



HOUSING MANAGEMENT STRATEGY FOR OCCUPIED HIGHER RISK BUILDINGS – DELIVERY PLAN 2025/26 – 2026/27

The Housing Management Strategy for Occupied Higher Risk Buildings sets out the approach by the Housing Management Service to make an effective and compliant contribution to the Council’s Building Safety Policy in the context of occupied higher risk buildings within its ownership and management. This Strategy, and the Delivery Plan, has been developed to ensure that the Council is fully compliant with the Building Safety Act 2022, the Social Housing Regulation Act 2023 and other legislative and regulatory obligations which at their heart are designed to ensure that our residents are ‘fire safe’ and ‘fire aware’.

The Housing Management Service, in conjunction with residents, will carry out a review of the Strategy and delivery plan every three years to make sure that it remains properly aligned to regulatory requirements and the needs of residents. In the event of any material secondary legislation being introduced, a review will take place in advance of the stated review period. The review process will also enable us to assess how well we have delivered against the priorities and targets set and identify areas for improvement. It will also enable us to use feedback received from residents and the latest best practice to ensure that our Strategy for occupied higher risk buildings and associated Delivery Plan remains fit for purpose.

Version 1- March 2025	Date completed / Approved
Rod Smith – Housing Landlord Programme Manager / Accountable Person	18 March 2025
Gary Penticost, Director of Operational Assets - Principal Accountable Person	20 March 2025
Sam Strong – Assistant Director – Homes & Neighbourhoods	20 March 2025

Quarterly Control Update	Date
Rod Smith – Housing Landlord Programme Manager / Accountable Person	Q1 – 27 June 2025
Rod Smith – Housing Project Delivery Manager / Accountable Person	Q2 – 29 September 25
Rod Smith – Housing Project Delivery Manager / Accountable Person	Q3 – 16 January 26

	Actions to deliver objective	Lead	By	Comments/ status / evidence	RAG
1. Improve levels and quality of data to ensure a 'single source of the truth' associated with all forms of occupation arrangement to effectively contribute towards the 'golden thread' of information and to improve outcomes for residents.					
1.0 Achieve a 'single view of the tenant' and household members which supports the effective management of higher risk buildings, and which can be used to improve decision making and bring forward better outcomes for residents	Scope the extent of household information needed for tower block residents over and above that needed for the general needs portfolio.	SN	Q1	SN briefed – 6.5.25 No further action required. Data on Tower block tenants / households to be captured as part of 'tenant census' workstream. Tenancy Management to focus on; leaseholders / subtenants and keeping data up to date 'post census'. Welfare checks and PEP/PEEP being amended by DDT [18.06] to capture household members too	G
	Where data is not forthcoming for any household, ensure action is taken outside of the project to achieve 100% coverage.	SB	Q4	'Tenant census' commencement estimated to be July 25 and completion December 25.	
	Introduce operational practices to capture relevant household data across leasehold properties [including those which are sub-let] as an integral part of delivering the 'housing management offer' for occupied higher risk buildings.	BG	Q2	Practical use to be made of the template used for the 'tenant census'. Update requested from BG 27.8	R
	Introduce operational practices which supports the adopted standard for refreshing household data across the higher-risk buildings portfolio making effective use of 'touch points' set out in the 'housing management offer' for occupied higher risk buildings.	SB	Q4	SN briefed – 6.5.25 Practical use to be made of the template used for the 'tenant census'. Task put back from Q2 to Q4 to move forward from recently uploaded tenant census data.	
1.1 Ensure data held within premises information boxes [PIBs] meets the current requirements of the 'Code of Practice for the Provision of Premises Information Boxes in Residential Buildings'	Document procedural guidance / standards for the population and maintenance of data supplied to PIBs by Housing Management	SB	Q2	SN briefed – 6.5.25 Simple 'Standard' to reflect who does what and when and to ensure the content of the PIBs match back-office records, the reality of residents living in the block and any 'flags' on NEC. Update and evidence from SN 16.9 – PIB Management standard documented.	G
	Ensure accurate and up to date digital records are in place to 'back-up' hard copy records held within PIBs which can be made available to the Fire & Rescue services on demand.	SB	Q1	SN briefed – 6.5.25 Completed – High-rise Living 'working plan' stored centrally as Excel doc.	G

