



HILLINGDON’S BUILDING SAFETY STRATEGY 2022 - 2025 - Quarter three December 2024

Following the Grenfell Tower fire on 14 June 2017, the Government has been planning a wholesale reform of the building safety system to improve building and fire safety, with the primary aim of ensuring that residents will feel and be safer in their homes. At the centre of this is the Building Safety Bill (the **Bill**) and its associated regulations and guidance.

As part of the reform the council will require the development or purchase of suitable IT (Infrastructure and Technology) systems to enable the effective management and control of building safety “Golden thread” of data for all appropriate buildings.

The Fire Act 2022 will come into force on 23rd January 2023 following publication of guidance which was published on 6th December 2022.

The Fire & Building Safety Act 2022 creates the role of ‘Accountable Person’ who has several specific responsibilities including the development and implementation of a single Residents’ Engagement Strategy for the whole building. The Council’s approach to engagement is set out in Appendix 2 – [draft] Higher Risk and Complex Buildings Engagement Strategy. For the first time it will be a statutory requirement for a resident engagement strategy to be produced for each in-scope high rise building. The Council’s draft reflects a generic approach which can be tailored to the needs of residents across the 11 tower blocks. The key purpose of the strategy will be for residents aged 16 years and over (including non-resident owners) to be encouraged to participate in the making of building safety decisions.

Please see below pages and items for Lead Officer.

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Version 4- February 2025	Date completed
Gary Penticost, Director of Operational Assets- Principal Accountable Person	Updated January 2025
Rod Smith, Housing Landlord Programme Manager - Accountable Person	Updated January 2025 
Michael Naughton, Head of Capital Programme- Accountable Person	Updated December 2024
Julia Johnson, Director of Planning and Sustainable Growth Accountable Person	Updated November 2024

Action plan: Work together with the Building Safety Regulator to discharge our reformed building control responsibilities effectively

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG rating
Work together with the Building Safety Regulator to discharge our reformed building control responsibilities effectively					
<p>5.2.1 Implement the new building control regime whereby the Regulator becomes the building control authority for higher-risk buildings in the borough.</p>	<p>Identify, maintain, and keep up to date a list of all higher-risk buildings in Hillingdon which the Council is the building control authority for and prepare to liaise with the Regulator in relation to these.</p> <p>Draft new procedures for responding to a Regulator's notice (clause 31 of the Bill) that the Regulator will be building control authority for a non-higher-risk building on a multi-building site which also comprises a higher-risk building.</p> <p>Deliver training on the role of the new building control regime for all relevant staff.</p>	<p>Central Services Development Management and Building Control</p>	<p>2022 - 25</p>	<p>Update July 2023</p> <p>The latest government figures suggest that there are 29 existing HRBs in Hillingdon within the scope of the new regime.</p> <p>It is assumed that this would be an isolated situation where a multi-use site is constructed which contains an HRB. A process of information sharing should be put in place with our planning colleagues to provide an early indication of such a development coming forward. If the BSR becomes the BCB for such a development, it is anticipated that our own BC team will be required to support the regulators MDT (providing our BC team has the capability and capacity and there is no conflict of interest e.g., it is a Hillingdon lead scheme).</p> <p>Update Feb 2024</p> <p>Under the interim staffing arrangements, the council will not have surveyors qualified at the relevant levels to work with the BSR. It is hoped that once a new structure has been agreed, we will be able to recruit permanent staff with the necessary qualifications.</p> <p>It should be noted that other boroughs could perform the BCB and MDT function in Hillingdon if required.</p> <p>Update Nov 2024</p> <p>The council has recruited an Interim Building Control manager who is registered at Class 3 and Class 4 and able to inspect all types of buildings, including HRBs. A proposal for a new service model will be developed for presentation at CMT in February/ March 2025.</p>	<p>Amber</p>
<p>5.2.2 Make effective use of our new powers to provide assistance requested by the Regulator (ensuring careful consideration is given to such requests) and ensure all staff assisting the Regulator are competent to do so;</p>	<p>Draft new procedures for responding to Regulator requests for assistance.</p> <p>Audit skills base across the Building Control team in the light of the new duty to ensure staff assisting the Regulator are competent.</p> <p>Deliver training on the role of the new Regulator for all staff in building safety roles and specific training where any gaps in knowledge or skills are identified.</p>	<p>Central Services - Development Management and Building Control</p>	<p>2022 - 25</p>	<p>Flow Chart for Section 13 requests.</p> <p>November 2024 Update</p> <p>Updates have been made the Ocella system to incorporate the new processes. Work is still underway to ensure the council is able to report on the new KPIs.</p>	<p>Amber</p>

	Review relevant job descriptions to ensure they include any specific competency requirements in relation to the new Regulator.			Interim staff are in place and have received the necessary registration New job descriptions will be provided as part of the service restructure and will incorporate the requirements set out by the new Regulator. Interim job role requirements are in place. It should be noted that other boroughs could perform the BCB function in Hillingdon if required.	
5.2.3 Comply with our new duties, including to co-operate and share information with the Regulator and other relevant persons in order to ensure effective delivery our statutory functions.	Draft new procedures for sharing information and deliver training to ensure staff understand them. Deliver training on the role of the new building control regime for all relevant staff.	Central Services - Building Control	2022 - 25	Nov 2024 Update Updates have been made the Ocella system to incorporate the new processes. Work is still underway to ensure the council is able to report on the new KPIs.	Amber
5.2.4 Implement new enforcement powers in relation to contravention of building regulations, including the introduction of compliance and stop notices.	Review and where necessary redesign building control procedures to incorporate the amended system. Deliver training on the role of the new building control regime for all relevant staff.	Central Services - Building Control	2022 - 25	Nov 2024 Update Updates have been made the Ocella system to incorporate the new processes. Work is still underway to ensure the council is able to report on the new KPIs.	Amber
5.2.5 Where appropriate, register staff members as, and comply with new rules in relation to, registered building inspectors.	Review guidance on general/ specific competency requirements for registered building inspectors and conduct an audit of current skills, knowledge, experience, and behaviours in the team. Make arrangements for registering staff members as registered building inspectors. Review and redesign building control procedures to incorporate new rules on registered building inspectors. Deliver training on the role of the new building control regime for all relevant staff.	Central Services - Building Control	2022 - 25	Nov 2024 Update Interim staff are in place and have received the necessary registration	Amber
5.2.6 Ensure we meet the performance standards set by the Regulator.	Once published, conduct a review of the Operational Standards Rules defining the minimum performance standards that building control bodies must meet to ensure the Council complies with these. Put in place arrangements continuously to assess performance against the standards. Deliver training on the role of the new building control regime for all relevant staff.	Central Services - Building Control	2022 - 25	Nov 2024 Update The standards have not yet been published.	Green

