NORTHAMPTONSHIRE PARTNERSHIP HOMES

Building Safety Policy

October 2026

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DOCUMENT MANAGEMENT	
Approved by: Board *Date of approval: 14/10/2026*	Next Review Date: October 2027 *Version 1*
Contact Officer: (Duty Holder) Winston Williams - Executive Director of Operations and Deputy Chief Executive) Contact: (Responsible Person) Tania Emery- Principal Building Safety Adviser	

THIS DOCUMENT IS TO BE READ IN CONJUNCTION WITH:
1. Health & Safety Policy
2. Fire Safety Policy
3. Resident Engagement strategy
4. Mandatory Occurrence Reporting procedure

REVISION HISTORY				
Revision date	**Previous revision date**	**Summary of Changes**	**Changes marked**	**Version**
1/4/2025		Policy creation		1.0
16/9/2025		Draft revised with feedback from the WNC/NPH roles and responsibilities.		2.0
8/9/2025	16/9/2025	Policy rewritten to align with BSR requirements		3.0

DISTRIBUTION – This document has been distributed to:			
Name	**Job Title**	**Date of Issue**	**Version**

The information below is required for the approval process but will be removed prior to publication

PUBLICITY – How will this policy be publicised to staff or tenants who may be affected?

This policy will be published on the NPH website and communicated to residents through the Resident Engagement Strategy. Relevant information will be shared through appropriate resident communication channels, including resident meetings, newsletters and engagement activities where appropriate. The policy will also be made available to employees via internal communication channels and document management systems to ensure staff are aware of their responsibilities in supporting building safety objectives.

IMPLICATIONS – What are the implications for other NPH or WNC departments (e.g. IT, finance, communications etc) and have these been discussed?

The implementation of this policy requires a coordinated approach across several departments. Building Safety, Asset Management, Housing Management, Resident Engagement, Communications, IT, Governance, Legal and Finance teams may all contribute to the delivery of the policy's objectives. This includes maintaining accurate building safety information, supporting resident communications, managing compliance activities, monitoring performance and ensuring sufficient resources are available to meet regulatory requirements. The policy does not introduce any significant new financial commitments but supports the delivery of existing building safety responsibilities and statutory obligations. Relevant departments have been consulted as part of the policy development and review process.

1. Purpose and Context

1.1 Purpose

Northamptonshire Partnership Homes (NPH) is committed to ensuring the safety of residents, leaseholders, visitors, employees, contractors and all others who may be affected by its activities.

The purpose of this Policy is to establish NPH's commitment and approach to the effective management of building safety risks, ensuring that buildings are safe throughout occupation and that legal and regulatory obligations are met.

This Policy provides the framework for the identification, assessment, management, monitoring and review of building safety risks, with a particular focus on Higher-Risk Buildings (HRBs) as defined by the Building Safety Act 2022.

For the purposes of the Building Safety Act 2022, West Northamptonshire Council (WNC) is currently the Principal Accountable Person (PAP) for NPH's Higher-Risk Buildings, with NPH acting as an Accountable Person (AP). NPH will work with WNC to support effective management of building safety risks and the discharge of the respective statutory duties associated with these roles.

1.2 Context

Building safety is a fundamental organisational priority and is supported by effective governance, robust risk management arrangements, resident engagement and a culture of continuous improvement.

This Policy supports compliance with relevant legislation and guidance, including:

- Building Safety Act 2022
- Building Regulations 2010 (as amended)
- Fire Safety Act 2021
- Regulatory Reform (Fire Safety) Order 2005
- Health and Safety at Work etc. Act 1974
- Occupiers' Liability legislation
- Guidance issued by the Building Safety Regulator (BSR)

Whilst statutory obligations primarily apply to Higher-Risk Buildings, NPH will apply building safety principles proportionately across its wider housing portfolio to support the safety of all residents.

1.3 Strategic Objectives

NPH will:

- Maintain compliance with legislation, regulatory requirements and recognised good practice.
- Ensure clear accountability and governance arrangements for building safety.
- Operate and continuously improve an effective Building Safety Management System.
- Identify, assess and manage building safety risks.
- Maintain and regularly review Safety Case Reports.

- Maintain an accurate and accessible Golden Thread of information.
- Support meaningful resident engagement and participation.
- Ensure those undertaking building safety functions are competent.
- Promote organisational learning and continuous improvement.
- Provide assurance regarding building safety performance to residents, senior management, the Board and regulators.

2. Policy Statement

NPH recognises that residents have the right to live in safe homes and that effective building safety management is essential to protecting people from harm.