	Use NEC to extract system-based reports on households who are flagged as being category 1 or category 2 residents and / or residents who are receiving oxygen therapy.	SN	Q4	SN briefed – 6.5.25 Task put back from Q4 linked to ongoing census work. SN has met with TC and KS to scope 'person attributes' element in NEC to record this data captured via census, welfare checks and self-referrals. Once this is in place it will be possible to extract and report.	A
	Introduce and promote approaches, including digital approaches, to support residents across higher-risk buildings in self-identifying and reporting physical, sensory and mental impairments which could impact their ability to appropriately respond and react to a real fire situation.	SN	Q2	SN briefed – 6.5.25 Simple online form to be developed with supporting text on the high-rise section for the website. Need to ensure wording encourage residents to self-refer only where they are not the subject of a current PEEP. Online form uploaded – awaiting conversion to a Microsoft form with direct link to Tenancy mailbox.	G
	Demonstrate a robust approach to evidencing that all residents who are recorded as categories 1 & 2 are the subject of a Personal Emergency Evacuation Plan and a live 'Management Transfer'.	SN	Q1	SN briefed – 6.5.25 Completed: High-rise 'live working plan' document supported by QAF in place. All live cases are allocated to a named TMO.	G

Objective	Actions to deliver objective	Lead	By	Comments/ status / evidence	RAG
2. Ensure staff do the right thing at the right time to the right quality standard.					
2.0 Co-develop and implement a 'Quality Assurance Framework' [QAF] which supports the management role in monitoring the qualitative and quantitative aspects of delivering the 'housing management offer' for occupied higher risk buildings.	As part of the Housing Management restructure, bring forward a named manager to act as 'service lead' for Fire Safety with responsibility for operating the QAF.	SS	Q4	Housing Management Restructure consultation launched September 25.	A
IA	Scope and document the quantitative and qualitative aspects of service delivery set out within the offer.	RS	Q2	'Housing Management Offer for Occupied Higher-Risk Buildings – Quantitative & Qualitative aspects of Service delivery [QAF]' drafted and circulated 1.9.25	G
IA	Document a QAF which includes but is not limited to:	RS	Q2	See above – combined draft circulated 1.9.25.	G