Action Plan: Take responsibility for ensuring building safety is carefully considered in design and building projects

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Take responsibility for ensuring building safety is carefully considered throughout the design and construction process					
<p>6.3.1 Comply with our duties as the Client in Projects, including ensuring:</p> <p>(a) we make suitable arrangements for planning, managing, and monitoring Projects.</p> <p>(b) building information is provided as soon as is practicable to designers and contractors on a Project, including in relation to any HRB work.</p>	<p>Review current building management procedures for planning, managing, and monitoring Projects to ensure they are fit for purpose.</p> <p>Review member oversight arrangements for the design and building process and consider whether further member oversight is required.</p> <p>Review current processes for sharing building information with designers and contractors.</p> <p>Develop new processes to identify and share information on HRB work.</p>	<p>Directorate of Place - Development & Capital Works</p>	<p>2022 - 25</p>	<p>Updated December 2024</p> <p>This is our current practice and procedures are in place to ensure these items are considered. Procedures will be reviewed following any new legislation.</p> <p>Designers, consultants and contractors are required to carry out their duties using reasonable skill and care, and this is referred to in the agreements and contracts executed. In addition, the works are inspected through the construction process. As constructed documents and operation and maintenance manuals form part of the Health and Safety File, which is made available following completion of the building.</p> <p>Information is shared electronically through appropriate software during the construction process and is stored on internal shared folder following completion. A hard copy file is generally issued to managed buildings.</p> <p>The design decisions that affect building safety made throughout the pre-construction and constructions stages will be recorded through the new RIBA tracker template.</p>	<p>Green</p>
<p>6.3.2 Identify and appoint the other Duty holders in the Projects where we are the Client, in line with all regulatory requirements.</p>	<p>Review processes to include any necessary new appointment processes in all Projects.</p> <p>Review current Construction (Design and Management) Regulations 2015 (CDM) processes for appointing designers and contractors to ensure they incorporate the new requirements, particularly as the Client may certify, in writing, that those persons who are appointed under CDM may also be appointed under the relevant building safety regulations.</p>	<p>Directorate of Place - Development & Capital Works</p>	<p>2022 - 25</p>	<p>Updated December 2024</p> <p>All necessary statutory positions under the CDM Regulations and Building Safety Act 2022 are appointed, e.g., Principal Designer and Principal Contractor.</p>	<p>Green</p>
<p>6.3.3 Work together with the other Duty holders to plan, manage and monitor the Project, ensure they cooperate and communicate with each other, coordinate their work, and have systems in place to ensure that the Project complies with all relevant building regulations.</p>	<p>Review processes for working with designers and contractors to ensure compliance with this objective.</p>	<p>Directorate of Place - Development & Capital Works</p>	<p>2022 - 25</p>	<p>Updated December 2024</p> <p>This is current practice and all projects have Building Control Signoff. Any new legislation will be taken into account from the relevant implementation date(s).</p> <p>The entire team delivering a construction process work together and this is implemented using programmes, regular meetings, coordinated data transfer, etc. In addition design decisions that affect building safety made throughout the pre-construction and constructions stages will be recorded through the new RIBA tracker template</p>	<p>Green</p>
<p>6.3.4 Where we fulfil any of the other Duty holder roles, comply with the specific duties and regulatory requirements required for that role.</p>	<p>Review the requirements for other Duty holder roles which are separate to the Client role and ensure the Council can comply with them.</p> <p>Implement systems to identify which roles the Council holds on all Projects and the requirements for each role and implement such processes as are necessary to comply with the Council's different roles.</p>	<p>Directorate of Place - Development & Capital Works</p>	<p>2022 - 25</p>	<p>Updated December 2024</p> <p>This is current practice, and it will continue. All parties in the construction process have defined roles and must comply with the statutory requirements.</p>	<p>Green</p>

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Take responsibility for ensuring building safety is carefully considered throughout the design and construction process					
<p>6.4.1 In our capacity as Client (and any other Duty holder roles), comply with the requirements of:</p> <p>(a) planning gateway one to ensure fire safety matters are incorporated in applications at the planning stage.</p>	<p>These changes have already come into effect.</p> <p>Ensure applicable applications include the required fire statement setting out fire safety considerations specific to the development.</p> <p>Ensure Planning Committee members are fully appraised on the changes.</p>	<p>Directorate of Place - Development & Capital Works</p>		<p>Updated December 2024</p> <p>This is now incorporated into our processes since it became legislation.</p> <p>Applicable applications take account of fire safety considerations and this is incorporated into the design including planning gateway one.</p>	<p>Green</p>
<p>6.4.1 In our capacity as Client (and any other Duty holder roles), comply with the requirements of:</p> <p>(b) gateway two to seek the Regulator's approval before commencing any HRB work, including:</p> <p>i submitting a signed application containing the required information together with the relevant fee.</p> <p>ii ensuring that a signed competence declaration is submitted with the application; and</p> <p>iii if such approval is given, give the Regulator at least 2 working days' notice of our intention to commence the work.</p>	<p>Amend procedures to include the new gateways.</p> <p>The Council will need to include a signed "competence declaration" regarding the other Duty holders' competence. To do this, a framework/ checklist will be required to set out (once the guidance has been published) what evidence the Council will need to satisfy itself of a Duty holder's competence before making this declaration.</p> <p>The Council will review its current procedures for the appointment of persons involved in all aspects of a HRB work to ensure that are fit for purpose and in particular that they enable the Council to complete the required declaration to the Regulator as to the competence of those working on the HRB work Project.</p>	<p>Directorate of Place - Development & Capital Works</p>	<p>2022 - 25</p>	<p>Updated December 2024</p> <p>This is part of our processes for in scope buildings.</p>	<p>Green</p>
<p>6.4.1 In our capacity as Client (and any other Duty holder roles), comply with the requirements of:</p> <p>(c) gateway three to seek the Regulator's approval when the HRB work is complete before registering and commencing occupation of the building, including:</p> <p>i submitting a signed application containing the required information together with the relevant fee.</p> <p>ii submitting a signed statement confirming that to the best of our knowledge the building, as built, complies with all applicable requirements of the building regulations.</p>	<p>Amend procedures to include the new gateways.</p> <p>The Council will need to include a signed statement confirming that to the best of its knowledge the building, as built, complies with all applicable requirements of the building regulations. To do this, a framework/ checklist will be required to set out what evidence the Council will need to satisfy itself of before making this declaration.</p>	<p>Directorate of Place - Development & Capital Works</p>	<p>2022 - 25</p>	<p>This will become part of our processes for in scope buildings.</p>	<p>Amber</p>