NPH places residents at the centre of building safety decision-making and recognises residents as essential partners in maintaining safe buildings. Resident views, feedback and concerns will inform the development, implementation and continual improvement of building safety arrangements.

NPH is committed to identifying, assessing and managing building safety risks through effective leadership, competent people, accurate information, meaningful resident engagement and proportionate risk controls. NPH will take all reasonably practicable steps to prevent, reduce and manage risks associated with fire spread, structural failure and other building safety hazards.

NPH will work collaboratively with WNC, residents, regulators, emergency services, contractors and other relevant stakeholders to support the effective management of building safety risks and ensure buildings remain safe throughout occupation.

NPH is committed to fostering a positive building safety culture where concerns are welcomed, learning is shared and continuous improvement is embedded throughout the organisation.

3. Policy

3.1 Building Safety Management System

NPH will establish, implement and maintain a Building Safety Management System (BSMS) that provides a structured framework for managing building safety risks.

The BSMS will support:

- Governance and accountability.
- Risk management.
- Resident engagement.
- Competence management.
- Information management.
- Assurance and compliance monitoring.
- Change management.
- Contractor management.
- Mandatory Occurrence Reporting.
- Performance monitoring and reporting.

- Continuous improvement.

The Building Safety Management System will operate as the overarching framework for planning, implementing, monitoring, reviewing and continually improving building safety arrangements. The system will incorporate policy, procedures, governance, assurance activities, performance monitoring and organisational learning.

3.2 Governance and Accountability

NPH will maintain governance arrangements that ensure effective oversight and management of building safety risks.

Clear responsibilities will be established for:

- West Northamptonshire Council (WNC), as Principal Accountable Person;
- NPH, as an Accountable Person;
- The Board.
- Executive Management Team.
- Senior Managers.
- Compliance and Building Safety Team.
- Responsible Persons.
- Contractors and consultants undertaking work on behalf of NPH.

NPH will work collaboratively with WNC to support the effective management of building safety risks and maintain appropriate governance, reporting and assurance arrangements in relation to their respective statutory responsibilities.

Building safety performance, risks, compliance matters, emerging issues and significant incidents will be reported through the appropriate governance routes to support effective oversight, informed decision-making and the allocation of appropriate resources.

3.3 Building Safety Risk Management

NPH will identify, assess, monitor and manage building safety risks through a risk-based approach.

This will include risks associated with:

- Fire spread.
- Structural failure.
- External wall systems.
- Building safety systems and equipment.
- Resident activities that may impact building safety.
- Resident vulnerability and individual needs that may influence building safety arrangements.
- Building alteration and change management activities.

Control measures will be implemented proportionate to the level of risk identified.

3.4 Safety Cases

NPH will prepare, maintain and review Safety Case Reports for Higher-Risk Buildings as required.

Safety Case Reports will demonstrate:

- Identification of building safety hazards.
- Assessment of building safety risks.
- Preventative and protective measures.
- Management and assurance arrangements.
- Ongoing monitoring and review processes.
- How building safety risks are being prevented, mitigated and reduced so far as is reasonably practicable.

Safety Cases will be reviewed periodically and updated following significant changes to the building, associated risks or management arrangements.

3.5 Golden thread Information

NPH will maintain Golden Thread information for its Higher-Risk Buildings in support of WNC, as Principal Accountable Person, to support informed decision-making and the effective management of building safety risks throughout the lifecycle of each building.

Golden Thread information will be:

- Accurate and up to date.
- Accessible and understandable.
- Secure and appropriately controlled.
- Transferable where required.

Golden Thread information will be held within C365, with supporting records securely stored within NPH's internal SharePoint system. Access will be restricted to authorised employees, and information will be managed in accordance with NPH's IT security, backup and recovery arrangements.

This will ensure that relevant building safety information is securely maintained, readily accessible and available to support building safety decisions when required.

3.6 Resident Engagement

NPH recognises residents as key stakeholders in managing building safety.

Residents will be provided with appropriate opportunities to participate in building safety matters and will receive relevant information relating to:

- Building safety risks.
- Fire safety arrangements.
- Safety inspections and testing.
- Planned major works affecting safety.

- Resident responsibilities.
- How concerns can be raised.

Resident views, feedback and concerns will be considered when reviewing building safety arrangements. NPH will provide feedback to residents on how their views have influenced building safety decisions where appropriate.