	<ul style="list-style-type: none"> Coverage of the core PEEP process including completion, storage, review and sign-off Civica case-file audits Exception reporting where standards are not meet, to include feedback to the team 				
	Develop and implement a rolling programme of transactional surveys as an integral part of the QAF which includes perceptions on engagement and	SN	Q3	SN briefed – 6.5.25 To include awareness of fire escape route from their own flat.	R
Objective	Actions to deliver objective	Lead	By	Comments/ status / evidence	RAG
3. Improve levels of resident empowerment, engagement and communication as part of improving the landlord tenant relationship, building trust, treating residents with respect and ensuring residents are ‘fire safe’ and ‘fire aware’.					
3.0 In conjunction with residents, review and refresh the current Resident Engagement Strategies for all in-scope buildings and bring forward a new Resident Engagement Strategy for Cavenham Court, 18 Millington Road.	Undertake a self-assessment exercise of existing strategies using ‘BSR Building Assessment Certificate Application Assessment Record: Residents’ Engagement Strategy’ to identify potential gaps and incorporate performance measures as an integral part of the QAF to drive improvements in outcomes and behavioural change.	MF	Q1	Completed 29.5.25 and signed off by PAF following Fire Safety Board on 12.6.25	G
	Ensure reviewed and refreshed engagement strategies are comprehensive and cover all areas reflected in; Preparing a resident engagement strategy – GOV.UK	RS	Q2	See above – incorporated into ‘Housing Management Offer for Occupied Higher-Risk Buildings – Draft engagement Strategy [High Rise] approved by Fire Safety Board 11.9.25 to proceed with resident engagement	G
	Scope mandatory induction and refresher training for all Housing Management staff who have a direct responsibility for delivering the housing management offer for occupied higher risk buildings.	SN	Q1	Completed. SN briefed – 6.5.25	G
	Include the 5 principles of ‘How to engage with residents’ as set out by the BSR – within revised strategies: 1. Understand who lives in each building 2. Engage via multiple channels 3. Communicate information effectively 4. Listen to residents 5. Be inclusive	RS	Q2	Principles adopted and incorporated into Draft engagement Strategy [High Rise] and 24.6.25. Included in training pack for all new High-Rise staff. • PEEP minimum standards training delivered 8.5.25. Staff briefings on new Evac	G
	With each strategy, ensure residents are clear about: • the information the Council provide to residents • building safety decisions residents will be asked about • how residents can make a complaint	MF	Q2	Regulations delivered December 25. Consultation/engagement on 26. Business case submitted to AD 19.1.26 regarding accredited training for 44 staff across the Building 7 Fire Safety Panel – Service.	A
	Ensure relevant housing management staff are competent to undertake fire door checks.	SN	Q1	SN briefed – 6.5.25	A
	As part of refreshing and reviewing the current Engagement Strategies with reference to published good practice and the BAC assessment criteria [see objective 7] opportunities need to be explored to raise the profile of online reporting of ‘safety related concerns’ to residents living across the tower block portfolio and document additional staff training needs.	RS	Q2	Completed: Fire door inspection opportunities incorporated and training delivered June for all staff managing higher-risk buildings. consultation by Fire Safety Board on 11.9.25	G
	Make effective use of QAF outcomes to identify and document additional staff training needs.	SN	Q1 Q4	SN briefed – 6.5.25 QA ‘Fire Safety Blocks’ document introduced June ‘25	A
	Evidence that revised and refreshed strategies are tailored to the needs of residents within each in-scope building.	MF	Q2	See above – consultation on draft Engagement Strategies. See above – training Business Case – Jan 26.	A
	Report quantitative and qualitative outcomes from the QAF on a rolling quarterly basis to residents and the Landlord Governance structure.	SN	Q4	SN briefed – 6.5.25	A
	Publicise each strategy and ensure it can be evidenced that a copy is provided to all residents aged 16 years and over occupying a flat within a higher-risk building.	SN	Q4	Suggest ‘year-end report’ for 25/26, followed by quarterly household members aged 16 years and over.	A
3.1 Introduce and make effective use of digital notice boards across the higher-risk building portfolio	Document the business case for the extended roll out of digital notice boards across all higher-risk buildings	SN	Q3	See below on pilot – task reset to Q3.	G

	using feedback from residents involved in the pilot approach.			Feedback considered by Fire Safety Board Jan 26 – approval to proceed based on resident feedback and available new burdens capital funding.	
	Establish an editorial board of residents to co-design a standard for use of digital notice boards, including processes to approve core messages.	MF	Q2	Pilot on-going in 2 blocks, due to end in October. Feedback so far has been positive with a few recommendations from residents on how to improve its functionality. Building & Fire Safety Panel acting as 'Editorial Board'.	G
	Document operational practices to upload, amend and review information displayed on digital notice boards.	SB	Q4	SN briefed – 6.5.25 Pilot ongoing and extended to Rabbs Mill House to broaden scope for business case – this second screen is larger than the Melbourne House screen and engagement is more positive. screen. Task put back to Q4 to allow for pilot review and roll-out.	A
3.2 Ensure all residents occupying a flat within a higher risk building has a Fire Safety information pack tailored to the flat and building in which they live.	Document processes to ensure and evidence that all new tenants, leaseholders and their subtenants receive a tailored copy of a Fire Safety Information Pack relevant to their flat and building.	SB	Q2	SN briefed – 6.5.25 Standard to reflect one side of A4 on what we do across, Tenancy Leasehold and Lettings. Documented process completed by SN and evidenced.	G
	Document processes to ensure that effective use is made of solicitor's enquiries to ensure that, ahead of any planned assignment of a leasehold interest, the prospective leaseholders is made aware of and receives a copy of; the Housing Management Offer, the Resident Engagement Strategy and any relevant Standards and Regulations.	BG	Q1	Process document in place.	G
3.3 In conjunction with residents, review and refresh the current 'Housing Management Offer' to residents living in Council owned and managed 'higher risk buildings'.	Establish a mixed tenure working group of residents to review, amend and agree a refreshed Housing Management Offer which reflects the housing management contribution to ensuring that residents remain safe and fire aware.	MF	Q2	Building and Fire Safety Panel established. Agenda item for second planned meeting ser for November.	G
	Ensure all commitments within the Housing Management Strategy for Occupied Higher Risk Buildings are appropriately referenced within the refreshed Housing Management Offer.	RS	Q2	Documents to be cross-referenced to ensure consistency of content and message.	G
	Leasehold charges are referenced in the offer but lack clarity associated with post-Building Safety Act 2022 Regulation. Update the Housing Management Offer to	BG	Q2	Housing Management Offer updated. Charging arrangements for safety related work to be rolled	R

