

Appendix 3

Golden Thread Policy

(Higher-Risk Residential Buildings)

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Table of Contents

Golden Thread Policy	1
Document Control.....	1
Governance.....	1
Revision history.....	1
1 Introduction	2
1.1 Purposes of this policy	2
1.2 Legal context.....	2
1.3 Definitions	2
2 Objectives and scope	3
2.1 Policy objectives.....	3
2.2 Policy scope.....	3
3 Policy statement	4
3.1 Management.....	4
3.2 Storage	5
3.3 Updates.....	5
4 Roles and responsibilities	5
4.1 Council responsibilities	5
4.2 Third-Party Responsibilities	6
5 Monitoring and review.....	6
5.1 Monitoring and improvement	6
5.2 Policy review	6
6 Associated policies and strategies	7
6.1 Homes & Neighbourhoods policies	7
6.2 Kirklees Council policies	7

Document Control

Governance

Table 1 – Policy information

Item	Response
Title	Golden Thread Policy (Higher-Risk Residential Buildings)
Responsible officer	Head of Assets and Building Safety
Author	Building Safety Technical Officer
Approved by	TBC
Version approval date	TBC
Next review date	TBC
Review responsibility	Head of Assets and Building Safety
Applicable to	Kirklees Homes and Neighbourhoods staff and subcontractors
DPIA date	TBC
IIA date	12/05/2026
Regulatory framework	Social Housing (Regulation) Act 2023 and associated RSH Regulatory Standards . The Building Safety Act 2022 The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023 The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024

Revision history

Table 2 – Revision details

Date	Version	Author	Authorised by	Revision details
Xx/xx/2026	1.0	Xx	TBC	First publication

1 Introduction

1.1 Purposes of this policy

- 1.1.1 The Golden Thread means having the right information about a building so we can understand it and manage building safety risks properly. This critical information supports informed decision-making and helps us, as the Accountable Person and Principal Accountable Person, to keep buildings and residents safe. It also makes sure important safety information is not lost and that its integrity is maintained.
- 1.1.2 This policy explains what Golden Thread information is needed for Kirklees Council's high-rise residential buildings. It helps us understand each building and identify a single source of truth. The policy also explains how this information should be stored to protect its integrity, and how it should be shared.

1.2 Legal context

- 1.2.1 This policy responds to the Social Housing (Regulation) Act 2023 and the associated Regulatory Standards by addressing the following requirements:
- Safety and Quality Standard**
- When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas.
- 1.2.2 This policy also aims to ensure compliance with the following legislation:
- The Building Safety Act 2022;
 - The Higher-Risk Buildings (Keeping and Provision of Information etc) (England) Regulations 2023;
 - The Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023; and
 - The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023.

1.3 Definitions

- 1.3.1 For the purposes of this policy, the following definitions apply:

Table 3 – List of definitions used in this policy

Term	Definition
Higher-risk Residential Building (HRRB)	As defined within the Building Safety Act 2022, a higher risk building either 7 stories or 18 metres high, whichever comes first and containing 2 or more residential units.
Duty Holder	Kirklees Council as owner of the high-rise residential building with responsibility for ongoing repair and maintenance of common parts and firefighting equipment.
Accountable Person and Principal Accountable Person	Kirklees Council, as owner of the high-rise residential building, with responsibility for ongoing repair and maintenance of common parts and firefighting equipment.
Resident	A person living in any higher-risk residential building where Kirklees Council is the Principal Accountable Person, including tenants, leaseholders and other household members.
‘we’ or ‘us’ or ‘our’	Kirklees Council
Building Safety Team	A specialist building safety team within Kirklees Council Homes & Neighbourhoods
Staff/Employee	A person that works for Kirklees Council.
Contractor	A company or person that works on behalf of Kirklees Council.

2 Objectives and scope

2.1 Policy objectives

- 2.1.1 This policy sets out how we manage, store, and keep up-to-date information for our higher risk residential buildings. This information forms the Golden Thread and provides a single, accurate source of truth. The policy also explains how this information will be made available when required, including to those who need it to meet legal and safety responsibilities, using clear formats and plain language.
- 2.1.2 This policy confirms how building safety information is managed by those with responsibility under the Building Safety Act. It ensures staff know where the most up-to-date information is held and how it can be accessed. The aim is to make sure that the right people have access to the right information at the right time to support safe decision-making and compliance with building safety duties.

2.2 Policy scope

- 2.2.1 This policy applies only to higher risk residential buildings that fall within scope of the Building Safety Act and are owned or controlled by Kirklees Council while residents are

living in them. During this time, Kirklees Council acts as the Principal Accountable Person.

- 2.2.2 The information we must keep about our HRRBs and covered by this Policy is set out in the Golden Thread Map (GTM). The GTM describes what information must be kept to meet building safety duties. It is a live document, meaning it is reviewed regularly and updated when information changes.
- 2.2.3 The Golden Thread information starts from the design phase and continues throughout the life cycle of a HRRB, documenting how you meet the applicable building regulations and ensuring refurbishment and maintenance works are accurately documented.

