seek to recover all associated legal costs.

#### **Balconies**

- 3.9 It's important that balconies are free from sources of ignition, and combustible items are kept to a minimum to mitigate the risk of fire spread externally up the façade. For this reason, we do not allow patio heaters or any other source of ignitions to be stored. Where any unauthorised items are found, we will contact resident/s to request their removal. Further action may be taken against the resident should this request not be fulfilled.
- 3.10 If there are items deemed a fire hazard on balconies, we will proceed with legal action again the leaseholder or tenancy for a breach of lease or tenancy. We will seek to recover all associated costs.

#### Barbeques

- 3.11 Barbeques are considered to be 'open fires' and, in accordance with Fire Authority advice, are not permitted within any of our buildings including any balcony areas, which are considered extensions of buildings.
- 3.12 Barbeques pose an unacceptable fire risk when used on balconies because they can easily burn out of control and cause combustible materials in the area to ignite, which can spread inside the property. Using a barbeque on a balcony can also pose a high risk of carbon monoxide poisoning.

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3.13 If residents repeatedly ignore the 'no barbeque' approach on balconies, legal proceedings will commence for a breach of lease or tenancy.

**Security Grilles** 

- 3.14 Customers (including leaseholders) should not fit metal security gates to their homes without obtaining prior permission from us first. As gates of this type can often hinder entry to and exit from the premises for purposes of evacuation and firefighting, permission will rarely be given for these to be fitted.
- 3.15 Where customers have already fitted metal security gates and these have been identified as an unacceptable fire risk in the fire risk assessment, we will request for them to be removed. If necessary, we will take action in line with the tenancy agreement to ensure they are removed and will recharge residents the cost of the work where necessary.

**Mobility Scooters** 

3.16 SNH recognises the benefits of mobility scooter use for residents with mobility problems. We are committed to using a mobility scooter application and management process to ensure the safety of all residents is not compromised while enabling residents with mobility problems to remain independent in their daily lives. Please refer to the Mobility Scooter Policy for specific details.

#### Exceptions

3.17 We will not permit exceptions to the application of the above policies.

Electric bikes (e-bikes) & E-scooters

3.18 Electric bikes and E-scooters are becoming common modes of transport. These must be stored and charged within residents' homes if there is no dedicated, purposely allocated, bike store. If these e-bikes or e-scooters are sighted within the communal areas, they will be removed with immediate effect without prewarning due to the risk and hazard presented. Due to an increase number of fires resulting from EV batteries within electric bikes and Escooters we actively encourage the importance of safe charging within homes, through guidance on SNG's website.

#### Suited key systems

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- 3.19 SNH works hard to unify locks on commonly used areas, whilst ensuring the integrity of the fire door certification is not compromised. Any door replacements to communal doors will have FB locks or approved GERDA suited locks, suitable for those needing to access these areas.
- 3.20 The specification of locks is also recommended for all new developments.

#### 4. Audit, Compliance and Review

Fire Safety Audit

- 4.1 The SNH Internal Audit Team undertake annual audits of the Fire Safety to ensure operational compliance.
- 4.2 SNH have longstanding agreements in place with the Primary Authority, who act as an independent auditor of our services. Our current Primary Authority partner is the London Fire Brigade and their agreement is a rolling annual agreement.
- 4.3 SNH will ensure that specialist passive fire safety works are undertaken by competent and where appropriate 3<sup>rd</sup> party accredited contractors. SNH will arrange for a sample of on site audits to be undertaken by the relevant accredited bodies to provide further assurance that works have been completed correctly.

#### Contractors

- 4.4 SNH has appointed appropriate accredited contractors to undertake the servicing and maintenance of fire safety equipment following a robust procurement exercise.