	reflect a clear approach to the extent of safety related charges which can be passed onto leaseholders and the statutory safeguards which are in place.			forward to 26/27 as part of a larger income workstream.	
	Update the 'Leaseholder Handbook' to reflect the approach to safety related charges within higher risk buildings.	BG	Q2	See above and linkage to section 8.0 below.	R
	Publish and make available a refreshed version of the Housing Management Offer, including a summary version.	SN	Q4	Consultation nearing completion.	A
3.4 Introduce, publish and promote a Mandatory Occurrence Reporting System [MOR] in accordance with the Building Safety Act 2022	Draft, consult and seek approval to introduce a MOR Policy and Procedure.	RS	Q1	Documented Policy & Procedure in place	G
	Update the website to include guidance on MOR and introduce an on-line reporting form.	RS	Q1	Approach to MOR on LBH website, including online form.	G
	Draft and issue a briefing note for staff to raise the awareness of MOR and support for residents in completing appropriate on-line reports.	RS	Q1	Staff briefing note [including roles and responsibilities] issued and cascaded 23.5.25	G
	Update the Terms of Reference for Fire Safety Board to reflect monthly reporting of MOR.	RS	Q1	Refreshed ToR adopted by Fire Safety Board 24.4.25	G
3.5 Introduce and publish a suite of communication posters for use across the tower block portfolio which convey core fire safety and related messages to residents via notice boards, digital notice boards and via the website.	Scope core requirements and good practice in relation to communication posters.	RS	Q1	Camden LBC approach / templates recognised and shared as good practice via London Councils.	G
	Fire Safety Board to approve scope and content and issue design brief to Corporate Communications	RS	Q1	Scope and brief approved at May 2025 Fire Safety Board.	G
	Seek and incorporate feedback from residents on draft designs	MF	Q2	Draft designs due July '25. To be reviewed by Fire Safety Board 10.7.25 prior to seeking input from tenants. Inaugural meeting of Building & Fire Safety Panel set for 20.8.25 – feedback awaited.	A
	Introduce and publish communication posters	RS	Q3	Re-worked designs from Corporate Communications signed off for use / roll-out by Fire Safety Board – December 25	G
3.6 Introduce and publish an 'Acceptable Standard for Fire Escape Routes in Council Housing' to support improved understanding by residents and staff, to make an effective contribution to compliant escape routes, to improve levels of fire safety and to proactively reduce the number of [housekeeping] fire risk assessment actions presenting.	Scope core requirements of an acceptable standard linked to statutory obligations, contractual obligations [tenancy and lease conditions] and good practice.	RS	Q1	Draft reviewed May 25 Fire Safety Board – Customer Engagement to seek tenant input to draft standard as part of emerging engagement & empowerment structure. Inaugural meeting of Building & Fire Safety Panel set for 20.8.25.	G
	Co-create an 'Acceptable Standard for Fire Escape Routes in Council Housing' with residents	RS	Q2	See above Inaugural meeting of Building & Fire Safety Panel set for 20.8.25. Final updates to be incorporated post Building & Fire Safety Panel prior to formal adoption.	G
	Consult with staff and submit to Fire Safety Board for approval and publication.	RS	Q3	See above	G

3.7 Develop an effective response to the increasing and ongoing risk associated with the presence of e-bikes within occupied higher risk buildings.	Scope and deliver a targeted [safety] campaign to residents living across the higher risk portfolio in connection with the fire safety risks associated with e-bike ownership, storage, charging and modification.	MF/SJ	Q2	The campaign has been launched and promoted through the T&L newsletter, the B&FS Panel meeting, rent statement and at estate-based events. During resident visits, a standard conversation is now included to raise awareness and highlight the risks of non-compliance. The Communications team has also designed a poster to further reinforce the message	G
	Ensure awareness training is delivered to visiting staff groups linked to the risks presented by e-bikes within the managed housing portfolio, to include the role of social landlords in mitigating the risks.	RS	Q4	Task put back to Q4 following decision to deliver training 'in-house' due to operational difficulties engaging the LFB and capacity / availability linked to the Annual Tenant & Leaseholder conference in September.	A
	Update the 'welfare check' template to incorporate e-bike ownership and oxygen therapy associated with any specific flat to better manage high risk factors.	SN	Q2	Work underway with DDT to amend welfare check template. Confirmation and evidence received 16.9 from SN – welfare check templated updated to reflect e-bike and O2 risks.	G

