

# Building Safety Policy

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## 1. Document Overview

<b>Purpose</b>	This policy sets out Thrive Homes' approach to building safety to ensure customers feel safe and are safe in their homes, and that colleagues and contractors are safe in their place of work.		
<b>Audience</b>	Thrive Homes customers, colleagues, and contractors.		
<b>Data Classification</b>	For internal and external use		
<b>Review Cycle</b>	24 months		
<b>Last Review</b>	New procedure	<b>Next Review</b>	November 2027
<b>Relevant Legislation</b>	The Building Safety Act 2022 (BSA) The Fire Safety Act 2021 The Fire Safety (England) Regulations 2022		

	The Regulatory Reform (Fire Safety) Order 2005 – amended by the Fire Safety Act.
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## 2. Document Version History

Version	Date	Author	Reviewer	Changes & Additions
V1.0	03/11/25	CG	Emma Murphy – Director Business Assurance & Risk  To be approved by the Exec Board	New policy which states Thrive approach to Building Safety

## 3. Introduction

This policy set out how Thrive Homes will meet the requirements and obligations set out in Building Safety and Fire Safety legislation for all flat blocks owned and managed by Thrive Homes, how we plan to keep our customers safe and how we will engage with customers to ensure that they are involved in the management of safety within their building.

It will also give colleagues guidance and reporting mechanisms to ensure anyone within or working in the Thrive Buildings is safe from harm.

## 4. Roles and Responsibilities

The BSA identifies new Duty Holders who will be known as Accountable Persons (AP).

The roles and responsibilities for key stakeholders across Thrive Homes are detailed below:

- **Principal Accountable Person (PAP)/Accountable Person (AP)** – In relation to this policy and the implementation of the BSA, the AP is the Body Corporate, Thrive Homes Limited.
- **Chief Executive** – will ensure that adequate resources are made available to ensure we can comply with the requirements of legislation. For all existing properties that fall within the BSA and for properties under construction and yet to be completed, the Chief Executive will delegate their responsibilities to the Director of Business Assurance and Risk and the Director of Development
- **The Executive Board, Board, Risk & Audit (R&A) and Customer Committee (CC)** will review and receive assurance quarterly from the Health, Safety and Wellbeing report that Thrive is compliant with the requirements of the Building Safety Act, Fire Safety Act, and all other relevant legislation to ensure assurance is obtained.
- **The Head of Strategic Asset Management** will work closely with the Head of People and Property Safety to ensure all major works comply with the relevant legislation and customers are made aware of these programmes.
- **The Head of People and Property Safety** will ensure compliance with Building Safety and Fire Safety legislation and ensure this policy, and any processes are followed.
- **The Director Business Assurance & Risk** is responsible for the overall implementation of this policy and ensuring that building safety is embedded into all associated projects. They will ensure Thrive Homes remains compliant with current legislation requirements, further legislation, and best practice guidance and will highlight any issues to Executive Board, Board and Customer Committee.  
They will work closely with all departments in Thrive Homes to ensure buildings within the scope of the BSA remain safe.
- **The Compliance Manager** is responsible for managing all compliance activities, contract management and informing the Director Business Assurance & Risk of any compliance-related issues which may affect the safety of the buildings in scope.
- **The Compliance and Fire Safety Teams** will support the Compliance Manager and Head of People and Property Safety with relevant day-to-day activities. They will undertake and record

completed fire-related inspections and services through Servicesoft (our compliance software), and any issues or concerns will be raised with their manager.

- **All Colleagues** are to report safety concerns to the fire safety team and follow all building safety procedures. Colleagues will engage with and action concerns from customers and be proactive in explaining safety measures or signposting residents to information.
- **Customers** are to comply with the fire safety process (keeping escape routes clear), raise safety concerns with Thrive through the correct contact channels and allow access for essential safety inspections.

## 5. Buildings in Scope

The Building Safety Act (BSA) clearly defines the scope of buildings to which it applies; these are identified as being over 18 metres in height or 7 stories, whichever comes first.

## 6. Thrives Approach to Building Safety

We want all Thrive Homes flat blocks to be safe for our customers, and have outlined below what steps we will take, this includes completing a type 3 (best practice in the Sector) fire risks assessments giving us an enhanced level of understanding about fire safety in our flat blocks compared to completing a type 2 fire risk assessments as it includes an inspection of the loft space, any service areas, an external wall assessment (see Section 15 of this policy) and accessing 10% of properties within the flat block and.