  Accreditations and memberships are reviewed annually to ensure they are competently trained to work on fire safety equipment.
- 4.5 SNH Fire Safety contractors are required through the terms of their contract to immediately report any incidents and or fire risks to the Fire & Building Safety Team
- 4.6 SNH publishes KPIs to a range of committees within our governance structure on fire safety compliance to demonstrate performance in accordance with legislation which include fire risk assessments and fire doors inspections.

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#### 5. Records Keeping

- 5.1 We will manage compliance and keep accurate records, which are stored and updated by the Fire & Building Safety Team.
- 5.2 Fire risk assessments, fire risk assessment actions and fire door inspection data are recorded and managed via our Riskhub platform. Fire safety equipment servicing information is recorded and managed via our Rowanwood Apex system.

#### 6. Contractors

- 6.1 SNH' Director of Compliance and Planned Works has responsibility to all compliance.

  Servicing and maintenance contracts have been procured accordingly and competent contractors engaged to conduct the necessary servicing and maintenance of fire safety equipment; and ensure compliance with all relevant health and safety and fire legislation.
- 6.2 Annual reviews of contractor health and safety procedures as well as regular review of contractor compliance and performance will be carried out.

#### 7. Door Inspections and remediation works

- 7.1 In line with legislation, SNH inspect all fire doors within buildings over 11m in line with legislation. Communal fire doors are inspected every quarter, and flat entry fire doors are inspected annually. In accordance with the terms of leases and tenancies, residents are required to provide access. SNH may proceed with legal action for a breach of lease or tenancy if a resident fails to provide access.
- 7.2 Any remediation works identified to the doors as a result of the inspection will be programmed in accordance with the risk associated.
- 7.3 If a fire door is found to be beyond repair, the Fire & Building Safety Team will liaise with the term repairs contractor to carry out a temporary replacement before arranging a permanent replacement.
- 7.4 All identified fire doors are tagged using a QR system before being recorded on a database.

  SNH uses a system called Riskhub to record these assets, record inspections and the findings.

  The system is also utilised to manage programme of works.

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#### 8. General Precautions

Fire Detection in Properties

- 8.1 All dwellings rented out by SNH (excluding leasehold and shared ownership) will have battery operated fire detection systems installed on each floor as a minimum standard. An ongoing programme of installing hard wired smoke/heat detection is in progress as part of a planned programme of domestic electrical testing, void improvement works and cyclical works contracts.
- As a minimum SNH ensures that all properties have LD3 detection installed. A part of the domestic electrical testing programme LD3 detection is upgraded to LD2 detection in line with BS 5839-6:2019. All rented properties with a gas supply are also fitted with a carbon monoxide detector, which is checked and tested as part of the annual Gas Safe inspection.

Fire Detection in Communal Areas

8.3 Where it is deemed appropriate in the recommendations of site-specific Fire Risk Assessments, communal areas will also be fitted with mains operated fire detection systems, these will be link within dwellings where appropriate.

Fire Detection Maintenance

8.4 Maintenance of fire detection systems will be carried out accordance with Manufacturers' instructions. Where works are refused by the resident, we will treat the situation sensitively but will be clear that the work must be completed to ensure the health and safety and others in the property. Given the importance of the system, this may result in legal action being pursued for a breach of lease or tenancy.

Extra Fire Detection

8.5 We will respond appropriately to meet the needs of residents who inform us they have a disability such as a hearing impairment and install appropriate equipment to ensure they are alerted in the event of a fire.

Fire Safety Equipment

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- 8.6 We will ensure that all shared and supported housing properties and communal areas of other tenures are appropriately equipped with fire protection equipment and emergency lighting, fire doors, dry risers and safety signs, as advised by a fire risk assessment.
- 8.7 Fire extinguishers found in communal areas will be removed to prevent untrained occupants from attempting to tackle a blaze. Extinguishers will be supplied within areas where staff have been adequately trained or risk areas that have been identified. For example
  - Sheltered scheme manager's offices.
  - Lift motor rooms.
  - M&E plant room.
  - Electrical intake cupboards where necessary.
- \*please note the above list is not exhaustive
  - 8.8 SNH does not have extinguishers in offices that are occupied by people not employed by SNH as it cannot be guaranteed that workers have been appropriately trained.