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4. Develop a sector leading and compliant approach to residential PEEPs across the Council's higher risk buildings which places vulnerable residents at the centre of a process that ensures they are safe, effectively supported and any presenting needs are regularly reviewed.					
4.0 Identify and record ['relevant persons'] vulnerable households / household members occupying flats within higher risk buildings.	Document processes which capture physical, sensory or mental health issues impacting residents living in higher risk buildings in the context of: <ul style="list-style-type: none"> Increased risk of fire Ability to react to a fire alarm Ability to escape from a fire 	RS	Q3	Operational Procedure note drafted and circulated for comments – December 25. Link to CAT 1 and 2 definitions.	G

	Identify and record on NEC, as part of the 'single view of the resident', any 'reasonable adjustments' which may be necessary in the context of ensuring vulnerable residents are 'fire safe' and 'fire aware'.	SB	Q3	SN briefed – 6.5.25 Incorporate within above process document. See 1 above - linked to ongoing census work. SN has met with TC and KS to scope 'person attributes' element in NEC to record this data captured via census, welfare checks and self-referrals. Once this is in place it will be possible to extract and report. Ahead of Phase 1 NEC Housing, by April 2026 we will have created a person profile element to record health, medical conditions and PCFRA outcomes such as Cat 1/2, Oxygen use & adaptations. This includes 360 dashboard visible alerts and the ability to extract data.	A
	Identify and flag on NEC any resident who is unable to self-evacuate the building unaided [other than via the passenger lift] within a reasonable period of time if directed by the fire and rescue services.	SN	Q4	SN briefed – 6.5.25 Suitable fields in NEC to be scoped.	A
	Evidence that all residents unable to self-evacuate are the subject of an approved Management Transfer [and are being actively supported and monitored to move to suitable alternative accommodation] or, by exception, have appropriate mitigations in place.	SB	Q1 Q4	SN briefed – 6.5.25 QAF in place showing 25% of Cat 1 & 2 cases are checked for a live MT or Buy back submitted [unless tenant refuses] on a rolling monthly basis. [Circa 90 cases as at June 25] Linkage to development of new QAF for management of HRBs	A
	Ensure data on residents unable to self-evacuate unaided is recoded within Premises Information Boxes [PIBs] as a Cat 1 / 2 case and is also available in a digital format which can be shared with the Fire & Rescue Service on demand.	SB	Q1	SN briefed – 6.5.25 Completed: QAF in place And Digital Excel back up in place. Linkage to development of new QAF for management of HRBs	G
	Ensure evidence is available to demonstrate reasonable endeavours to identify vulnerable residents who require a PEEP and Emergency Evacuation Statement	RS	Q3	SN briefed – 6.5.25 Document and define our position on the meaning of 'reasonable endeavours' as part of documenting the process to bring forward a 'Residential	G

