

Consultation on the new safety regime for occupied higher-risk buildings

NHF submission to the Department for Levelling Up, Housing and Communities

12 October 2022

Summary

The National Housing Federation (NHF) is the voice of housing associations in England. We represent almost 600 housing associations that own and manage more than two and a half million homes for around six million people. Our members also provide vital care, support and community services.

Housing associations represent an incredibly diverse sector of independent, not-for-profit organisations driven by their social purpose – to ensure everyone in the country has the opportunity to live in a good quality and safe home that they can afford.

Housing associations' top priority is the safety of their residents. The tragic fire at Grenfell Tower had a profound effect on the housing sector. We are committed to doing everything we can to make sure that such a tragedy never happens again, and that includes housing associations undertaking significant programmes of work within their individual organisations, both to address current building safety issues and to prepare for future regulatory changes.

We welcome this consultation on the in-occupation regime for occupied higher-risk buildings and we look forward to further dialogue with the government, with residents and with other stakeholders to keep moving forward on this vital topic.

Throughout this submission we answer and make reference to the questions posed by the government as part of this consultation. The corresponding information to these questions can be found on the [consultation website](#).

For further information on this submission, [please contact Natalie Turner](#), Policy Officer at the NHF.

Our position

Housing associations are committed to delivering good quality, safe homes for their residents. The NHF and our members support the government's work to overhaul building safety regulation and we were grateful to contribute our expertise to [Dame Judith Hackitt's Independent Review of Building Regulations and Fire Safety](#).

The NHF and our members welcome the opportunity to comment on the government's current proposals on the new safety regime for occupied higher-risk buildings. We support the overarching proposal to introduce a new, more stringent regulatory regime for higher-risk buildings and the ambition to make buildings safer and deliver improvements across the entire built environment. We recognise the importance of these proposals, covering part 4 of the Building Safety Act, and their role in bringing about significant improvements to building safety in ours and other sectors.

We welcome the proposal that organisations must register their buildings with the Building Safety Regulator by 1 October 2023 and that they must apply for a building assessment certificate within 28 calendar days upon receiving a direction from the Regulator to do so. We agree with the proposed information required to register a building, most of which housing associations already possess. Where new information is required, members agree that the 1 October 2023 deadline is reasonable.

In respect of the safety case approach, we support the proposals to manage fire and structural safety during occupation. We agree that this approach will provide assurance that risks have been identified and assessed, and steps are in place to mitigate them on an ongoing basis. To help implement this approach, we would welcome clear guidance for principal accountable persons and accountable persons on how to effectively engage with the Health and Safety Executive (HSE) in the production of a safety case. Such guidance could enable the HSE to share more about effective safety cases as thinking evolves to support Dutyholders to develop the most effective safety case they can.

We agree with the creation of a mandatory occurrence reporting framework, and we agree with the proposal for safety occurrences to be reported to the Building Safety Regulator within 10 calendar days. We recognise the importance of capturing and reporting any risks that could have a potential impact on fire and structural safety. Further guidance detailing examples of incidents and situations which should be reported to the Building Safety Regulator will enable organisations to operate and maintain effective mandatory occurrence reporting systems.

In respect of the residents' voice section of the consultation, we welcome the government's proposals that will ensure all residents are informed about building safety, are engaged in discussions about the safety of their building and are empowered to challenge decisions which they believe may be unsafe or unreasonable. Resident engagement is a priority for all housing associations and the sector has been working hard in recent years to strengthen the culture, structures

and processes to ensure engagement is as effective as possible, particularly with regards to safety. We agree that the principal accountable person is best placed to decide how to implement their engagement strategy, working with residents to do so. Housing associations want to ensure that they strike the right balance between providing safety information and assurance to residents, and the potential for technical information that could be confusing to some residents. We would welcome further government guidance on this topic, to include case studies of how other organisations have effectively managed this, as we agree with the notion that residents have the right to request additional information about their building.

We welcome the proposals for information related to building safety to be stored and managed in the golden thread, and we agree with the proposed contents of the golden thread set out in the consultation. Many housing associations are already working to implement a golden thread of information that is accurate and up to date and ensures the safety of residents and those working in the building or in the surrounding area. However, storing and managing a golden thread is a resource intensive process and can therefore present a challenge for many organisations. To support this work to be as effective as possible, we would welcome further guidance from the Building Safety Regulator on implementing a golden thread, such as around the level of detail to be included in the golden thread.