3.7 **Resident Responsibilities**

Residents have an important role in maintaining building safety and are expected to:

- Report building safety concerns.
- Follow fire safety and emergency instructions.
- Allow access for safety inspections and maintenance activities where required.
- Avoid actions that may compromise building safety.
- Obtain permission before undertaking alterations that may affect fire or structural safety.

3.8 **Building Safety Complaints and Escalation**

NPH will maintain clear and accessible arrangements for residents to raise building safety concerns and complaints.

Building safety concerns and complaints will be appropriately recorded, assessed, investigated and responded to within established timescales. Residents will be kept informed of progress and advised of the outcome of their complaint.

Where concerns cannot be resolved, or where the nature or seriousness of the matter requires further action, appropriate escalation arrangements will be followed. Residents will be provided with information about relevant internal and external escalation routes, including referral to the appropriate regulatory body where applicable.

NPH will monitor building safety complaints and concerns to identify recurring issues, emerging risks and opportunities for organisational learning and improvement.

3.9 **Competence**

NPH will ensure that employees undertaking building safety responsibilities have the appropriate skills, knowledge, experience and training for their role.

A Building Safety Skills Matrix has been developed to identify the competence and training requirements for relevant building safety roles. This will be shared with the Learning and Development Team and reviewed collaboratively to identify and address any training or development needs. The matrix will be reviewed periodically to ensure it remains appropriate and up to date.

3.10 **Mandatory Occurrence Reporting**

NPH will maintain arrangements for the identification, investigation, escalation and reporting of safety occurrences in accordance with applicable legal and regulatory requirements, working with WNC as Principal Accountable Person where required.

All employees, contractors and relevant stakeholders will be encouraged to report building safety concerns and potential safety occurrences.

Learning arising from incidents, near misses, complaints, audits, inspections and investigations will be evaluated and used to improve building safety performance and prevent recurrence.

3.11 Contractor and Duty holders

NPH will ensure that contractors, consultants and other duty holders undertaking activities that may affect building safety are competent and are provided with relevant information to discharge their responsibilities.

NPH will monitor contractor and duty holder performance through supervision, auditing, assurance activities and performance review processes to ensure building safety responsibilities are effectively discharged.

Building safety risks will be considered throughout planning, design, procurement, construction, refurbishment and maintenance activities

3.12 Change Management

NPH will maintain arrangements for assessing and controlling changes that may affect building safety risks.

Changes relating to building design, physical alterations, occupancy, resident vulnerability, building systems, organisational structure, management arrangements and contractor arrangements will be assessed prior to implementation to ensure risks remain controlled.

Where proposed works or changes affect a Higher-Risk Building, NPH will ensure that any requirements for Building Regulations approval, Building Safety Regulator approval, change control notifications or other statutory consents are identified and addressed before works commence, where required.

Significant changes will be appropriately recorded, communicated and reflected within relevant Safety Case and Golden Thread information.

4. Policy Arrangements

4.1 Assurance Framework

NPH will maintain assurance arrangements to evaluate the effectiveness of building safety controls and compliance with regulatory requirements.

Assurance activities may include:

- Building inspections.
- Fire Risk Assessments.
- Fire Risk Appraisals of External Walls (FRAEWs).
- Safety Case reviews.
- Internal audits.
- External audits and assessments.
- Compliance monitoring activities.
- Management reviews.
- Performance reporting.

Findings from assurance activities will be reviewed and appropriate actions implemented to address identified issues.

4.2 Performance Monitoring

NPH will establish, maintain and monitor building safety performance indicators to assess the effectiveness of its Building Safety Management System.

Performance information will be regularly reviewed and reported through management, Executive Team and Board governance arrangements to provide assurance that building safety risks are being effectively managed and that building safety objectives are being achieved.

Performance monitoring will include, but not be limited to:

- Fire Risk Assessment completion and action close out;
- Fire Risk Appraisal of External Walls (FRAEW) action implementation;
- Statutory compliance activities;
- Mandatory Occurrence Reporting trends and outcomes;
- Resident engagement and participation activities;
- Building safety inspections and audits;
- Progress against safety improvement actions;
- Internal and external assurance findings; and
- Lessons learned and continuous improvement actions.

4.3 Building Safety Culture

NPH is committed to promoting a positive building safety culture.

This includes:

- Prioritising resident safety.
- Encouraging reporting of concerns.
- Learning from incidents and near misses.
- Acting on resident feedback.
- Supporting continuous improvement.
- Encouraging a just and reporting culture.
- Sharing learning from incidents, audits, inspections and resident feedback.
- Promoting accountability at all organisational levels.