3 Policy statement

3.1 Management

- 3.1.1 The regulations set out 10 key principles for how Golden Thread information must be managed. We will follow these principles in how we manage information:
 - Single source of truth: information is managed in a single, central place
 - Accurate and trusted: information is updated, relevant, and verified
 - Secure: data is protected, secure, and compliant with GDPR
 - Accessible: information is easy to access
 - Understandable/Consistent: data is in a clear format and uses consistent terminology
 - Accountable: tracks who made changes, what was changed, and when
 - Resident-focused: helps residents feel secure in their homes
 - Culture change: supports better industry standards and competence
 - Longevity/Durability: records are maintained over the entire life cycle of the building
 - Relevant/Proportionate: the information is relevant for managing building safety
- 3.1.2 No one person should be the only person with access to data considered to be a part of the Golden Thread. The GTM will name the relevant team and role as the Responsible Person for their data considered a part of the Golden Thread. Every Responsible Person should have a documented deputy(s) to their data considered a part of the Golden Thread.
- 3.1.3 Each Responsible Person must regularly review who has access to their Golden Thread information, including any deputy or other approved users. This review must take place at least once every 12 months, or sooner if there are changes to legislation, regulations, the organisation's structure, or the systems used. Any changes to access must be made through the Building Safety team.

- 3.1.4 A version of the GTM will be available to all staff so they know where information is stored and who to contact for access or for any required amendments or updates.
- 3.1.5 Responsible Persons and their deputies must only share Golden Thread information in a format that cannot be edited. This helps protect the single source of truth and ensures information is not changed without proper control. Information must only be shared with people who have a legitimate right to receive it.
- 3.1.6 Anyone responsible for managing or sharing any part of the Golden Thread for a higher risk residential building must have the appropriate skills, knowledge, and experience to manage and share that information.

3.2 Storage

- 3.2.1 The regulations require Golden Thread information to be stored digitally. For this reason, this policy only applies to information held in digital form. Only digital information is considered part of the Golden Thread.
- 3.2.2 More than one IT system may be used to store and manage Golden Thread information. All systems used for this purpose are recorded in the GTM. The GTM will also explain who is responsible for each system, including who inputs the information and who checks that it is accurate and up to date.
- 3.2.3 Any planned changes to document storage arrangements or IT systems must be reported to the Building Safety team as early as possible. This ensures the Golden Thread is not broken and the GTM is updated to reflect the change.

3.3 Updates

- 3.3.1 There will be instances where updates are required to key pieces of Golden Thread. Any changes must maintain the Golden Thread Principles and importantly, the 'Accountable' principle must be followed and documented. If it is not possible for the software to capture the Accountable principle, an alternative method needs to be implemented by the Responsible Person for that data.
- 3.3.2 Anyone carrying out or managing repairs and maintenance in a higher risk residential building must understand their responsibility to provide and keep Golden Thread information up to date. They must also have the appropriate skills, knowledge, and experience to do this correctly.

4 Roles and responsibilities

4.1 Council responsibilities

- 4.1.1 To keep a single, accurate source of truth, certain roles are responsible for managing the software used for the Golden Thread. This includes entering information and supplying data as Responsible Persons. These roles and responsibilities are clearly set out in the.
- 4.1.2 All other staff have a responsibility to make sure that any information they share is up to date, accurate, and relevant. Staff must only make changes to information if they are the right person to do so, have the correct approval, and save the updated information in the correct digital location.
- 4.1.3 Staff must not save or keep their own copies of Golden Thread information. To protect the single source of truth, information must always remain in its agreed location and only be shared by those who are responsible for managing it.
- 4.1.4 Once a digital location has been agreed as part of the Golden Thread, staff must not change where information is stored without first consulting the Responsible Person for that data and the Building Safety team.
- 4.1.5 Any member of staff may come into contact with information as part of their normal role that forms part of the Golden Thread. Everyone working in or managing any aspect of a higher risk residential building must understand these requirements and have the appropriate skills and knowledge as part of their job competence.

4.2 Third-Party Responsibilities

- 4.2.1 Any contractor working on our higher risk residential buildings must follow the relevant regulations and any Golden Thread requirements that apply to the work they are carrying out. Before starting work, contractors must be able to show that they have the right skills, knowledge, and experience to properly manage and update Golden Thread information, in line with the Building Safety Act 2022.

5 Monitoring and review

5.1 Monitoring and improvement

- 5.1.1 The GTM will be regularly monitored and checked to make sure the Golden Thread information is accurate, complete, and working as it should. This monitoring will be carried out by the Building Safety team.
- 5.1.2 If any issues are identified through this monitoring, improvements will be made to ensure the Golden Thread continues to meet requirements.

5.2 Policy review

- 5.2.1 This policy will be reviewed at least once a year. It will also be reviewed sooner if there are changes to legislation, regulations, the Council's organisational structure, or the systems and software used.
- 5.2.2 The policy will also be reviewed if we receive feedback from the Building Safety Regulator or following a serious or significant incident.
- 5.2.3 Any significant changes will be consulted on prior to implementation and relevant approval sought.

6 Associated policies and strategies

6.1 Homes & Neighbourhoods policies

6.1.1 The following Homes & Neighbourhoods policies and strategies are relevant:

- Asbestos Management Policy
- Electrical Safety Management Policy
- Fire Safety Management Policy
- Gas Safety Management Policy
- Legionella Management Policy
- Lift Safety Management Policy
- Mandatory Occurrence Reporting Policy
- Repairs and Maintenance Policy
- Construction and Contractor Work Policy
- Mobility Scooter Policy
- Complaints Policy
- Resident Engagement Strategy

6.2 Kirklees Council policies

6.2.1 The following wider Kirklees Council policies and strategies are relevant:

- Data Protection Policy
- Records Management Policy