### 7 storey and above (High Rise)

- Develop a programme of works based on the recommendations highlighted in the fire risk assessment
- Ensure all fire safety equipment in the communal areas is serviced by a competent contractor
- Provide fire safety advice and fire door information to customers on dedicated building safety pages on our website for each block
- Ensure that wayfinding signage is installed
- Complete annual flat entrance fire door inspections
- Complete quarterly communal door inspections
- Install Secure Information Boxes (SIB)
- Share building information with the Fire and Rescue Service
- Implement and maintain a building safety case
- Register the building with the BSR
- Complete a structural survey every 10 years
- Complete EWS1 every 5 years
- Monthly inspection and Emergency Light flick test completed by the Fire Safety team
- Quarterly Estate inspections

### 5-6 storey blocks (Medium Rise)

- Develop a programme of works based on the recommendations highlighted in the fire risk assessment
- Ensure all fire safety equipment in the communal areas is serviced by a competent contractor
- Provide fire safety advice and fire door information to customers on dedicated building safety pages on our website for each block
- Ensure that wayfinding signage is installed (above and beyond requirements)
- Complete annual flat entrance fire door inspections
- Complete quarterly communal door inspections
- Monthly inspection and Emergency light flick test completed
- Quarterly Estate Inspection

### 2-4 storey blocks (Low Rise)

- Developing a programme of works based on the recommendations highlighted in the fire risk assessment

- Ensure all fire safety equipment in the communal areas is serviced by a competent contractor
- Provide fire safety advice and fire door information to customers on dedicated building safety pages on our website for each block
- Ensure wayfinding signage is installed (above and beyond requirements)
- Quarterly estate inspection
- 6 weekly emergency light flick tests

The image below depicts the specific requirements that Thrive will follow to ensure we fulfil our duties under fire safety legislation in each flat block according to height:



## 7. Fire Risk Assessments Frequencies

Type 3 Fire Risk Assessments (FRAs) will be conducted using PAS 79/BS9792:2025 in all Thrive flat blocks in accordance with the Sector's best practice approach and to provide us with an enhanced level of understanding of fire safety in our flat blocks.

- For buildings in scope, buildings classed as medium-risk and all sheltered schemes type 3 FRA's will be conducted annually
- For all low-rise blocks type 3 FRAs will be completed every 3 years or soon depending on the risk

All remedial works will be subject to time scales which are dependent on the risk; these will be tracked and closed in Servicesoft, our compliance software.

The Head of People and Property Safety will appoint an external contractor to sample 5% of FRAs to ensure quality and accuracy. Findings will be reported quarterly on the Health, Safety and Wellbeing report to give assurance that Thrive Homes FRAs are suitable and sufficient.

## 8. Golden Thread

The BSA creates a legal duty on Duty Holders and Accountable Persons to create, obtain, store, and share documents and information about our buildings in a prescribed format. This includes the six main principles of:

- Kept digitally
- Kept securely
- A building's single source of truth
- Available to people who need the information to do a job
- Available when the person needs the information
- Presented in a way that people can use

Thrive has the Golden Thread procedure in place to deliver on these requirements.

## 9. Embedding a Culture of Continuous Improvement

Thrive Homes has an ongoing responsibility for building safety, and we will actively embed this across our operations by:

- Ensure colleagues receive ongoing training to ensure compliance with the BSA
- Monitor and measure our performance through internal and external audits
- Ensure the golden thread of information is maintained through improvements to our buildings
- Champion a safety-first culture, ensuring building safety is embedded in operational decision-making

## 10. Mandatory Occurrence Reporting (MOR)

Thrive Homes has a mandatory occurrence reporting process in place to inform the Building Safety Regulator of 'safety occurrences' related to the spread of fire and smoke and structural failure safety issues in our high-risk buildings.

Any MOR are reported monthly to our Leadership Team and quarterly to the Board. Thrive has a procedure in place.

## 11. Fire Door Inspections

Legislation requires Thrive to undertake regular fire door inspections of buildings above 11+ metres or above 5 storeys as follows:

- Flat entrance doors – annually
- Communal doors, including riser cupboard and storage cupboards – quarterly

Low-rise building fire doors are inspected during the type 3 FRA inspection, and a 10% flat entrance door check is also completed every 3 years or sooner dependant on the risk.

The Fire Safety Team has completed the relevant competence training to complete these inspections, and findings are reported monthly on the Health, Safety and Wellbeing report.

Where access is an issue, the Fire Safety Team will follow the no access procedure. The BSA provides legal measures to customers to ensure access is granted.

All inspections are recorded on Servicesoft, our compliance software, and if the door is found not to meet the 'Notional' standard, Thrive will carry out repairs to bring it up to the required status and performance. If this is not possible, Thrive will replace the door.

Where a door is owned by a Leaseholder (LH), or Shared Owner (SO) Thrive will work with them to ensure the door meets the required standard. The Fire Safety Team will work with the Homeownership Team to ensure the requirements of leases are followed; a procedure has been developed to ensure compliance.