				Personal Emergency Evacuation Plan'. Incorporated into Operating Procedure.	
4.1 Develop standard documentation and processes to comply with the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025.	In conjunction with residents, document a template for conducting a person-centred fire risk assessment [PCFRA] to support a structured conversation between the Neighbourhood Housing Officer and the resident to better understand their unique risks and identify how their fire safety and evacuation can be improved	RS	Q4	Existing process and documentation to be reviewed / refreshed and documented in the light of any mandatory requirements and guidance issued by Government. Template shared with Fire & Building Safety Panel, LL Board and Fire Safety Board.	G
	In conjunction with residents, document a template for: <ul style="list-style-type: none"> • Personal Emergency Evacuation Plans [PEEPs] and • A summary 'emergency evacuation statement' setting out what the resident should do in the event of a fire. • Ensure clear reference to consent and withdrawing consent 	RS	Q4	Approved template incorporated into Operational Practice note and rolled out via staff training sessions.	G
	Update Housing Management Privacy Policy to make explicit reference to obtaining consent as an integral part of complying with the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025	RS	Q4	Privacy Policy updated, signed off by AD and published in December 25.	G
	Engage with the LFB to determine and agree the format of information required [in the PIB and or electronically] to help inform an operational response and /or undertake evacuation [to include the new Emergency Evacuation Statements]	RS / ME	Q3	Mike E requested on 3.9.25 to engage with the LFB and seek documented guidance / definitive response on PIB content linked to Regulation 10 – 'Provision of information to the local fire and rescue service'. Awaiting LFB feedback linked to a pan-London approach. Operational Practice note includes interim arrangements - to be updated following LFB decision.	G
g	Document the process to guide and support staff in completing [and reviewing] a person-centred fire risk assessment [PCFRA], bringing forward a 'Residential Personal Emergency Evacuation Plan' [PEEP], an Emergency Evacuation Statement that records what residents should do in the event of a fire and required information for the LFB to help their operational response.	RS	Q4	Operational Practice note drafted and circulated for comments December 25. Final version circulated to Fire Safety Board January 26.	G
	Following the Internal Audit of 'Emergency Evacuation Plans' during Q4 2024/25, develop a management plan to address and respond to all risks identified as medium and high and report progress quarterly.	RS	Q1	Management Actions and associated targets incorporated into delivery plan 19.6.25 following issue of final IA Report	G

IA	Develop and implement a QAF for the PEEP process as an integral part of the broader / overarching Higher-Risk Building QAF	RS	Q4	Action put back from Q2 to Q4 to accommodate the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 introduced on 4.7.25 and effective from 6.4.26	A
IA	Produce a slide deck resource and Deliver PEEP refresher training to relevant staff and update the training delivered following the issue of government guidance	SN	Q1 and Q4	SN briefed – 6.5.25 PEEP minimum standards training delivered 8.5.25. SN to convert training material into a slide dec for evidence / future use.	G
IA	Work with DDT to bring forward workflow processes in connection with: • PCFRAs, PEEP development / Emergency Evacuation Statements	SN	Q4	A fully functioning Customer Services and Document Management workflow is being completed under Phase 1 of	A
Objective	Actions to deliver objective	Lead	By	Comments/ status / evidence	RAG
5. Maximise the potential for complaints to positively contribute to a culture of learning, improving outcomes for residents and shaping the way housing management services are delivered across higher risk buildings.					
5.0 Demonstrate that a variety of channels and approaches are being used to facilitate access to the complaints handing process.	Scope all communication and engagement opportunities and 'touch points' with residents where accessing complaints can be promoted.	RS	Q1	Scoping work complete and staff to use. It will be prepopulated with Management Offer and Engagement Strategies, piloting / rollout of Digital notice boards, new tenant visits / welfare checks, refresh of tailored fire safety Quality Assurance Framework. information packs.	G
IA	Integrate this workflow data within power BI dashboards to enable effective monitoring and analysis of new data insights	SN	Q1 26/27		
IA	Demonstrate the use of digital workflows to improve process tracking and completeness of relevant resident checks.	SN	Q1 26/27	Now engaging DDT to promote tailored complaints process into Welfare Check process /checklist.	
4.2 Ensure new CAT 1 and CAT 2 tenants are not permitted to take up occupation within tower blocks in line with the Council's Approved Social Housing Policy.	Document guidance for staff responsible for general needs lettings and short-term placements which introduces an enhanced level of verification associated with prospective tenants and household members. Ensure guidance is aligned to the definition of CAT 1 and 2 persons as set out in the NFCC Code of Practice for the Provision of Premises Information Boxes in Residential Buildings.	RS RS	Q2 Q2	Written instructions issued to managers and staff in June 25. Standard paragraph introduced on all template documentation used in relation to the management of tenancies and leases in higher-risk buildings which promotes the definition of complaints and how to access the process.	G
4.3 Ensure staff are clear on the approach to delivering 'reasonable adjustments' linked to mitigations documented in PEEPs.	Document guidance for staff responsible for identifying and requesting the installation of 'reasonable adjustments' (adaptations) to tenanted and household flats and communal areas arising from the formal complaints and access to the complaints handling process [PEEPs] and Emergency Evacuation Statements. Ensure sign-off by Fire Safety Board prior to implementation.	SB SN	Q4 Q3	Introduced August 25. Integrated into Operational Practice note. Linkage to published Vulnerable Persons & Reasonable Adjustments Policy. Pilot on going in 2 blocks, due to end in October. Feedback so far has been positive with a few recommendations from residents on how to improve its functionality Q1 task reset to Q3 – pilot end date 27.9. See above – roll out agreed and fully funded by new burdens grant. To be completed Q4	G