What we need from government

Many housing associations have been implementing the principles of the Hackitt Review recommendations since the draft report was published in May 2018. The NHF has been sharing the lessons learned with our members to support them in their work to ensure that residents are safe, and feel safe, in their homes.

In terms of the proposals set out in the consultation, the government must provide clear and comprehensive guidance to assist organisations with the implementation of different aspects of the new regime for occupied higher-risk buildings. The NHF and our members would be happy to provide any expertise or case studies to support guidance, where that would be useful.

Implementing these proposals could be resource-intensive for organisations, particularly around storing and managing the golden thread and implementing a resident engagement strategy. This could pose a particular challenge for smaller organisations who have lower resource capacity, as well as organisation where many of their buildings are in scope. Housing associations are facing significant pressures, including uncertainty around their income and the cost of their debt (given the predicted rise in interest rates). They will continue to prioritise responding to the new regime to ensure all their buildings are safe, but this may become more challenging. Improving building safety is, and will always be, a priority for housing associations, and further clarity through government guidance will further support them to prepare to implement these proposals as effectively as possible.

Our response to DLUHC's consultation questions

Registration

Do you agree or disagree that 6 months is sufficient time for the principal accountable person to provide the information to register their building? Please provide an explanation for your answer to the question above. If you disagree or neither agree nor disagree please say how many months you consider would be necessary to provide the information for registration?

We agree that six months is sufficient time for the principal accountable person to provide the information to register their building. Many housing associations already collect the proposed information required to register a building set out in the consultation. Where they don't, six months from April 2023 to October 2023 provides a reasonable amount of time to find and collate this information in order to apply for registration.

Do you agree or disagree that the required information is sufficient to identify the building and whether it is within scope of part 4 of the Act, and identify the principal accountable person and accountable person(s) (if there are multiple accountable persons) for the building? Please provide an explanation for your answer to the question above. If you have answered disagree or neither agree nor disagree, please explain what else needs to be included. Could you explain why this information is important to include in registration?

We agree that the required information is sufficient to identify the building and whether it is within scope of part 4 of the Act, and identify the principal accountable person and accountable person(s) for the building. However, identifying all accountable person(s) is not always straight forward, particularly in cases where there are parts of the building not under a housing association's control. Additional guidance on the roles of individual accountable person(s) in this circumstance would be welcomed to ensure that housing associations are able to submit accurate and detailed information about the principal accountable person for the building and any other accountable person(s).

Do you agree or disagree that the principal accountable person should notify the Building Safety Regulator of any changes to registration information? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what else needs to be included.

We agree that the principal accountable person should notify the Building Safety Regulator of any changes to registration information. This approach will help to ensure that information about higher-risk buildings is kept up to date and relevant at all times.

Do you agree or disagree that the Building Safety Regulator should be notified within 14 calendar days, excluding Christmas Day, Good Friday or a bank

holiday in England and Wales, of the change occurring? Please provide an explanation for your answer to the question above. If you disagree or neither agree nor disagree, please state how many days you consider should be allowed for notification of changes?

We agree that the Building Safety Regulator should be notified within 14 calendar days of the change occurring. This is a reasonable time frame and housing associations would aim to notify the relevant people of any changes as soon as practicably possible to ensure the safety of residents. However, we would welcome guidance to assist housing associations where a principal accountable person is away from the business for more than 14 days, in terms of whether this information can be made available and submitted on their behalf.

Do you agree or disagree with this proposal? Please provide an explanation for your answer to the question above. If you have answered disagree or neither agree nor disagree, please explain what changes you would make.

We agree that when submitting an application for registration, the principal accountable person must confirm whether, to their knowledge, the building met the appropriate building standards applying at the time of completion. As the government and the regulator are aware, there will be many cases in which the building did not meet the appropriate building standards applying at the time of completion, and these buildings are now part of programmes of inspection and remedial works, or have had such works completed.

While housing associations are working quickly to implement remedial works programmes, prioritising higher-risk buildings, there is a question as to whether works on all higher-risk buildings will have completed by the time the principal accountable person has to provide this confirmation. We would welcome clarity on whether a principal accountable person can provide confirmation that the building has been inspected for risks and that these have been appropriately mitigated, instead of confirming that a building complied with regulations at the time it was built.

