Construction Leadership Council

DELIVERING THE GOLDEN THREAD:

Guidance for dutyholders and accountable persons

August 2024

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Foreword

In my review of building regulations and fire safety in 2018, I noted the need to view buildings as a whole system and to rebuild trust in the safety of our higher-risk building stock. In particular, my 2018 review identified significant issues in the lack of key information about buildings during design and construction, and the ongoing maintenance of accurate, reliable and up to date information during operation. This led me to advocate the creation of an electronic record for higher-risk buildings, which I called the "Golden Thread".

The new regulatory system requires those responsible for these buildings to use the "golden thread" to inform the safe operation and occupation of the building and to enable them to identify, mitigate and manage risks to the safety of those who live in the building. The primary mechanism for doing this is the safety case report for the building, but that report can only be developed if the golden thread information is intact, accurate, up to date and readily available as a working system to those who operate the building.

There has been much debate about the content and level of detail required in the golden thread as the legislation has been developed, but at its core it is the information that those responsible need to assure themselves and reassure residents and the regulator that they understand and are effectively managing the building so that it is safe for those who live in it and visit it.

This guidance sets out in much more detail what the golden thread is and how it may be developed during design, through construction, handover and completion of the building and into occupation. It seeks to set out the clear purpose of the golden thread, which is first and foremost intended to rebuild and then retain trust in the safety of our higher-risk building stock. I would encourage everyone involved to remember that purpose. It is not intended to be a list of things to do for no real purpose, nor is it intended to be a repository for every detail of a building. It is intended to provide a means to demonstrate to the hundreds of thousands of people who live in higher-risk buildings that their home is safe and is being kept safe by those responsible for their safety.

The guidance has been developed by an industry working group with broad experience of the development and delivery of information and the delivery and management of higher-risk buildings. As the new regime develops and the first safety case reports are assessed, the guidance will almost certainly need to develop with it. The authors of this guidance have been open that this is work in progress, and mechanisms to provide constructive feedback are provided. As we seek to rebuild trust in the safety of our higher-risk building stock, I would encourage you to use the guidance intelligently and to provide feedback so that those buildings become progressively safer for all who live in, work in and visit them.

Dame Judith Hackitt DBE FREng

The Construction Leadership Council

The Construction Leadership Council[1] (CLC) brings together all parts of the construction industry and government. Its mission is to provide leadership and coordination to enable the construction sector to improve its performance, benefiting both the private and public sectors. By convening an industry partnership, the CLC provides the means to address short-term and long-term issues that affect our sector.

The CLC's four strategic priorities are: Building Safety; Net Zero and Biodiversity; People and Skills; and Next Generation Delivery.

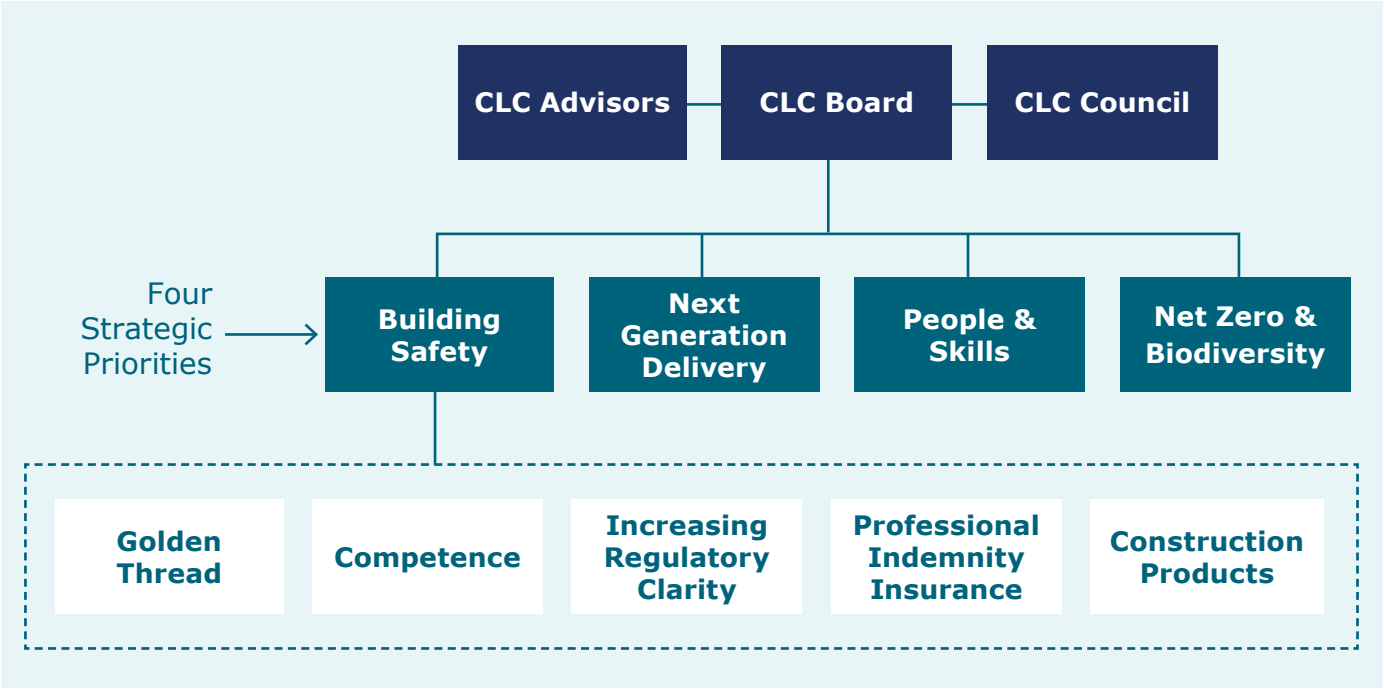

Figure 1: The structure of the Construction Leadership Council

Building Safety Strategic Priority

The CLC aims to champion and support delivery of safe and high-quality buildings for those who live and work in them.

The Building Safety Act 2022[2], together with supporting secondary legislation, has introduced a new regulatory regime which has placed new requirements and obligations on everyone, not just those who work on higher-risk buildings. This means all those within the construction sector must play their part in procuring, designing, constructing, managing and refurbishing buildings safely.

Industry leadership and adoption is vital, to achieve not only regulatory compliance, but a cultural shift within the industry in relation to building safety. The Council's vision is that building safety should be embedded as normal business practice and no longer required as a strategic priority.

The Council works with government, regulatory bodies, professional bodies and firms across the construction sector on strategic building safety issues, to support the whole built environment to build its capability to meet the requirements of the new legislation. Industry guidance forms part of this work.

The Building Advisory Committee

The Building Advisory Committee was established under section 9 of the Building Safety Act. The Committee provides advice and information to the Building Safety Regulator[3] across its building functions, including its duties to facilitate building safety in higher-risk buildings and keeping under review safety and standards of all buildings. The Committee advises on current practice as well as on new and emerging issues across the built environment. It also provides leadership across the industry. It does not advise on competence of persons within the building industry or registered building inspectors.

The Committee consists of a high-level steering group, which meets at least quarterly, supported by a number of separate thematic working groups which are focused on specific areas of work and meet as their workload requires. Members are experienced and informed practitioners who are drawn from across the construction and building industry. They have a variety of skills, knowledge and expertise, covering fire safety, structural safety, the construction industry, planning, housing and building services engineering. They are all committed to working with the Building Safety Regulator and the industry to improve standards.

The Golden Thread Working Group is continuing the work of the former Building Regulations Advisory Committee working group which produced the original definition and principles for the golden thread[4]. Members all have knowledge and expertise of construction and operation of higher-risk buildings and of their management and operation.

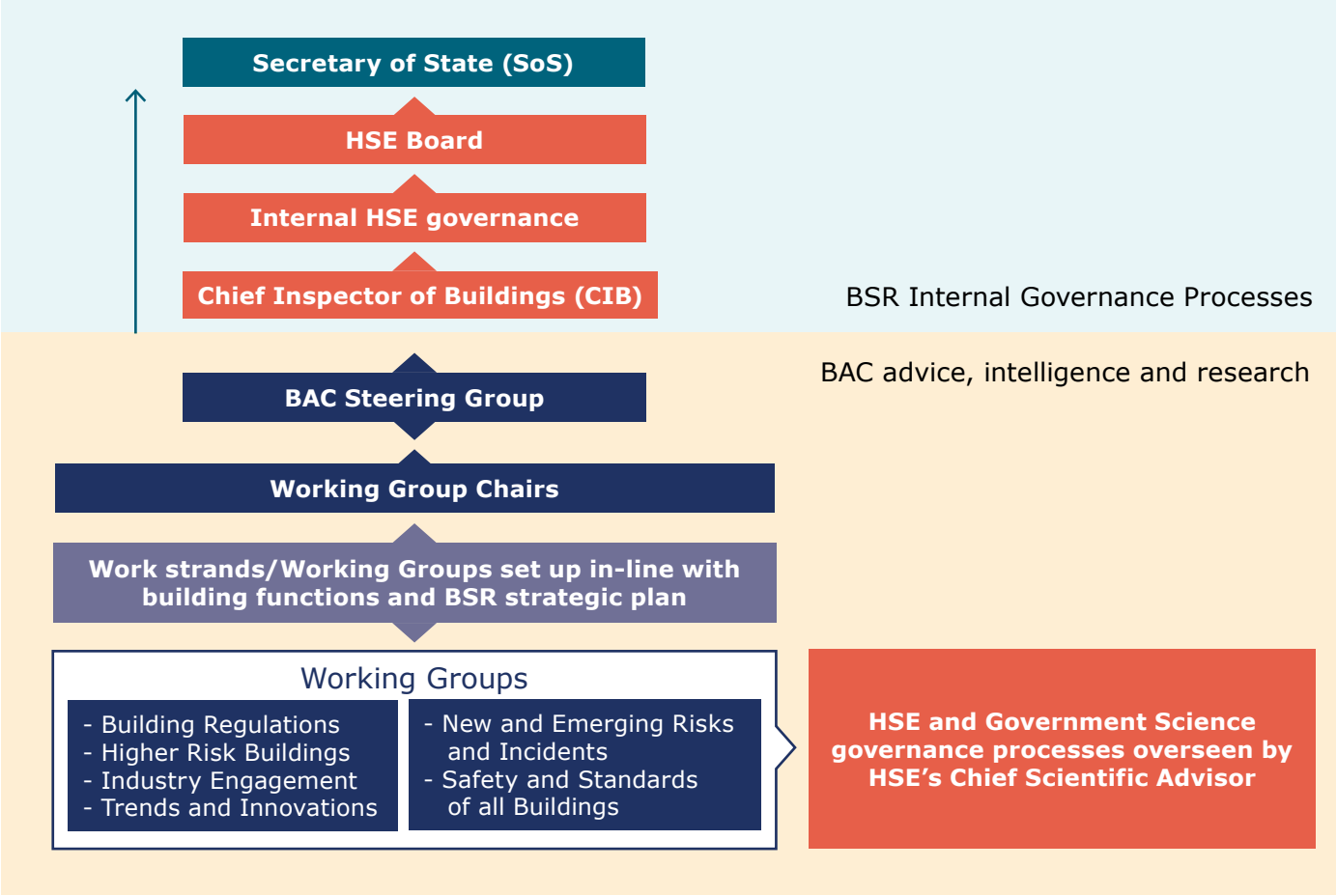

Figure 2: The Building Advisory Committee – operating model

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The Health and Safety Executive
The Health and Safety Executive provided support to the Construction Leadership Council in producing this guidance, which is aimed at delivering improvements in building safety in higher-risk buildings. This guidance may go further than the minimum you need to do to comply with the law with regard to building safety.

Disclaimer
This publication has been issued by the Construction Leadership Council (CLC) for general information only and is not intended to provide advice or guidance on specific issues or projects. The CLC accepts no liability for any loss or damage incurred by any person as a result of reliance on this guidance. If you require advice on a specific issue or project, you should seek your own competent professional advice.

Scope

The golden thread is a legal requirement for a higher-risk building (HRB) under the Building Safety Act 2022[5] and supporting secondary legislation. Guidance on the legal criteria for determining whether a building is considered a HRB is provided on GOV.UK[6].

The HRB regulatory regime is only applicable in England.

This guidance covers the content of the golden thread throughout the lifecycle of a HRB – i.e. what golden thread information dutyholders and accountable persons need to create, obtain, update, maintain and share.

It is intended to cover:

- design;
- construction;
- handover and completion; and
- occupation.

It is applicable for:

- any HRB once it is occupied;
- any building work to create a new HRB (either by building new or changing the use of an existing building); and
- any building work to an existing HRB.

This guidance will be relevant for:

- clients;
- principal designers (PD);
- principal contractors (PC);
- designers;
- contractors;
- principal accountable persons (PAPs); and
- accountable persons (APs).

It will also be useful for those people responsible for HRBs which were under construction before 1st October 2023 or covered by the transitional arrangements in building control[7]. This is because as the person responsible for the building when it is occupied will have to comply with the golden thread requirements. Therefore, it would be helpful for the person responsible for the design and construction of the building to be aware of the golden thread requirements as the person responsible for the occupied building will need to request information about the design and construction phases to develop their golden thread.

Outline of the guidance

This guidance is divided into 3 main sections:

Section 2 – this section will be of relevance to all readers and summarises:

- the fundamentals of the golden thread;
- the new regulatory regime and requirements;
- storing and managing information; and
- related guidance that is available.

Section 3 – outlines the golden thread information required to be kept during design and construction and sets out:

- the golden thread requirements on dutyholders responsible for designing and constructing HRBs;
- the development of the golden thread through planning gateway one to building control approval application at gateway two;
- the development of the golden thread through the construction process; and
- the information required to support the application for the completion certificate at gateway three.

Section 3 will be of particular relevance to clients, principal designers, principal contractors, designers and contractors involved in creating a new HRB. This section will also be relevant for projects where building work is to be undertaken to an existing occupied HRB.

Scope

Section 4 – sets out the golden thread information required to be kept during occupation and sets out:

- the golden thread requirements for accountable persons responsible for existing HRBs;
- the information expected to be kept as golden thread information for an existing building; and
- organisational information management to support the golden thread for those organisations that manage multiple HRBs, and how it relates to other requirements in the sector.

This section will be of particular relevance to any person who has some responsibilities for HRBs in occupation or are actively managing HRBs in occupation. This will include building owners, building managers, facilities managers, resident management companies and right to manage companies.

Many of the building safety reforms are for all building work, not just for work on HRBs. There must be greater responsibility and progressive assurance through the whole supply chain and across the whole lifecycle of a built asset. Whilst golden thread legislation is only applicable to HRBs, many of the approaches within this guidance may be of benefit and can be applied to work carried out by the rest of the industry.

Throughout this guidance:

- the principal accountable person and accountable person are referred to as accountable persons. However, where there are specific duties which only the principal accountable person must carry out, the guidance will specifically refer to the 'principal accountable person' as necessary: and
- the information and documents that are held as golden thread information, are referred to as the 'golden thread information'. However, if there are specific requirements that relate to just the 'information' or the 'documents' the guidance will specifically refer to the 'information' or 'documents' as necessary.
- Further terms and definitions are specified in the glossary in Annex A.

There is great variability in the scale and complexity of building work in scope of this guidance. Therefore, it is not possible to provide specific technical guidance for every scenario or project.

It is also not possible to provide specific technical guidance for every individual occupied building. Occupied HRBs are all different as each building will have been built and maintained in different ways. The accountable persons responsible for the occupied HRB include investment and development companies, housing providers who develop and then manage the finished building and resident management companies or right to manage bodies. The accountable persons will have to define the content of their golden thread information for their individual building and to meet their individual needs.

Building work relating to occupied HRBs can range from small refurbishment work in a single flat, to a refurbishment or redevelopment of the whole building. The golden thread information requirements therefore will vary between different projects.

This technical guidance aims to bring all information about the golden thread into one place, about the content needed throughout the lifecycle of a HRB. It also reinforces the principles of the golden thread.

The new building safety regulatory regime is at an early stage and as such understanding and experience will evolve on the golden thread of information. This guidance or any supporting documents will be revised if necessary. This may include development of case studies and practical examples. As part of this process, the drafting group would welcome any comments and feedback on the guidance and sharing of knowledge and case studies

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INTRODUCTION

1.0

1.0 Introduction

The golden thread of information for higher-risk buildings

1.1. The golden thread of information for higher-risk buildings (HRBs) was one of the key recommendations made by Dame Judith Hackitt in her Independent Review of Building Regulations and Fire Safety[8] published in 2018. It is intended to ensure that comprehensive, accurate and up to date electronic information about a building is created during design, updated during construction, provided at handover and completion, maintained in operation and transferred when there is a change of ownership.

1.2. The Government accepted this recommendation, and it was implemented through the Building Safety Act 2022[9] and subsequent secondary legislation.

1.3. The purpose of the golden thread of information is to give the right people the right information at the right time to understand a building and the steps needed to keep both the building and the people safe, now and in the future.