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Take responsibility for ensuring building safety is carefully considered throughout the design and construction process					
iii ensuring a compliance declaration signed by the appropriate Duty holder is submitted with the application; and iv before or at the same time a gateway 3 application is submitted, notifying the Regulator in writing that the work has been completed: and					
6.3.2 In our capacity as Client (and any other Duty holder roles), comply with the requirements of: (d) the Regulator's change control procedures where a change is proposed in relation to the HRB work between gateways 2 and 3.	Review procedures to ensure that the relevant changes which require notification or approval of the Regulator can be identified. Draft and implement procedures to ensure that the changes are submitted to the Regulator in compliance with The Building (Higher-Risk Buildings) (England) Regulations [2022].	Directorate of Place - Development & Capital Works	2022 - 25	This will become part of our processes for in scope buildings.	Amber

Action Plan: Ensure those working on our design and building projects and on or in our higher-risk buildings are competent to do so

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Ensure those working on our design and building projects and on or in our higher-risk buildings are competent to do so					
7.2.1 Comply with the new general competency duty to ensure that the Council has the organisational capacity to carry out any building or design work covered by The Building (Appointment of Persons, Industry Competence and Duty holders) (England) Regulations [2021] (the Competency Regulations);	Review the Council's management policies, procedures, systems, and resources to ensure the Council has the organisational capacity to comply with the new duty. Review guidance on general/ specific competency requirements and conduct an audit of current skills, knowledge, experience and behaviours in all relevant teams. Where any gaps are identified, the Council will devise a specific action plan as to how the gaps are to be filled in, which might include training, additional resources or new appointments.	Directorate of Place - Building Safety	2022 - 25	Updated August 2023 All consultants, suppliers and contractors involved in the design and construction of buildings are required to comply with all legislation and ensure they have the competency and resources to carry out their duties. Where the council does not have inhouse expertise it will commission the necessary specialists to undertake the work.	Green
7.2.2 Take all reasonable steps to ensure that those who the Council appoints to carry out any building or design work covered by the Competency Regulations meet the general competence requirement, the competence requirements for their roles and can fulfil their duties to plan, manage and monitor any building work or design work.	Consider the steps that the Council will need to take to be comfortable that external Duty holders are competent. Review all template procurement documents and procedures to reflect the evidence the Council will require from contractors and designers. This links with the competence statement that will need to be provided under Error! Reference source not found. Consider the preparation of checklists to help ensure all requirements are met (and continue to be met) throughout the lifecycle of a project.	Directorate of Place - Building Safety	2022 - 25	Updated August 2023 All consultants, suppliers and contractors involved in the design and construction of buildings are required to comply with all legislation and ensure they have the competency and resources to carry out their duties. Where the council does not have inhouse expertise it will commission the necessary specialists to undertake the work.	Green

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Ensure those working on our design and building projects and on or in our higher-risk buildings are competent to do so					
7.2.3 Where the Council appoints a Principal Designer or Principal Contractor in relation to HRB work, keep written records of the steps taken under 7.2.2; and	Draft new templates to record this information.	Directorate of Place - Building Safety	2022 -25	Updated August 2023 All written records required by legislation shall be kept by the Principal Designer and Principal Contractor and they shall be made available in the Safety File and/or any other format required by law.	Green
7.2.4 Ensure we meet the specific competency requirements where the Council is appointed in any other Duty holder role, including, where required, designating an individual to manage the Council's functions under a particular role.	Consider which individual should be appointed in cases where the Council fulfils the Principal Designer and Principal Contractor roles. Review guidance on general/ specific competency requirements and conduct an audit of current skills, knowledge, experience and behaviours in the team. Deliver training where any gaps are identified.	Directorate of Place – Building safety	2022 - 25	Updated August 2023 All consultants, suppliers and contractors involved in the design and construction of buildings are required to comply with all legislation and ensure they have the competency and resources to carry out their duties. Where the council does not have inhouse expertise it will commission the necessary specialists to undertake the work. Where further training is required, this shall be undertaken.	Green
7.2.5 Ensure that where the Council appoints specific persons (such as Building Safety Managers) to work on our higher-risk buildings, they meet the competency requirements to do so.	Review guidance on general/ specific competency requirements and conduct an audit of current skills, knowledge, experience and behaviours in the team. See paragraph Error! Reference source not found. for specific requirements for the Building Safety Manager role. Review job descriptions for any role working on higher-risk buildings to ensure compliance with competency regulations and guidance.	Directorate of Place – Building Safety	2022 - 25	In July 2022 the British Standards Institution published a number of new competency standards for roles responsible for safety management in the built environment. This included PAS 8673, which sets out competency requirements for the management of safety in residential buildings. PAS 8673 had originally been intended to set out competency requirements for the Building Safety Manager role in the higher-risk regime in the Building Safety Act. The standard now sets out competency requirements for safety management in the occupation phase of a higher-risk building, against which duty holders can assess all people performing necessary tasks in higher-risk buildings. Fire Safety Board will consider the need to align the competencies of key staff involved in the management and maintenance of higher risk buildings against PAS 8673 during 2024/25. There is no longer a requirement to appoint Building Safety Managers. Following Cabinet Member approval, the Housing Landlord Programme Manager will assume the role of Accountable Person to support the Principal Accountable Person [Director of Operational Assets] with specific delivery and management tasks associated with the Council's approach to 'people, property and prevention' in the context of the management of its own in-scope buildings.	Green