We would also welcome guidance on what a principal accountable person should do if their building has not had remedial works completed, or they cannot reasonably confirm whether to their knowledge the building met the appropriate building standards applying at the time of completion, should it not be acceptable for them to confirm that risks have instead been identified and mitigated.

Building Assessment Certificate

Do you agree or disagree that 6 months is the appropriate time scale for calling in (i.e. issuing a direction) applications for a building assessment certificate following occupation of a registered new build building? Please provide an explanation for your answer to the question above. If you have answered disagree or neither agree nor disagree please set out (in months) what you consider the appropriate time scale should be?

We agree that six months is the appropriate time scale for calling in applications for a building assessment certificate following occupation of a registered new build building. However, allowing 28 calendar days for the principal accountable person to apply after the direction has been issued may not be sufficient in cases where the housing associations has multiple higher-risk buildings and many of these are in the same phase of the rollout of the new regime, as described in the Economic Annex section of the consultation. More clarity is needed on how the risk-based prioritisation will work to enable organisations to undertake planning to ensure they are ready when they are directed to apply.

Do you agree or disagree how the detail about the mandatory occurrence reporting system should be given in connection with the application? Please provide an explanation for your answer to the question above. If you have answered disagree or neither agree nor disagree, please explain what information you think should be prescribed, and how it should be submitted.

We agree how the detail about the mandatory occurrence reporting system should be given in connection with the application. This approach will help provide assurance that building safety risks are being managed effectively by showing how the principal accountable person will establish and operate an effective mandatory occurrence reporting system for the receiving of information relating to a building safety risk.

Do you agree or disagree with the proposed requirements for the provision of prescribed information for application for a building assessment certificate? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please describe the prescribed information you think should be provided.

We agree with the proposed requirements for the provision of prescribed information for application for a building assessment certificate. This enables each accountable person to demonstrate compliance with their duties under section 89 to provide information to relevant persons.

Do you agree or disagree that this information must be included in a notice refusing to issue a building assessment certificate?

We agree that this information must be included in a notice refusing to issue a building assessment certificate. We would also welcome further clarification on the consequences of the Building Safety Regulator refusing to issue a building assessment certificate.

Do you agree or disagree that the Building Safety Regulator must plan to conduct an assessment at least once in every 5 years? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please set out in years the frequency

with which you think the Building Safety Regulator should conduct assessments.

We agree that the Building Safety Regulator must plan to conduct an assessment at least once in every five years. Housing associations' top priority is the safety of their residents. Conducting an assessment every five years will contribute to housing associations' commitment to keeping their residents safe.

Further guidance on the circumstances in which the Building Safety Regulator might choose to conduct an assessment more frequently than every five years would enable organisations to plan and would help to ensure they are ready to submit this information as and when the regulator asks for it.

Do you agree or disagree that this is the right level of information which needs to be included in a displayed notice? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what information you think should be included.

We agree that this is the right level of information which needs to be included in a displayed notice. However, identifying all accountable person(s) is not always straightforward, particularly in cases where there are parts of the building not under control by the registered provider. Additional guidance on the roles of individual accountable person(s) in this circumstance would be welcomed to enable organisations to display the proposed level of information about all accountable person(s).

Accountable Persons

Do you agree or disagree with the approach set out above? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, how do you envisage we define parts of a building for which the accountable person is responsible for?

We agree with the approach set out in the consultation document. Some housing associations have experienced success in engaging leaseholders alongside Fire and Rescue Services, which could be an approach replicated elsewhere.

Principles for managing building safety risks and the safety case report

Do you agree or disagree with the proposed principles that the principal accountable person and accountable person(s) must follow when managing building safety risks? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the proposed principles that the principal accountable person and accountable person(s) must follow when managing building safety risks. Following these principles will enable the principal accountable person and accountable person(s) to ensure residents' safety by enabling them to identify building safety risks and introduce measures to mitigate these risks.

Ensuring the safety of residents is a top priority for housing associations and this includes ensuring reasonable safety arrangements are in place to support disabled residents. We believe there is an opportunity within these principles to make specific reference to disabled and mobility-impaired residents to ensure that the management of building safety risks also ensures that these residents are fairly treated and enables every resident to feel safe in their home.