## 12. Fire and Rescue Service Relationship (for buildings in scope)

The BSA requires that Thrive has a relationship with the Fire and Rescue Service (FRS) and that we co-operate with all requests for information, which will include site visits from the FRS to get an understanding of the layout of the building and how the FRS would manage any emergency for our buildings in scope.

There is a legal requirement to notify the FRS if fire safety equipment for buildings in scope is broken in the communal areas and cannot be fixed within 24 hours, including firefighting lifts. This is to

ensure that the FRS can make alternative arrangements, such as additional resources being sent to the building in the event of an emergency.

Security Information Boxes (SIB) have been fitted to all high-rise buildings with the required information as prescribed in regulations.

### **13. Contractor Management**

Thrive Homes has developed a Procurement and Contract Management Playbook (Procedure) and Control of Contractor Procedure to ensure any contractor working in any of our customers' homes or communal areas is competent to do so and must go through a due diligence process before work can start.

Thrive Homes has developed a Working in Higher Risk Building procedure, which gives guidance on work requirements. A Building Control application must be submitted and approved by the Building Safety Regulator before any work can start.

### **14. Resident Engagement Strategy & Communications**

The BSA requires Thrive Homes to develop a resident engagement strategy specifically for all customers living in high-risk buildings. It places a legal obligation on the AP (Thrive Homes) to ensure customers are involved in all 'Building Safety Decisions.'

To meet the requirements under the BSA, Thrive has:

- Developed and implemented a resident engagement strategy that promotes residents' engagement and involvement in decision-making about safety issues
- Established a complaints system to ensure residents' safety concerns are heard and dealt with
- Residents can also escalate complaints to the Building Safety Regulator

Thrive Homes will provide customers with information on fire safety in their homes, with additional information provided to customers living in flat blocks with communal areas. This will include the type of fire safety equipment in the communal areas, its purpose, and the evacuation strategy for the building. This information is provided on our website under the building safety information packs.

Fire Safety information is also provided to customers during sign-up for a new tenancy and via our newsletter. We also provide customers with fire safety information via social media platforms, via the hub and on our website.

Thrive Homes encourages our customers to let us know if they have any vulnerabilities relating to the ability to self-evacuate a building if required to do so.

If a customer is identified, a Person-Centred Risk Assessment (PCRA) will be completed. The findings will be shared with the Local Fire and Rescue Service (LFRS) (permission will be required by the customer).

Under new guidance to be issued by the Government, a Resident PEEP will apply to all high-rise and medium-rise buildings that have a simultaneous evacuation strategy in place.

### **15. External Wall Assessments**

It is a requirement of the BSA that where a building contains 2 or more sets of domestic premises the fire risk assessment will include an assessment of the buildings external wall system which will include the materials used and if applicable how Thrive will mitigate that risk.

Thrive has completed an assessment on all external walls/ secondary wall finishes using the Code of Practice PAS 9980 and developed a programme of works. Thrive does not have any buildings with High-Pressure Laminate (HPL) or Aluminium Composite Material (ACM) cladding.

The described systematic review of external wall systems in accordance with relevant legislation, regulation, and guidance will be used when further housing stock is acquired.

All external wall systems are recorded on Thrive Homes FRA's and assessed against PAS 9980. This information is held on SharePoint.

All our high rise blocks (7 storey and above) will have their EWS1 renewed every 5 years. In the event of Thrive acquiring high rise blocks that do not have an EWS1, one will be completed and added to our 5-year reassessment schedule.

## 16. Building Safety Cases

Under the BSA, Thrive Homes is required to provide a Building Safety Case for all high-risk buildings. The building safety case is reviewed every year or sooner if a significant event or change happens. This is reviewed on completion by the Director of Business Assurance and Risk.

## 17. New Building Development of Buildings over 18m

The Building Safety regulator has implemented a three 'gateways' for the development of residential buildings as set out below:

- **Gateway 1** – ensures the consideration of fire safety matters as they relate to land use planning is incorporated at the planning stage for schemes involving high-rise buildings
- **Gateway 2** – applicants must demonstrate how the proposal complies with building regulation requirements. Building regulations should be considered holistically with an outcome-focused approach, which includes appropriate considerations of building safety. All plans and documents must be realistic for the buildings and not rely on unreasonable assumptions about the occupied building once built. This includes management, maintenance and behaviours and characteristics of residents or other users
- **Gateway 3** – applicants must demonstrate how the building work complies with building regulations requirements to provide assurances that the building is safe to occupy. An application will be required, including plans and documents that reflect the 'as-built' building (this will form part of the golden thread of information). The information must also be handed over to the building owner to help them manage building safety risks when the building is in use by ensuring they have accurate, good quality, up-to-date information on the building.