Action Plan: Effectively carry out our new statutory responsibilities for our occupied higher-risk buildings

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Effectively carry out our new statutory responsibilities for our occupied higher-risk buildings					
<p>8.3 We will be proactive and clear about our role within a higher risk building and comply with all our duties and responsibilities under the new legislation.</p>	<p>Audit each existing higher risk building to identify all the Accountable Persons for each and ensure this information is documented. Where the Council is the only Accountable Person, it will automatically become the Principal Accountable Person under legislation.</p> <p>Consider whether amendments to the Council's constitution are required to provide for these new roles.</p> <p>Consider amending the Forward Plan to include any reporting to Cabinet on Accountable Person/ Principal Accountable Person issues.</p>	<p>Directorate of Place – Building Safety</p>	<p>2022 - 2025</p>	<p>See 7.2.5 above in relation to Principal Accountable Person / Accountable Person roles in relation to occupied higher risk buildings.</p> <p>Principal Accountable Person: Gary Penticost (GP) Accountable Person: Rod Smith (RS) Michael Naughton (NS) Julia Johnson (JJ) Duty Holder: Alana Martin (AM)</p>	<p>Green</p>
<p>8.4.1 Ensure that:</p> <p>(a) new higher-risk buildings are registered with the Regulator before they become occupied or as soon as the relevant section of the Bill comes into force and identify the Council as the Principal Accountable Person; and</p> <p>(b) existing higher-risk buildings are registered with the Regulator within the appropriate transition period or as soon as the relevant section of the Bill comes into force and identify the Council as the Principal Accountable Person.</p>	<p>The Council has identified its existing higher-risk buildings that will need to be registered. Once the Government has published details on the transition period and regulations on registration requirements, arrangements should be made to ensure each building is registered.</p> <p>Identify any higher-risk buildings in the pipeline and draft a specific action plan for that building, including compliance with registration requirements.</p> <p>Deliver training for all teams involved in higher-risk buildings on the regime.</p>	<p>Directorate of Place – Building Safety and Capital works</p>	<p>2022 - 2025</p>	<p>(a) Any necessary registration of new HRB will be undertaken as set out in the legislation.</p> <p>(b) Cavenham Court, 18 Millington Road, Hayes UB3 4FZ is an 'in-scope' building acquired by the Council in September 2024. The property was registered with the BSR and confirmation of registration received prior to letting. A third FTE Tenancy Management Officer [High Roise Living] was introduced at this stage when the number of in-scope blocks increased from 10 to 11. RS</p> <p>(c) We have identified the 11 higher-risk buildings that require registration within LBH Stock. All buildings have been registered with the BSR by the Building Safety Advisor.</p> <p>Training provided: Direct Labour Team are attending Trada training W/C 24th February. This will ensure that LBH staff are complaint when installation of new fire doors and repairs and completed check on Fire door sets that have been installed are all to a competent standard. Tenancy officers and scheme managers completed fire door training in April 2023 to ensure they are competent to undertake fire door checks. Fire Safety Board will review the need and scope for mandatory refresher training to be delivered in 2024/25 to relevant staff groups and review this annually moving forward. RS</p>	<p>Green</p>
<p>8.4.2 Be responsible for applying for a Building Assessment Certificate for the whole building after the higher-risk building has been registered, as directed by the Regulator.</p>	<p>After registration, the Accountable Person for a high-risk residential building will need to apply for a Building Assessment Certificate within 28 days of a direction from the Regulator. Therefore, procedures should be drafted to ensure that the Council complies with this timescale and the documentation required to be submitted with it under section 74 of the Bill.</p>	<p>Directorate of Place – Building Safety</p>	<p>2022 - 2025</p>	<p>This stage will be completed by Building Safety Advisor, following registration being completed we will need to apply for the building assessment certificate. Documents will need to be shared including, the Safety Case Report, mandatory Occurring Reporting System and the Residents Engagement Strategy. The Regulator will assess the documents and inspect the building if passed they will provide a building assessment certificate. This stage is live in April 2024.</p> <p>Current advice is that the BSR will invite Landlords to apply for a BAC on a 'risk-based approach'. It may therefore be some time before the Council is invited to apply in relation to the 11 'in-scope' blocks it owns and manages. The Assessment Criteria set and used by the BSR for each element of the submission for a BAC was obtained in November 2024. This assessment criteria will be used to forward plan a series of self-assessments ahead of any application to ensure that the Council's</p>	<p>Green</p>