Do you agree or disagree with the proposed content of the safety case report? Please provide an explanation for your answer to the question above. If you have answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the proposed content of the safety case report. We believe this will be an effective tool to enable the principal accountable person and accountable person(s) to provide assurance that they have understood and assessed building safety risks and are mitigating and managing them on a risk basis.

To enable housing associations to produce an effective safety case report, we would welcome further guidance on how best to engage with the HSE on the production of effective safety cases. Such guidance could enable the HSE to share more about effective safety cases as thinking evolves to support Dutyholders to develop the most effective safety case they can.

Housing associations face significant pressures, including uncertainty around their income. They will continue to prioritise their work to implement the new regime, including the development of a safety case approach. However, this could become more challenging. We agree that the exact content and level of detail to be included in the safety case report should be for the principal accountable person and accountable person(s) to determine.

Providing clear guidance on how best to engage with the HSE on the safety case would enable organisations to plan more effectively and would ensure that a consistent approach is taken across the sector to producing the safety case report.

Do you have you any views on the format in which a safety case report must be produced, stored and submitted?

We agree with the consultation proposal that a safety case report should be a written document, which takes the reader through a logical journey about the building, the

assessment of building safety risks, and how those risks are being managed on an ongoing basis. We also agree that the safety case report should be stored in the golden thread and should be submitted to the Regulator electronically.

We would welcome further guidance on the format of the safety case report to assist organisations with the production of these reports and to ensure that individual reports are adequately detailed to demonstrate that all reasonable steps have been taken. We agree with the consultation proposal that a safety case report should be contextual to the building in question. However, additional guidance or examples of completed reports would make the process of producing safety case reports more efficient for housing associations.

Do you have any views on the way in which the Building Safety Regulator must be notified by the principal accountable person following the completion or update of a safety case report?

We would welcome the establishment of a clear and consistent process or format to ensure consistency and efficacy across the sector.

Do you have any further observations you would like to share?

We would value further guidance on the associated costs to assist organisations in the development of safety case reports.

Mandatory Occurrence Reporting

Do you agree or disagree with the proposals for establishing and operating a mandatory occurrence system by the principal accountable person? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the proposals for establishing and operating a mandatory occurrence system by the principal accountable person. We welcome this proposal that will prioritise the safety of residents by ensuring that there is a timely and consistent approach to reporting safety occurrences.

Housing associations are used to reporting on a variety of building safety measures and many already have processes in place for ensuring the relevant people are notified of safety occurrences as quickly as is practicably possible. Based on this, the requirement for the principal accountable person to establish and operate an effective mandatory occurrence reporting system is reasonable.

Do you agree or disagree with the proposed circumstance in which a safety occurrence is reportable? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the proposed circumstances in which a safety occurrence is reportable. Housing associations prioritise the safety of their residents and would therefore agree that an incident is reportable if it relates to the structural integrity or spread of fire of a higher-risk building that meets the risk condition.

We welcome the proposal for the Building Safety Regulator to produce guidance detailing examples of incidents and situations which should be reported. This will provide further clarity on the circumstances in which a safety occurrence is reportable and will support consistency in reporting across the sector.

Do you agree or disagree that safety occurrences should be reported to the Building Safety Regulator within 10 calendar days? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree that safety occurrences should be reported to the Building Safety Regulator within ten calendar days. Housing associations strive to act quickly when an incident occurs to ensure the safety of all residents. Ten days is a fair timescale that balances ensuring the relevant people are notified of a safety occurrence in a timely manner while allowing the principal accountable person enough time to investigate the issue and gather all the relevant information to be submitted to the regulator.

Residents' Voice

Do you agree or disagree with the instances in which the accountable person will be required to provide residents with information? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the instances in which the accountable person will be required to provide residents with information. Resident engagement has become an increasingly important part of the work housing associations do in recent years. The approach set out in the consultation documents will enable housing associations to continue resident engagement and will empower residents to be involved in decisions related to building safety. However, the challenge for registered providers will be getting residents choosing to actively engage in this work when there are often other priorities that residents want to focus their engagement on.

Allowing the principal accountable person to determine how to communicate with residents will be crucial here as they are best placed to determine how to engage their residents to encourage them to actively participate in building safety matters.