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6. Residents, irrespective of tenure, are required to meet the same standards of behaviour and levels of compliance with safety obligations in order to make our tower blocks better places to live.					
6.0 Explore the potential for 'Estate Regulations' to support the management role in 'levelling up' obligations between tenures to support a more uniform and robust approach to compliance and enforcement.	Using engagement structures for the tower block portfolio, seek resident views / Leaseholder Association views on formally introducing 'estate regulations' into all long leases across the higher risk building portfolio which introduces a 'level playing field' associated with contractual issues which support the safety of all residents in higher-risk buildings.	MF	Q4	To be forward planned for Building & Fire Safety Panel and engagement with LH Association.	
	Subject to resident views and legal advice, develop a plan to introduce 'estate regulations' across the higher risk building leasehold portfolio in 2026/27 which would be enforceable as if they were express terms of the lease.	RS	Q4		
	Ensure all communications and documentation makes explicit reference to the Regulations, their role and use.	BG	26/ 27		
6.2 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 	Document operational practices to support staff in effectively enforcing rights and obligations via the use of Contravention Notices.	SN	Q4	Scoping work has commenced. Potential to make request via London Councils associated with other Boroughs who are using the powers linked to BCNs.	A
	Bring forward template documentation to underpin formal use of Sect 38 powers.	SN	Q4		
	Ensure appropriate updates are incorporated into all communications and documentation making explicit reference to Sect 38 powers in the event of any breakdown in the 'social contract' between the Council and residents occupying higher risk buildings.	SN	Q4	SN briefed – 6.5.25	

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7. When invited to apply for a Building Assessment Certificate by the Building Safety Regulator, ensure that the housing management contribution is comprehensive and can be evidenced in the form of up-to-date Resident Engagement Strategies and Safety Case Reports					
<p>7.0 In line with the Housing Management Strategy for occupied higher risk buildings, ensure the housing management contribution to Building Assessment Certificates [BAC] is compliant and makes a positive contribution to the overall safety of the building and the mitigation of identified risks.</p> <p>[The BSR will assess; the resident engagement strategy, the mandatory occurrence reporting system and the safety case report as an integral part of assessment BAC applications. Current advice is that the BSR will invite Landlords to apply for a BAC on a 'risk-based approach' every 5 years].</p>	<p>Undertake a self-assessment of the resident engagement strategy against the published Assessment Criteria used by the BSR. The resultant gap analysis to be used to ensure that all revised and published engagement strategies reflect the documented expectations of the BSR.</p> <p>All published documents should set out what the Council can do if someone needs information in a different language or in an alternative format. For example, large text, easy read, braille, or audio.</p>	RS	Q2	<p>Self-assessment completed 29.5.25 and signed off by PAP following Fire Safety Board on 12.6.25</p>	G
	<p>Undertake a self-assessment of the Mandatory Occurrence Reporting System [MoR] against the published Assessment Criteria used by the BSR. Using the resultant gap analysis, ensure that all expectations for the MOR associated with residents is compliant including:</p> <ul style="list-style-type: none"> • Involving and consulting with residents when establishing the MoR system • Referencing the MoR system in the engagement strategy • Ensuring residents understand the meaning of a 'building safety incident' • Documenting how residents can submit reports • Documenting the various channels through which reports can be made i.e. online, email, telephone. • How residents can report a 'building safety incident' via the established complaints system • How incident reports via the complaints system are reviewed, identified and processed as 'building safety incidents'. • Consider and document what to do if residents find it difficult to describe an incident and whether they could submit, for example, photo or video evidence that helps communicate what happened. • How you will make information about your MoR system easily available and accessible to residents. • When necessary, promoting that residents can appoint a representative to report an incident for them • Documenting joint reviews of the system with residents to ensure it remains 'fit for purpose' <p>All published documents should set out what the Council can do if someone needs information in a different language or in an alternative format. For example, large text, easy read, braille, or audio.</p>	RS	Q4		