Thrive will ensure all high-risk buildings follow the gateways which are embedded in Thrives Development processes.

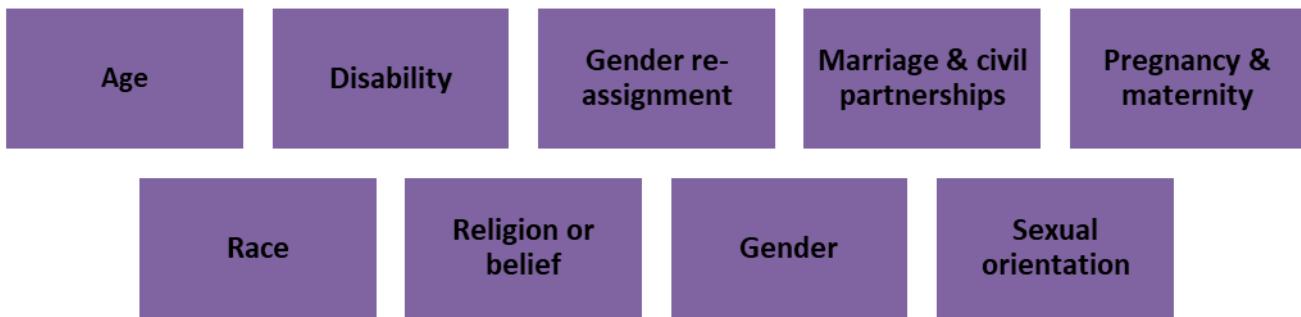
## 18. Thrives Core Behaviours



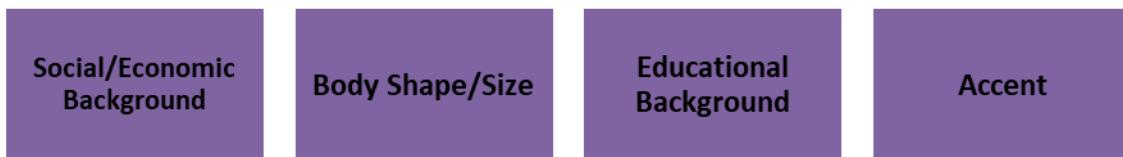
Customers and colleagues are entitled to hold us accountable if we behave in a manner that is not in keeping with the statements above. To be clear, that does not mean we can always deliver exactly what is being sought. but it does mean we demonstrate empathy and provide clarity.

## 19. Treating Everyone with Respect

This policy has been impact assessed in line with Thrive Homes' obligation to comply with the Equality Act (2010). We aim to design inclusive services, policies and behave in a way that does not discriminate on the grounds of:



While we are not required by law, we seek to ensure we do not discriminate on any basis that is rooted in prejudice, for example we are not influence by:



Every effort will be made to ensure that decisions made reflect this commitment.

## 20. Other Related Policies and Guidance

This policy links to other policies Thrive has in place, including but not limited to:

- Risk Management & Assurance Framework
- Mandatory Occurrence Reporting
- Maintenance work in high-risk buildings
- Health, Safety and Wellbeing policy
- Neighbourhood Management Policy
- Procurement and Contract Management Policy
- Development Procedures
- Complaints Policy
- Building Safety Cases

As a business, we try hard to keep all these related policies aligned with each other. Anyone spotting inconsistencies or contradictory statements is asked to contact the Author and make concerns known. Supporting us to keep information clear and consistent will always be welcomed.

## 21. Risk and Assurance

The commitments and intent of this policy is aligned to our Strategic and Risk & Assurance Frameworks, specifically:

Strategic Framework Pillar	Corporate Risk Register
Great Place to Work	Health, Safety & Wellbeing

To ensure we hold ourselves accountable, we will, monthly complete reporting of the H&S report which will be reviewed by the Leadership Team and provide a quarterly report to the Board.

Compliance will also be assessed on a regular basis through our external and internal audit programme. All compliance areas will be checked as a minimum every 3 years through the internal audit process.

As the Board has determined this to be an area of critical importance, expert external assurance will also be sought on a 3 yearly basis and reported to the appropriate Committee.

## **22. Policy Review & Approval**

As this policy is a core component of how Thrive manages its business the document will be evaluated by the Customer Forum, Customer Working Group, CC and Thrive Board part of the review and approval process.

## **23. Support and Further Guidance**

This policy has been drafted with input from colleagues across Thrive. Any concerns on how to interpret or follow its requirements, can be raised with members of the Fire Safety Team.

Colleagues, Board Members and third parties have a responsibility to work in a way that is consistent with the expectations set out in the policy and its implied intent. Should anyone witness or become aware of activities that undermine or conflict with the intention of this policy, please alert a member of the Governance Team or any member of the leadership team as soon as possible.