Do you agree or disagree with the proposed types of information residents should always receive? Please provide an explanation for your answer to the question above.

We agree with the proposed types of information residents should always receive. This will provide residents with the information they need to empower them to become actively involved in building safety matters.

This also presents an opportunity to cultivate good two-way communication with residents on the role they can play to help reduce the risk of fire in the buildings in which they live. Housing associations have been developing ways to ensure the information is shared with residents in the appropriate language to inform and provide assurance, and not to confuse or raise any undue concern.

Are there any specific documents or information you think should be included or excluded from the information residents receive automatically?

Yes, full technical documents should be excluded from the information residents receive automatically. These can be very detailed and not always helpful in aiding residents' understanding of building safety. Higher-level summaries of these documents should be included in the information residents receive to provide assurance to residents and not to raise any undue concern.

Do you agree or disagree with the proposed lists of further information that residents can request? If you disagree or neither agree nor disagree, please explain what changes you propose and how it would support residents in understanding the safety of their building.

We agree with the proposed lists of further information that residents can request. There is some concern with the level of technical documentation listed and striking a balance between keeping residents appropriately informed and providing assurance, and the potential to bring confusion and undue concern. There might be some circumstances where an agreed, resident-friendly summary of the documents and building safety information could be considered alongside the full technical documents to support residents' understanding.

Do you agree or disagree that residents should be able to request information in an accessible form? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree that residents should be able to request information in an accessible form.

Do these exemptions strike the right balance between making sure residents can access information and the need to protect sensitive information? Please provide an explanation for your answer to the question above.

We agree that these exemptions strike the right balance between making sure residents can access information and the need to protect sensitive information. In addition to the exemptions listed, we would suggest DLUHC consider exemptions related to information that could affect the outcome of an outstanding settlement case against a contractor. Further guidance on data protection legislation and protecting sensitive information would be welcomed here.

Do you agree or disagree that it should be up to the principal accountable person to decide how to provide residents with a copy of the residents' engagement strategy? Please provide an explanation for your answer to the question above.

We tend to agree that it should be up to the principal accountable person to decide how to provide residents with a copy of the residents' engagement strategy. The principal accountable person is best placed to decide how to share the engagement strategy with residents. The principal accountable person should propose methods that are cost effective for them and that are suitable for the residents to retrieve relevant information.

However, different approaches will be suitable for different types of housing association. For example, the approach for sharing the residents' engagement strategy is likely to differ in care and supported housing compared to general needs housing. In some cases, the principal accountable person may require the flexibility for relevant accountable person(s) to undertake this role.

Do you agree or disagree with the proposed minimum requirements for when residents should be provided with building safety information? Please provide an explanation for your answer to the question above.

We agree with the proposed minimum requirements for when residents should be provided with building safety information. Resident engagement is an important aspect of housing associations' work and many housing associations already provide residents with various aspects of building safety information. Setting minimum requirements for when residents should be provided with building safety information will help to create consistency throughout all sectors.

Do you agree or disagree with the proposed minimum requirements for the aspects of a decision residents should be consulted on? Please provide an explanation for your answer to the question above.

We agree with the proposed minimum requirements for the aspects of a decision residents should be consulted on.

Do you agree or disagree with allowing accountable persons to decide how best to seek residents' views? If you disagree - explain your reasoning. Include any particular methods of engagement that should be used.

We agree with allowing the accountable persons to decide how best to seek residents' views. The principal accountable person and accountable person(s) are best placed to decide how to seek residents' views and they should propose methods that are cost effective for them and that are suitable for the residents to share their views.

Ownership arrangements also need to be considered when accountable persons are seeking residents' views. There are some instances where a housing association is the landlord to residents in a building but not the owner or manager of the building – and therefore won't have dutyholder responsibilities. In these circumstances, accountable persons should have to consider how they seek residents' views, to ensure the residents themselves have an opportunity to contribute.

In practice this would mean the building owner or manager communicating with residents directly or giving the housing association adequate time to be able to organise this so the engagement is meaningful. Our members tell us that the latter does not currently consistently happen, meaning some residents feel ostracised from the engagement process.

Do you agree or disagree with the proposed approach to when the residents' engagement strategy should be consulted on and with whom? Please provide an explanation for your answer to the question above.