1.4. This guidance has been developed by industry practitioners for people working in the industry. It covers the content of the golden thread. It is intended to:

- Explain what golden thread information the client, principal contractor and principal designer (dutyholders) need to generate and maintain during design and construction and then to handover to the person responsible for the HRB in occupation;
- Explain what golden thread information the accountable persons need to keep and maintain throughout the building's lifecycle;
- Outline the legal requirements for the golden thread of information;
- Set out how the golden thread of information can support better decision making throughout the building's lifecycle; and
- Challenge misconceptions about the golden thread requirements.

1.5. This guidance will be of benefit to all with legal duties for HRBs, no matter what their role or stage of their building. Everyone involved in HRBs needs to understand the fundamentals of the golden thread, and to have a broad awareness of the entire process. This will provide the foundation blocks for the effective and holistic delivery of the golden thread for a building.

1.6. Greater competence is required by all who collect and manage this information, and processes need to be put in place for good information management. It should prompt more collaborative and digital working, reduce duplication, and promote accountability.

1.7. Ultimately, the golden thread enables dutyholders to assure themselves that their building complies with building regulations and for accountable persons to demonstrate that the building is being managed safely. It will also enable them to demonstrate this compliance and safe management to others, including, residents, regulators, mortgage providers and insurers.

THE LEGAL BASIS

2.0

2.0 The Legal Basis

Understanding the fundamentals

2.1. The concept of the golden thread is simple: a continuous and holistic process and approach to good information management.

2.2. The golden thread of information is intended to deliver accurate information about the building to those that need it and to support those people to use that information to comply with building regulations (in design and construction) and managing spread of fire and structural risks (in occupation).

2.3. The golden thread is both:

- the information about a building that allows someone to understand a building and keep it safe; and
- the information management systems and processes to ensure the information is accurate, easily understandable, can be accessed by those who need it and is up to date.

2.4. During design and construction the golden thread is the information required to comply with all relevant building regulations. In occupation the golden thread is the information required to demonstrate that building safety risks are being managed.

2.5. For the purposes of HRBs, building safety risks are the spread of fire and structural safety. This means that information collected through the design and construction stages will need to be divided into the ongoing golden thread information (and documents) that relate to the spread of fire and structural safety and any other information about the building.

2.6. The information on the spread of fire and structural safety will need to be kept and maintained to meet the requirements for the golden thread during the in-occupation regime by the accountable persons.

2.7. Those in charge of an occupied building should make informed decisions on the information that is within the golden thread and information about the building that has value to them but is not within the golden thread. Information that is handed over from the design and construction phase that does not need to be kept as golden thread information is very likely to be of significant value in the day to day operation, management, maintenance and refurbishment of the building even though it is not part of the golden thread.

Remember the golden thread is:

- individual, bespoke, and specific to your building and group of residents/ occupants;
- continuous, holistic and requires a chain of responsibility (e.g. clarity on who is responsible for updating the information);
- electronic information about the building that is created, obtained, updated, maintained and shared;
- the information and processes that enable the right decisions to be made by the right people, all the time; and
- the golden thread will alter and develop throughout the life of the building (from design to occupation):
- at the design stage – it is the information to demonstrate how the design, if built, will comply with building regulations.
- in construction – it is evidence that the approved design is being built and that any changes are managed and comply with building regulations.
- at handover and completion – it is evidence that the completed building complies with building regulations and provides a comprehensive and accurate electronic record of the finished building for the accountable person.

2.0 The Legal Basis

- in occupation – it is an accurate and up to date electronic record of the building as it is managed, maintained, repaired, refurbished and altered to support accountable persons in managing building safety.

Remember the golden thread is not:

- just a repository of technical information and documents about the building;
- a tick box exercise to satisfy the HRB building control stages;
- records of actions that have been completed;
- something that is rarely used;
- information just to be produced for regulators;
- a particular format;
- simply a product or software solution;
- a consultancy service; or
- a lot of paperwork that doesn't relate to what is happening on a day to day basis.

2.8. Competent individuals will need to be engaged to contribute to the development of the golden thread and there should be organisational capability to develop the required processes and procedures that underpin it. This is not an audit exercise by the Building Safety Regulator (BSR).

Outline of the regulatory regime

2.9. The Ministry of Housing, Communities and Local Government (MHCLG) is responsible for building safety policy. The primary legislation that underpins the golden thread is the Building Safety Act 2022 (BSA)[10].

2.10. The BSA has 6 Parts and put in place a new and enhanced regulatory regime for building control, building safety and construction products, and ensures residents have a stronger voice in the system. It established new bodies, duties and systems and introduced requirements for all buildings and additional requirements for HRBs.

2.11. The BSA also includes changes to existing legislation including the Architects Act 1997[11], the Building Act 1984[12], the Defective Premises Act 1972[13], the Housing Act 1996[14], and further changes to the Regulatory Reform (Fire Safety) Order 2005[15], building on the Fire Safety Act 2021[16].

2.12. The BSA divides the lifecycle of a HRB between design and construction, which is covered in Part 3 of the Act, and occupation of the building, which is covered in Part 4 of the Act. The BSA is supported by a suite of secondary legislation.

2.13. The BSA, through sections 33, 88, 89 and 90, and associated Regulations, places legal duties on dutyholders (Part 3) and accountable persons (Part 4). These duties are to create, obtain, update, maintain and share information and documents about a HRB: this information is known as the golden thread. This requirement applies to both HRBs proposed to be or currently under construction as well as to existing occupied HRBs.

2.14. The HRB regime is wide-ranging and is set out in different pieces of legislation. As the golden thread requirements are integral to the HRB regime, this means that the golden thread requirements are not consolidated in one place in the law, rather they are spread across these different pieces of legislation.

2.15. Three sets of Regulations outline the main duties and detail, including what information has to be kept as golden thread information and how the information should be kept:

- The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023 – SI 2023/909[17];
- The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 – SI 2023/907[18]; and

2.0 The Legal Basis

- The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024 – SI 2024/41[19].

2.16. A further four sets of Regulations detail additional aspects of the golden thread of information:

- The Building Regulations etc. (Amendment) (England) Regulations 2023 – SI 2023/911[20];
- The Building Safety (Registration of Higher-Risk Buildings and Review of Decisions) (England) Regulations 2023 – SI 2023/315[21];
- The Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023 – SI 2023/396[22]; and
- The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 – SI 2023/275[23].

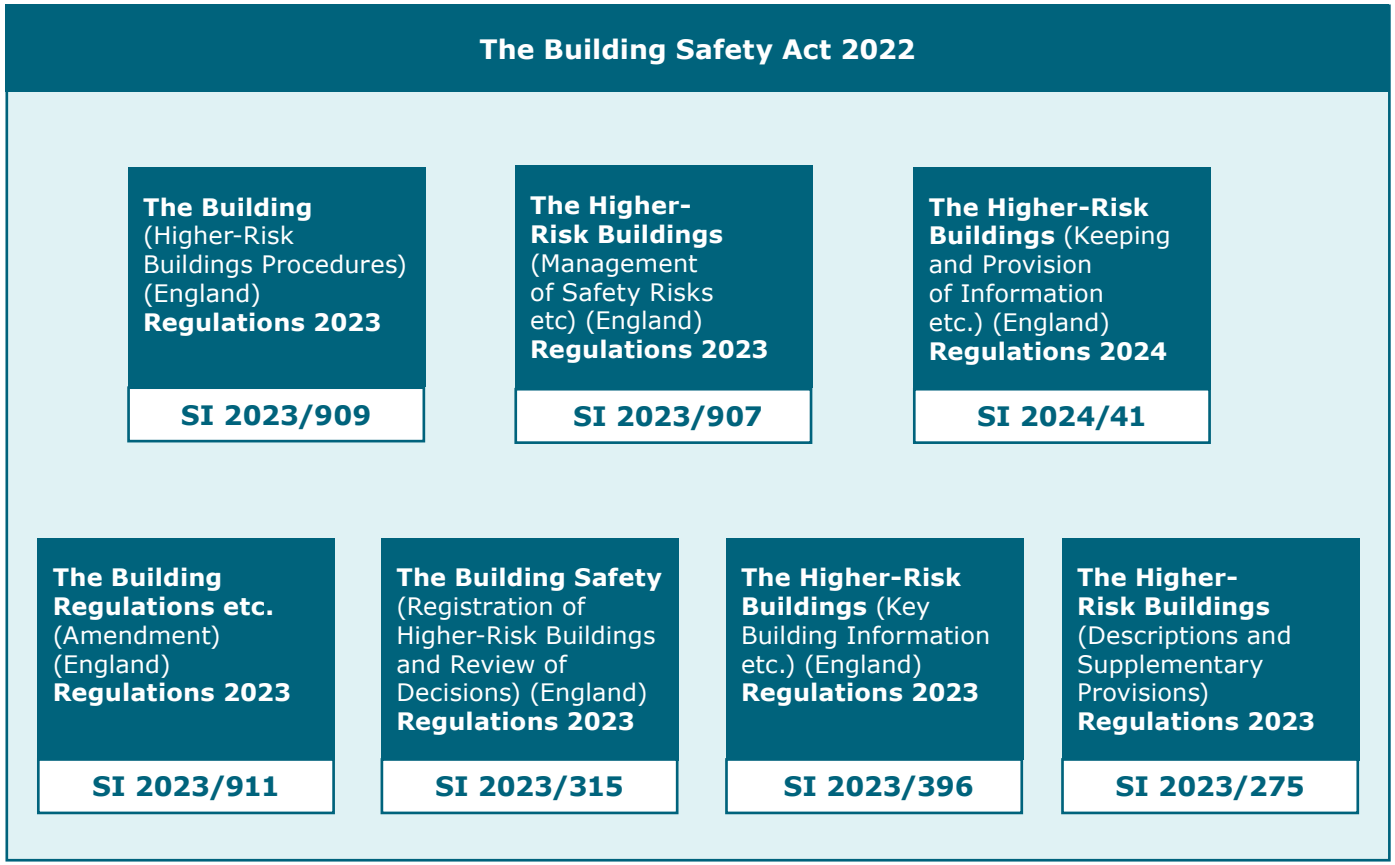

Figure 3: Building safety for HRBs - legislative framework

2.0 The Legal Basis

2.17. Guidance can also support compliance with statutory duties. It will typically outline good or best practice – providing simple, clear and practical information.

2.18. The legislative requirements are summarised in Annex B under the four scenarios below.

- I am a dutyholder – What golden thread requirements do I need to be aware of if I am building a new HRB from 1st October 2023?
- I am an accountable person – What golden thread requirements do I need to be aware of if I am responsible for an occupied HRB?
- I am a dutyholder – What golden thread requirements do I need to be aware of if there is building work in an existing HRB?
- I am an accountable person – What golden thread requirements do I need to be aware of if there is building work in an existing HRB?

2.19. For the full details of any aspect of the BSA or Regulations, dutyholders and accountable persons are advised to also review the legislation itself, which is all freely accessible on the legislation.gov website[24].

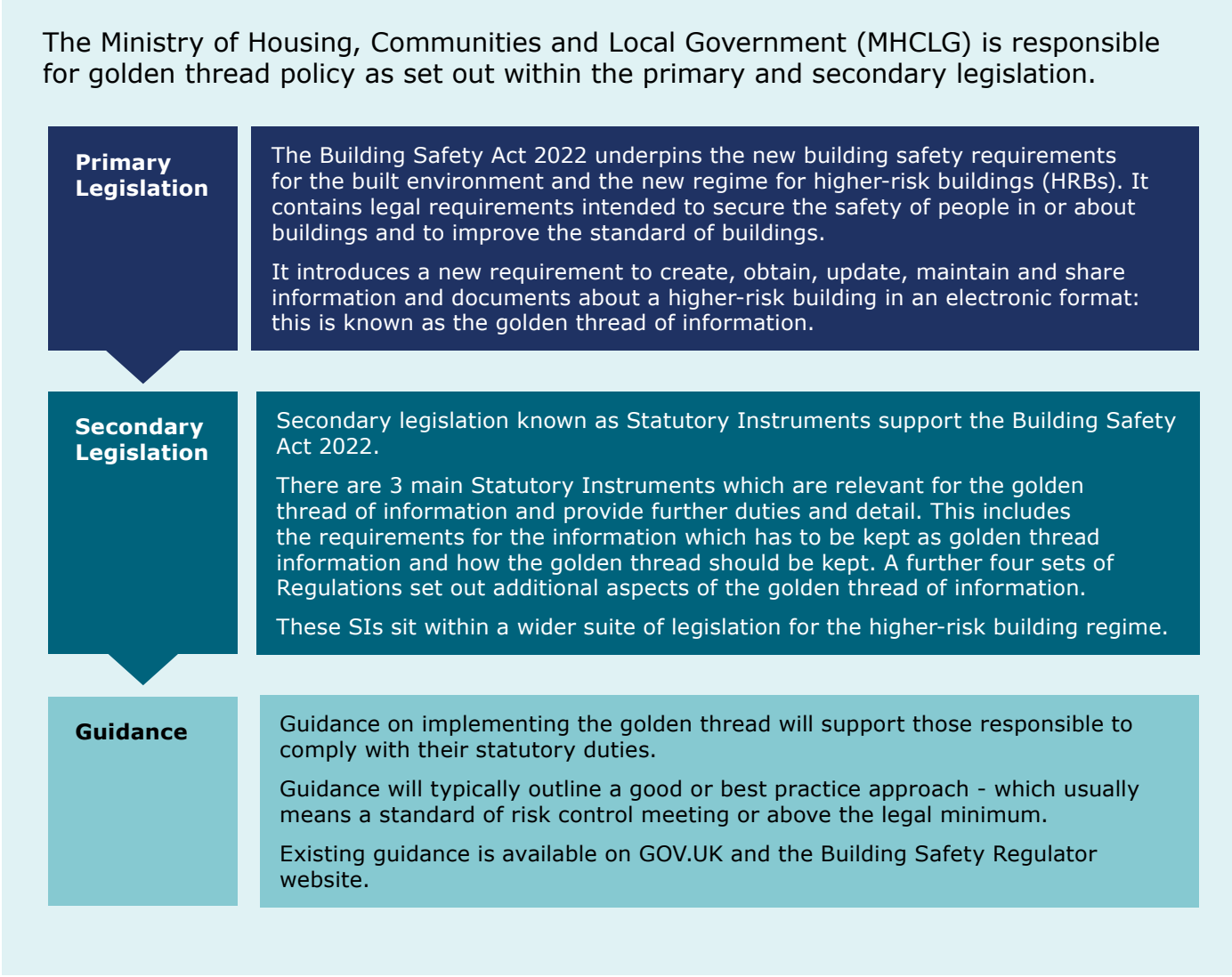

Figure 4: Building safety – legislative framework and guidance for golden thread

2.0 The Legal Basis

New building safety regime for higher-risk buildings

2.20. The new regime strengthens regulatory oversight before building work commences, during construction, before a building is occupied and for occupation - through the new building control and in-occupation regimes for HRBs.

2.21. The golden thread of information is an integral part of this new regime and is summarised in the diagram below for design, construction, handover, completion, and in-occupation.

2.22. During the design and construction phase the duty to keep and manage the information thread rests with the dutyholder - this is the client, principal contractor or principal designer. During occupation, the duty to keep and manage the information thread rests with the accountable persons.

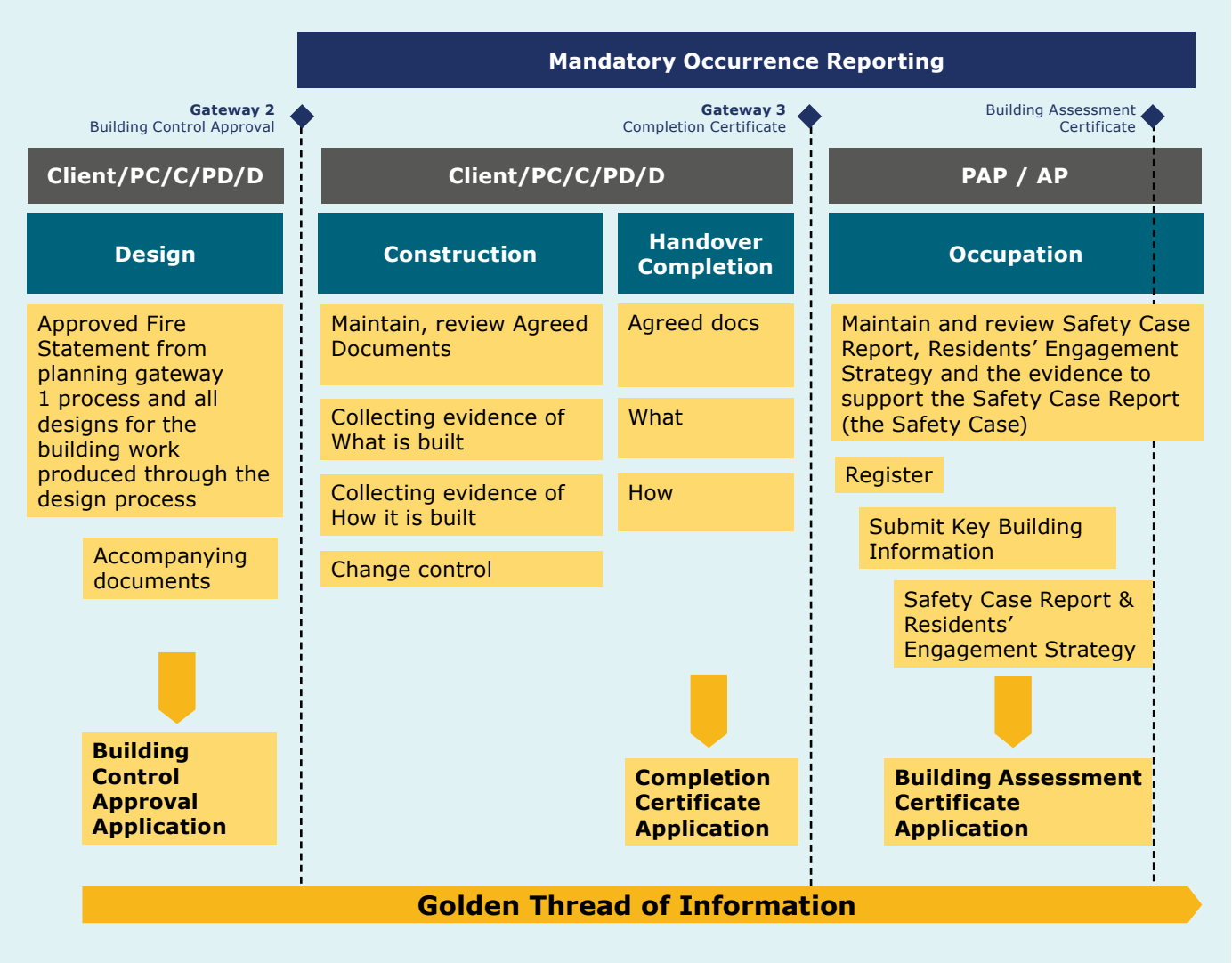

Figure 5: The stages, processes and procedures through the lifecycle of a HRB and how this aligns to the golden thread of information

2.0 The Legal Basis

Managing and storing the golden thread

2.23. No particular format or software is prescribed for the golden thread, however the information should be managed and stored effectively.