				submissions would be 'fit for purpose' and 'right first time'. The self-assessment programme will complete by the end of Q1 2025/26, and actions identified will be reported to Landlord Board and Cabinet Member Leads. RS	
8.4.3 Establish and operate a system for Mandatory Occurrence Reporting and comply with Mandatory Occurrence Reporting requirements as set out in paragraph 10.	See paragraph 10.	Directorate of Place - Building Safety & Capital works	2022 - 2025	Any mandatory occurrence reporting will be undertaken in accordance with the requirements set out in legislation. Occupation Stage: Any incidents that occur will be reported by Building Safety Advisor. The Council's adopted approach to Mandatory Occurrence Reporting will be documented in a Practice Standard and 'sign-off' by Landlord Board by March 2025. RS	Green
8.4.4 Comply with our responsibilities for resident engagement set out in paragraph 9.	See paragraph 9.	Directorate of Place - Building Safety and Housing Management	2022 - 2025	A Tenant & Leaseholder Engagement Strategy has been completed and adopted following consultation and Cabinet approval. This overarching strategy includes specific proposals for resident engagement associated with the Council's management and maintenance of its portfolio of tower blocks. Engagement with tower block residents will support the Council's approach to taking a partnership approach in delivering safe, well managed and maintained higher-risk buildings. Copies of the strategy have been delivered to all households / persons over 16 years of age residing in the 10 in-scope blocks. [There is no plan in place for the recently acquired block at Cavenham Court – see 8.4.1 above] The engagement strategy will be reviewed in conjunction with residents in 2024/25 to bring forward more tailored plans linked to the needs of residents across each of the 11 in-scope blocks. See 8.4.2 above in relation to ensuring that revised and updated Engagement Strategies for each of the 11 'in-scope buildings' will be aligned to the BSR assessment criteria linked to applications for BACs. RS	Green
8.4.5 Develop and maintain a Safety Case for each higher risk building by: (a) conducting an assessment of fire and structural safety risks for areas of responsibility as soon as reasonably practicable after the building becomes occupied or, if later, when the Council becomes an Accountable Person for the building. (b) conducting further assessments of fire and structural safety risks for areas of responsibility at regular intervals, at any time we have reason to suspect the current assessment is no longer valid and at direction of the Regulator; and (c) taking all reasonable steps to prevent a major incident occurring because of a building safety risk materialising and to reduce the severity of the incident.	The Council has a hierarchy of control approach which applies to all Hillingdon's residential buildings but is focussed on higher-risk buildings. All existing higher-risk buildings have been surveyed to identify potential issues, and this has generated a work schedule that has ensured that all buildings meet or exceed the requirements of the Bill. This information should be stored and maintained in order to form part of the golden thread and Safety Case for all of the Council's higher-risk buildings. Ensure there are systems in place going forward to identify and assess "building safety risks" (as defined in the legislation) and take reasonable steps to ensure those risks are reduced and controlled to a proportionate level on an ongoing basis. Procedures should be developed to ensure the assessments are done within the timescales prescribed by the Bill and in line with the definition of "building safety risks" in clause 59 of the Bill. Ensure assessments are recorded. Deliver training to relevant teams on identifying and managing "building safety risks." When taking steps to manage building safety risks within their buildings, the "prescribed principles" must be followed, which build on existing best practice in relation to risk assessment and management. These are: <ul style="list-style-type: none"> • avoid building safety risks. • evaluate building safety risks that cannot be avoided, including identifying the proportionate measures required to reduce address and mitigate the building safety risks. 	Directorate of Place - Building Safety and Housing Management	2022 - 2025	A Housing Management Offer has been developed which sets out the Council's approach to the day-to-day management of its tower block portfolio. The Council has adopted an effective approach which considers the 'people' and 'property' relates risks as part of its approach to the assessment, prevention and mitigation of building safety risks. This provides for a more robust and holistic approach to housing management which has feed into the Safety Case Reports. The Housing Management Offer is now being delivered by 3 FTE dedicated staff within Tenancy Management [and increase of 1 FTE following the acquisition of Cavenham Court, 18 Millington Road. RS Following pilot delivery of the offer, the 'Housing Management offer to residents living in higher risk buildings' has been formally adopted and hand delivery along with the engagement plan and the tailored fire safety information packs to all residents which was completed in March 2024. See comments regarding training above in 8.4.1 as well as 'accreditation under PAS 8673 8.4.5 has a clear focus on the production and submission of Safety Cases for each block. This appears not to have been covered in this section and information about our Safety Cases and compliant submission should be inserted in front of the para on the Housing Management Offer. RS	Amber

	<ul style="list-style-type: none"> • combat building safety risks at source by introducing proportionate measures to reduce, address and mitigate that risk at the earliest opportunity. • ensure suitable and proportionate systems are in place for the effective inspection, testing and maintenance of the efficacy of measures taken. • give collective protective measures priority over individual protective measures. • adapt to technical progress. • where reasonable to do so, replace the dangerous with the non-dangerous or less dangerous. • where reasonable to do so, consider the impacts on residents within the higher risk building and carry out engagement with those residents, and • give appropriate instructions and information to employees and persons working on or in the higher-risk building. <p>Review the current approach to ensure it follows these prescribed principles.</p> <p>The Council should consider drawing together relevant information for each higher-risk building's Safety Case, based on the early-adopter safety cases on existing buildings and the HSE's "Safety case principles for high-rise residential buildings."</p>				
<p>8.4.6 Bring together the Safety Case Report to show the steps taken to identify, assess, remove, reduce, and manage building safety risks, demonstrating that reasonable and proportionate steps have been taken, and where required, submit these to the Regulator for assessment.</p>	<p>The Safety Case Report is a document that summarises your safety case. It should provide a narrative describing why the most important parts of the safety case are necessary and how these parts work together to keep the building safe to occupy. Documents or information used in the safety case may be referenced in the report to support that narrative.</p> <p>The report should show that you have a clear understanding of the major hazards associated with your building and how the measures you have in place are effective in managing and controlling the risk of a major accident. This should give the reader confidence that the major fire and structural risks have been identified and are being properly managed and controlled.</p> <p>The Council should consider drawing together relevant information to contribute to each higher-risk building's Safety Case Report, based on the early-adopter safety cases on existing buildings and the HSE's "Safety case principles for high-rise residential buildings."</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>See 8.4.5 above. RS</p> <p>A housing management offer has been developed and is being delivered to residents living in higher-risk buildings. Residents were consulted on the draft offer prior to formal adoption.</p> <p>The more intensive approach to housing management reflected in the offer underpins the effective management of people / behaviours to deliver safe, well managed and maintained higher-risk buildings.</p> <p>Resident information packs have been completed and hand delivery to all residents across the 10 in-scope blocks. As at March 2024. Resident information packs are under development for the newly acquired block at Cavenham Court, 18 Millington Road. RS</p> <p>Key building information has been uploaded to the online portal by end of September.</p> <p>Building Safety Cases have been created for all 11 LBH owned tower blocks.</p>	<p>Amber</p>
<p>8.4.7 Apply a Safety Management System to make and implement arrangements which deliver the effective planning, organisation, control, monitoring, and review of all the measures in place to prevent an incident involving building safety risks materialising and to limit the impact should one occur.</p>	<p>Review/ implement a tailored Safety Management System to suit the Council's size and nature, meeting the complexity of the Council's operations, with the hazards and associated building safety risks unique to each individual building directly considered.</p> <p>Ensure this is in line with the "Plan, Do, Check, Act" methodology and includes processes to identify, select, define, implement, monitor, maintain, review and improve the range of control measure on which safety depends.</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>See above – the management of risks associated with people and behaviours is set out with the Housing Management Offer.</p> <p>A joint quality assurance framework will be developed between Building Safety & Housing Management by the end of Q1 2025/26 to ensure that 'the right thing is being done at the right time to the required standard' across all aspects of building safety and housing management which contribute to the effective management of risk and the prevention of building safety incidents. The development of the framework [Standard] will include matters relating to training and refresher training. RS</p>	<p>Amber</p>
<p>8.4.8 Appoint a Building Safety Manager for the whole higher risk building with the necessary skills, knowledge, experience and</p>	<p>Implement a staffing structure that will fully meet the Council's requirements in respect of the new building safety</p>	<p>Directorate of Place -</p>	<p>2022 - 2025</p>	<p>2 FTE dedicated staff have been engaged to deliver the Housing Management Offer across the higher risk buildings portfolio.</p>	<p>Green</p>