We agree with the proposed approach to when the residents' engagement strategy should be consulted on and with whom. However, the proposals set out could lead to different buildings in the same estate or area having widely varied strategies. Some further guidance on the approach to consulting on the residents' engagement strategy would create consistency throughout all sectors.

Do you agree or disagree with the minimum timeframe for reviewing the residents' engagement strategy and the further instances where a review will be required? Please provide an explanation for your answer to the question above.

We agree with the minimum timeframe for reviewing the residents' engagement strategy and the further instances where a review will be required. This will enable the principal accountable person and accountable person(s) to make sure the residents' engagement strategy is working for residents.

Further guidance around when a principal accountable person may consider a more frequent review to be necessary and/or appropriate would be welcomed. For example, the principal accountable person might want to review the strategy if there is a regulatory update, or a baseline number of residents' requests to review the strategy.

Do you agree or disagree with the approach that anyone can make a relevant complaint? Please provide an explanation for your answer to the question above.

We agree with the approach that anyone can make a relevant complaint. However, the appropriate measures need to be in place to ensure the complaints system is as effective as possible. Further guidance on how a 'relevant complaint' is defined would be welcomed. This would help ensure that only complaints related to a 'building safety risk', or the performance by an accountable person with regard to their duties, would be escalated to the Building Safety Regulator as opposed to other organisations with a role in complaint handling (such as the Housing Ombudsman). This would help ensure a consistent and fair approach to complaints is taken, but importantly that complaints relating to safety reach the right route of redress as quickly as possible.

Do you agree or disagree with the requirements to communicate clearly with complainants when rectifying a relevant complaint? Please provide an explanation for your answer to the question above.

We agree with the requirements to communicate clearly with complainants when rectifying a relevant complaint. To support this, there should be flexibility for complaints to be handled by the relevant accountable person.

Do you agree or disagree with this approach to escalating a complaint to the Building Safety Regulator? Please provide an explanation for your answer to the question above.

We agree with the approach to escalating a complaint to the Building Safety Regulator. This strikes a good balance between putting the onus on those responsible for the building's safety with ensuring complainants have proper access to redress.

Do you agree or disagree with the approach of requiring the principal accountable person to respond to building safety complaints in a timely manner and appropriately prioritise them, rather than within a fixed timeframe? If you disagree, explain why and set out what timeframe you think would be appropriate.

We agree with the approach of requiring the principal accountable person to respond to building safety complaints in a timely manner and appropriately prioritise them. A standard timeframe for the initial response could be developed to ensure there is consistency across the sector, with flexibility to manage complaints and exceptions based on ensuring the complaints most relevant to the safety of residents are prioritised.

The approach could also be aligned with the current Housing Ombudsman Complaints Code and changes coming into force from 1 October 2022. Otherwise,

this could cause confusion for all parties if a two-tier system to complaints timescales is advised.

Do you agree or disagree that the principal accountable person should have to keep complainants regularly informed of the steps they are taking to resolve a complaint and whether any progress has been made, including reasoning for any delays? Please provide an explanation for your answer to the question above.

We agree that the principal accountable person should have to keep complainants regularly informed of the steps they are taking to resolve a complaint and whether any progress has been made, including reasoning for any delays. Further guidance on the meaning of keeping complainants ‘regularly informed’ in this instance would be welcomed. Establishing a common understanding of this will help to ensure a consistent approach to keeping complainants informed is taken throughout all sectors.

The Contents of the Golden Thread

Do you agree or disagree that only information relevant to building safety risks should be stored in the golden thread? Please provide an explanation for your answer to the question above. If you’ve answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree that only information relevant to building safety risks should be stored in the golden thread. This approach will help to ensure the golden thread remains manageable and allows relevant information to be used easily and effectively.

Many housing associations have already started to implement a golden thread and are doing so effectively. Furthermore, the sector recognises the importance of implementing and maintaining a golden thread to enable the right people at the right time to have information they need to support building safety. However, the scale of creating and maintaining a golden thread should not be underestimated. We would welcome further guidance, which would help organisations to plan their approach to implementing a golden thread and would ensure resources are used in the most effective way.

Do you agree or disagree that the information in the golden thread should be regularly reviewed to ensure it remains proportionate and relevant? Please provide an explanation for your answer to the question above. If you’ve answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree that the information in the golden thread should be regularly reviewed to ensure it remains ‘proportionate and relevant’. We would welcome further guidance on how to keep the golden thread ‘proportionate and relevant’ to ensure housing

associations and the principal accountable person and accountable person(s) can ensure reviews are as effective as possible.