4.4 Stakeholder Engagement

NPH will maintain effective working, reporting and assurance arrangements with WNC in its capacity as Principal Accountable Person. NPH will also work collaboratively with relevant internal and external stakeholders to support effective building safety management.

Key stakeholders include:

- Residents and leaseholders.

- The Building Safety Regulator.
- Northamptonshire Fire and Rescue Service.
- Contractors and consultants.
- Partner organisations and professional advisers.

NPH will maintain appropriate engagement arrangements with regulatory authorities and emergency services to support effective management of building safety risks and emergency preparedness.

5. Guidelines

This Policy is supported by a suite of operational procedures, frameworks and guidance documents, including:

- Building Safety Management System Framework.
- Resident Engagement Strategy.
- Mandatory Occurrence Reporting Procedure.
- Safety Case Procedure.
- Golden Thread Strategy.
- Building Safety Skills Matrix.
- Building Safety Assurance Framework.
- Fire Safety Management Procedures.
- FRAEW Management Procedure.
- Change Management Procedure.
- Incident Management Procedures.
- Risk Management Framework.

These documents provide detailed guidance for the implementation of this Policy.

6. Review Date

This Policy will be reviewed:

- Annually;
- Following significant legislative or regulatory change;
- Following regulatory intervention;
- Following significant organisational change; or
- Following a major building safety incident where lessons learned indicate a review is necessary.

The Director responsible for Building Safety is the Policy Owner and is accountable for ensuring this Policy remains effective, current and aligned with legal and regulatory requirements.

The Policy will be approved in accordance with NPH's governance and policy approval arrangements.

Appendix A - Equality Impact Assessment

Title of Policy : **BUILDING SAFETY POLICY**

1. What is the purpose of the policy / procedure / project / strategy?

The Building Safety Policy establishes NPH's commitment to the effective management of building safety risks across its housing stock, with particular focus on Higher-Risk Buildings (HRBs). The policy provides the framework for governance, accountability, resident engagement, risk management, competence, assurance and compliance with the Building Safety Act 2022 and associated legislation. It supports the delivery of safe homes and promotes a positive building safety culture throughout the organisation.

2. What is the scope of the policy / procedure / project / strategy?

The policy applies to:

- All NPH employees.
- Board Members.
- Contractors and consultants working on behalf of NPH.
- Residents, leaseholders and occupants of NPH-managed properties.
- Higher-Risk Buildings subject to the Building Safety Act 2022.
- Building safety activities across the wider housing portfolio where building safety principles are applied proportionately.

The policy covers fire safety, structural safety, resident engagement, Safety Case management, Golden Thread information, mandatory occurrence reporting, competence and assurance activities.

3. Any general comments relating to each equality strand and/or any relevant background information/ evidence that should be noted in undertaking the assessment?

The Building Safety Policy is intended to have a positive impact on all residents, employees and stakeholders by improving safety, communication and access to information.

The policy promotes equality by:

- Supporting accessible communication methods.
- Encouraging resident participation regardless of protected characteristic.
- Ensuring residents are able to raise concerns regarding building safety.
- Providing building safety information in appropriate formats where required.
- Applying risk management arrangements consistently and fairly.
- Recognising the needs of vulnerable residents when developing emergency and engagement arrangements.

No adverse impacts have been identified during this assessment; however, ongoing engagement with residents will help identify any barriers and required adjustments.

4. Who will be consulted for purposes of this Equality Impact Assessment?

- Residents and leaseholders.
- Resident Representative Groups.
- Building Safety Team.
- Health and Safety Team.

- Senior Leadership Team.
- Board Members.

5. Could the policy / procedure / project / strategy have a differential impact on the following groups (please complete for all groups):

Race or Ethnicity (Including ethnic origin, colour, nationality)

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy applies equally to all residents and colleagues regardless of ethnicity, nationality or race. Information will be made available in alternative languages or formats where reasonably required to support understanding and engagement.

If Adjustments are identified, please list in Actions Template

Sex

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy applies equally to individuals regardless of sex. No differential impact has been identified.

If Adjustments are identified, please list in Actions Template

Gender Reassignment

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy does not contain any provisions that would disadvantage individuals undergoing or who have undergone gender reassignment. All residents and colleagues are afforded equal access to building safety information and services.

If Adjustments are identified, please list in Actions Template

Disability

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy is expected to have a positive impact on people with disabilities by promoting consideration of vulnerability, accessible communication, evacuation arrangements and resident engagement.