Fire Safety Equipment Maintenance

- 8.9 We will ensure that all fire safety equipment including fire protection equipment, fire alarms, emergency lighting, dry risers, sprinklers etc. are maintained and serviced in line with regulation/best practice and/or manufacturer's instructions.
- 8.10 Servicing and maintaining fire safety equipment is very important, therefore if access is not gained to test life safety equipment, despite request made in line with tenancy agreements or leases, legal action will be taken against the resident. This is always deemed a last resort but is necessary for us to safeguard the occupants and other residents living in the building. We will always seek to recover any associated costs.

On occasion there may be a deviation between maintenance regimes dictated by British Standards and that which we deliver. This will only happen following consultation and with the agreement of our fire safety consultant and with consideration to the risk profile of the building and its occupants.

8.11 Our maintenance regime frequencies are set out in the below table:

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Equipment Type	Frequency of Testing Regime
Sprinklers/Suppression Systems	Annual
AOV	Monthly
Emergency Lighting (flick test)	Monthly
Emergency Lighting (duration test)	Annual
Fire Alarms	Quarterly
Dry/Wet Riser Testing	Twice annually
Fusible Links	Annual
Fire Blankets	Annual
Extinguishers	Annual
Stand alone additional aids (vibrating plates and pillows, beacons, etc.)	Annual
Fire curtains	Annual
Evacuation Systems	Annual

8.12 Please note that fire alarms are tested weekly to ensure that they operational at high rise, sheltered and supported living blocks. These tests can be completed by trained contractors, SNG staff or representatives working within the buildings (supported agencies). We also conduct weekly testing at blocks which have an evacuation strategy.

#### Way finding Signage

8.14 In accordance to the Fire Safety (England) Regulations 2022 all existing high-rise (18 metres or 7 storeys, whichever comes first) residential buildings require wayfinding signage. All buildings over 11m built since 23 January 2023 also require way finding signage. This includes clear markings identifying floor and individual flat numbers. These are inspected regularly to ensure they remain fit for purpose.

Secure Information Boxes (SIB), formally known as Premises Information Boxes (PIB)

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- 8.15 SNH ensures that all sheltered housing properties and building over 18 metres in height have SIBs installed. These high security GERDA boxes have a suited lock to ensure the Fire & Rescue Services have easy access.
- 8.16 The SIB boxes are regularly inspected and maintained to ensure that contain all relevant property information and access keys for the emergency services to utilise.
- 8.17 All buildings over 18 metres have floor and vertical plans stored within the SIB boxes, which again are audited regularly by SNG staff. These plans have also been uploaded on to the Fire and Rescue Services' portals.

#### Fire Action Notices

- 8.18 All buildings subject to the Regulatory Reform (fire Safety) Order and Fire Safety (England Regulations) 2022 will have a fire strategy. Guidance on the strategy will be detailed on the Fire Action Notice, which is typically placed in the entrance/lobby of the block.
- 8.19 As part of the tenancy 'sign up' process, the new resident is notified of the specific fire strategy for the building they occupy.
- 8.20 Leaseholders are notified of fire strategy for their building through the information pack provided to their solicitor as part of the sale.
- 8.21 All residents living in buildings within scope of the fire safety (England) regulations will be provided with reminders annually of the fire strategy specifically for the building the occupy annually. Residents will also be able to access this information themselves through the Riskhub Hub via SNG's website, and or the dedicate Fire & Building Safety Team.

#### Portable Appliance Testing (PAT)

8.22 Any portable electrical appliances (such as vacuum cleaners or toasters) are provided by SNH, regular checks and testing will be carried out in line with The Electricity at Work Regulations 1989. More details of this testing regime can be found in the Electrical Policy.