2.24. The golden thread of information should be: Accessible, Accountable, Accurate, Electronic, Secure, Transferable, Understandable and Up to date.

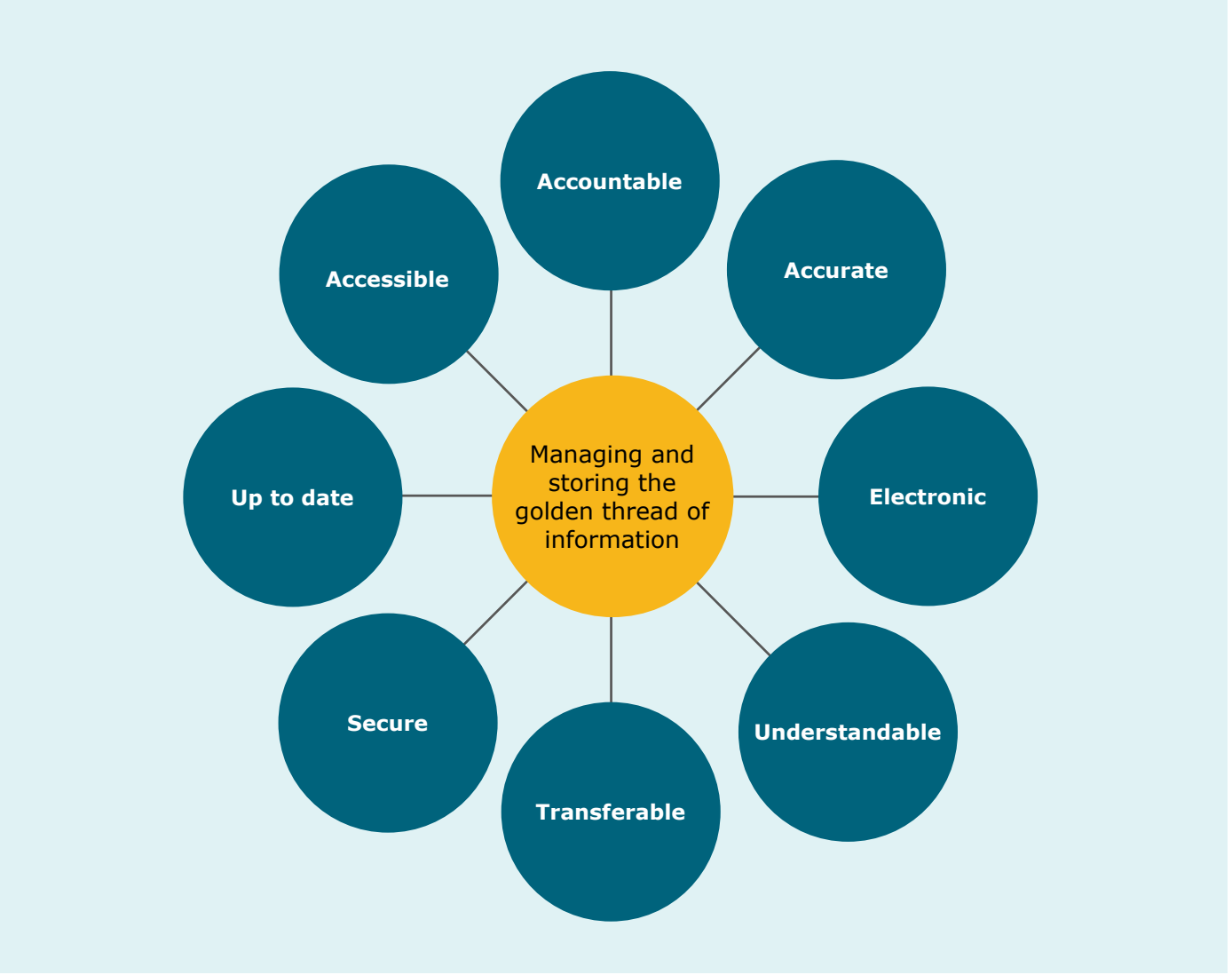

Figure 6: Duties related to managing and storing the golden thread

2.0 The Legal Basis

2.25. Dutyholders and accountable persons have an ongoing responsibility to ensure that the golden thread is held and managed in a way that meets these requirements. **Table 1** provides further detail on the duties.

Table 1: Duties related to managing and storing the golden thread

Accessible
• The golden thread information must be provided as soon as reasonably practicable to those who need the information. • Dutyholders must share information with each other, and the client must handover golden thread information on building completion or completion of building work. If dutyholders leave their role they must transfer information to the new dutyholder. • Accountable persons are under a duty to share information with each other and others including the client, Responsible Persons, residents, owners of flats, the fire and rescue services and in certain circumstances the landlords of residents. Accountable persons must transfer information to the new accountable person when they leave their role.
Accountable
• The golden thread information should only be changed in accordance with procedures which record the person who made the change and the date of that change. • This supports greater accountability and transparency as there is a clear audit trail of those responsible throughout the building and management process.
Accurate
• The golden thread information has to be accurate. Accuracy is crucial for trust and reliability. The higher-risk regime requires clear change control processes to both manage the golden thread information and the activities that trigger changes to the information. This supports greater accuracy. • Good practice encourages people to use clear and consistent definitions of terms. This is not a requirement of the legislation but it is good practice for better information management systems. This will support greater accuracy as the same term will mean the same thing throughout the system.
Electronic
• The golden thread must be kept in an electronic format. • There are no restrictions on the format it is kept in or on the type of software used except that it must be held in a way that when the information is transferred. The person receiving this can access and read it.

2.0 The Legal Basis

Table 1: Duties related to managing and storing the golden thread (continued)

Secure
The golden thread must be secure from unauthorised access.
Transferable
• The golden thread information must be shared electronically with other persons who have a professional interest in a building. • The information must be held in an electronic format that ensures that when the information is transferred, the person receiving this can access and read it and without any data being lost or corrupted. • Information does not have to be provided electronically to residents or owners of flats, although some may prefer to receive information in this way.
Understandable
• The golden thread information must be understandable to the intended users and readers of the data. • Any information provided to residents and owners of flats should include an explanation of any technical language used, or with plain English summaries of complex or technical provisions.
Up to date
• So far as possible dutyholders and accountable persons are responsible for keeping the golden thread information up to date. Dutyholders and accountable person will use this up to date information to demonstrate ongoing compliance with building regulations and building safety duties. • Some information will not have to be kept up to date but will provide a historic record of the building at a certain moment in time (for instance plans of the building upon completion). • Good practice encourages dutyholders and accountable persons to review their information to ensure it is still relevant and useful. Not all information will need to be kept permanently and when certain golden thread information is updated previous versions will not need to be retained.

2.26. Enabling easy access between people, across different teams, and organisations will be essential. Throughout the lifecycle of the building, information will also have to be transferred between different software platforms and when ownership of the building changes.

2.27. Meeting the golden thread requirements will require some dutyholders and accountable persons to change the way they approach management of information about buildings, ensuring that the information is recognised as being a valuable asset in itself.

2.28. Accountable persons will also need to comply with requirements around security, commercial confidentiality and data protection when sharing golden thread information. These restrictions vary depending on the person who the information is being shared with though.

2.29. The new building safety regime requires HRBs to be considered as a single system. The requirements to collect golden thread information should be considered as part of the wider programme of building safety reforms.

2.0 The Legal Basis

Existing guidance and advice

2.30. Existing guidance is available for the golden thread of information and the wider HRB regime. This includes:

- **GOV.UK: Building Safety Regulator: Keeping information about a higher-risk building: the golden thread**[25] A high-level introduction to the golden thread.
- **GOV.UK: Building Safety Regulator: Understanding the golden thread**[26] A high-level introduction to the golden thread.
- **GOV.UK: Building Control: An overview of the new regime**[27] An overview of gateway 2 and 3.
- **GOV.UK: Managing building control approval applications for HRBs**[28] How clients can submit and manage a building control application to the BSR.
- **GOV.UK: Design and building work**[29] A high-level overview of the duties on dutyholders.
- **GOV.UK: Roles and responsibilities of accountable persons**[30] A high-level overview of the duties of accountable persons.
- **GOV.UK: Building Safety guides for accountable persons**[31] Information on assessing and managing risks, and safety management systems.
- **GOV.UK: Safety case for a high-rise building**[32] Information on the golden thread for the safety case for a building.
- **GOV.UK: Safety case toolkit**[33] Reasonable steps and practical examples for preparing a safety case report.
- **GOV.UK: Preparing a building assessment certificate application**[34] Information principal accountable persons must submit.
- **BSI: Raising competence across the built environment**[35] Suite of competence standards.
- **GOV.UK: BRAC: golden thread report**[36] This guidance was published in 2022 before the secondary legislation, but the definition and principles of the golden thread remain relevant.

2.31. The BSR also provides a telephone advice service[37] – more information is provided on GOV.UK.

Summary – The Legal Basis

Understanding the fundamentals

- Everyone involved in higher-risk buildings (HRBs) need to understand the fundamentals for the golden thread.
- Good information management should not be something new.
- The golden thread allows understanding of a building and the steps needed to keep both the building and people safe, now and in the future.
- The golden thread is electronic information created, obtained, updated, maintained and shared for the life of the building.
- The golden thread is not a tick box exercise or simply a product or software solution.
- Competent individuals will need to be engaged to contribute to the development of the golden thread and there should be organisational capability to develop the required processes and procedures that underpin it.
- The golden thread is your information, for your building, to assure you and your residents that the building is safe and demonstrate that you are managing it safely - be curious about your building.

Outline of the regulatory regime

- The legal basis for the new regime for HRBs is set out in the Building Safety Act 2022 (BSA). The golden thread is an integral part of this new regime
- The legal powers that enable the requirements of the golden thread of information for HRBs are contained in the BSA. The detailed requirements are set out in secondary legislation. Guidance is available to support compliance with these duties.
- The BSA places legal duties on dutyholders (Part 3) and accountable persons (Part 4) to keep and maintain information about a HRB - this information is known as the golden thread information.
- There are 3 key Regulations for the implementation of the golden thread. These detail the requirements for the information which has to be kept as golden thread information and how the golden thread should be kept.
- A further 4 Regulations for the HRB regime interlink with the above regulations for the golden thread of information.
- The BSA and Regulations set out:
  - what information needs to be kept as golden thread information;
  - how it should be kept;
  - who is responsible for keeping and updating the information; and
  - that information from the golden thread needs to be shared throughout the lifecycle of the building, and who and when this information needs to be shared.

Managing and storing the golden thread

- The golden thread of information should be managed and stored effectively.
- Information should be: Accessible, Accountable, Accurate, Electronic, Secure, Transferable, Understandable and Up to date.
- Information should be periodically reviewed and supported by effective change control processes.
- There should be structured storage and shareability for the information whilst maintaining security, commercial confidentiality and data protection.
- Greater competence is required by all who collect and manage golden thread information, and processes need to be put in place for good information management.
- Building information is a valuable asset in itself.
- Effective management of the golden thread will bring greater collaborative and digital working, reduce duplication, and promote accountability.

THE GOLDEN THREAD FOR THE DESIGN AND CONSTRUCTION OF NEW HRBS AND BUILDING WORK ON EXISTING HRBS

3.0

3.0 The golden thread for the design, construction and building work on HRBs

Scope

3.1. This section provides guidance on the golden thread information and documents that the client, principal designer and principal contractor (dutyholders) need to obtain and update:

- through the design and construction phases for creating a new higher-risk building (HRB), either by building new or changing the use of an existing building;
- for projects where HRB work is to be undertaken to an existing building;
- for the handover of completed construction work for a new HRB; and
- for the handover of completed building work in an existing HRB.

This includes: all new HRBs under construction from 1st October 2023; and HRBs which were under construction before 1st October 2023 but are no longer under transitional arrangements and have transferred to the Building Safety Regulator (BSR).

3.2. It includes all the information and documents:

- required for the building control approval application at gateway two;
- required due to changes during construction work (i.e. information which has been updated through the construction process); and
- required for the completion certificate application at gateway three.

3.3. This information will allow dutyholders to ensure they are designing and building a building that complies with the functional requirements of the building regulations[38]. It will also enable dutyholders to demonstrate this to others if requested.

3.4. Building work relating to HRBs can range from small refurbishment work in a single flat, to a new complex multi-tower mixed used development. In addition, the occupants of HRBs can vary from private and/or social housing, as can the clients, from investment and development companies to housing providers who go on to manage the finished building. Therefore, it is not possible to provide specific technical guidance for every scenario or project. The client will have to define the content of their golden thread information for each individual project.

Background

3.5. The new regime strengthens regulatory oversight before building work commences, throughout construction and before a building is occupied. It includes stop/go decision points (gateways) that must be passed before a development can proceed to the next stage. This new approach continues into the 'build' phase where those management arrangements set out in the approved building control application (gateway two) are put into practice ensuring that the design that was approved is what is built and that the right evidence is being collected to support the completion certificate application (gateway three).

3.6. A new building can only be registered with the BSR for occupation once the completion certificate application has been approved (gateway three) either for partial or full completion.

3.7. The effective creation and management of the golden thread during the design and construction phases will not only bring greater assurance on the delivery of a compliant and safe building, but contribute to comprehensive building control approval and completion applications. In turn this supports better communication and collaboration with those who have duties in the occupation stage.

3.0 The golden thread for the design, construction and building work on HRBs

The golden thread of information for the HRB building control regime

3.8. The golden thread information is all the information required to support the whole HRB building control process, it will evolve and should be managed and stored effectively (see section 2 of this guidance). This includes all the information:

- required for the building control approval application, including a full record of the design for the planned building and the 'accompanying documents';
- records associated with any changes through the construction phase; and
- the evidence collected to support the completion certificate application and handover to the Responsible Person.

3.9. More detail on the HRB building control regime can be found in The Building (Higher-Risk Buildings Procedures) (England) Regulations[39], HSE guidance[40] and GOV.UK[41].

3.10. During the design and construction phases, the emphasis is on designing and building in compliance with the functional requirements of the building regulations. The documents required as part of an application for building control approval (gateway two) and a completion certificate (gateway three) will be used to support this.

Golden thread information

Design phase – The information to demonstrate the design if built will comply with the building regulations

3.11. The client is responsible for determining that appropriate procedures for developing, managing and storing the golden thread information are in place. They must allow the right people (principal designer, principal contractor and other dutyholders) to have access to the golden thread.

3.12. The principal designer is responsible for ensuring that the designs are stored appropriately and for managing the golden thread information relating to design work of the project. This includes capturing and keeping all of the design information up to date, effective communication between designers and sharing of information relevant to the building work with the principal contractor and contractors.

3.13. Before building work starts the golden thread information must contain sufficient detail to demonstrate how:

- the building, when built, will satisfy all of the applicable functional requirements of building regulations; and
- the construction activity (building work) will be managed to ensure the building will be built to the design. This includes demonstrating that sufficient credible evidence to support your building completion certificate application will be captured.

3.14. The golden thread information enables the design and construction teams to demonstrate "what" is to be built and "how" compliant delivery is to be met.

3.15. The new HRB regime requires some new information and documents to be submitted with the building control application as well as the design (drawings and plans). These are called accompanying documents and all should be submitted as part of the building control approval application (gateway two) to the BSR. These documents need to be kept as golden thread information. The building control application should include a description of the HRB work.

