

REPORT TITLE: NEW H&N BUILDING SAFETY POLICIES

Meeting	Growth and Regeneration Scrutiny Panel
Date	20 th July 2026
Cabinet Member	Cabinet Member for Transport and Housing
Key Decision Eligible for Call In	No Yes
Purpose of Report This report provides information on a number of new Homes & Neighbourhoods building safety policies, and seeks Cabinet approval to implement and publish these. Delegated authority is also sought for the Service Director for Homes & Neighbourhoods to oversee and approve future updates of these policies. A summary of the proposed policies and relevant considerations is set out in a table under 'Information required to take a decision' below.	
Recommendations: - To review and agree the implementation and publication of the following new Homes & Neighbourhoods policies: - H&N Building Safety Policy - H&N Golden Thread Policy Higher-Risk Residential Buildings - H&N Mandatory Occurrence Reporting (MOR) Policy - H&N Person-Centred Fire Risk Assessments (PCFRA) and Residential Personal Emergency Evacuation Plans (RPEEP) Policy - H&N Lift Safety Management Policy and Management Plan - To delegate to the Service Director for Homes & Neighbourhoods, authority to oversee and approve future minor, legislative or annual updates of these policies. Any substantial changes will remain subject to Cabinet approval.	
Reasons for Recommendations: The safety and quality of council homes is of paramount importance to Kirklees Homes & Neighbourhoods, and a number of policies and processes are already in place to support this. Adopting the new policies set out in this report will help the council continue to meet its regulatory duties and responsibilities as a social landlord. The policies will also make expectations and requirements clearer and easier to understand for staff, tenants, and other residents. The policies will be reviewed and updated annually, or sooner if there are changes to legislation, regulations, the council's organisational structure, or the systems and software used.	

Following ELT review and recommendation, the policies were considered by the Council's Information Governance Manager, who confirmed that presentation to the IG Board was not required. Section 3.5 of the PCFRA and RPEEP Policy was amended to include reference to the council's Data Protection Policy.

An additional review was undertaken with the council's Strategic Facilities Manager to confirm if any existing corporate policies could address the requirements of the policies outlined in this report; however, no such policies are currently in place.

Resource Implications: No implications.

Date signed off by Executive Director & name

David Shepherd – 8 July 2026

Is it also signed off by the Service Director for Finance?

Not Applicable for Scrutiny report

Is it also signed off by the Service Director for Legal Governance and Commissioning (Monitoring Officer)?

Not Applicable for Scrutiny report

Electoral wards affected: All

Ward councillors consulted: Not Applicable

Public or private: Public

Has GDPR been considered? Yes

Personal data may be collected from tenants through the implementation of these policies. All data will be managed in line with the [Privacy Notice for Homes & Neighbourhoods](#).

1.0 Executive Summary

- 1.1 The proposed new policies support improvements across Homes & Neighbourhoods in improving building safety processes, ensuring compliance with the RSH Consumer Standards and wider building safety legislation.
- 1.2 The policies presented in this paper seek to ensure:
 - Ongoing legal compliance;
 - Consistency across H&N policies, including recognition of the need to tailor services to meet individual tenants' needs;
 - Improved document accessibility.
- 1.3 A summary of the proposed policies, their purposes and relevant considerations is set out in a table under 'Information required to take a decision' below.
- 1.4 Approval to implement and publish the policies is sought, along with delegated authority to the Service Director for Homes & Neighbourhoods to oversee and approve future updates.

2.0 Information required to take a decision

2.1 Background

- 2.1.1 The Building Safety Act 2022, Social Housing (Regulation) Act 2023 and associated building safety regulations have significantly strengthened the legal and regulatory responsibilities placed on social housing landlords. In response, Homes & Neighbourhoods has further strengthened

our suite of building safety policies to provide a clear, consistent and transparent framework for managing building safety risks, particularly within higher-risk residential buildings.

- 2.1.2 The policies formalise existing good practice, support compliance with statutory duties and the Regulator of Social Housing's Safety and Quality Standard and clarify the council's approach to areas including building safety management, the Golden Thread of information, Mandatory Occurrence Reporting, fire safety arrangements for vulnerable residents, and lift safety management. Collectively, they provide assurance that robust governance, risk management and resident engagement arrangements are in place to protect tenants, residents, staff and visitors.