#### Furniture

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- 8.23 In all residential properties where furniture is provided, whether in common areas or as part of a furnished tenancy, furniture will be fire retardant in compliance with the Furniture and Furnishings (Fire Safety) Regulations 1988.
- When providing or replacing furnishings provided in communal and or shared areas within a building, SNH will ensure it meets BS 7176:2007.

#### **Additional Safety Measures**

- 8.25 All residential SNH tenanted properties (including mutual exchanges) will receive:
- An annual landlords gas safety check (only undertaken where there is a gas supply within a property).
- A five year electrical safety test both within general needs accommodation and in communal areas, thereby reducing the risk of fire from faulty electrical systems.
- Where a property is re-let, there will be an additional gas safety check and electrical safety test.
- 8.26 Warden call lines and remote monitoring systems are managed by an external provider who provides staff 24/7 to react to calls and activations from the fire alarm systems. These lines are tested weekly as part of the fire alarm test and are serviced annually by the maintenance provider.

#### 9. Fire Risk Assessments

- 9.1 Fire Risk Assessments are conducted by a BAFE accredited consultant.
- 9.2 We will retain written records of the risk assessment for at least five years or until one year after a new assessment has been completed and any fire precautions put in place to address the risks identified.
- 9.3 SNH currently provides customers access to all Fire Risk Assessments via the Riskhub Residents Hub. This applies to all buildings SNH are deemed the responsible for conducting the Fire Risk Assessment. The Riskhub Hub hold live copy of the fire risk assessments and any associated actions. The Riskhub Hub is accessible via the SNG website.

Fire Risk Assessment Scope

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9.4	As a minimum standard, where applicable, all accommodation owned, managed, controlled
	or occupied by SNH will have a type 1+ Fire Risk Assessment. This Fire Risk Assessment
	incorporates details set out in PAS 79-2 and includes a 10% sample of flats within the survey.

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- 9.5 All buildings over 18m or 7 storeys, whichever comes first; will have a type 2 FRA by 31 March 2024. Should any significant defect be identified, our Building Safety Operations Group (BSOG) will decide if a Type 4 FRA is required.
- 9.6 Type 2, 3 or 4 fire risk assessments may also be undertaken when it is deemed that a further level of inspection is required.

#### Fire Risk Assessment Frequency

- 9.7 The Regulatory Reform (Fire Safety) Order 2005 is not prescriptive and does not define how often fire risk assessments should be undertaken or reviewed. However, as a minimum, we will undertake/review fire risk assessments:
  - Within the buildings risk based timescale (detailed in 8.4).
  - Following a fire, near miss or threat of arson investigation that recommends a review.
  - Following any significant changes to the type of occupants within a building that the
    previous fire risk assessment did not consider (i.e. general needs building changed to
    sheltered etc.)
  - Whenever there have been any structural or material changes to the building or its use.

#### Property Risk Based Timescales

Property Designation	No. of Storeys	No of Flats	Property Type	Property Classification	Frequency of FRA review
General Needs (5 Storeys and		1 to			
under)	1 to 2	10	Converted	Level 3	3 Years
General Needs (5 Storeys and		11			
under)		and			
	1 to 2	over	Converted	Level 2	2 Years
General Needs (5 Storeys and		1 to			
under)	3 to 5	10	Converted	Level 2	2 Years
General Needs (5 Storeys and		11			
under)		and			
	3 to 5	over	Converted	Level 1	1 Year
General Needs (6 Storeys and	6 and				
over)	over	Any	Converted	Level 1	1 Year
General Needs (5 Storeys and			Purpose-		
under)	1 to 2	Any	Built	Level 3	3 Years
General Needs (5 Storeys and		1 to	Purpose-		
under)	3 to 5	10	Built	Level 3	3 Years
General Needs (5 Storeys and		11			
under)		and	Purpose-		
	3 to 5	over	Built	Level 2	2 Years