3.0 The golden thread for the design, construction and building work on HRBs

3.16. The accompanying documents are set out in The Building (Higher-Risk Buildings Procedures) (England) Regulations[42] and include:

- competence declaration;
- construction control plan;
- change control plan;
- building regulations compliance statement;
- fire and emergency file;
- mandatory occurrence reporting plan; and
- partial completion strategy (where relevant).

3.17. Certain information will also be developed through the planning gateway one process and the design stage that is not submitted as part of the building control approval application. However, the client must ensure that relevant information is kept as golden thread information when the application for building control approval is submitted including:

- all designs for the building work produced before the building control approval application is submitted; and
- the fire statement that was developed as part of the planning gateway one process. [43]

Construction phase – The evidence to demonstrate that the approved design is being built and any changes are managed and comply with the building regulations

3.18. Once building control approval has been granted and the BSR has been notified of the intention to start work, the principal contractor is responsible for managing the golden thread relevant to the building work. This includes using the system set up by the client, capturing and keeping all building information up to date. They also need to ensure effective communications and share information with relevant persons.

3.19. In certain circumstances such as where requirements have been imposed on a building control approval, or where changes are made to the design once construction work has started, design work will overlap with the construction work. The principal designer will therefore continue to have a duty to plan, manage and monitor design work throughout the project. They will need to collaborate with the principal contractor to ensure any changes to designs or design work during the construction phase continue to be captured in the golden thread.

3.20. Sufficient evidence must be captured during construction to show:

- how the building work conforms to the design that was approved, including any approved changes; and
- how the building satisfies all the applicable functional requirements of the building regulations.

3.21. To make sure there is robust record keeping during HRB work, the client must have procedures in place to ensure changes are managed and the principal contractor must ensure there is a record of all the controlled changes that have been made. All changes from the original building control approval application (agreed documents) must be recorded in the change control log.

3.22. It is essential that the agreed documents are updated throughout construction. Up to date versions will be required to be submitted to the BSR as part of a completion certificate application. The golden thread will therefore evolve throughout the construction phase.

3.23. The golden thread information will enable the design and construction teams to demonstrate "what" has been built and "how" compliant delivery was met.

3.0 The golden thread for the design, construction and building work on HRBs

Handover and Completion – The evidence to demonstrate that the completed building complies with the building regulations and a comprehensive and accurate record of the building has been handed over

3.24. The golden thread information must be handed over at building completion (or completion of building work) to enable the relevant person to understand, operate and maintain the building and the systems in it. Receipt of this must be confirmed by the person who has received the information and that it is accessible and in a useable format.

3.25. The golden thread information is handed over by the client to the:

- principal accountable person or accountable person for a higher-risk residential building; and/or
- Responsible Person for a non-residential building or non-residential parts of the building (a hospital or a care home) (only the relevant fire safety information)[44].

By ensuring the information is updated throughout construction, this means accurate information is handed over at building completion.

3.26. The golden thread information that the client must handover is:

- a copy of the completion certificate application (or partial completion certificate application);
- a copy of each accompanying document which was submitted as part of the completion certificate application (or partial completion certificate application);
- extracts from the GT information from throughout the design and building work concerned with specified parts of the provisions in schedule 1 of the Building Regulations 2010 relating to fire safety (part B), ventilation (part F), energy (part L) and overheating (part O). This is known as the BFLO information.[45]
- a copy of the completion certificate (or partial completion certificate) from the BSR when approved.

3.27. Information that has been handed over to the appointed person from the design and construction phases, will need to be reviewed and a judgement made on:

- what information is required as ongoing golden thread information (and documents) that relate to structural and fire safety; and
- other information about the building that has value to the accountable person but is not within the golden thread.

3.28. However, that other information is very likely to be of significant value in the day to day operation, management, maintenance and refurbishment of the building even though it is not part of the golden thread.

3.29. Clients responsible for HRBs that were under construction before 1st October 2023 and are part of the transitional arrangements in building control will not be under a legal duty to handover golden thread information on building completion. They will be under a legal duty to handover fire safety information. However, the person responsible for the building when it is occupied (the accountable person) will have to comply with the golden thread requirements in occupation. Therefore, it is likely that they will request design and construction information about the building to develop their golden thread. It is recommended that the client is able to provide this information to the accountable person.

3.0 The golden thread for the design, construction and building work on HRBs

3.30. Once the golden thread is handed over and building work is complete, a building completion certificate application (or partial completion application) can be submitted to the BSR by the client. A completion certificate application can only be submitted after the building work has been completed. Construction activity which is not technically building work, such as decorating or landscaping, can be carried out after an application has been submitted.

3.31. The application must contain sufficient information to show how the building conforms to the approved design and satisfies all the applicable functional requirements of the building regulations. Dutyholders must also indicate their change control process and confirm that all changes have not changed their assessment of compliance.

3.32. The application for a completion certificate must be made in writing and signed by the Client. It will need to include a description of the work and be accompanied by:

- a notice stating the date on which the building work was completed;
- 'as built' plans and information;
- The change control log;
- The latest version of any 'accompanying document' that was approved at GW2 (the 'agreed documents'):
  - construction control plan;
  - change control plan and the change control log;
  - mandatory occurrence reporting plan;
  - building regulations compliance statement;
  - Fire and Emergency File;
  - a statement, signed by the Client, confirming that to the best of the Client's knowledge the work complies with the relevant building regulations;
  - a compliance declaration; and
  - confirmation from the relevant person that they have received the golden thread and relevant handover information from the Client.

However, if the completion certificate is solely for category B building work you will only need to submit the accompanying documents from the list above that were approved in your GW2 application.

3.33. A completion certificate is required to register a higher-risk residential building. Residents are not allowed to occupy a new higher-risk residential building until it has been registered.

3.0 The golden thread for the design, construction and building work on HRBs

The information and documents forming the golden thread should show how the design, if constructed, will comply with building regulations by demonstrating how:

- the building type and the building safety risks are identified throughout the design;
- the design specifications of products or products systems meet all building regulations individually and as a system and address the building safety risks. This could be meeting the building regulations for a powered opening door to allow safe and free access for less able persons to pass through it and preventing the spread of fire and smoke where the powered door is a compartment door;
- the design specification of products or product systems are prescribed in functional classifications so as to meet the specified design operational performance requirements and address the building safety risks;
- the prescribed products or product systems interface together and do not compromise the fabric or compartmentation of the building; and
- the designed and prescribed products or product systems can safely be installed, inspected, commissioned, operated and maintained.

The golden thread information will also enable the construction team to show that they are delivering the approved design by demonstrating:

- compliance of all installations during the building work;
- compliance of the installation quality parameters required for handling materials and workmanship during the building work;
- how the approved design requirements of specific systems are met and are compliant;
- compliance of the finished building work;
- full commissioning records that show compliance to the approved design performance requirements;
- that the information provided for the installed conditions allows future compliant changes to be made during and after the occupation; and
- operation and maintenance instructions that allows safe access for future maintenance, inspection, commissioning changes and replacement.

3.0 The golden thread for the design, construction and building work on HRBs

Further detail

Design – such plans as necessary to show that the HRB work would comply with all applicable requirements

3.34. There should be a design which can be understood by all delivery participants and if built to, would result in a building that complies with the functional requirements of the building regulations. This is achieved by designers detailing plans which show enough detail about the construction of the building.

3.35. Drawings and specifications must show compliance of the design with the relevant technical requirements in the building regulations. The plans and specifications will enable dutyholders to understand what needs to be built to deliver a building which is in compliance with the building regulations and is safe. BS EN ISO 7519 Technical product documentation (TPD) – construction documentation – general principles of presentation for general arrangement and assembly drawings[47] sets out good practice in relation to the development of plans, such as general arrangement drawings and assembly drawings.

3.36. These plans have to be accompanied by any other necessary design details, specifications and product classification, such as structural, drainage, thermal, ventilation, fire safety systems, or water conservation calculations.

3.37. The building control approval application must be clear where it has not been viable to produce sufficient information at the point of application. Those elements might be appropriate to form a requirement imposed on any application approval. Any outstanding information will need to be submitted and approved before that element of the building work can start.

Competence declaration – dutyholders must be competent in the area they are responsible for

3.38. The new Part 2A of the building regulations[48] sets requirements for dutyholder duties and competence. Everyone who carries out design or building work must be competent for the work they carry out. Clients need to ensure any necessary checks have been carried out before appointing competent people as principal designer and principal contractor and need to be able to demonstrate the steps they have taken (this should include steps taken to review the conduct of their proposed appointees in previous roles). Checking competence should include steps taken to review relevant past conduct. A suite of standards to raise the competence of those working in buildings and support safety, under the BSA and Regulations are available[49].

3.39. The competence declaration sets out a written record of the steps the client has taken and confirms the client is satisfied that those they have appointed have the required competencies to carry out their roles.

3.0 The golden thread for the design, construction and building work on HRBs

Construction control plan – managing and ensuring that compliance is maintained through the construction process

3.40. The purpose of a construction control plan is to describe the strategies, policies and procedures that are intended to ensure that building work will be managed to maintain building regulations compliance. This includes the policies and procedures intended to ensure that the robust evidence is captured throughout construction to support the completion certificate application. That evidence of compliance forms a critical part of the golden thread.

3.41. It should be a practical and useful document describing the working arrangements that a principal contractor and all other contractors should follow. It will also support the change log.

3.42. The client and their teams must ensure that they have suitable mechanisms set up to manage compliance throughout the construction process. Those mechanisms should address:

- provision of information, instruction and training;
- management and supervision of the building work;
- quality control, monitoring and auditing procedures;
- ongoing competence of those associated with the design and building work;
- coordination and communication between dutyholders: and
- records of compliance.

3.43. All of the arrangements, outlined above, should be set out in the construction control plan. The detail available in Schedule 1 of The Building (Higher-Risk Buildings Procedures) (England) Regulations[50] outlines elements that should be covered.

3.44. It is essential that once a compliant design has been achieved and communicated at building control approval, then the aims of that design intent should not be lost during the construction process.

Change Control Plan – controlling and evidencing any changes during construction

3.45. Any changes to the documents approved at the building control application stage (gateway 2) (the agreed documents) is a controlled change. This includes changes in organisations or personnel as well as changes to building design or management arrangements. All controlled changes must be recorded in the change control log and the relevant documents need to be updated (although each change needs to be recorded, not every change needs to be notified to the BSR).

3.46. The client must establish policies and procedures for controlling, recording and assessing the impact of any controlled change. This should be set out in the change control plan. Procedures should ensure that change is properly understood, recorded accurately and that appropriate action is taken promptly in response to any controlled change. Not all changes require the same response.[51]

3.47. The change control log will be an important document that allows the client and others to be satisfied that the requirement to assess and record all controlled changes has been met.

3.0 The golden thread for the design, construction and building work on HRBs

Building Regulations Compliance Statement – communicating the compliance route method

3.48. The purpose of the building regulations compliance statement is to explain any guidance or standard that the designer is using to support the compliance of the design. It helps provide assurance of how the planned building work will comply with the relevant requirements of the building regulations. Compliance and the route to that compliance must be achieved for each applicable building regulation requirement.

3.49. The building regulations are not prescriptive, rather they set out functional requirements. This allows designers to follow any relevant guidance and allows for different approaches to be taken. The benchmark to be achieved for those functional requirements is the standard set for common building situations in the statutory guidance:

- Designs may follow the approach set out in the relevant Approved Document to the building regulations.
- Designs may follow the advice given in another recognised standard such as a British Standard.
- Designs may follow an innovative approach, supported by competent appraisal and appropriate design review.

3.50. To demonstrate the compliance of the design, it is essential that clarity of the approach taken is identified at gateway two. This means that anyone seeking assurance of the design approach is directed to the relevant information and documents that will enable an assessment of compliance to be made.

3.51. The statement acts as a summary and should signpost relevant documents (guidance, standards, design codes or specifics of individual solutions) in the application for each of the functional requirements. The statement must set out the approach taken in designing the proposed work and the building standards applied and the reasons for adopting the approach taken, together with an explanation of why the approach is appropriate and ensures compliance with all applicable requirements of the building regulations.

3.52. For the compliance statement it will not be enough to simply state that the building control application is compliant. It is necessary to set out how each of the relevant functional requirements are to be met.

Fire and Emergency File – a particular focus on fire and structural safety

3.53. The purpose of the fire and emergency file is to ensure that the strategies for managing building safety risks, once the building is completed, have been considered from the early design stages. This includes clarity about the assumptions that underpin those strategies.

3.54. Safe design must address all aspects of the building regulations. This includes building safety risks (spread of fire and structural failure) which need to be appropriately considered.

3.55. Everyone involved in delivery of these particular strands of the design must understand how the requirements of the building regulations are to be met and any assumptions relating to ongoing management of the building that underpin those elements of the design. This includes how:

- the structural design brings forward particular areas of delivery for relevant contractors and how they may impose limitations on other structurally related packages of design;
- all occupants will be alerted to the occurrence of a fire;
- all occupants will be able to safely escape from the building;

3.0 The golden thread for the design, construction and building work on HRBs

- the internal linings and any penetrations through them will resist excessive spread of fire and smoke;
- the structure is to resist premature collapse and contribute to the containment of a fire;
- the building will resist ignition from a fire in an adjacent building and will not endanger adjacent buildings from the effects of a fire in or on the building; and
- the building design will assist firefighting operations.

3.56. Anyone carrying out design and construction work needs to have a good understanding about the fire strategy and systems – this is provided through the fire and emergency file.

3.57. There are a number of standards that provide guidance:

- BS EN ISO 31000 Risk management guidelines: sets out good practice in relation to risk management.[52]
- BS 8644-1 Digital management of fire safety information - code of practice: management of digital asset information in the built environment, particularly fire safety information.[53]
- BS 9991 Fire safety in the design, management and use of residential buildings - code of practice: sets out good practice in relation to building safety risks relating to fire.[54]
- BS 9792 Fire risk assessment – housing – code of practice (currently under development): sets out good practice in relation to building safety risks relating to fire.[55]

Mandatory Occurrence Reporting Plan – Reporting and recording occurrences of incidents of non-compliance that (if not rectified) could have resulted in serious safety risk

3.58. If, during the construction phase, it is discovered that there has been an incident or a risk of an incident, which if not remedied could cause either; structural failure of the building or the spread of fire or smoke in the building, that could cause serious harm to a significant number of people when the building is in use. Then details of that occurrence need to be recorded and reported to the BSR.

3.59. The client must ensure that a mechanism is put in place to allow for those occurrences that are mandatory to report are reported by relevant persons in the design and construction teams. The detail of this plan is to be set out in the Mandatory Occurrence Reporting Plan. This plan will form part of the building control approval application. The information generated by the reporting requirement will enable lessons to be learned by the wider industry and government.

3.0 The golden thread for the design, construction and building work on HRBs

Partial Completion Strategy – managing the partial occupation of a building

3.60. The delivery and commercial arrangements for many buildings will be based on a phased partial completion model where sections of the building are completed and can be occupied whilst work still goes on in other sections of the building.

3.61. Challenges can present to developers in situations where parts of the building become subject to different requirements under design, construction and occupation. It is essential that a means of managing safety and compliance with dutyholder requirements in this situation is planned and adhered to.

3.62. The proposed means of managing these challenges must be set out in a partial completion strategy which, in addition to being communicated to all relevant people to allow understanding and success. Where partial occupation is being planned this statement must form part of the building control approval application.

The partial completion strategy must explain—

- the proposals adopted in designing for occupation of each part of the building or the proposed building to be completed to ensure compliance with the applicable requirements of the building regulations (e.g. how are the occupied parts provided with compliant fire safety measures, are they independent, do they rely on partial emergency access at non-working times, how will things change upon full occupation and how will this be communicated?);
- the measures, strategies and policies it is proposed the owner of the building should adopt to manage and maintain each such part of the building or the proposed building; and
- any assumptions made in those measures, strategies and proposals as to the intended occupiers of each such part of the building or the proposed building and their likely characteristics and behaviours, and the intended management or maintenance of each such part of the building or the proposed building.

Summary – The golden thread for the design, construction and building work on HRBs

Background

- The new building control regime for higher-risk buildings (HRBs) strengthens regulatory oversight before building work commences, throughout construction and before a building is occupied.
- The new building control regime examines not only what is to be built but requires demonstration of what measures have been instigated to manage (and evidence) compliance throughout the design and construction phases.
- The golden thread helps to:
  - comply with legal duties;
  - manage building safety; and
  - provide information on request to those who need information (including others with duties, residents and regulatory bodies).
- Managing the golden thread of information will bring assurance, support better decision making and maximise the development of comprehensive and accurate building control approval and completion certificate applications.

The golden thread of information for the HRB building control regime

- The golden thread of information is the information and documents required to support the whole HRB building control process.
- This includes all the information and documents:
  - required and approved for the building control approval application at gateway 2;
  - records associated with any changes through the construction phase; and
  - the evidence collected to support the completion certificate application at gateway 3.
- The golden thread of information:
  - helps dutyholders ensure they are designing and constructing a building that complies with the requirements of the building regulations; and then
  - demonstrates compliance with all functional requirements of the building regulations.
  - the accompanying documents required as part of an application for building control approval (gateway two) and a completion certificate (gateway three) will be used to support this assurance.