<p>behaviours or organisational capacity to carry out the role (or, where appropriate, carry out the role ourselves, appointing an individual to manage and direct the appropriate teams).</p>	<p>regime, including the appointment of a sufficient number of Building Safety Managers.</p> <p>Once guidance is published, job descriptions should be tailored, and skills of current staff members audited to ensure Building Safety Managers meet the competence requirements for the role. This should be regularly reviewed and documented.</p>	<p>Building Safety and Housing Management</p>		<p>There is no longer a requirement to appoint Building Safety Managers. Following Cabinet Member approval, the Housing Landlord Programme Manager will assume the role of Accountable Person to support the Principal Accountable Person [Director of Operational Assets] with specific delivery and management tasks associated with the Council's approach to 'people, property and prevention' in the context of the management of its own in-scope buildings.</p> <p>In relation to the broader governance of Fire Safety matters, Fire Safety Board will review its Terms of Reference in December 2024 to include broader attendance by a range of managers who directly or indirectly contribute to the management of higher risk buildings and fire safety generally. RS</p>	
<p>8.4.9 Be responsible for displaying information about the most recent Building Assessment Certificate, compliance notices and details of those responsible for managing building safety for the higher risk building.</p>	<p>Draft procedures to ensure these requirements are complied with, where necessary.</p> <p>Deliver training for all teams involved in higher-risk buildings on the regime.</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>All higher risk buildings contain appropriate notice boards in prominent locations. 2 FTE dedicated Tenancy Management Officers [High Rise Living] have taken ownership of these boards to ensure information presented is compliant, up to date, is helpful to residents and supports the adopted engagement strategy Standards will be set and documented in the context of a uniform approach to information displayed within the tower blocks by March 2025.</p> <p>The Fire Safety Board has assumed responsibility for identifying, scoping and documenting relevant Fire Safety training needs for individual staff members / staff groups and ensuring delivery. This Standard will be documented and reflect Mandatory training requirements. RS</p> <p>The BSR will produce the building assessment certificate after April 2024, they will assess the Key Building Information that has been uploaded and will produce the certificate. The tower blocks will be audited by BSR before a certificate can be produced. This will then be displayed within the ground floor communal areas of all tower blocks.</p>	<p>Amber</p>
<p>8.4.10 Where a special measures order has been made, ensure that no Building Assessment Certificate relating to the building is displayed in the building.</p>	<p>Draft procedures to ensure these requirements are complied with, where necessary.</p> <p>Deliver training for all teams involved in higher-risk buildings on the regime.</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>Once a special measure order is made to the Accountable Persons as they are not meeting their duties, the Duty Holder and Fire Safety Inspector will ensure that the building Assessment Certificate is not displayed within the building.</p> <p>Note comment in 8.4.9: <i>The BSR will produce the Building assessment certificate after April 2024, they will assess the Key Building Information that has been uploaded and will produce the certificate. The tower blocks needs to be audited by BSR before a certificate can be produced. This will then be displayed within the ground floor communal areas of all tower blocks.</i></p>	<p>Green</p>
<p>8.4.11 Take the lead responsibility for coordinating the golden thread of safety information for the higher risk building as set out in paragraph 10.</p>	<p>See paragraph 10.</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>The Fire Safety Board has assumed responsibility for implementing a programme of self-assessment / audit to ensure that safety related information is available and meets the threshold for compliance at individual block level.</p> <p>A programme of desktop / site visit audits will be developed in Q4 2024/25 and rolled out in 2025/26 with outcome reported to Landlord Board and Cabinet leads as part of engendering assurance. RS</p>	<p>Amber</p>
<p>8.5 Where there is more than one Accountable Person in a higher-risk building, more complex arrangements arise. We will comply with all of our additional duties, including those to co-operate, consult and co-ordinate with other Accountable Persons and Responsible Persons for fire safety.</p>	<p>Identify and record whether there are other Accountable Persons and Responsible Persons for each higher-risk building. Where there are, consider what additional requirements are needed under the Bill in relation to the Principal Accountable Person, consulting or co-ordinating with others (for example, in relation to appointing a Building Safety Manager).</p> <p>Review information sharing systems to ensure co-ordination.</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>Following Cabinet Member approval, the Housing Landlord Programme Manager will assume the role of Accountable Person to support the Principal Accountable Person [Director of Operational Assets] with specific delivery and management tasks associated with the Council's approach to 'people, property and prevention' in the context of the management of its own in-scope buildings.</p> <p>The coordination of responsibilities between the Principal Accountable Person and the Accountable Person is undertaken via the Fire Safety Board. Terms of reference for this Board will be reviewed in December 2024. RS</p>	<p>Green</p>