General Needs (6 Storeys and over)	6 and over	_	Purpos Built		1 Year
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Sheltered Housing	Any	Any	Any	Level 1	1 Year
Supported Living	Any	Any	Any	Level 1	1 Year
Extra Care	Any	Any	Any	Level 1	1 Year
HMO (House in Multiple Occupation)	Any	Any	Any	Level 1	1 Year
FMO (Flat in Multiple Occupation)	Any	Any	Any	Level 1	1 Year
Cluster Accommodation	Any	Any	Any	Level 1	1 Year
Community Centre	1	N/A	Any	Level 2	2 Years
Community Centre	2 and ove	n/A	Any	Level 1	1 Year
Commercial	Any	N/A	Any	Level 1	1 Year
Office	1 to 2	N/A	Any	Level 2	2 Years

#### **Further Risk Considerations**

- 9.9 Occupancy and building use are essential factors which are taken into account in the risk grading of a property. These include but are not limited to:
  - How able customers are to respond to emergency situations
  - Evidence of Smoking (including E-Cigarettes)
  - Whether there is stored oxygen or any other flammable substance such as paraffin or camping gas kept in or around the properties (where known).
  - Where one or more of these factors is identified in a property, or another factor is identified which affects the risk of the building, it may be necessary to upgrade the risk level.
  - Should the fire risk assessor think this is necessary, this will be taken into account when making the decision.

#### Remedial Items

- 9.10 During fire risk assessments issues are identified that require action in order to preserve fire safety within the building.
- 9.11 Details of these issues, a photograph and proposed method of remedy is recorded on the fire risk assessment.

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- 9.12 Any actions identified on site that are critical and pose an immediate risk are referred to SNH by the risk assessor whilst on site and are actioned by SNH immediately.
- 9.13 Remedial items identified during the fire risk assessments are categorised dependent on their nature as detailed in the below table and the subsequent table shows the expected remediation target date.

Category	Description
A	Where an urgent action is required to preserve fire safety standards within a building.
В	These items are regarded as important but a lead time to organise is recognised to be necessary.
С	Where an immediate risk to fire safety is not present but improvements/actions are necessary to maintain the essential systems & standards.
R	Works to be considered in future improvements or ongoing/rolling maintenance programmes.
M1	Relates to important management issues that need to be prioritised in order to preserve fire safety standards within a building.
M2	These management improvements are not urgent but are required.

	Property Risk Level 1	Property Risk Level 2	Property Risk Level 3
<b>U</b> (Urgent)	1 day	1 day	1 day

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ion	A (High)	3 months	6 months	12 months
of Action	<b>B</b> (Medium)	12 months	18 months	24 months
	C (Low)	18 months	24 months	30 months
Priority	<b>R</b> (Recommended)*	Unlimited	Unlimited	Unlimited
P	Man1 (Management Action)	1 month	2month	3month
	Man2 (Management Action)	3 months	12 months	24 months

- 9.14 The length of time given to complete each remedial item is set by our fire risk assessment consultant. This timescale is calculated by assessing a combination of the Property Risk Rating and the Remedial Item Category
- 9.15 When all the FRA remedial items are collated these can amount to large volumes of works and therefore it is not reasonably practical to undertake some of these recommendations within the original recommended target. (E.g. a single fire door replacement identified a hundred times would become a planned programme of works and it may not be feasible to adhere to the initial rating.) Remedial items and their priorities are audited and assessed monthly by both SNH staff and our fire risk assessment contractor to ensure that they are appropriate and reasonably practical, and therefore in some instances a priority rating and target dates may change having been viewed collectively.

#### **10. Evacuation Policies**

10.1 SNH applies one of three evacuation policies depending on the type, use and occupants of the building. A fire action notice will be erected in all communal areas informing any visitors of the buildings evacuation policy.