Do you agree or disagree with the approach outlined above? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree that the principal accountable person should retain overall responsibility for the golden thread and that accountable person(s) should be individually responsible for keeping information about the part of the building which they are responsible for in the golden thread. However, the roles of the principal accountable person and accountable person(s) are not always easily distinguishable.

Further guidance that provides clarity on the roles and what that means for responsibility for the golden thread for each accountable person would be welcomed. This would help to ensure that the golden thread is kept up to date and contains all information that remains relevant to identifying, assessing and managing building safety.

Do you agree or disagree that the information/documentation provided at the registration and as part of the building assessment certificate application should be stored in the golden thread as long as it remains relevant to building safety? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree that the information/documentation provided at the registration and as part of the building assessment certificate application should be stored in the golden thread as long as it remains relevant to building safety. This will enable the principal accountable person, accountable person(s) and any other relevant persons to identify, assess and manage building safety risks effectively.

How the Golden Thread is Stored and Managed – Golden Thread Principles

Do you agree or disagree with the proposal to require that the golden thread should be digital and that by digital we mean information and data is stored and can be transferred electronically? Please provide an explanation for your answer to the question above. If answered disagree or neither agree nor disagree please set out the changes you would like to see, including how you would define digital.

We agree with the proposal to require the golden thread to be digital. Many housing associations have already started to implement a golden thread and have done so digitally. Storing and managing the golden thread digitally will enable organisations

to use data effectively and share data between the principal accountable person, accountable person(s) and other relevant persons, to ensure residents' safety.

Do you agree or disagree with the proposed requirements for keeping information and documents in the golden thread accurate and valid? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the proposed requirements for keeping information and documents in the golden thread accurate and valid. This will enable the principal accountable person and accountable person(s) to ensure that building safety risks are adequately identified, assessed and managed.

As previously mentioned, we would welcome further guidance on managing the golden thread to help organisations to effectively store and use information in the golden thread, in part by ensuring this information remains accurate and valid. Furthermore, we would value this guidance as soon as practicably possible and far enough in advance of regulations coming into effect to give organisations as long as possible to adequately prepare themselves for these requirements.

We would also welcome guidance on acceptable time frames for adding information and documents to the golden thread. This will help to ensure that all necessary information is added as quickly as is reasonably practicable.

Do you agree or disagree with proposed requirements that the golden thread operates as an interoperable single point of truth? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please set out what changes you would like to see, including how you would enable the transfer of information.

We agree with proposed requirements that the golden thread operates as an interoperable single point of truth. This concept underpins the whole approach and information in the golden thread must be trustworthy. This enables all relevant people working on the building to depend on the information they need to ensure building safety risks are managed effectively.

Do you agree or disagree with the approach for ensuring accountability? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the approach for ensuring accountability. Further guidance on how the principal accountable person and accountable person(s) can meet the 'principles of accountability' set out in the consultation documents would be welcomed. This would create a consistent approach and would drive greater accountability across all sectors.

Duties on the Principal Accountable Person and Accountable Person(s) to Provide Information

Do you agree or disagree with the proposed approach for information sharing between the principal accountable person and accountable person(s)? Please provide an explanation for your answer to the question above. If you've answered disagree or neither agree nor disagree, please explain what changes should be made.

We agree with the proposed approach for information sharing between the principal accountable person and accountable person(s). However, where multiple accountable persons are involved, an appropriate information sharing mechanism must be agreed to help ensure the overall safety of the building.

Further guidance on the approach for sharing information between the principal accountable person and accountable person(s) in this circumstance would be welcomed to ensure that information is shared in a way that best supports them to manage the safety of the building.

Key Building Information

The key building information is to be provided to the Building Safety Regulator to enable oversight and analysis of the building industry. Do you agree or disagree with the information being required as part of the key building information?

We agree with the information being required as part of the key building information. This is information that housing associations already have about their buildings. However, additional guidance on minimum requirements and the format the information should be submitted to the Regulator in would be useful to assist organisations with the submission of this data.

Contact information

For further information on this submission, [please contact Natalie Turner](#), Policy Officer at the NHF.