Golden thread information - design phase

- At the design phase, the golden thread is the information required to demonstrate the design, if built, will comply with the building regulations.
- The client is responsible for providing the facility for storing the golden thread and procedures that allow the right people (principal designer, principal contractor and other dutyholders) to have access to the golden thread.
- The principal designer is responsible for ensuring that the designs are stored appropriately and for managing the golden thread relating to design work of the project.
- The information enables the design and construction teams to demonstrate "what" is to be built and "how" compliant delivery is to be met.
- The building control approval application, includes a full record of the design for the planned building and the 'accompanying documents'.
- The accompanying documents include:
  - competence declaration;
  - construction control plan;
  - change control plan;
  - building regulations compliance statement;

Summary – The golden thread for the design, construction and building work on HRBs

  - fire and emergency file;
  - mandatory occurrence reporting plan; and
  - partial completion strategy (where relevant).
- There are also additional documents to be submitted where relevant. The client will have to define the content of their golden thread information for each individual project.

Golden thread information - construction phase

- During the construction phase the golden thread is the evidence to demonstrate that the approved design is being built and any changes are managed and comply with the building regulations.
- The principal contractor is responsible for managing the golden thread relevant to the building work. This includes using the system set up by the client, capturing and keeping all building information up to date.
- The principal contractor must ensure there is a record of all the controlled changes that have been made. All changes from the original building control approval application (agreed documents) must be recorded in the change
- There must be effective communication between principal designer and all contractors and sharing of information relevant to the building work.
- The information will enable the design and construction teams to demonstrate "what" has been built and "how" compliant delivery was met.

Golden thread information – handover and completion phase

- At handover and completion the golden thread is the evidence to demonstrate that the completed building complies with the building regulations and a comprehensive and accurate record of the building has been handed over.
- The client must handover the golden thread of information to the relevant person on completion of the building (or completion of building work).
- The client must apply for a building completion certificate. The application must contain sufficient information to show how the building conforms to the approved design and satisfies all the applicable functional requirements of the building regulations. Supporting information includes:
  - a notice stating the date on which the building work was completed;
  - 'as built' plans and information;
  - construction control plan;
  - change control plan and the change control log;
  - mandatory occurrence reporting plan;
  - building regulations compliance statement;
  - fire and emergency file;
  - compliance declaration; and
  - confirmation from the relevant person that they have received the golden thread and relevant handover information from the client.
- The approved building completion certificate and application must be handed to the relevant person.
- The information will enable the client, design and construction teams to demonstrate "what" has been built and "how" compliant delivery was met.
- The information will enable the relevant person (Responsible Person or accountable persons) to manage the building safely in operation.

Summary – The golden thread for the design, construction and building work on HRBs

Design

- Building plans and specifications are required to be submitted as part of the building control approval application (gateway two) to show understanding and compliance of the design with the relevant functional requirements in the Building Regulations. These should be supported by any other necessary design details, specifications and product classification, as well as the 'accompanying' documents.
- Building plans and specifications should consider key elements and how each integrate to deliver a compliant system.
- Plan and manage your application and submit a comprehensive design with all the appropriate supporting plans and specifications required to demonstrate that the building design will be capable (without significant change) of achieving compliance with the functional performance requirements of the Building Regulations.
- Even if some information is not available at the point of the application, it will still be required before building control approval can be given for the relevant works. No building work can commence without approval.

Competence declaration

- Dutyholders must be competent in the area they are responsible for. The building regulations set out requirements for dutyholder duties and competence.
- A client is required to appoint a competent principal designer and principal contractor and whoever appoints other dutyholder designers and contractors must also satisfy themselves as to their appointee's competence.
- A competence declaration needs to be submitted as part of the building control approval application (gateway two) to demonstrate these duties have been discharged and compliance with the relevant Regulations.
- The declaration should be signed by the client and include:
  - confirmation that the principal designer, principal contractor, and any other designers and contractors are competent to carry out their roles;
  - the steps taken to make sure all of the above are competent to carry out their roles; and
  - any reasons the principal designer or principal contractor competence is called into question, why they have still been appointed and mitigation steps to reduce risks.

Construction control plan

- A construction control plan is a detailed document outlining the procedures, processes, and measures to be implemented during the construction phase of a building project to ensure compliance with building regulations. This includes:
  - How the building works will meet the building regulations and how evidence will be captured, including 'as built' evidence to support the completion certificate application;
  - How those involved in the project with co-operate and share information;
  - Evidence for competence, information and training for those carrying out the works;
  - Names of the principal contractor, principal designer and any others who will carry out the work and summaries of responsibilities; and
  - How and when the control plan will be reviewed.
- The construction control plan needs to be submitted as part of the building control approval application.
- It should be a practical and useful document describing working arrangements for a principal contractor and all other contractors to follow. It will also support the change log.

Summary – The golden thread for the design, construction and building work on HRBs

Change control plan

- The golden thread information will need to reflect the building that is being built, and any changes made throughout construction.
- The change control plan needs to be submitted as part of the building control approval application.
- The purpose of a change control plan is to show:
  - a clear change control process during construction to ensure there is an accurate record of changes;
  - that the impact of changes are carefully considered and discussed with other parties as required; and
  - that BSR has oversight as necessary.
- Any change to the documents that were approved at the building control approval application stage is defined as a controlled change.
- A change control plan must set out the strategies, policies and procedures the client has adopted to ensure any controlled change is recorded and notified as required by regulations.

Building regulations compliance statement

- The building regulations compliance statement needs to be submitted as part of the building control approval application.
- The purpose of the building regulations compliance statement is to demonstrate how the planned building work will comply with the relevant functional requirements of the building regulations.
- A building regulations compliance statement must set out the approach taken in designing the proposed work and the building standards applied.
- The principal contractor has the duty to ensure all building work is in compliance with the relevant requirements and will need to coordinate records with all contractors for the project.

Fire and emergency file

- The fire and emergency file needs to be submitted as part of the building control approval application.
- Building safety risks (spread of fire and structural failure) need to be appropriately considered before construction starts. Fire and structural safety are specifically defined as building safety risks for the purposes of the new regime for HRBs in occupation.
- The fire and emergency file ensures that the strategies for managing building safety risks, once the building is completed, have been considered from the early design stages.
- The fire safety strategy and structural design should be clear and explained as independent parts of the overall design.
- Everyone involved in delivery of these particular strands of the design must understand how the requirements of the building regulations are to be met.

Summary – The golden thread for the design, construction and building work on HRBs

Mandatory occurrence reporting plan

- The mandatory occurrence reporting plan needs to be submitted as part of the building control approval application.
- A safety occurrence is something which if not remedied, could cause serious harm to people when the building is in use.
- The client must ensure that a mechanism to allow for safety occurrences to be reported by relevant persons in the design and construction teams is set up and that everyone is briefed not only on how the reporting mechanism is to be used but on the mandatory requirement for them to do so.
- You must submit a mandatory occurrence notice and report when a safety occurrence has caused, or is likely to cause:
  - the death of a significant number of people
  - serious injury of a significant number of people
- A safety occurrence is an incident involving, or a risk that could cause:
  - structural failure of the building
  - the spread of fire or smoke in the building
- A safety occurrence is something which if not remedied, could cause serious harm to people when the building is in use.

Partial completion strategy

- The delivery and commercial arrangements for many buildings will be based on a phased partial completion model where sections of the building are completed and can be occupied whilst work still goes on in other sections of the building.
- A partial completion strategy should be submitted as part of the building control approval application if relevant for the project.
- The strategy should set out a planned approach for completing the construction, remediation, or safety improvement works on a HRB.

THE GOLDEN THREAD FOR OCCUPIED HIGHER-RISK BUILDINGS

4.0

4.0 The golden thread for occupied higher-risk buildings

Scope

4.1. This section is intended to explain what golden thread information an accountable person must keep about an occupied higher-risk building (HRB) to comply with their building safety duties and demonstrate the safe management of their building. It applies to:

- An existing occupied HRB;
- A new HRB (once a completion certificate has been issued for it); and
- An existing HRB on which work has been carried out (once a completion certificate has been issued for the work).

4.2. The golden thread includes information and documents relating to the building:

- required for the registration of the building;
- required for the building assessment certificate application; and
- required as part of the application for the completion certificate for a new HRB or relating to building work on an existing HRB (if relevant).

4.3. Meeting these requirements should contribute to the safer management of HRBs, to improving resident safety and rebuilding resident trust.

4.4. Throughout this guidance the principal accountable person and accountable persons are referred to as accountable persons. However, where there are specific duties which only the principal accountable person must carry out, the guidance will specifically refer to the 'principal accountable person' as necessary.

4.5. Building work relating to occupied HRBs can range from small refurbishment work in a single flat, to a refurbishment or redevelopment of the whole building. In addition, the occupants of HRBs may be private leaseholders or tenants or social housing tenants. Accountable persons can range from investment and development companies to housing providers who develop and then manage the finished building. A substantial proportion of accountable persons are Resident Management Committees or Right to Manage bodies. The accountable person will have to define the content of their golden thread information for their individual building. It is not possible to provide specific technical guidance for every scenario or project.

4.6. The regulations relating to the golden thread do require accountable persons to obtain and maintain information about their building. To assist accountable persons in understanding the requirements and to better enable them to demonstrate why they need to obtain and hold information the specific regulations are referenced in the text of this section. This will support accountable persons in explaining what they require from consultants and third parties and also to demonstrate to residents of their building what they must do to comply with the new regime and to demonstrate the safe management of the building.

Background

4.7. The legislation governing occupied HRBs is set out in Part 4 of the Building Safety Act (BSA)[56]. The specific legal requirements for the golden thread of information for HRBs in occupation are set out in detail in Schedule 1 of The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations[57] and in The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations[58].

4.0 The golden thread for occupied higher-risk buildings

4.8. These regulations deliver on Dame Judith Hackitt's 2018 call for the golden thread, a digital record of accurate and reliable information about a HRB, which formed part of the Independent Review of Building Regulations and Fire Safety[59]. This was triggered by evidence of a very widespread lack of knowledge of basic structural and fire safety information about many occupied HRBs in the aftermath of the Grenfell Tower tragedy.

4.9. These two sets of regulations are in addition to the regulations covering the legal description of existing HRBs, their registration and provision of key building information about the building to the Building Safety Regulator (BSR). Further details of these are set out in section 2 of this guidance under legislative requirements.

Accountable persons

4.10. Section 72 of the BSA defines the accountable person responsible for the safety of an occupied HRB under Part 4[60]. Accountable persons have legal responsibility for building safety obligations, including managing the spread of fire and structural safety risks, of a HRB. The accountable person is usually a "person who holds a legal estate in possession in any part of the common parts". The accountable person will often be an organisation rather than an individual.

4.11. There can be multiple accountable persons for a HRB due to the ownership and legal arrangements for the building. If there is just one accountable person for a building, then they are the principal accountable person. Where there is more than one accountable person then the owner or person with a legal obligation to repair the structure and exterior of the building is the principal accountable person. They will usually be an organisation such as a social housing provider, commonhold association or the freeholder for a leasehold block.

4.12. Further guidance is available on GOV.UK on who is an accountable person or principal accountable person[61].

4.13. Accountable persons cannot delegate their legal obligations to others. They can employ an organisation or individual, like a managing agent, to carry out duties on their behalf. They can commission competent specialists to undertake structural or fire safety investigations or undertake fire risk assessments. Accountable persons are required under The Higher-Risk Building (Management of Safety Risks) (England) Regulations[62] to ensure that any person responsible for or assisting with compliance with a duty in or under Part 4 of the BSA[63] has the relevant competence.

4.14. In practice, this means appointing the right people or organisations, with the right competencies and capabilities for the work, and ensuring those they appoint have systems in place to ensure they comply with their duties under Part 4 and capture the evidence of that in the golden thread. However, ultimate accountability for making sure those tasks are carried out appropriately and the liability for a building's safety remains with the accountable persons.

4.15. The golden thread is "both the information that allows you to understand a building and the steps needed to keep both the building and people safe, now and in the future." It provides the information that will enable an accountable person to understand a building and what they need to do to keep the building itself and those who occupy or visit it safe, now and in the future.

4.0 The golden thread for occupied higher-risk buildings

4.16. Accountable persons must be able readily to access the golden thread information and documents to give the right people the right information at the right time to keep a building safe. They will also need to give appropriate people direct access to the golden thread information to enable them to refer to it and update it where appropriate. This will improve knowledge, understanding and management of building safety risks, which are defined in the BSA as the spread of fire and structural failure. The golden thread should be an up to date picture of the current state of the HRB. The information and documents must be stored and shared in an electronic format and be readily available to support the day to day management and operation of the building.

4.17. Where there are multiple accountable persons for a building, they must coordinate and cooperate to ensure golden thread information is shared. This is vital as it will enable each accountable person to understand the wider building, allowing them to effectively assess and manage risks and supports the delivery of a whole building approach. Without the golden thread information of other accountable persons, the principal accountable person will not be able to produce a sufficiently robust safety case report.

4.18. When an accountable person leaves their role they must transfer golden thread information to the new accountable person. The outgoing accountable person must transfer all the golden thread information that they were keeping immediately before they leave their role to the new accountable person. The outgoing accountable person does not have to transfer commercially sensitive information unless it is information that is significant for managing the building safely.

4.19. Whenever regulated building work is carried out in a HRB the dutyholders and the accountable persons must also be aware of the new competence requirements in the building regulations and The Building (Higher-Risk Buildings Procedures) (England) Regulations[64]. PAS 8673:2022[65] provides a benchmark for assessing competence in building safety management. These require competent people to be appointed to do the work. They must also supply the client with the information and documents to maintain and update the golden thread as the work progresses. These requirements will have to be reflected in contracts let by accountable persons and will also have an impact on the selection and management of contracts. Accountable persons will need to ensure that they comply with all the new requirements and that appointed contractors understand and comply. These requirements may also have cost implications for accountable persons.

4.20. An accountable person is not expected to be competent and have expertise on every aspect of building safety. An accountable person does need to know the limits of their competence or organisational capabilities and when they may need to employ or appoint someone with specific skills and expertise for a specific role or task.

4.21. Accountable persons will have different levels of competence, capability and expertise within their organisation. Larger organisations may have competence and capability spread across a number of teams, allowing them to meet building safety duties in-house. Smaller organisations or individual accountable persons may need to appoint suitably competent people to carry out those activities that they are not competent to undertake.

4.0 The golden thread for occupied higher-risk buildings

4.22. Developing and maintaining the golden thread of information is an essential requirement of the new regime, as section 88(3) of the BSA[66] makes clear. It underpins the content of a safety case report and will be used to demonstrate a good understanding of the building and that building safety risks are being identified, assessed, mitigated and managed on an ongoing basis.

The golden thread of information for the HRB in occupation regime

Existing higher-risk buildings

4.23. The golden thread will include the information about the building, details and outcomes of risk assessments, as well as the safety features within the building and management processes which ensure they remain effective. All of this information will be vital to preparing the safety case report and assuring the accountable person that the building is being managed safely. It will also demonstrate to residents and to the BSR that the building is being safely managed on an ongoing basis. The golden thread therefore needs to be maintained and kept up to date to reflect the current state and condition of the building.

4.24. An accurate golden thread of information will also enable accountable persons to comply with other legal and regulatory requirements, such as those set out by the Regulator of Social Housing, and various fire safety requirements.

New higher-risk buildings

4.25. The golden thread information that is handed over at completion will support the management of the building in occupation. The information is handed over by the client to enable the building to be managed safely in operation. It is essential that the information is updated throughout construction to ensure that accurate information is handed over at building completion.

4.26. Not all the information from the design and construction phase that is required to demonstrate compliance with building regulations is needed to meet the requirements for the in-occupation regime. Those in charge of an occupied building must make informed decisions on the information they need for the golden thread.

4.27. Design and construction information which is not golden thread information is very likely to be of significant value in the day to day operation, management, maintenance and future refurbishment of the building even though it is not part of the golden thread.

4.28. The golden thread information will evolve and should be managed and stored effectively (see section 2 of this guidance). This includes all the information:

- required for registration of a HRB;
- required for the key building information[67] (within 28 days of registration);
- specified in the Keeping and Maintaining Information Regulations[68], to support the development safety case report and building assessment certificate application;
- to support the development of the resident engagement strategy;
- to enable to effective ongoing management of the HRB and ensure the safety of the building and its residents; and
- to enable updates to the BSR so that the BSR can assess whether the accountable persons are meeting their legal duties.

4.0 The golden thread for occupied higher-risk buildings

4.29. The key building information submitted at registration will help accountable persons to understand their buildings and make informed decisions around the assessment and management of building safety risks. It will also help the BSR to determine which HRBs to prioritise when directing the submission of applications for a building assessment certificate. The application process began in April 2024, and it is likely to take approximately five years to process all existing HRBs for the first time.[69]

Golden Thread Information

4.30. Schedule 1 of The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations[70] sets out in detail the golden thread information and documents that accountable persons must keep for a particular HRB. The information and documents are set out in detail and are essential to support the appointed person in managing building safety and to develop and justify the safety case report.