2.2 Policy updates

- 2.1.1 The table below summarises the key purposes and considerations relevant to each of the policies presented:

Policy	Purposes and Considerations
Building Safety Policy	• To confirm the council's approach to managing building safety risks in higher-risk residential buildings, including fire and structural safety. • To demonstrate compliance with statutory duties, including the Building Safety Act 2022, the Social Housing (Regulation) Act 2023, and the Regulator of Social Housing's Safety and Quality Standard. • To provide assurance that clear governance, roles, and resident engagement arrangements are in place in line with building safety and social housing regulatory requirements. • Although the Building Safety Act has been in place since 2022, there is no legal requirement for a formal policy. This policy has been produced to clearly set out the approach to managing fire and structural risks within H&N.
Golden Thread Policy	• To set out the council's approach to managing accurate, up-to-date building safety information for higher-risk residential buildings throughout their lifecycle. • To demonstrate compliance with statutory Golden Thread requirements, as set out in the Building Safety Act 2022 and the Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024. • To provide assurance that clear governance, ownership, and information controls are in place to support effective management of fire and structural safety risks. • Since the introduction Building Safety Act 2022, Higher-Risk Buildings must maintain a Golden Thread of building information. A formal policy isn't legally required, but is considered best practice.
Mandatory Occurrence Reporting (MOR) Policy	• To set out how the council identifies, records, and reports serious building safety incidents in higher-risk residential buildings. • To demonstrate compliance with statutory Mandatory Occurrence Reporting duties, as required by the Building Safety Act 2022 and the Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023. • To provide assurance that safety incidents, near misses, and concerns are reported, investigated, and addressed promptly and transparently, including notification to the Building Safety Regulator where required. • Under the Building Safety Act 2022, Higher-Risk Buildings are required to operate a Mandatory Occurrence Reporting (MOR) system. While a specific written policy is not explicitly mandated, it is considered best practice. H&N already operates MOR processes; this policy clarifies and formalises how compliance is achieved.
PCFRA and RPEEP Policy	• To set out how the council identifies and manages individual fire safety risks for residents who may need support to evacuate safely from higher-risk residential buildings, through Person-Centred Fire Risk Assessments (PCFRA) and Residential Personal Emergency Evacuation Plans (RPEEPs).

	• To demonstrate compliance with statutory fire and building safety duties, including the Building Safety Act 2022, the Fire Safety Order 2005, and the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025. • To provide assurance that clear, consistent arrangements are in place to assess needs, agree reasonable measures, and support safe evacuation in the event of a fire. • New policy required by law, focused on fire safety planning for tenants who may need additional support in an emergency. • Introduces a clear and consistent framework for assessing and recording individual needs. • Relevant processes are already in place, as required by the statutory deadline of 6th April 2026.
Lift Safety Management Policy and Management Plan	• To set out how the council manages the safe operation, inspection, and maintenance of lifts in higher-risk residential buildings to protect residents, staff, contractors and visitors. • To demonstrate compliance with statutory duties, including the Building Safety Act 2022, the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER), and the Provision and Use of Work Equipment Regulations 1998 (PUWER). • To provide assurance that clear governance, inspection, and reporting arrangements are in place to identify risks, respond to defects, and maintain lift safety. • Lift safety regulations (LOLER and PUWER) have been in place since 1998. Although H&N had a management plan, no formal policy existed safety and compliance was maintained through appropriate servicing, repair, and maintenance in line with regulation ensuring no risk to users. This policy formalises H&N's approach and responsibilities.

3.0 Implications for the Council

3.1 Council Plan

- 3.1.1 The proposed Building Safety policies support the Council Plan by helping to ensure that council homes are safe, well-managed and meet the needs of tenants and residents. The policies strengthen the council's approach to managing fire, structural and building safety risks, while ensuring compliance with key legislation and regulatory standards, including the Building Safety Act 2022 and the Regulator of Social Housing's Safety and Quality Standard.
- 3.1.2 They provide a clear framework for governance, accountability and resident engagement, helping to build trust and confidence in housing services. The policies also promote equality and inclusion by recognising the need to tailor services and safety arrangements to individual circumstances, particularly through measures such as Person-Centred Fire Risk Assessments and Residential Personal Emergency Evacuation Plans. In addition, the policies have been designed to improve accessibility, transparency and understanding for both staff and tenants, supporting the Council Plan ambition to deliver high-quality, customer-focused services and improve outcomes for communities.