<p>8.6 The Bill also makes changes to the fire safety system which places duties on the Responsible Person. Where the Council is the Responsible Person for a building regulated by the Regulatory Reform (Fire Safety) Order 2005 (FSO), we will comply with our new duties.</p>	<p>Update documents, precedents, and procedures to ensure that the Council:</p> <ul style="list-style-type: none"> Records fire risk assessments in full. Does not appoint a person to assist with making or reviewing a fire risk assessment unless the person is competent. Records fire safety arrangements. Co-operates and co-ordinates with any other Responsible Persons and Accountable Persons in line with legislative requirements; and Keeps records of relevant fire safety information. <p>Key actions include:</p> <ul style="list-style-type: none"> Review guidance on general/ specific competency requirements for persons and conduct an audit of current skills, knowledge, experience, and behaviours in the team Take steps to ascertain who the other Responsible Persons are in buildings regulated by the FSO and Accountable Persons in higher-risk buildings 	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>In relation to PAS 8673 competency levels mentions LBH staff currently managing HRB's and our term contractors completing works adhere to the below comments: <i>'Those managing HRBs (or those appointed to do so) should have sufficient working knowledge to make informed decisions, ask intelligent questions, understand when to bring in any expert help and understand how to co-ordinate action based on this expert advice.'</i></p> <p>LBH building safety team and managers are being competent with the necessary skill in relation to PAS 8673.</p> <p>As part of the statutory engagement plan for residents living in higher risk buildings, core documents and other safety and maintenance related information will be made available to residents in simple, easy to access formats. Transparency will underpin the Council's approach to engagement and information sharing. See comments under 8.4.11 and 8.4.9 above.</p> <p>Frankham's undertake fire risk assessment for Hillingdon stock in line with the current regulations and PAS 8673. These are undertaken on a yearly basis and all recommendations are completed within a timely manner. [To include reference to the FRA standard we documented here, which includes our high-risk buildings] RS</p>	<p>Green</p>
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Action Plan: Engage and communicate with residents meaningfully about building safety for higher-risk buildings

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Engage and communicate with residents meaningfully about building safety for higher-risk buildings					
<p>9.3.1 ensure residents are informed about, and are involved in decisions that concern the safety of their higher-risk building, including providing residents with relevant safety information about the building and enabling residents to request further safety information (in line with data protection legislation);</p>	<p>Develop training to relevant teams to understand what information must be provided to residents and when.</p> <p>Amend cross-departmental procedures to ensure information is communicated to residents in a timely manner.</p> <p>Where the Council is the Responsible Person for buildings regulated by FSO containing two or more sets of domestic premises, we must provide residents with relevant and comprehensible information about relevant fire safety matters. These buildings will need to be identified and tailored information provided.</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>Tailored residents 'fire safety packs' and other relevant documentation including the summary housing management offer and engagement strategy, were hand delivered to all residents by the end of March 2024. Processes are in place to share the tailored fire safety packs and other relevant documentation with all new tenants via the 'sign-up process' / "new tenant visit and to all new leaseholders via the assignment process / solicitors' enquiries.</p>	<p>Amber</p>
<p>9.3.2 implement (and share with residents) a Residents' Engagement Strategy that promotes residents' engagement and involvement in decision-making about the management of their higher risk building in relation to building safety.</p>	<p>The tenancy management team have produced a document Service Offer – High Rise Living 2021 outlining the Council's commitment to its residents. This should be reviewed in line with the requirements of the Bill.</p> <p>Produce a Residents' Engagement Strategy that meets the requirements of the Bill. Consider whether this will be</p>	<p>Directorate of Place - Building Safety and Housing Management</p>	<p>2022 - 2025</p>	<p>See above 8.4.5</p> <p>The Housing Management Offer has been reviewed and updated to reflect the changes linked to the enactment of the Building Safety Act 2022. This Offer will be the subject of ongoing review and amendment, in conjunction with residents, as detailed Regulations are implemented.</p> <p>Except for Cavenham Court, 18 Millington Road, Resident Engagement Strategies are in place across the remaining 10 blocks. See 8.4.2 and 8.4.4 above in relation to review and self-assessment. RS</p>	<p>Green</p>

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Engage and communicate with residents meaningfully about building safety for higher-risk buildings					
	a new strategy, or a current strategy will be updated. The strategy should contain: <ul style="list-style-type: none"> • what information will be provided to residents • what residents will be consulted on • how residents' views will be sought • how the effectiveness of the strategy will be measured. 				
9.3.3 establish and operate a complaints system which ensures residents' safety concerns are heard and dealt with.	Once regulations are published, develop, and implement a new complaints system. Consider whether this will be separate or part of the current complaints system and how cross-departmental working will need to be amended.	Directorate of Place - Building Safety and Housing Management	2022 - 2025	The role of complaints is reflected within the statutory engagement plan as part of demonstrating that 'the voice of residents' will be heard and acted upon. A complaints process has been developed which captures 'safety related concerns' at individual block level has been developed and promoted via the Housing Management offer. To date no complaints have been received via the new complaints process. As part of refreshing and reviewing the current Engagement Strategies with reference to published good practice and the BAC assessment criteria [see above] opportunities will be explored to raise the profile of online reporting of 'safety related concerns' to residents living across the tower block portfolio. RS	Green
9.3.4 clarify our responsibilities and residents' responsibilities to ensure their homes remain safe, including implementing and where necessary, enforcing, the three new safety-related obligations on residents to help them to play their part: and	Consider how the Council will communicate with residents regarding their new responsibilities. Implement new procedures for issuing Contravention Notices and applications for access to premises. Consider whether any amendments to the Council Tenancy Handbook or related documents should be made to reflect the proposed new tenant statutory duties.	Directorate of Place - Building Safety and Housing Management	2022 - 2025	New and existing landlord and tenant responsibilities are clearly set out in the housing management offer to residents living in higher risk buildings. Supporting the delivery of the offer will be more detailed operational practices which support staff in effectively enforcing rights and obligations. Regulations are awaited following enactment of the Building Safety Act 2022. The Sect 38 Building Safety Act 2022 (BSA) gives Accountable Persons (APs) the power to issue contravention notices to residents and owners of residential units who breach their building safety duties. APs can also request access to premises to carry out their duties. If necessary, a County Court can grant an order for access. APs can issue contravention notices if they believe a resident or owner is: <ul style="list-style-type: none"> • Causing a building safety risk • Interfering with a safety item • Failing to comply with a request for information • The notice requires the recipient to remedy the breach or pay a sum within a specified period • If the recipient is not the owner, the AP must provide a copy of the notice to the owner Operational practices will be documented and brought forward by the end of Q1 25/26 in relation to the use and progression of Contravention Notices. Consideration will also be given to introducing Estate Regulations, developed in conjunction with Legal Services, for consultation with Leaseholders. If implemented, they will assume the status of 'express lease conditions' and support the Council in 'levelling up' obligations between tenures to support a more uniform and robust approach to enforcement. Consultation with leaseholders in higher risk buildings will take place in 2025/26 RS	Amber
9.3.5 ensure relevant tenants and leaseholders are aware of the new implied terms relating to building safety and consult on and implement new provisions for the Building Safety Charges in respect of costs incurred in connection with building safety measures.	Consider amends to relevant leases to explicitly set out the new implied terms.	Directorate of Place - Building Safety and Housing Management	2022 - 2025	Leasehold charges are referenced in the housing management offer. The proposals within the Building Safety Bill associated with leasehold accounting and charges were 'watered down' following the enactment of the Building Safety Act 2022. Leaseholders will be updated on the extent of charges which can be passed on and the statutory safeguards which are in place once Regulations are issued. Request made to	Amber