Schedule 1 also identifies what information an accountable person must provide to the BSR, to other accountable persons, to residents and to the local fire and rescue authority.[71]

Table 2 outlines the prescribed information and documents to be kept by the accountable person, along with practical examples.

4.31. It is very likely that accountable persons will already have some of the golden thread information through:

- registration of the building and the provision of key building information; and
- requirements under existing legislation such as The Regulatory Reform (Fire Safety) Order.

Table 3 provides further guidance. Some other information may need further action to obtain, maintain and keep up to date.

4.32. The golden thread, assessment of safety risks and their management and safety case reports are all new requirements. Whilst well managed organisations should have a significant amount of the information required, it may not be in the prescribed form. Since the safety case report is a new concept for HRBs, the assessment of risks and preparation of the report may require additional resources, whether in house or using a consultant. Additional resources should be directed to tasks demonstrably required to comply with the regulations.

4.0 The golden thread for occupied higher-risk buildings

Table 2: The prescribed information and documents to be kept by the accountable person

Information to be kept	Documents to be kept
Basic building information and documents	
• Registration • Key building information	• Registration • Plans
Compliance	
• Building compliance: scheme work (e.g. information about building work which only consists of scheme work – see Reg 39 of HRB Procedures Regs) • Building assessment certification application • Mandatory reporting requirements	• Completion and partial completion of works (e.g. all documents provided to the BSR as part of a successful completion/partial completion application – see HRB regs requirements for details) • Building compliance: scheme work (e.g. notice or certificate provided by scheme provider confirming completion of compliant work) • Building assessment certification application • Refusal of building assessment certification application • Building assessment certificate • Contravention notices
Fire Safety	
• Fire safety management (e.g. locations of – wet/dry risers; fire suppression systems; fire doors; fire detection/alarms systems; smoke control/ventilation systems etc.) • Evacuation (e.g. details of the evacuation strategy and evacuation procedures) • Fire Safety Regulations • Building design	• Fire safety management (e.g. type 1/2/3/4 fire risk assessment documentation) • Fire Safety Regulations information (e.g. floor/building plans)

4.0 The golden thread for occupied higher-risk buildings

Table 2: The prescribed information and documents to be kept by the accountable person (Continued)

Information to be kept	Documents to be kept
Structure (e.g. info provided under KBI reg 12 – structure)	
• Structural risks • Building design	• Structural risks
Management of Building Safety Risks	
• Management of building safety risks (e.g. servicing and maintenance of: lifts, LOLER Regs requirements; dry/wet risers; fire doors; fire detection/alarms systems; smoke control/ventilation systems etc.) • Mandatory reporting requirements (e.g. details/logs of any MORs reported)	• Building safety risk assessment (e.g. any fire or structural risk assessment documentation) • Management of Building Safety risks (e.g. policies, procedures, processes, reports, etc. resulting from servicing and maintenance of safety features) • Mandatory reporting requirements (e.g. policies, procedures, processes documentation created for meeting MOR duties)
Resident Engagement	
• Resident engagement (e.g. results/feedback from residents following consultation on resident engagement strategy) • Complaints (e.g. details of received building safety complaints)	• Resident engagement (e.g. resident engagement strategy document) • Complaints (e.g. policies, procedures created to deliver building safety complaints process; any documented reports created following a complaint having been received, considered, assesses, and/or resolved)

4.0 The golden thread for occupied higher-risk buildings

Table 3: Golden Thread Information

Some golden thread information will already be available from the following:

Registration
The principal accountable person is responsible for registering a HRB and for keeping the 'registration information' in the golden thread of information. The BSR has produced guidance on how to register a higher-risk building and the information that will need to be provided when registering a building[72]. The registration information that needs to be provided to the BSR needs to be kept as golden thread information. If the information is updated the principal accountable person needs to both update the register to provide the updated information to the BSR and update the registration information in the golden thread.
Key Building Information
The principal accountable person must also provide the key building information within 28 days of registering their building with the BSR. Guidance on what information needs to be provided as key building information is available[73]. The key building information must also be kept by the principal accountable person as golden thread information. If the information is updated both the register and the golden thread must be updated.
Fire Safety Management
The documents are the most recent version of any document which was created to manage the risk of fire spread in any part of the HRB or to comply with article 9 of The Regulatory Reform (Fire Safety) Order.
Management of Building Safety Risks
Accountable persons must have the following golden thread documents relating to building safety risks in their HRB: • the safety case report for the building; • a record of any maintenance and any repairs relating to a building safety risk that has been undertaken on behalf of the accountable person; and • the most recent version of any document relating to managing a building safety risk to the HRB. For further details see section 84 of the BSA.

4.0 The golden thread for occupied higher-risk buildings

Adopting a whole building approach

4.33. The new building safety regime requires HRBs to be considered as a single system. Compliance with building safety obligations requires accountable persons to take a whole building approach which recognises the building as a system, rather than a series of independent systems, elements or processes.

4.34. To consider how a building functions as a whole it is necessary to know how the parts of the buildings and components within it work together. A fire door, for example, is a part of the compartmentation of the building, as well as being one of many fire doors. As a part of the compartmentation it contributes both to containing a fire within the compartment of origin, but also contributes to protecting the neighbouring compartment, which may be a means of escape, or a place of refuge for disabled people.

4.35. Understanding the relationship between different elements of the building will help support safety management through recognising potential knock-on effects of changes to one element on other aspects of the building and its safe operation. This in turn has implications for the management of golden thread information.

4.36. Accountable persons need to be able to demonstrate to the BSR and others that they are assessing and effectively managing building safety risks in a systematic fashion and on an ongoing basis. The primary means for this will be through the building's safety case report, which should make a demonstration that all reasonable steps have been taken to manage building safety risks.

Safety case reports

4.37. The golden thread information and documents will inform preparation of the safety case report. Section 85 of the BSA[74] requires that the principal accountable person for an occupied HRB "must as soon as reasonably practicable after the relevant time prepare a report (a "safety case report") containing—

- any assessment of the building safety risks made under section 83 by an accountable person for the building; and
- a brief description of any steps taken under section 84 by an accountable person for the building.

4.38. The 'relevant time' is either when the building is occupied or, if later, when the principal accountable person becomes responsible for the building. This means that any principal accountable person should already have or be preparing a safety case report for their higher-risk building whether they have been directed to submit it to the BSR or not.

4.39. The BSR will assess safety case reports, usually when determining a building assessment certificate application (although they may direct the submission of safety case reports at any other time). They will determine whether building safety obligations are being delivered on an ongoing basis. Whilst they will not routinely ask to review the golden thread, if it is not accurate and up to date then the safety case report is also likely to be inaccurate and this will prompt further investigation by the BSR.

4.40. Meeting the golden thread requirements will require some accountable persons to change their approach to management of information about buildings. Information should be recognised as being a valuable asset in itself. Ultimately, the golden thread of information will enable accountable persons to demonstrate to the BSR that the building is being managed safely and enable the BSR to verify this. It will also enable residents

4.0 The golden thread for occupied higher-risk buildings

to access accurate and robust information about their building so they can feel safe in their homes.

4.41. It is important that information intended for residents is provided in an understandable form. This may mean that professional reports, for example structural surveys or fire risk assessments, will require summaries to be prepared in language that is accessible to and understandable by residents and others who do not have expertise in that professional background.

4.42. Details of the information that must be included within a safety case report are set out in Regulation 5 of The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations[75] and summarised in Annex C. **Table 4** shows how the golden thread information listed in Schedule 1 of The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations[76] will inform the safety case report content.

4.43. The safety case report will describe the building and set out the findings from building safety risk assessments, including the potential scenarios that have been identified and the likelihood of them occurring.

4.44. The safety case report will clearly detail the measures that have been taken to remove, reduce and manage building safety risks. It will set out the management arrangements, policies and procedures to ensure those risks are managed on an ongoing basis in a sufficient and proportionate manner to maintain the safety of the building and those living in it and those in and around it. It will provide details of the emergency arrangements that are in place.

4.45. In summary, using information contained within the golden thread, the safety case report will serve to **identify** the building safety risks for the building, **clarify** the measures taken to remove or manage the risk and **justify** those measures as being appropriate to maintain the safety of the building and people in and around it. The accuracy and effectiveness of the safety case report depends on golden thread information.

4.46. The golden thread will also provide information to support the responsibilities of the Responsible Person in relation to the Fire Safety Act[77] and The Fire Safety (England) Regulations[78].

4.47. It is important to stress that the golden thread is not just a set of information and documents but needs to be underpinned by policies and processes to ensure the information is accurate, up to date, and accessible to the right people whilst also being secure. This supports the overall management approach to building safety. It cannot be delivered as a product, a "software solution" or a consultancy service. Competent individuals will need to be engaged to contribute to the development of the golden thread and the processes and procedures that underpin it.

4.48. During a building's life cycle various people are involved in developing and assuring building information and even more use the information to make decisions on the management of a building. They all need to work together and be managed to maintain accurate data based on correct assumptions with the information stored electronically.

4.0 The golden thread for occupied higher-risk buildings

Table 4: How to use the golden thread information and documents to deliver the requirements of the safety case report

Note: the numbers in brackets indicate where the information item or document appears in the list of information and documents in Schedule 1 of The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations[79].

Information	Documents
Regulation 5 (a) the registration number given to the building on the register	
• Registration (3) • Fire Safety Regulations information (8)	• Registration (18)
Regulation 5 (b) a brief description of the building and its wider environment	
• Building compliance: scheme work (2) • Key building information (4) • Structural risks (9) • Building design (11)	• Completion and partial completion of works (16) • Building compliance: scheme work (17) • Fire Safety Regulations information (23) • Plans (27)
Regulation 5 (c) a description of the possible scenarios of building safety risks that have been identified by each accountable person through the risk assessment process under section 83 of the Building Safety Act, the likelihood of those risks materialising and the assessment of the likely consequences if they do materialise	
	• Fire safety management (22) • Structural risks (24) • Building safety risk assessment (25)
Regulation 5 (d) a description of how the steps taken by each accountable person demonstrate compliance with the obligations under section 84 of the 2022 Act	
• Building compliance: scheme work (2) • Fire safety management (6) • Evacuation (7) • Structural risks (9) • Mandatory reporting requirements (12)	• Completion and partial completion of works (16) • Building compliance: scheme work (17) • Fire safety management (22) • Mandatory reporting requirements (28)

4.0 The golden thread for occupied higher-risk buildings

Table 4: How to use the golden thread information and documents to deliver the requirements of the safety case report

Information	Documents
Regulation 5 (e) a description summarising the system for managing safety for the building including but not limited to details of— (i)how safety measures are tested and maintained, (ii)the policies and procedures in place for managing works to the building, including for assuring the competence of designers and contractors appointed, quality of materials used and assessment and management of building safety risks whilst works are in progress.	
• Management of building safety risks (10) • Mandatory reporting requirements (12) • Complaints (14)	• Management of building safety risks (26) • Mandatory reporting requirements (28) • Complaints (30)
Regulation 5 (f) a description of emergency plans in place for the building including but not limited to— (i) a description of equipment in place to allow emergency services to respond to an emergency, (ii) details of information provided to emergency services to support emergency response planning, (iii) a description of the expectation with regard to residents and how they are to respond to emergency situations.	
• Fire safety management (6) • Evacuation (7) • Fire Safety Regulations information (8) • Structural risks (9) • Resident engagement (13)	• Fire safety management (22) • Fire Safety Regulations information (23) • Resident engagement (29)

4.0 The golden thread for occupied higher-risk buildings

Information for residents and third parties

4.49. Part 3 of The Higher-Risk Buildings (Keeping and Provision of Information etc.) Regulations[80] sets out the information and documents that a principal accountable person or an accountable person is required to give to people with an interest in the building such as:

- residents;
- owners of flats;
- other accountable persons in the building;
- Responsible Persons in the building;
- landlords of residents;
- the BSR;
- the local fire and rescue service; and
- the client for building work in the building.

4.50. Regulations 7 and 8 make provision for residents and owners of flats in a HRB to be given certain information and copies of documents by an accountable person in accordance with what is set out in Schedule 2.

4.51. Regulation 14 with Schedule 3 set out the information and documents that an accountable person is required to provide to a resident and owner of a flat in a HRB where a request has been made by that resident or flat owner for that information or document.

4.52. Regulations 5, 6, 9, and 10 to 13 set out information and documents to be provided to various non-resident parties with an interest in or duties in relation to the building, including where a new accountable person takes over responsibility for part of a HRB.

An accountable person has to:

- provide certain information to the BSR in cases of insolvency of the accountable person;
- provide the golden thread information they are required to keep to the other accountable persons and Responsible Persons in the HRB;
- provide information to all owners of residential units in the building who own flats in the part of the building that they are responsible for. The specific information is set out in schedule 2 of the Regulations;
- provide a copy of the contravention notice to the landlord of a resident, if they issue a contravention notice to a resident who does not own their residential unit;
- provide information to a client in relation to any project which relates to the part of a building for which the accountable person is responsible; and
- an accountable person has to provide certain information to the local fire and rescue authority. All accountable persons have to provide a limited amount of information but further information has to be provided by the principal accountable person.

4.0 The golden thread for occupied higher-risk buildings

Large HRB portfolios

4.53. Further information is provided in Annex D for accountable persons with larger portfolios of HRBs. Accountable persons with responsibility for only one or two HRBs may also find some of the material helpful but may wish to focus on the earlier part of section 4. The annex provides details on:

- information and documents management; and
- risk and safety management systems;
    - context of the organisation;
    - leadership;
    - planning;
    - support;
    - operation;
    - performance evaluation; and
    - improvement.

Summary – The golden thread for occupied higher-risk buildings

Background

- The golden thread of information will enable an accountable person to understand a building and what they need to do to keep the building itself and those who occupy or visit it safe, now and in the future.
- Accountable persons have legal responsibility for building safety obligations, including managing the fire spread and structural safety risks, of a higher-risk building (HRB). The accountable person will often be an organisation rather than an individual.
- If there is just one accountable person for a building, then they are the principal accountable person. Where there is more than one accountable person then the owner or person with a legal obligation to repair the structure and exterior of the building is the principal accountable person.
- Where there are multiple accountable persons for a building, they must coordinate and cooperate to ensure golden thread information is shared.
- The accountable person must make suitable arrangements to ensure that the building is being managed safely.
- The accountable person must ensure that any person responsible for or assisting with compliance with Part 4 of the Building Safety Act (BSA) has the relevant competence.
- The golden thread of information underpins the content of a safety case report and will be used to demonstrate a good understanding of the building and that building safety risks are being identified, assessed, mitigated and managed on an ongoing basis.

HRB in occupation regime

- Existing HRBs - The golden thread will include the information about the building, details and outcomes of risk assessments, as well as the safety features within the building and management processes which ensure they remain effective.
- New HRBs - During occupation the golden thread information is the information the accountable person needs to demonstrate that building safety risks are being managed. Buildings safety risks are the risk of structural failure and the spread of fire.
- New HRBs - The golden thread information that is handed over at completion will support the management of the building in occupation.
- New HRBs - Not all the information from the design and construction phase that is required to demonstrate compliance with building regulations is needed to meet the requirements for the in-occupation regime. Those in charge of an occupied building must make informed decisions on the information they need for the golden thread.
- New HRBs - Design and construction information which is not golden thread information is very likely to be of significant value in the day to day operation, management, maintenance and future refurbishment of the building.
- The golden thread information will evolve and should be managed and stored effectively (see section 2 of this guidance). This includes all the information:
  - required for registration of a HRB; and
  - to support the safety case report and building assessment certificate application.

Content of the golden thread

- Schedule 1 of The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations sets out in detail the golden thread information that accountable persons must keep for a particular HRB.
- The golden thread of information with be used to support the safety case report.
- Whilst well managed organisations should have a significant amount of the information required, it may not be in the prescribed form. Some information will be available from:
  - registration;
  - key building information;
  - fire safety management; and
  - management of building safety risks.

Summary – The golden thread for occupied higher-risk buildings

- Some other information may need further action to obtain, maintain and keep up to date.
- The assessment of risks and preparation of the safety case report is a new requirement and may require proportionate and competent additional resources.

Safety case reports

- The golden thread information and documents will inform preparation of the safety case report. The Building Safety Regulator (BSR) will assess safety case reports, usually when determining a building assessment certificate application.
- The golden thread of information will enable accountable persons to demonstrate to the BSR that the building is being managed safely and enable the BSR to verify this. It will also enable residents to access accurate and robust information (in an understandable form) about their building.
- Using information contained within the golden thread, the safety case report will serve to:
  - identify the building safety risks for the building;
  - clarify the measures taken to remove or manage the risk; and
  - justify those measures as being appropriate to maintain the safety of the building and people in and around it.
- The safety case report will describe:
  - the building and set out the findings from building safety risk assessments;
  - the measures that have been taken to remove, reduce and manage building safety risks;
  - the management arrangements, policies and procedures; and
  - details of the emergency arrangements that are in place.

Information for residents and third parties

- A principal accountable person or an accountable person is required to give information and documents to people with an interest in the building such as residents, other accountable persons, the BSR and the local fire and rescue service.
- The Higher-Risk Buildings (Keeping and Provision of Information etc.) Regulations sets out the required information and documents that should be provided.