3.2 Financial considerations

- 3.2.1 Implementation and delivery of each policy will be undertaken in accordance with all currently approved budgets. Building Safety has approximately £60 million allocated across capital and revenue budgets within the forthcoming five-year programme. The implementation of these policies is not expected to result in any additional budgetary impact

3.3 Legal and regulatory implications

- 3.3.1 The proposed Building Safety policies have been developed to strengthen the council's framework for managing building safety and to support compliance with a range of statutory and regulatory requirements. Collectively, the policies demonstrate how Homes & Neighbourhoods will meet its duties under the Building Safety Act 2022, the Social Housing (Regulation) Act 2023, the Fire Safety Order 2005, the Higher-Risk Buildings Regulations, and other relevant legislation governing the safety and management of residential buildings.

- 3.3.2 The policies provide clear governance arrangements, roles and responsibilities, risk management processes, incident reporting requirements, and resident engagement mechanisms, supporting compliance with the Regulator of Social Housing's Safety and Quality Standard and wider consumer regulation expectations. They also formalise existing operational practices in key areas such as the management of higher-risk residential buildings, maintenance of the Golden Thread of information, Mandatory Occurrence Reporting, fire safety planning for vulnerable residents, and lift safety management.
- 3.3.3 Approval and implementation of these policies will strengthen assurance that the council has effective controls in place to identify, manage and mitigate building safety risks, helping to protect tenants, residents, staff and visitors. Failure to maintain robust building safety arrangements could expose the council to regulatory intervention, legal challenge, reputational damage and financial consequences.

3.4 Climate Change and Air Quality

- 3.4.1 There are no direct climate change or air quality implications arising from the approval of these policies. The policies are focused on strengthening governance, compliance and operational arrangements for building safety, including fire safety, building information management, incident reporting and lift safety within higher-risk residential buildings. They formalise the council's approach to meeting statutory and regulatory requirements and do not introduce any new activities that are expected to have a material impact on carbon emissions, energy consumption or local air quality.
- 3.4.2 Any future capital investment or building improvement programmes delivered under the building safety framework will continue to be assessed separately for environmental and sustainability impacts as part of normal project governance processes.

3.5 Risk, and Integrated Impact Assessment

- 3.5.1 These policies collectively mitigate the strategic risk that council homes do not comply with relevant legislation and building safety requirements, reducing the likelihood of tenant harm, regulatory intervention, legal challenge, reputational damage and financial consequences.

Risk Theme	Risk Description	Risk Assurance Focus
Building Safety Compliance	Failure to comply with the Building Safety Act 2022, Social Housing (Regulation) Act 2023 and associated regulations for higher-risk residential buildings.	Approval and implementation of the Building Safety Policy, clear governance arrangements, defined responsibilities, annual policy review, and regulatory assurance reporting.
Fire and Life Safety	Failure to identify and manage fire safety risks, including risks affecting residents requiring additional support to evacuate safely.	Delivery of PCFRAs and RPEEPs, completion of fire risk assessments, monitoring of remedial actions, resident engagement and compliance reporting.
Lift Safety and Asset Assurance	Failure to identify, investigate and report building safety incidents, near misses or emerging risks to the Building Safety Regulator where required.	Compliance with LOLER and POWER requirements, planned inspections and servicing, performance monitoring, defect management and assurance reporting.
Building Safety Information Management	Inaccurate, incomplete or inaccessible building safety information resulting in poor decision-making, regulatory non-compliance or inability to demonstrate compliance.	Implementation of the Golden Thread Policy, information governance controls, data quality checks, document ownership and audit arrangements.
Incident Reporting and Learning	Failure to identify, investigate and report building safety incidents, near misses or emerging risks to the Building Safety Regulator where required.	Mandatory Occurrence Reporting (MOR) procedures, incident monitoring, escalation processes, lessons learned reviews and management oversight.

Integrated Impact Assessment (IIA)

An IIA has been completed for these policies – ref: [IIA-830941977](#)

4.0 Consultation

- 4.1 Relevant staff have been consulted in the development of the policies.

5.0 Engagement

- 5.1 Alongside approval of the draft Building Safety policies, a structured Building Safety Engagement Strategy will be developed, in collaboration with tenants and other stakeholders to support effective implementation across the organisation and with tenants.
- 5.2 The engagement plan will focus on ensuring that staff understand their roles and responsibilities under the updated policies, and that tenants are aware of how building safety is managed, what they can expect from the council, and how they can raise concerns. This will include proportionate and accessible communications, supported by targeted briefings and guidance for relevant staff groups.
- 5.3 For tenants, engagement will be designed to raise awareness of building safety arrangements in a clear and accessible way, using appropriate channels and formats. This will align with existing tenant engagement activity and “You Said, We Did” approaches, to ensure messages are understood and feedback is captured and acted upon.
- 5.4 The engagement and embedding plan will be aligned to the final approved policies and will be delivered on a phased basis, with assurance provided through existing governance arrangements. Progress and impact will be monitored to ensure the policies are consistently applied in practice and embedded into day-to-day delivery.
- 5.5 All policies have been drafted and formatted to align with Kirklees Council’s document accessibility standards, improving clarity and transparency for staff and tenants. The policies will be made publicly available on the council’s website.

