

Building Safety Policy

Executive Summary

This policy explains how Capital Sky Ltd manages building safety in accordance with the [Building Safety Act 2022](#), associated regulations, and relevant industry standards. The policy applies to all projects undertaken by the Company and sets out the principles, procedures, and responsibilities necessary to ensure that construction activities are planned and executed safely and in compliance with applicable legal requirements. While Capital Sky Ltd does not currently undertake projects involving higher-risk residential buildings (HRBs), this policy establishes the arrangements that will be implemented should such projects be undertaken in the future.

Our key commitments are to:

- Comply with all applicable building safety legislation, including the [Building Safety Act 2022](#) and related regulations where relevant.
- Plan and carry out all design, construction, and refurbishment activities in a manner that prioritises the safety of building users and occupants.
- Engage openly and transparently with residents, clients, contractors, and other stakeholders where required by law and good practice.
- Cooperate fully with the Building Safety Regulator and other relevant regulatory authorities.
- Identify, report, and address building safety risks and defects promptly.
- Maintain accurate and accessible records, including the “Golden Thread” of building safety information where required.
- Implement the additional duties and governance arrangements required under the [Building Safety Act 2022](#) if the Company undertakes work involving Higher-Risk Buildings.

1. Purpose and scope

This policy outlines Capital Sky Ltd’s approach to ensuring that all works undertaken on buildings meet current safety standards and comply with the [Building Safety Act 2022](#) (“the Act”) and its associated secondary legislation.

This policy outlines how we:

- Adopt and implement new design and construction standards
- Meet our commitment to keep building occupiers and residents safe
- Engage proactively with residents and share safety information
- Ensure qualifying leaseholders are protected from building safety defect costs
- Hold those responsible for building safety defects to account
- Work transparently with regulators and provide required information

The Act introduces several reforms to ensure buildings across England are safer. It specifically sets out requirements related to the design, construction, and management of ‘higher risk buildings’, which are defined as residential buildings (HRBs), defined as residential buildings at least 18 metres or seven storeys high and containing two or more residential units.

The reforms and requirements will be managed through the creation of three new regulatory bodies:

- Building Safety Regulator (BSR) – oversees HRB safety during design, construction, and occupation. From 27th January 2026, the BSR will operate as an independent body within the Health and Safety Executive (HSE), with statutory powers to regulate higher-risk buildings.
- National Regulator of Construction Products – monitors construction product standards
- New Homes Ombudsman – addresses complaints from new homebuyers

The requirements of the Act broadly introduce several key principles, and two main areas of reform:

- Design and construction: Reforms providing new guidance and standards for the design and construction industry by way of amendments to the Building Act 1984 and the introduction of the Building Safety Regulator.
- Occupation: Reforms providing new guidance and standards for the housing industry during a building's occupation overseen by the Building Safety Regulator. These will ensure building safety standards and resident engagement in blocks classified as 'higher risk buildings' are being met.

2. Definitions

The Act: The [Building Safety Act 2022](#), passed in April 2022 after Dame Judith Hackitt's independent review following the Grenfell Tower tragedy. It establishes wide-ranging reforms for HRB design, construction, and management.

Accountable Person (AP) / Principal Accountable Person (PAP): Dutyholders legally responsible for an HRB's compliance with the Act. Their main duty is preventing or reducing fire or structural safety incidents.

Building Assessment Certificate: The key certificate required from the PAP when an HRB is occupied. After registration with the BSR, the PAP must provide documents including a Safety Case Report, an HRB-specific engagement strategy, a Mandatory Occurrence Reporting strategy, and agreements with other accountable persons. The certificate must be displayed in the building and renewed every five years.

Building Safety Case (BSC): A body of evidence demonstrating fire and structural risks are identified, escalated, and managed. It is overseen by the Building Safety Manager (BSM) on behalf of the PAP. A summary forms the Safety Case Report submitted to the BSR.

Building Safety Fund: A government fund protecting leaseholders from costs of unsafe non-ACM cladding.

Building Safety Levy: A levy on developers of HRBs in England to fund remediation of defective cladding and other building safety defects.

Building Safety Manager (BSM): Not mandatory under the Act, but supports the PAP by overseeing safety cases, engagement strategies, and risk management.

Building Safety Regulator (BSR): The BSR monitors building safety across design, construction, and occupation. From **27th January 2026**, the BSR will operate as an independent body within the Health and Safety Executive (HSE), strengthening its oversight and enforcement powers.

Defective Premises Act (as amended): Extends developer liability for safety defects (15 years prospectively, 30 years retrospectively).

Dutyholders: Individuals or entities responsible for maintaining standards and safety in HRBs.

Fire Safety Act: 2021 legislation clarifying scope of fire safety measures, complementing the [Building Safety Act 2022](#).

Gateway Process: Three submission and approval stages overseen by the BSR for HRB design and construction:

- Gateway 1: Planning (1 Aug 2021)
- Gateway 2: Pre-construction (1 Oct 2023)
- Gateway 3: Completion/handover (1 Oct 2023)

Golden Thread: Digital record of building safety information maintained throughout the building lifecycle, linking to the Safety Case.