Large HRB portfolios

- Accountable persons with large HRB portfolios should consider effective management systems for the golden thread including:
  - information and documents; and
  - risk and safety.

CONCLUSION

5.0

5.0 Conclusion

5.1. The golden thread is a very specific requirement of the new regulatory regime for higher-risk buildings (HRBs). Those responsible for designing, building and operating them should use the golden thread on a day by day basis to inform the safe design, construction, operation and occupation of their building and to enable them to identify, eliminate, mitigate and manage risks to the safety of those living in the building.

5.2. In construction the applications for approval of plans and for the completion certificate will require golden thread information. In operation the safety case report for the building is the main mechanism for doing this. That report can only be developed if the golden thread is intact, accurate, up to date and readily available as a working system to those who operate the building.

5.3. The golden thread is a central tool in improving the operation and management of HRBs and rebuilding the trust of those who occupy and visit them.

5.4. The golden thread is a key information source and tool for those responsible for HRBs to enable them to both assure themselves as well as residents, regulators and the wider public that they understand and are effectively managing their buildings so make sure they are safe for all those who live in and visit them.

5.5. This guidance will provide all those with duties relating to the design, construction, operation and management of HRBs to understand their duties and responsibilities and the benefits of having a systematic approach to information for their building.

GLOSSARY

ANNEX

ANNEX A - Glosssary

accompanying documents
the documents which have to be submitted with a building control application for higher-risk buildings.

accountable person (AP)
person or organisation who owns, or has a legal obligation to repair, any common parts of an occupied higher-risk building.

agreed documents
accompanying documents related to either an approved building control application or an approved completion certificate application. When the Building Safety Regulator approves a building control application or a completion certificate application, the accompanying documents become known as the agreed documents (as they have been 'agreed' by the Building Safety Regulator).

building
any permanent or temporary building but not any other kind of structure or erection. NOTE: A reference to a building includes a reference to part of a building.

building control application (gateway 2)
application milestone where information and documents are required to gain approval from the BSR to commence work.

building regulations
The Building Regulations 2010 (England and Wales) with its amendments.

building safety risk
risk to the safety of people in or about a building arising from: the spread of fire; structural failure; any other prescribed matter.

competence
application of skill, knowledge, experience and behaviour consistently to achieve a specific outcome.

completion certificate application (gateway 3)
application milestone where information and documents are required to gain a completion certificate prior to occupation.

compliance
fulfilment of specified requirements or prescribed responsibilities.

construction process
the inception, brief, design, production, and demolition/deconstruction of construction works.

dutyholder
person or organisation with specific legally prescribed responsibilities.

golden thread
the golden thread is both the information that allows someone to understand a building and the steps needed to keep both the building and people safe, now and in the future.

golden thread information
this is the information and documents to be kept in the golden thread.

higher-risk building (HRB)
higher-risk buildings are defined in design and construction as building which are either 18m (or above) or seven stories (or above) which will contain at least two residential units, or are hospitals or care homes that meet the same height threshold. In occupation higher-risk buildings are occupied multi-residential buildings which are 18m (or above) or seven stories (or above).

information and documents
meaningful data, with or without a medium to contain it.

key building information

this information is set out within regulations 3 to 18 of The Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023. It is the information which has to be provided to the Building Safety Regulator by the principal accountable person within 28 days of registration.

occupant
resident, worker, visitor or other person in and around a building.

occupation
possession, by an occupant, for the purpose of being lived in.

ANNEX A - Glosssary

organisational capability
organisations must be able to demonstrate they have the organisational capability to carry out their duties and undertake the work. This means having policies, procedures, systems and resources in place to make sure those employed by the organisation comply with all relevant regulations.

principal accountable person (PAP)
if there is one accountable person for a higher-risk building then they are the principal accountable person. If there are multiple accountable persons for a higher-risk building then the accountable person is the person or organisation who is responsible for repairing the structure and exterior of the building.

principal designers (PD)
person or organisation responsible for the planning, management, monitoring, and coordination of design work.

principal contractor (PC)
person or organisation responsible for the planning, management, monitoring, and coordination of building work.

resident
person who lives in a dwelling or any other unit of living accommodation within a higher-risk building.

responsible person
the person who has duties in relation to fire safety under the Regulatory Reform (Fire Safety) Order 2005 for the non-residential parts of a building. In some buildings the Responsible Person, will also be an accountable person. But in some buildings, they will be different people. Under section 109 of the Building Safety Act 2022, the accountable persons are under a duty to cooperate with the Responsible Person and under the Fire Safety Order the Responsible Person is also under a duty to cooperate with the accountable persons.

safe
state of being protected from recognized hazards that are likely to cause harm.

LEGISLATIVE REQUIREMENTS FOR DUTYHOLDERS AND ACCOUNTABLE PERSONS

ANNEX

ANNEX B - Legislative Requirements for dutyholders and accountable persons

I am a dutyholder - What golden thread requirements do I need to be aware of if I am building a new HRB from 1st October 2023?

The Building Safety Act 2022[81]

For the golden thread of information:

- The Act gives the Secretary of State the power to amend building regulations to make requirements around what information is kept as golden thread information for a HRB.
- The Act gives the power to make regulations on the sharing of this information and how it is kept.
- These regulations would apply to any building work to create a new HRB and any building work to an existing HRB. This is set out in section 33 of the Act.
- NB The BSA and The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023[82] define a HRB.

The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023 – SI 2023/909[83]

These Regulations introduce a new building control process for building work creating a new HRB or building work in an HRB. This work is overseen by the BSR.

The Regulations provide the detail of the building control regime and the requirements on dutyholders when a new HRB is being designed and constructed (known as higher-risk building work).

Part 4 of these Regulations specifically sets out the detailed regulations relating to the provision of the golden thread for new HRBs.

For the golden thread of information, the Regulations specify:

- the information and documents that the client must ensure are kept as part of the golden thread of information before building work begins on a HRB (regulations 31(3), (4) and (6));
- how this golden thread information must be kept (regulations 31(1) and (2)). The Regulations set out that the golden thread must be accessible, accurate, accountable, electronic, secure, transferable, understandable and up to date (regulation 7);
- that the client must ensure that the principal designer and principal contractor have access to the golden thread information (regulation 31(2));
- how and when the information must be updated throughout construction and who is responsible for updating the information (regulations 31(4) and (6) to (11));
- what information must be handed over on building completion and when this information should be handed over (regulation 38 and 39); and
- how the information should be handed over on building completion and who to (regulations 38 and 39).

ANNEX B - Legislative Requirements for dutyholders and accountable persons

I am a dutyholder - What golden thread requirements do I need to be aware of if I am building a new HRB from 1st October 2023?

The Building Regulations etc. (Amendment) (England) Regulations 2023 – SI 2023/911[84]

These Regulations amend the Building Regulations 2010 (the 2010 Regulations) to support the new higher-risk building control regime and provide for the BSR to be the only building control authority for all HRBs.

The changes to the building control regime include a new building control process for higher-risk building work, and changes to non-higher-risk building work to raise standards across the built environment. These include clear legal responsibilities for those involved in the commissioning, design and construction of building work, and those who carry out building control

These Regulations set out requirements with regard to dutyholders and competence.

For the golden thread of information the Regulations specify:

- The client must make suitable arrangements for planning, managing and monitoring a project so as to ensure compliance with all relevant requirements (including the golden thread) (regulation 11 A).
- The client must provide building information as soon as is practicable to every designer and contractor on the project (regulation 11 B).
- The client must ensure designer and contractors are aware that when a project includes higher-risk building work and therefore relevant requirements apply (regulation 11 B).
- The client must appoint a principal designer and a principal contractor and must take all reasonable steps to ensure that the person appointed to role of principal designer and principal contractor meets the competence requirements for that role (regulations 11 D to I).
- The duties of dutyholders (regulations 11 J to O).

The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 - SI 2023/275[85]

The term "higher-risk building" in design and construction is defined in Section 31 of the BSA as a building in England that is at least 18 metres in height or has at least 7 storeys and give powers to the Secretary of State to make further regulations on the definition of a higher-risk building.

These Regulations supplement that definition and specify that higher-risk building in design and construction has to also include two residential units or be a care home or hospital that meets the height threshold.

ANNEX B - Legislative Requirements for dutyholders and accountable persons

I am an accountable person - What golden thread requirements do I need to be aware of if I am responsible for an occupied HRB?

The Building Safety Act 2022[86]	**For the golden thread of information:** • The Act specifies that accountable persons must keep certain information as golden thread information and must keep this information to the required standards. • The Act specifies that that this information must be shared with certain persons. • The Act also gives the Secretary of State the power to make regulations to make further requirements around what information is kept as golden thread information, the sharing of this information and how it is kept. This applies to any HRB that is occupied. This is set out in section 88, 89 and 90 of the Act. NB The Act and The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023[87] define a HRB.
The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 - SI 2023/907	These Regulations place requirements on accountable persons, residents and others with regard to building safety and the management of building safety duties for occupied HRBs. **For the golden thread of information the Regulations:** • set out how the accountable persons must keep the golden thread of information during occupation of a higher-risk building. The Regulations set out that the golden thread must be accessible, accurate, accountable, electronic, secure, transferable and understandable (regulation 7). The Regulations do not specify that the golden thread has to be up to date as this is already specified in the BSA. • specify details requirements around the provision of golden thread information to the BSR, residents and others (regulations 8, 9 and 11). This includes setting out when the information must be given and the form it must be given it. • set out the prescribed principles for the ongoing management of building safety risks and the content of safety case reports (which will be kept as golden thread information) (regulations 4 and 5).
The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024 - SI 2024/41[88]	These Regulations specify the golden thread information that accountable persons for a HRB must keep and the information that they have to share with other persons (including residents). **The regulations specify:** • the golden thread information that accountable persons should keep during occupation (regulation 4 and Schedule 1). • what information needs to be handed over when an accountable person leaves their role (regulation 13). • the information that should be shared with other persons and when this information should be shared (regulations 5 to 12 and 14). These persons are specified in the Act and these Regulations as the BSR, residents, owners of flats, clients, Responsible Persons, fire and rescue service and landlords of residents. • certain exceptions to the sharing of information (regulations 15 to 19).

ANNEX B - Legislative Requirements for dutyholders and accountable persons

I am an accountable person - What golden thread requirements do I need to be aware of if I am responsible for an occupied HRB?

The Building Safety (Registration of Higher-Risk Buildings and Review of Decisions) (England) Regulations 2023 - SI 2023/315[89]

These regulations set out:

- the registration information that a principal accountable person must keep and must provide to the BSR when they register their HRB (regulations 11 to 19); and
- when the registration information is updated the principal accountable person must notify the BSR within 14 days (regulation 4).

The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024 specify that the registration information must be kept as golden thread information.

The Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023 - SI 2023/396[90]

These regulations set out:

- the key building information that principal accountable persons must keep (regulations 3 to 18) and information they must submit to the BSR within 28 days of registration (regulations 19 and 20); and
- when the information is updated the principal accountable person must notify the BSR within 28 days (regulation 21).

The key building information must be kept as golden thread information. This is specified in The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024.

The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 - SI 2023/275[91]

The term "higher-risk building" in occupation is defined in Part 4, Section 65(1) of the BSA 2022 as a building in England that is at least 18 metres in height or has at least 7 storeys.

These Regulations supplement that definition and specify that higher-risk building in occupation also has to also include two residential units.

ANNEX B - Legislative Requirements for dutyholders and accountable persons

I am a dutyholder - What golden thread requirements do I need to be aware of if there is building work in an existing HRB?

The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023 – SI 2023/909[92]

These Regulations introduce a new building control process for building work in an existing HRB. This work is overseen by the BSR.

The Regulations provide the detail of the building control regime and the requirements when building work is being done to an existing HRB (known as higher-risk building work).

Part 4 of these Regulations specifically sets out the detailed regulations relating to the provision of the golden thread for new HRBs.

For the golden thread of information the Regulations specify:

- the information and documents that the client must ensure are kept as part of the golden thread of information before building work begins on a HRB (regulations 31(3), (4), (6));
- how this golden thread information must be kept (regulations 31(1) and (2));
- that the client must ensure that the principal designer and principal contractor have access to the golden thread information (regulation 31(2));
- how and when the information must be updated throughout construction and who is responsible for updating the information (regulations 31(4)and (6) to (11));
- what information must be handed over on building completion and when this information should be handed over (regulation 38 and 39); and
- how the information should be handed over on building completion and who to (regulation 38 and 39).

The Building Regulations etc. (Amendment) (England) Regulations 2023 – SI 2023/911[93]

These Regulations amend the Building Regulations 2010 (the 2010 Regulations) to support the new higher-risk building control regime, and provide for the BSR to be the only building control authority for all HRBs.

The changes to the building control regime include a new building control process for higher-risk building work, and changes to non-higher-risk building work to raise standards across the built environment. These include clear legal responsibilities for those involved in the commissioning, design and construction of building work, and those who carry out building control.

These Regulations set out requirements with regard to dutyholders and competence.

For the golden thread of information the Regulations:

- The client must make suitable arrangements for planning, managing and monitoring a project so as to ensure compliance with all relevant requirements (including the golden thread) (regulation 11 A).
- The client must provide building information as soon as is practicable to every designer and contractor on the project (regulation 11B)
- The client must ensure designer and contractors are aware that when a project includes higher-risk building work and therefore relevant requirements apply (regulation 11 B).
- The client must appoint a principal designer and a principal contractor and must take all reasonable steps to ensure that the person appointed to role of principal designer and principal contractor meets the competence requirements for that role (regulations 11 D to I)
- Specifies the duties of dutyholders (regulations 11 J to O).

ANNEX B - Legislative Requirements for dutyholders and accountable persons

I am an accountable person - What golden thread requirements do I need to be aware of if there is building work in an existing HRB?

The Building Safety (Registration of Higher-Risk Buildings and Review of Decisions) (England) Regulations 2023

These regulations set out:

- When the registration information is updated the principal accountable person must notify the BSR within 14 days. Certain significant building work may require registration information to be updated.

The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024 specify that the registration information must be kept as golden thread information.

The Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023 - SI 2023/396[94]

The Regulations set out:

- when the key building information is updated the principal accountable person must notify the BSR within 28 days. Building work to an existing building may mean that the key building information needs to be updated and submitted to the BSR.

The key building information must be kept as golden thread information. This is specified in The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024.

The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023 - SI 2023/907[95]

These regulations place requirements on accountable persons, residents and others with regard to building safety and the management of building safety duties for occupied HRBs. These duties continue even when there is building work is the building.

For the golden thread of information the Regulations:

- set out how the accountable persons must keep the golden thread of information during occupation of a higher-risk building. The regulations sets out that the golden thread must be accessible, accurate, accountable, electronic secure, transferable and understandable (regulation 7). The Regulations do not specify that the golden thread has to be up to date as this is already specified in the BSA.
- specify details requirements around the provision of golden thread information to the BSR, residents and others including any client for building work (regulations 8, 9 and 11). This includes setting out when the information must be given and the form it must be given it.
- set out the prescribed principles for the ongoing management of building safety risks and the content of safety case reports (which will be kept as golden thread information) (regulations 4 and 5). The management of building safety risks could change when there is building work ongoing in the building.

ANNEX B - Legislative Requirements for dutyholders and accountable persons

I am an accountable person - What golden thread requirements do I need to be aware of if there is building work in an existing HRB?

The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024 - SI 2024/41[96]

These Regulations specify the golden thread information that accountable persons for a higher-risk building must keep and the information that they have to share with other persons (including the client for any building work).

- **The regulations specify:**
  the golden thread information that accountable persons should keep during occupation (regulation 4 and Schedule 1);
- what information needs to be handed over when an accountable person leaves their role (regulation 13);
- the information that should be shared with other persons and when this information should be shared (regulations 5 to 12 and 14). These persons are specified in the Act and these Regulations as the BSR, residents, owners of flats, clients, Responsible Persons, fire and rescue service and landlords of residents.
- certain exceptions to the sharing of information (regulations 15 to 19).

The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 - SI 2023/275[97]

The term "higher-risk building" is defined in Part 4, Section 65(1) of the BSA 2022 as a building in England that is at least 18 metres in height, or has at least 7 storeys.

These Regulations supplement that definition and specify that higher-risk building in occupation also has to also include two residential units.

CONTENT OF THE SAFETY CASE REPORT

ANNEX

ANNEX C - Content of the safety case report

Regulation 5 of The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023, made under the powers conferred by Section 85 (3) of the Building Safety Act, require the principal accountable person to include the following information in the safety case report for an HRB:

(1) A principal accountable person must include the following information in a safety case report

a) the registration number given to the building on the register;

b) a brief description of the building and its wider environment;

c) a description of the possible scenarios of building safety risks that have been identified by each accountable person through the risk assessment process under section 83 of the 2022 Act, the likelihood of those risks materialising and the assessment of the likely consequences if they do materialise;

d) a description of how the steps taken by each accountable person demonstrate compliance with the

e) obligations under section 84 of the 2022 Act;

f) a description summarising the system for managing safety for the building including but not limited to details of—

(i) how safety measures are tested and maintained,

(ii) the policies and procedures in place for managing works to the building, including

g) for assuring the competence of designers and contractors appointed, quality of materials used and assessment and management of building safety risks whilst works are in progress;

h) a description of emergency plans in place for the building including but not limited to

(i) a description of equipment in place to allow emergency services to respond to an emergency,

(ii) details of the information provided to emergency services to support their emergency response planning,

(iii) a description of the expectation with regard to residents and how they are to respond to emergency situations.