6.0 Options

6.1 Options considered

- 6.1.1 Not applicable.

6.2 Reason for recommendation

- 6.2.1 The new policies presented in this paper will help to ensure:
- Ongoing legal compliance;
 - Consistency across H&N policies, including recognition of the need to tailor services to meet individual tenants’ needs;
 - Document accessibility.

7.0 Next steps and timelines

- 7.1 The documents will follow the following flightpath to Cabinet. Subject to approval, the policies will be implemented and published on the council’s website.

- ~~19/05/2026~~ ~~H&N Senior Leadership Team (HNSLT)~~
- ~~03/06/2026~~ ~~Place Senior Leadership Team (Place SLT)~~
- ~~16/06/2026~~ ~~Executive Leadership Team (ELT)~~
- ~~24/06/2026~~ ~~Tenant Led Panel (TLP)~~
- 13/07/2026 H&N Improvement Board (HNIB)
- 20/07/2026 Growth & Regeneration Scrutiny
- 23/07/2026 Key Decision Notice (KDN)
- 03/08/2026 Executive Board (EB)
- 25/08/2026 Cabinet

- Date tbc Housing Portfolio Holder Briefing (PHB)

8.0 Contact officer

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9.0 Background Papers and History of Decisions

9.1 Not applicable.

10.0 Appendices

10.1 Appendix 1 - Glossary of Terms
Appendix 2 - Draft Building Safety Policy
Appendix 3 - Draft Golden Thread Policy
Appendix 4 - Draft Mandatory Occurrence Reporting (MOR) Policy
Appendix 5 - Draft PCFRA & RPEEP Policy
Appendix 6 - Draft Lift Safety Management Policy
Appendix 7 - Draft Lift Safety Management Plan

11.0 Service Director responsible

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Building Safety Policy

A set of rules and procedures the council follows to keep homes safe from risks like fire and structural problems. It includes regular checks, risk assessments, and clear information for tenants about how safety is managed.

Golden Thread Policy

This means keeping accurate, up-to-date information about building safety for each building, so everyone knows what's been done and what needs to be done. It's a "single source of truth" for safety information.

Mandatory Occurrence Reporting (MOR) Policy

A policy that explains how the council records and reports serious safety incidents (like fires or structural issues) in homes. Tenants can report concerns, and the council must investigate and act quickly.

PCFRA (Person-Centred Fire Risk Assessment)

A special fire safety check for tenants who may need extra help to evacuate safely. It looks at individual needs and helps plan for emergencies.

RPEEP (Residential Personal Emergency Evacuation Plan)

A personalised plan for tenants who might need help leaving their home in an emergency, like a fire. It ensures support is available and the safest way out is planned.

Lift Safety Management Policy and Management Plan

Rules and procedures for keeping lifts in homes safe and working properly. This includes regular inspections, maintenance, and clear ways for tenants to report faults or breakdowns.

Higher-Risk Residential Buildings (HRRBs)

Homes or buildings that have more safety risks, often because they are taller or have more people living in them. These buildings need extra safety checks and procedures.

Building Safety Act 2022

A law that sets out new rules for keeping homes safe, especially in higher-risk buildings. It requires councils and landlords to follow strict safety standards.

Social Housing (Regulation) Act 2023

A law that aims to improve the quality and safety of social housing, making sure tenants are safe and have clear information about their homes.

Fire Safety Order 2005

A law that sets out fire safety requirements for homes and other buildings, including regular checks and plans for emergencies.

LOLER (Lifting Operations and Lifting Equipment Regulations 1998)

Rules about how lifts and lifting equipment must be used and maintained to keep people safe.

PUWER (Provision and Use of Work Equipment Regulations 1998)

Rules about making sure all equipment used in homes (like lifts) is safe and properly maintained.

Risk Assessment

A process of checking homes for possible dangers and deciding how to reduce those risks.

Regulatory Duties

Legal responsibilities the council must follow to keep homes safe and meet government standards.

Resident Engagement

Ways the council involves tenants in decisions about their homes, including listening to concerns and providing information.

Call In

A process where decisions made by the council can be reviewed or challenged before they are finalised.