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Engage and communicate with residents meaningfully about building safety for higher-risk buildings					
	Introduce the new Building Safety Charge in accordance with the new Schedule 2 of the Landlord and Tenant Act 1985 and update service charge procedures accordingly.			Legal Services 3.9.24 on the extent of any Guidance issued in relation to revised charging arrangements. RS	

Action Plan: Establish systems and share building safety information with the Regulator and others

Objective	Actions to deliver objective	Service area	Timeframe	Comments/ status	RAG Rating
Establish systems and share building safety information with the Regulator and others					
10.4.1 During the design and construction phase: (a) As a client, take all reasonable steps to ensure that the Principal Designer or Principal Contractor: i. Before the construction phase begins, establishes, and thereafter operates and maintains an effective Mandatory Occurrence Reporting System to enable those on the site or in the building to report safety occurrences to the Duty holder(s). ii. Takes reasonable steps to ensure that those on the site or in the building know how to use the Mandatory Occurrence Reporting System and can identify which safety occurrences to report before they start work or enter the site; and iii Reports certain safety occurrences to the Regulator within the prescribed timescales. iv. Ensures an appropriate frequency of inspections for safety occurrences throughout the construction phase. (b) As a Principal Designer or Principal Contractor, we will take responsibility for the duties set out in paragraphs 10.4.1(a); (c) As a client, submit key building information to the Regulator and others in accordance with regulatory requirements.	Establish a Mandatory Occurrence Reporting System in cases where the Council will be the Principal Designer or Principal Contractor. Train staff to identify when and how to use the system. Embed procedures to report "key building information" to the Regulator in accordance with The Building (Higher-Risk Buildings) (England) Regulations [2022]. There will be prescribed information (listed in those regulations) which must be uploaded to the Regulator's online portal and shared with others before the occupation period begins. Where the Council is the Client and other persons take the role of Principal Designer or Principal Contractor, consider what the Council will need to assure itself that the Principal Designer or Principal Contractor can comply with the Mandatory Occurrence Reporting Requirements.	Directorate of Place – Capital works and Building Safety	2022-2025	Update August 2023 A Principal Designer and Principal Contractor are appointed for all construction applicable projects in accordance with the Construction Design and Management Regulations 2015. Any mandatory occurrence reporting required by law will be undertaken and systems set up for its use and any relevant reporting to the Regulator. Principal Designers and Principal Contractors shall be responsible for their duties as set out in legislation and any contractual requirements.	Amber
10.4.2 Introduce and comply with a system of voluntary reporting of information about building safety to promote a positive culture within safety management systems.	Once further regulations are issued, review current procedures, and amend as necessary so there are clear processes for when and how to voluntarily report certain issues to the Regulator.	Directorate of Place - Building Safety and ICT	2022-2025	New Regulations will be added to this document and circulated with all to implement to the correct areas. No additional regulations have been provided to date.	Green

<p>10.4.3 During the occupation phase, we will establish, oversee, and comply with a Single Mandatory Occurrence Reporting System and process, capture and report certain fire and structural safety issues to the Regulator.</p>	<p>Establish a Mandatory Occurrence Reporting System, to be operated by the Building Safety Managers. This is likely to require new information systems.</p> <p>Deliver training to all those whose role means they may need to make a report.</p>	<p>Directorate of Place - Building Safety and ICT</p>	<p>2022-2025</p>	<p>There is no requirement for a Building Safety Manager who would manage this action. Under Review with the Building Safety Advisor.</p> <p>Comments from the HSE website: Provide an overview of your organisation’s mandatory occurrence reporting system, as defined in the legislation. Include:</p> <ul style="list-style-type: none"> • how this has been communicated to, and arrangements for liaison with, other accountable persons • the arrangements for reporting required occurrences to BSR • a summary of any reports in the period since the building safety case was last submitted to BSR. If this is your first assessment, cover the period since the duty came into effect. The summary should include any learning points or remedial actions identified from the incident 	<p>Green</p>
<p>10.4.4 As the Client for any HRB work and also during the occupation phase, take the lead responsibility for coordinating the golden thread of safety information for the building, keeping it updated, ensuring it is accurate and accessible and meeting our responsibilities in providing golden thread information to other parties.</p>	<p>Make arrangements for an electronic system/ facility to be created and maintained by the Client (or someone on their behalf) for the purpose of holding the golden thread information. The exact requirements for the golden thread are yet to be published by the Government but its policy intentions are set out in "Building Regulations Advisory Committee: golden thread report."</p> <p>As the Client, develop procedures for handling this over to the relevant person in occupation so that building owners have to hand well-documented and accurate evidence of their risk assessments and safety arrangements, as well as the documentation supporting these. In many cases, this is likely to be one department in the Council handing over information to another.</p> <p>Develop procedures for persons involved with the higher-risk buildings to maintain any golden thread information in the electronic system.</p> <p>Develop procedures to ensure the required information is stored on the facility and uploaded within the required timescales and that the system is kept up to date.</p>	<p>Directorate of Place - Building Safety and ICT</p>	<p>2022-2025</p>	<p>Electronic system are in progress.</p> <p>Building Safety update: The below documents have been created and will be hand delivered by the high-rise tenancy officers to ensure everyone has received and understood</p> <p>Building Safety pack for tenants Stay Put Policy document- Fire Doors Policy document Building Safety case</p>	<p>Green</p>