<p>7.1 Demonstrate how the Housing Management Service is making a proactive and positive contribution to the review and content of Safety Case Reports in line with commitments set out in the Housing Management Strategy for occupied higher risk buildings.</p> <p>[A 'Safety Case Report' demonstrates how occupied residential buildings' safety risks are being identified, mitigated and managed on an ongoing basis]</p>	<p>Demonstrate the interrelationships of managing property and people related risks in the context of fire safety by ensuring that the review and amendment of Safety Case Reports properly capture all material behavioral risks and related mitigations and interventions and do not overly rely upon building structure to prevent or minimise the risk of harm.</p>	RS	Q1	<p>Interrelationships documented and referenced in the [approved] Housing Management Strategy for occupied higher risk buildings'.</p>	G
	<p>Co-create and document a 'Higher risk building trigger' which sets out a clear threshold for new or increased behavioural risks which, if triggered, would lead to a:</p> <ul style="list-style-type: none"> • formal review of the individual Safety Case Report • multi-agency response • documented management interventions to reduce or eliminate the presenting risk <p>Ensure the trigger document includes an 'appeals process' where a resident has raised a 'higher risk building trigger' which has been rejected for not exceeding the agreed threshold.</p> <p>All published documents should set out what the Council can do if someone needs information in a different language or in an alternative format. For example, large text, easy read, braille, or audio.</p>	BC	Q2	<p>First draft reviewed 26.6.25.</p> <p>Final draft considered by Fire Safety Board and the Building & Fire Safety Panel 20.8.25.</p> <p>'Higher risk building trigger' published on Higher-risk building web page.</p>	G
	<p>Publish the 'Higher Risk Building Trigger' and promote with residents and key partners. Ensure residents and partners are aware of the process to initiate a 'higher risk building trigger' if they believe the agreed threshold has been exceeded.</p>	RS	Q3	<p>Published on LBH website and incorporated into updated Housing Management Offer.</p>	G
	<p>Ensure comprehensive and up to date data is available on the resident profile of each higher risk building as part of the Safety Case Report. This will include for example any residents needing help to evacuate or have additional needs. [This data should be the same as that reflected in the related resident engagement strategy]</p>	SN	Q4	<p>SN briefed – 6.5.25</p> <p>Linkage to 'tenant census' [commenced July 25 and due to complete December 25] and approach to capture data relating to leaseholders and sub-tenants.</p>	A

Objective	Actions to deliver objective	Lead	By	Comments/ status / evidence	RAG
8. Provide clarity and transparency to leaseholders in the context of building safety costs associated with delivering safe and compliant higher risk buildings					
<p>8.0 Ensure 'building safety costs' applicable to higher risk buildings are comprehensively identified and that the Council's reasonable costs associated with its legal duties are passed onto leaseholders.</p>	<p>In conjunction with Compliance leads and Finance, scope and document a summary of 'building safety costs' which can legitimately and automatically be passed onto leaseholders via their service charge.</p>	TC	Q2	<p>Agreed to be rolled into 26/27 as part of a larger workstream on Income.</p>	R

	Include the statutory protections which are in place generally regarding service charges and specifically in relation to 'building safety costs' applicable to higher risk buildings.				
	Engage with leaseholders and the Leasehold Association in relation to the introduction of 'building safety costs' to service charge demands across the higher risk building portfolio from 2026	BG	Q4	See above - Agreed to be rolled into 26/27 as part of a larger workstream on Income.	
	Engage with Legal Services and bring forward revised templates for leaseholds in higher risk buildings to ensure that service charge demands linked to 'building safety costs' are compliant.	BG	Q4	See above - Agreed to be rolled into 26/27 as part of a larger workstream on Income.	
	Brief CMT and Cabinet Member leads on the introduction of 'building safety charges'.	TC	Q4	See above - Agreed to be rolled into 26/27 as part of a larger workstream on Income.	
	Publish a summary of chargeable 'building safety costs' and update the Leasehold Handbook.	BG	Q1 2026 / 27	See above - Agreed to be rolled into 26/27 as part of a larger workstream on Income.	