Stay Put (also known as defend in place) strategy

- 10.2 Generally a stay put strategy, also known as defend in place; will be implemented within a purpose built block where the buildings construction will provide a level of resistance to fire that can support a stay put policy.
- 10.3 A stay put policy may be implemented in another type of building where a fire risk assessment confirms a building has adequate provisions to sustain such a policy. Simultaneous Evacuation (also known as total evacuation) strategy
- 10.4 A Simultaneous evacuation strategy will usually be in place in a converted property where the original design and construction of the building does not provide an adequate level of fire resistance to support a stay put policy.

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- 10.5 Where a Simultaneous evacuation policy is in place, SNH urges residents to complete the self evacuation survey to ensure any vulnerabilities are identified and recorded, and if necessary, a Personal Emergency Evacuation Plan (PEEPs) is completed thereafter and is shared accordingly with the resident. A summary of the vulnerabilities identified is recorded securely, in line with GDPR requirement in the SIB on site and are held securely by SNH.
- 10.6 SNH has implemented a Capturing Vulnerabilities Information Procedure which describes the process used for identifying and collecting information in relation to vulnerabilities at specific blocks and how this information should be managed.

#### Phased Evacuation

10.7 Where a simultaneous evacuation is not deemed feasible nor appropriate, a phased evacuation may be deemed the most appropriate to operate. The specifics on the phased approach will be unique to the block and will be agreed with a qualified fire engineer.

#### Changes in Strategy

10.8 On occasion it may be necessary to change from stay put strategy to a simultaneous Evacuation strategy. This usually required after defects within the building structure have been identified. Responsible Managers from the Fire Safety & Building Safety Team and the Building Safety Remediation Team work collaboratively to implement a suitable solution, manage communications with residents; and inform the Fire & Rescue Services and Primary Authority Partnership.

#### 11. Formal Notices

- 11.1 On receipt of a formal notice served by Fire & Rescue Services, logged on tracker and managed by the Fire & Building Safety Team. All Notices are investigated thoroughly before a formal response sent to the Fire & Rescue Services confirming SNH position on each action. This response is sent by the Fire & Building Safety Contracts Manager.
- 11.2 Details of the notices received are reported to the Executive Board and SNG Board in accordance with the appropriate reports.

#### 12. Training

- 12.1 All technical staff members within the Fire & Building Safety Team are to attend a Fire Risk Assessment Training course delivered by an accredited organisation.
- 12.2 All technical staff members within the Fire & Building Safety Team are to attend BRE Door inspection course.

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- 12.3 SNH is committed to sending managers working within the fire and building safety remit on the CIOB Level 6 Diploma in Building Safety Management. The course is expected to be completed by December 2024.
- 12.3 All staff attending buildings owned and or managed by SNH are required to attend annual fire safety awareness, delivered by the Fire & Building Safety Team. A record of attendance is held by the team.
- 12.4 In addition to the Fire Safety Awareness training, all site based staff are required to attend the following training. Note: this relates to SNH employees:
  - Fire alarm/panel training (site specific)
  - FRA remedial works system training
  - Person Centre Risk Assessment Training
  - Fire drill and fire strategy training

#### 13. Vulnerabilities

General management

- 13.1 We will work to identify vulnerabilities at the time of letting of property and the life span of the tenancy.
- 13.2 All properties subject to the Regulatory Reform Fire Safety Order 2005, and Fire Safety (England) Regulations have Fire Action Notices displayed in the communal areas. Detailed within this sign residents are encouraged to contact SNH should they require assistance developing an escape plan.
- 13.3 If a vulnerable resident is identified, we will be following the 'Capturing Vulnerabilities Information Procedure'. By following this procedure, we will identify, assess and or address the risk presented and the suitability of the resident's home, either short or long term, implementing additional aids if deemed necessary.
- 13.4 We will periodically contact residents living in all buildings over 18m urging them to complete the short survey regarding their ability to self evacuate. The survey is available electronically via the website and in a paper format upon request. The data collected will be stored securely by SNH and will then be summarised in accordance to GDPR requirement and stored in the SIB.