Reasonable adjustments may include:

- Large print documents.
- Alternative communication formats.
- Accessible consultation methods.
- Additional support during engagement activities.

If Adjustments are identified, please list in Actions Template

Age

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy applies equally regardless of age. Particular consideration will be given to vulnerable older residents and younger occupants when developing building-specific emergency and engagement arrangements.

If Adjustments are identified, please list in Actions Template

Sexual Orientation

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy applies equally to all individuals regardless of sexual orientation. No adverse impact identified.

If Adjustments are identified, please list in Actions Template

Religion or Belief

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy does not affect any individual on the basis of religion or belief. Engagement activities and communication methods will seek to accommodate diverse needs where reasonably practicable.

If Adjustments are identified, please list in Actions Template

Maternity and Pregnancy

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy applies equally to all residents and colleagues. Building safety arrangements support the safety of all occupants, including those who are pregnant or have maternity-related needs.

If Adjustments are identified, please list in Actions Template

Marriage and Civil Partnership

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

☒ IF NO

Please give reasons / justifications

The policy applies equally to individuals regardless of marriage or civil partnership status. No differential or adverse impact has been identified.

If Adjustments are identified, please list in Actions Template

Actions/Tasks Identified through the Assessment/Reassessment

Issue	Action/Task	Lead Officer	Timescale	Resource Implications	Comments
Accessibility of information	Ensure building safety information is available in accessible formats upon request	Principal Building Safety Advisor	Ongoing	Existing resources	Supports inclusive engagement
Language barriers	Provide translation support where reasonably required	Building Safety Team	Ongoing	Existing resources	Resident focused measure
Resident engagement	Monitor participation levels from underrepresented groups	Building Safety Team	Annual Review	Existing resources	Supports equality objectives
Vulnerable residents	Continue consideration of vulnerable residents within building-specific engagement and emergency arrangements	Building Safety Team	Ongoing	Existing resources	Positive equality measure

Who will approve /authorise? SQC, EMT & Board
How will these be monitored? Through: • Annual policy review. • Resident engagement feedback. • Building Safety performance reporting. • Equality and Diversity monitoring where appropriate. • Internal audit and assurance activities. • Review of complaints, concerns and resident feedback.
How and where will this be published? The Building Safety Policy and associated Equality Impact Assessment will be: • Published on the NPH intranet. • Published on the NPH website where appropriate. • Available to residents upon request. • Retained within the Building Safety Management System and document management arrangements

Appendix B Definitions and Glossary

Term	Definition
Accountable Person (AP)	The organisation or person with legal responsibility for managing building safety risks in a higher-risk building under the Building Safety Act 2022.
Building Assessment Certificate (BAC)	A certificate issued by the Building Safety Regulator (BSR) confirming that a higher-risk building has met regulatory requirements.
Building Safety Act 2022 (BSA)	The legislation establishing the framework for the management of building safety risks in higher-risk residential buildings.
Building Safety Case	The documented evidence demonstrating how building safety risks are identified, assessed, managed, and controlled.
Building Safety Regulator (BSR)	The regulator responsible for overseeing the safety and performance of higher-risk buildings in England.
Building Safety Risk	A risk to the safety of people in or about a building arising from the spread of fire or structural failure.
Competence	The combination of skills, knowledge, experience, and behaviours necessary to undertake building safety activities effectively.
Compliance	Adherence to legal, regulatory, policy, and procedural requirements.
Control Measure	An action, system, process, or physical feature designed to reduce or manage risk.
Contractor	An external organisation or individual engaged to undertake work on behalf of Northampton Partnership Homes (NPH).
Fire Risk Assessment (FRA)	A systematic assessment
Principal Accountable Person (PAP)	The Accountable Person with responsibility for the structure and exterior of a Higher-Risk Building, or the Accountable Person responsible for all parts of the building where there is only one Accountable Person. For NPH-managed Higher-Risk Buildings, West Northamptonshire Council is currently the Principal Accountable Person.

Acronyms

Acronym	Meaning
AP	Accountable Person
BAC	Building Assessment Certificate
BSA	Building Safety Act 2022
BSR	Building Safety Regulator
FRA	Fire Risk Assessment
FRAEW	Fire Risk Appraisal of External Walls
HRB	Higher-Risk Building
KBI	Key Building Information
MOR	Mandatory Occurrence Reporting
NPH	Northampton Partnership Homes
PAP	Principal Accountable Person
RES	Resident Engagement Strategy
SMS	Safety Management System
TSM	Tenant Satisfaction Measure