(2) The safety case report must be kept in electronic form.

(3) A notification to the regulator under section 86(1) of the 2022 Act of a revised safety case report must include—

a) an overview of the main revisions to the safety case report; and

b) an explanation why the revision has been made.

(4) The regulator may make a direction as to the way in which a safety case report or a notification under section 86(1) of the 2022 Act is to be given, which may include a requirement to give the report or notification via a website address provided for that purpose by the regulator.

(5) The regulator must publish a direction under paragraph (4) on its website and make it available for inspection at its principal offices during normal office hours. Section 85(1) of the 2022 Act defines a "safety case report" as a report containing—

a) any assessment of the building safety risks made under section 83 by an accountable person for the building, and

b) a brief description of any steps taken under section 84 by an accountable person for the building.

LARGE HRB PORTFOLIOS

ANNEX

ANNEX D - Large HRB portfolios

Information and documents management

D1.1. There are two different elements of the golden thread of information, information and documents. This guidance provides examples of how to manage both information and documents effectively. The examples given are by no means exhaustive.

D1.2. Accountable persons building safety obligations are continuous, therefore at any given time the golden thread information must, as far as is possible, be an accurate reflection of the current building and how it is managed.

D1.3. For the golden thread information to remain true to the golden thread principles throughout the lifecycle of a building, it must be managed effectively and made available to those who need it when they need it. There should also be a clear, consistent and robust mechanism for recording changes and updates made to the golden thread. The reasons for changes and updates may need to be recorded, along with details of who has made the changes.

D1.4. Effective management of information can be achieved even when the information is held across more than one source, file management system, or software programme. This means that existing systems may be able to be used to meet the golden thread requirements.

D1.5. For larger organisations that manage a portfolio which includes a number of HRBs, it may be beneficial to consider how information is organised, structured and managed to support delivery of effective asset management across all relevant buildings. This may enable trends to be spotted, for example potential risk factors, ease of identifying all buildings where the risk factor is relevant and appropriate responsive actions carried out.

D1.6. Larger organisations may also have a number of teams that deliver a range of services, management or support to a building and the residents within. Teams with different functions should have a clear understanding of their roles and responsibilities, how they relate to and impact the roles and responsibilities of others and the potential impact of their work on the building and meeting wider building safety duties.

D1.7. Accountable persons should understand which aspects of their golden thread information are likely to remain static, for example fire resistance standards of compartment walls, and information which is dynamic, for example results of ongoing testing and maintenance of a fire suppression system or fire doors to ensure they remain fit for purpose. Other routine maintenance activities, such as the maintenance and servicing of lifts to comply with existing machinery related regulations also have an impact on the golden thread.

D1.8. To ensure that information and documents remain accurate and up to date, and supports those who use them, it is advisable to formally set out who is responsible for updating, maintaining, and periodically reviewing them. Different teams or people may be responsible for different elements of the information and documents.

D1.9. Certain actions will require new or replacement information to be accurately recorded. For example, the fire rating of a door will change when one type of fire door with a 30-minute fire rating is replaced by one with a 60-minute fire rating. In terms of the action, it will be necessary to ensure this is recorded, along with details of

ANNEX D - Large HRB portfolios

when the work was carried out, who it was carried out by, evidence of their competence to undertake the task, who decided that the door should be replaced, and the reason for that decision.

D1.10. Depending on the size of the organisation, multiple individuals may share responsibility for ensuring that the golden thread information remains up to date. Other users may just have access to view, but not amend, information. It is therefore important to set out and agree policies and processes for how this is to be managed to ensure consistency and avoid duplication or conflicting information, this may include, for example, a process for notifications where information has been amended.

D1.11. In addition to those with responsibility for ensuring that the golden thread information is accurate and up to date, other stakeholders, including those who are internal and external to the accountable person, are legally required to have information shared with them or will need to be able to access and use information to carry out various functions. The policies and processes that define the approach to information management should account for this.

D1.12. Table 5 below sets out an example approach to the management of information about fire doors.

Table 5: An example approach to the management of information about fire doors

Fire doors are a fundamental element of the fire protection of a building. They must be correctly installed and regularly maintained. Accountable persons and principal accountable persons will need to maintain an accurate and up to date record of the fire doors in the building, including:

Asset data
• Location: Where it is and the fire compartments it protects • Time/Date: When it was installed • Risk: What material or materials it is made of • Design intent: what purpose is it serving in the context of fire and structural safety • Systems: What is it linked to? Door closer, door frame, internal wall that is a line of compartmentation, alarm system(s)
Related documents
• What certification the door has • What evidence is there of correct installation of the door set
Competence
• Who installed it and any formal competence
Maintenance
• When and how often it needs to be checked • Records of previous checks • Any actions taken as a result of previous checks • Who is responsible for managing these actions
Access to information
• Where this information is held • Who is responsible for ensuring the information is accurate and up to date • Who else has access to it to update it • Who else has access to read it • Who needs to be provided with the information – residents, fire and rescue authority

ANNEX D - Large HRB portfolios

Risk and safety management systems and the golden thread

D1.13. One of the most important changes introduced through the Building Safety Act 2022 (BSA)98 is a shift from a culture of 'compliance' to one of 'systemic risk management'. Dame Judith Hackitt's interim report99 in 2017 stated "There is a widespread culture in relation to building and fire standards of waiting to be told what to do by regulators rather than taking responsibility for building to correct standards. The approach is very much driven by aiming for minimum compliance, not ensuring safety for the lifetime of the building." The introduction of the golden thread requirements exemplifies the cultural change that the new building safety regime seeks to achieve.

D1.14. Accountable persons must set out why they have made their decisions. For example, following a fire in a building fire alarm engineers recommend a change to the alarm and smoke control systems due to lessons learnt after a fire. The accountable person must record this evidence as golden thread information. If this decision is not captured and made easily accessible to a future accountable person, they may unwittingly reverse the decision when it comes to replacing the alarm system, and inadvertently reduce the safety of the building.

D1.15. Systemic approaches rely upon learning lessons from things that go well, and also events that go awry. If these learnings aren't recorded, and made intuitively accessible to future accountable persons, then the golden thread principle has not been delivered upon, as the core principle of the golden thread is to enable good decision making throughout the life cycle of the building.

D1.16. Therefore, when making decisions based on the questions detailed below, it is critical to make sure that the logic and justification of your decisions are recorded in a way that future accountable persons can find and rely on the information to enable them to make decisions.

D1.17. In the new regulatory regime for occupied HRBs, the expectation is placed firmly on the accountable person to understand their building, to assess the key building safety risks and then to manage them. This need not be unduly onerous and there is guidance available to assist accountable persons to assess risks in their building.

D1.18. The reason that risk management systems are identified as being critical to improving safety standards, is that risk management systems are typically based upon a continuous improvement cycle. Since the mid-1990s, in UK Health and Safety law, the improvement cycle has been based upon the Plan, Do, Check, Act (PDCA) cycle100. Existing guidance includes BS 9997101 and BS EN ISO 45001102, which are also PDCA based management systems, that can be used to manage building safety risks.

D1.19. This annex outlines how a larger organisation with responsibility for a number of buildings could develop a risk management system to enable them to discharge their duties under the Building Safety Act and other relevant legislation such as the Fire Safety Act and the Regulatory Reform Order and their obligations to the Regulator of Social Housing

D1.20. A significant element of the golden thread is based on capturing and retaining evidence of cyclical events, such as fire risk assessments and follow up works or alarm test records etc. Systemic management of building safety risks goes beyond these cyclical events and seeks to identify root causes of risks, rather than treating the symptoms.

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D1.21. In this example, it should be understood that a good systemic approach to safety will rely upon information being kept regarding previous customer communications about the fire door closers. It will also include documents detailing the procurement method used to source the new fire doors and closers and to appoint the installer. It will help to identify whether the criteria used to source the doors meant an inferior product was chosen because it was cheaper, without a competent assessment of the consequence of selecting the cheaper option.

D1.22. For a smaller organisation, perhaps managing only one HRB, this may just involve retaining the quotes for the door closers, and the reason why the successful quotation was chosen. Critically, once the root cause is identified, the PDCA cycle will then enable the problem to be identified and lessons to be learnt to avoid this situation in the future.

D1.23. This approach to managing building safety risks relies on holding the golden thread information to enable updating, maintaining, and periodically reviewing the steps taken with regard to identifying building safety risks in the HRB.

D1.24. BS 9997103 and BS EN ISO 45001104 give detailed assistance on building a systemic risk management system. However, there are seven core principles that are common to the majority of risk management systems and these are laid out below.

Context of the Organisation

D1.25. Note that the word 'system' does not refer to an IT system. It refers to a risk management system, a well thought out, step by step process for controlling safety risks.

D1.26. Understanding the context of an organisation is foundational to building a proportionate risk management system. An organisation with one HRB can achieve a good systemic approach with a less complex system, as they are unlikely to have as many external, nor internal, stakeholders.

D1.27. Whereas an organisation that has eighty HRBs will require a sophisticated system to manage such a significant number of properties and residents. It will likely have many external interested parties, including multiple regulatory bodies across a varied geography. It will also likely have multiple internal stakeholders, such as repairs teams or IT teams, that are important to establishing a strong safety system.

The questions an organisation can ask itself, to set its context, include:

- What issues are likely to impact the accountable person's organisation, and how will it monitor them? (e.g. how is the organisation going to keep up to date with new building safety law or product recalls? etc.)
- What are the interested parties that the accountable person needs to consider in the Risk Management System? (e.g. residents, regulators, other accountable persons, neighbouring properties, contractors, the public and visitors, other Responsible Persons under the Regulatory Reform (Fire safety) Order etc.)
- Understand how the organisation will establish, implement, maintain and continually improve the risk management system (e.g. has the accountable person written down processes for managing the building safely?)
- What are the desired outcomes of the processes the accountable person has in place, and how will it monitor they are working to control the risks in the building(s)?
- What resources are available to operate the risk management system and are they adequate?
- How will the organisation chronicle the improvements they make to processes over time?

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Leadership

D1.28. A risk management systems approach is, by its nature, more complex than a compliance based exercise. It requires a more comprehensive understanding of the risks associated with managing the building(s) and a robust, proportionate approach to addressing the risks found. Ultimately, a systemic risk management approach requires decisions to be made on how to manage the building safely, rather than ticking boxes to show compliance.

D1.29. In order for good, proportionate decisions to be made, there needs to be clear leadership. Where the accountable person is a small organisation (e.g. a Right to Manage company) it will likely be the company directors tasked with this leadership role. In larger organisations (e.g. housing associations, local authorities or large private landlords), this leadership should come from the company board and executive team.

The questions an accountable person should ask, to ensure clear leadership are:

- Who makes up the decision-making leadership? Is it a single individual, or a collection of individuals?
- How will the leadership promote the adoption of a systemic risk management system across the accountable person and residents?
- How will the leadership identify the resources required to implement and monitor a risk management system?
- How will the leadership promote the monitoring of issues, and continuous improvement to reduce these issues over time?
- How will the leadership ensure the fire risk management policy and procedures are chronicled, reviewed and updated regularly?
- How will leadership drive a safety culture and not a box ticking culture?
- How will the leadership assign responsibilities to others, inside and outside of the accountable person, ensuring they are competent to carry out these responsibilities?

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Planning

D1.30. The starting point of the Plan Do Check Act cycle is to Plan. The only way to crystalise improvement is to start with a plan of action and then to learn what works well and where things can be improved. Without a well thought out plan, this is impossible to achieve.

The questions an accountable person should ask, to ensure formulate a plan are:

- How am I going to assess the fire safety risks associated with my building?
- How will I assess the structural safety risks associated with my building?
- Are there any limitations listed in my risk assessments? If so, do these require additional risk assessments? e.g. if the fire risk assessment states that the roof void was not inspected, does this area require an additional risk assessment? It is for me to assure myself that I have adequately risk assessed the building.
- How am I going to address the issues identified in its risk assessments and within what time frames?
- How am I going to communicate to stakeholders and residents?
- How am I going to update my plan, and on what frequency?
- What are the objectives of my plan, and how will success or failure be measured?
- What technical expertise will be required to ensure the safety of the building?
- How will I assess the competence of those providing technical expertise?
- How will changes to the building be planned and recorded?
- How will materials and products be selected to ensure safety?
- How will changes to the risk management system be planned and recorded?
- Which individuals, or organisations, will be responsible for carrying out activities and processes to ensure the building is safe?
- What processes, risk assessments and method statements will individuals use to ensure their work maintains or improves the safety of the building?
- What training is required to maintain the risk management system? (this may be particularly relevant in smaller accountable persons and Right To Manage organisations)
- What controls will be used to ensure works on site are carried out safely? (e.g. correct information, instruction, training and supervision of operatives on site during work activities)
- What emergency plans are in place to manage a fire or structural safety incident?

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Support

D1.31. Previous sections have described that the leadership of the accountable person should identify the levels of resource required to implement a proportionate risk management system. This section provides additional guidance on this matter.

The questions an accountable person can ask to implement a proportionate risk management system are:

- What internal expertise and capacity do I possess?
- What, if any, external expertise needs to be instructed or procured?
- What infrastructure do I need to maintain an effective risk management system? (note that this can include personnel, as well as hardware, such as fire alarms or IT software systems for storing data)
- What do I require to ensure the management system is sustainable? (e.g. what happens if a key staff member, company director or stakeholder leave or become ill?)
- What happens if a critical piece of safety equipment breaks?
- How will I sustain competence? (e.g. frequency of training for key decision makers).

Operation

D1.32. The planning phase of the risk management system can now be implemented during the operational phase. This phase will be unique to each building.

The questions an accountable person may ask during the operational phase include:

- How will I ensure the people working on my building are competent to carry out those works?
- How will I recognise that the plan, developed in the previous sections, is insufficient and needs to change, including how does this change get recorded, to provide an audit trail?
- What servicing and maintenance of the building needs to be conducted?
- When does this need to take place, and by whom?
- How will this activity be recorded?
- Is there sufficient funding to enable this activity, and if not, what am I doing to mitigate the safety risks whilst funding is secured?
- How will I collect, consider, action (where appropriate) and record concerns raised by occupants, contractors and other interested parties regarding fire and/or structural safety of the building?
- How will I respond in a major fire and/or structural safety incident? (e.g. What processes are in place to identify all occupants? How will communication with residents occur? Are alternative accommodation arrangements in place? Is there a suitable mandatory occurrence reporting process in place? etc.)

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Performance Evaluation

D1.33. Previous sections have provided guidance on the need to develop plans and implement fire and structural safety activities. Critically, for a safety management system to be effective, the next two sections (Performance Evaluation and Improvement) must be implemented. It is these sections that generate the continuous improvement aspect of risk management, which distinguishes a risk management systems approach from a tick box approach.

D1.34. Performance evaluation is fundamental to any management system, as it allows the accountable person to measure the effectiveness of their plans, and to make improvements where they are on offer.

Questions an accountable person can ask themselves include:

- Which aspects of the risk management system can be measured and analysed? (e.g. false alarms on the alarm system, the length of time taken to complete risk assessment actions, or whether residents feel safe in the building.)
- How have I improved performance of the risk management system overall? (e.g. residents feel safer, or residents are now given guidance on lithium ion battery charging etc.)
- What steps have I taken to conform to the recommendations provided in its risk assessments?
- How will I test my procedures for emergencies/incidents, and what were the results of these tests?
- How will I manage the performance of contractors to improve their performance over time?
- How will I conduct regular audits to assess whether the risk management system is working effectively? (e.g. can I provide evidence that all of the commitments in the safety case file are complied with?)
- How will I ensure their risk management system is reviewed impartially?
- How will I report results of the audit to interested parties? (e.g. residents.)
- How will I ensure findings of the audit are implemented without delay?
- How will I ensure that the risk management strategy is aligned with the building's fire risk strategy?
- How will I ensure that accidents and near misses are captured and used to inform the risk management system?
- How will I collate and report information to the BSR under mandatory occurrence reporting requirements?
- How will I record and demonstrate the performance evaluation of the risk management system?

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Improvements

D1.35. Improvements to the risk management system are at the heart of why such systems are so crucial to delivering safe outcomes. In occupational health and safety, management systems have been implemented for decades, and the continuous improvement of those systems has resulted in an approximate 85% reduction in workplace fatalities since the 1970s[105].

Questions an accountable person can ask to improve the risk management system include:

- How will I identify where safety standards require improvement?
- How will I investigate incidents to ensure the root cause of the incident is identified, rectified and reported to the BSR via the Mandatory Occurrence Reporting mechanism?
- How will I monitor the effectiveness of any improvements compared to the previous management approach (e.g. does an email campaign to keep communal areas clear of clutter work better than a letter campaign)?
- How will I record the reasons behind changing the risk management system, so that future accountable persons and/or staff members within the accountable person can understand the benefits of the change?
- How can I demonstrate continuous improvement to other parties (e.g. residents or auditors.)?

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