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<sup>\*</sup>This is not an exhaustive list of training provided

- 13.5 If a resident identifies themselves as vulnerable, SNG will review the information before determining if a PCRA is required to better understand the vulnerability and provide advice, and or additional aids to support the fire safety precautions in place.
- 13.6 Those living in 'specialised housing' (Sheltered or Supported housing) are required to be assessed for any vulnerabilities regularly. The assessments are completed by the site staff/property managers.
- 13.7 If the building/residents are being managed by a specialist support agency; the appointed agency is responsibility for conducting a Person-Centred Risk Assessment (PCRA). Any critical information must be shared with SNH, so we can together determine any additional support and or aids required. A summary of any identified vulnerabilities are to be stored in the SIB.
- 13.8 A summary document of these assessments is be held in the SIB.

Assessment type	Abbreviation	Frequency reviewed	Location where information stored
Personal Emergency Evacuation Plans	PEEPS	Every 3 months, sooner if circumstances change	Secure information box
General Emergency Evacuation Plans	GEEPS	Every 3 months, sooner if circumstances change	Premises information box
Person Centre Risk Assessments	PCRA	Depending on identified risk or change in circumstances. All High risk residents must be reviewed annually or sooner if SNH are made aware of the vulnerability changing.	All PCRAs are held centrally by The Fire Safety Team

Person Centred Risk Assessments (PCRA)

- 13.9 The PCRA is an assessment to assess the vulnerability of the resident. The purpose is to
  - Identify the risk of a fire occurring
  - The residents ability to respond to a fire
  - The likely consequence of a fire occurring

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- 13.10 The PCRA is a digital assessment template used and has been copied from the template detailed in the NFCC Specialist Housing Guidance 2019.
- 13.11 The PCRA is completed and the overall risk rating will determine the expected review date (if not vulnerabilities change sooner?). The review periods for PCRA are:

Overall risk rating	Frequency of review of assessment (if there has been no change)
High Risk	Annual
Medium Risk	Every 2 years
Low risk	Every 3 years

13.12 All PCRA's are to be reviewed again/sooner if the vulnerability changes.

#### 14. Legislation and Regulation

- 14.1 The legislation listed in this policy is not intended to cover all legislation applicable to this policy. To comply with clause 1.1 of the Regulator of Social Housing's Governance and Financial Viability Standard, which requires adherence to all relevant law, SNH will take reasonable measures to ensure compliance with any and all applicable legislation by reviewing policies and procedures and amending them as appropriate.
- 14.2 The legislation listed within this policy was considered at the time of the development of this policy, but subsequent primary and secondary legislation, case law and regulatory or other requirements will be considered and the policy reviewed and adopted in accordance with the requirements set out therein, even should such subsequent legislation not be explicitly listed within this policy. Any queries relating to the applicable legislation should be directed to the policy owner.
- 14.3 The following Regulations, approved codes of practices and guidance notes relate to Fire Precautions. It is not an exhaustive list, but includes the main Regulations to which SNH' Staff, Contractors and Tenants should adhere:-

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#### 15. Regulations

The Health and Safety at Work Act 1974, particularly Section 3: - General duties of Employers and Self-employed persons other than their employees.

- The Regulatory Reform (Fire Safety) Order 2005
- Building Safety Act 2022

Fire Safety (England) Regulations 2022

- Higher-risk Buildings (England) Regulations 2023
- •
- NFCC Specialist Housing Guidance
- The Housing Act 2004, which introduces the Housing Health and Safety Rating System (HHSRS)
- Approved Document B (fire safety) volume 1: Dwellings, 2019 edition incorporating 2020 and 2022 amendments.
- Gas Safety (Installation and Use) Regulations 1998
- Electrical Equipment (Safety and Use) Regulations 1994
- Furniture and Furnishings (Fire Safety) Regulations 1998
- Smoke and Carbon Monoxide Alarm Regulations 2022
- Approved Codes of Practices: O Fire Safety Risk Assessment Sleeping Accommodation O
   Fire Safety Risk Assessment Small and Medium Places of Assembly Guidance
- Building regulations Approved Document B (Fire Safety): amended 2022.
- National Fire Safety Protocol. LACORS
- Fire Safety in Purpose-built Blocks of Flats. Communities and Local Government.
- A guide to making your small block of flats safe from fire.
- · Fire Safety in Housing. Chartered Institute of Housing
- All relevant NFCC guidance

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# **Equality and Diversity**

We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010.

#### Review

This policy is to be reviewed annually or sooner if there is a specific legislative, regulatory or service requirement or change in guidance, law or practice.

# **Appendixes**

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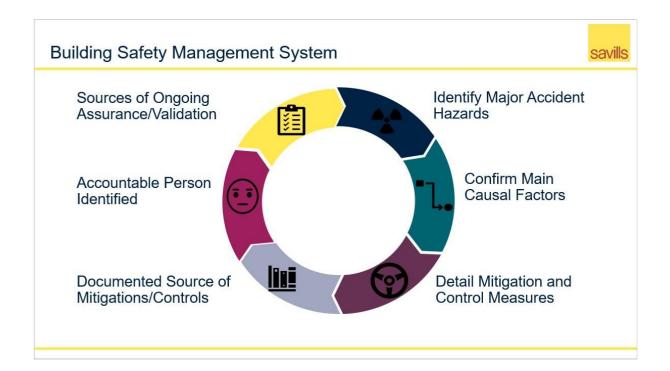


# BUILDING SAFETY CASE METHODOLOGY FOR RISK ASSESSMENT AND BUILDING SAFETY MANAGEMENT SYSTEM

Savills Building Safety Case Template has been built-up following our own examination and interpretation of the requirements of the Building Safety Act 2022, plus the additional guidance and information which has been released by the Health and Safety Executive (HSE)/Building Safety Regulator (BSR) in the period since April 2022 and this legislation receiving Royal Assent. Since Q1 of 2022 to the present day, the template has remained "fluid" and has been subject to ongoing continual appraisal.

The Safety Case Template has also been predicated on an overall Building Safety Management system which is also set out in Building Safety Case Template detailed below. This Building Safety Management System outlines the methodology used, and breaks the requirements of the Building Safety Act 2022 into six main areas of reference of control and mitigation. The risk matrix has also been built up and tracks the requirements of the industry recognised PAS 79:2012 methodology.

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The BSR has made it consistently clear – and continues to do so – that as it will not be providing any form of prescriptive Template or Standard Form for the Building Safety Case, that this will be the responsibility of any Building Owner to devise and ensure its own interpretation of the legislation and guidance provided. As such Savills UK Limited has been engaged to help support SNH in this area.

The Building Safety Regulator has acknowledged that it has no expectation that Building Safety Cases must testify to 'perfect' Higher-Risk Residential Buildings (BSCs) – and as a result our template features an 'Action Plan' Section upon which any as yet incomplete Risk Mitigations Actions and or Measures can be itemised and subject to regular, routine monitoring and oversight buy the Building Owner once handover has taken place to them from Savills UK Limited after completion of the BSCs First Iteration or Version.

Our BSC Template focusses strongly upon the twin risks of Spread of Fire and Structural Failure as they are the two, prescribed Major Accident Hazards within the Building Safety Act 2022.



Further to the original Building Safety Act 2022, Central Government has now released (mid-August 2023) the Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 Part 1-3) as secondary legislation to the main Act and the provisions and requirements of these Regulations feature within our Building Safety Case Handover Process, which follows once work to initially compile the starting First Version or Iteration of any Building Safety Case is complete.