Higher-Risk Building (HRB): Residential building $\geq 18\text{m}$ or ≥ 7 storeys with 2+ residential units. HRBs must be registered with the BSR, have a safety case, an engagement strategy, and adhere to the Golden Thread.

Regularisation: Certification process for previously unauthorised works. The BSR will act as the building control authority for HRBs.

Mandatory Occurrence Reporting: Requirement to report significant fire or structural risks.

3. Key Principles

Several key principles of the Act apply across both design and construction, and occupation:

3.1 Higher risk buildings (HRBs)

Where applicable under the requirements of the Act, we are taking reasonable measures to ensure that Capital Sky Ltd will:

- Comply with dutyholder and construction product standards.
- Follow mandatory occurrence reporting.
- Maintain change control and construction control plans.
- Apply the Golden Thread for managing building information.
- Meet Gateway submission and approval requirements.
- Ensure HRBs are registered with the BSR before occupation.

3.2 The Building Safety Regulator

We will meet all requirements under the Act and respond to BSR requests. From 27th January 2026, the BSR will be an independent body, enhancing regulatory oversight and enforcement.

3.3 Approved Construction Products

We will work with the appropriate governance to ensure we use approved products as set out by the National Regulator of Construction Products. This regulator has been set up to provide information and oversight of product standards applied through design, construction, refurbishment, and remediation.

3.4 The Golden Thread

We will undertake reasonable measures to implement the requirements and principles of the Golden Thread for storing, managing, and sharing building information and documents over a higher risk building's lifecycle. The Golden Thread will apply from design and construction, through to occupation and disposal. It constitutes a 'single source of truth' for a higher risk building's safety information, and ties directly into requirements for the creation and management of building safety cases.

3.5 Mandatory Occurrence Reporting

We have a mandatory occurrence reporting process in place to inform the Building Safety Regulator of 'safety occurrences' related to fire and structural safety issues in our higher risk buildings. The reporting criteria and process for mandatory occurrence reporting will be set out in further guidance from the regulator. A policy and process review will follow. Mandatory occurrence reporting will be supported with the development of a building safety management policy.

3.6 Holding Developers to Account

The Act includes a new section 2A to the Defective Premises Act which updates the period under which defect claims to developers can be made. The change extends the usual limitation period (the time a valid claim can be made) from six years to 15 years for claims that accrue after the Act took effect (28 April 2022), and 30 years retrospectively for claims that accrued before. The change, combined with the government's requirement for large scale developers to sign a developer remediation contract, which forces developers responsible for defects to agree to fix them or face significant consequences, means there will be a greater ability to hold developers to account. We will support the process for the remediation of building safety defects as well as leaseholder protections (see section 5.9).

3.7 Enforcement

We will act swiftly in response to enforcement measures imposed by the Building Safety Regulator through design, construction, and occupation:

Design and Construction:

The following enforcement changes apply to the design and construction of all buildings, including higher risk buildings:

- An increased penalty for a breach of building regulations to a maximum penalty of an unlimited fine and/or two years in prison.
- Expansion of section 35 of the Building Act 1984 so that it applies not only to breach of provisions of building regulations, but also to breach of individual requirements imposed under building regulations.
- Amendments to section 36 of the Building Act 1984 to extend the time limit to take action to correct non-compliant work under this section to 10 years and for the Building Safety Regulator as a building control authority to have powers under this section.
- The Building Safety Regulator and local authorities can issue compliance and stop notices against non-compliant work. Failure to comply with either notice will be a criminal offence, with a maximum penalty of up to two years in prison and an unlimited fine.

Occupation:

The following enforcement changes apply to occupied higher-risk buildings (HRBs):

- The Building Safety Regulator will be able to issue compliance notices against an HRB's principal accountable person or any relevant accountable person
- Notices will require identified issues to be rectified within a set date
- Where non-compliance has or will lead to imminent danger to people in and around the building, the Building Safety Regulator can issue them with an 'urgent action notice'

- Failure to comply with notices, without reasonable excuse, will carry a maximum penalty of an unlimited fine and/or two years in prison.

The methods of enforcement will be set out in our internal building safety toolkit subject to the transitional timeline.

3.8 Appeals

Where disputes arise over decisions relating to higher risk buildings, the first stage is informal discussion and mediation between the parties. Following that, in most cases, there is an internal review and appeals process provided by the Building Safety Regulator. If this cannot resolve matters, specified regulatory decisions are appealable to the First- tier Tribunal.

4. Design and Construction

Areas developed to meet the requirements of the Act through design and construction are subject to the transitional timeline including:

4.1 Dutyholders

We will take reasonable measures to ensure that updates relating to our role and competency through design and construction introduced in the Act are met.

The key dutyholders through design and construction set out in the Act are modelled on the dutyholder roles under the [Construction Design and Management regulations 2015 \(CDM\)](#). [CDM](#) and [Building Safety Act 2022](#) duty holders are independent and may be assigned to different individuals or organisations.

The key dutyholders through design and construction set out in the Act are,

- The Client
- The Principal Designer
- Designers
- The Principal Contractor
- Contractors

The main changes introduced in the Act relate to the role of the principal designer, principal contractor, and requirements for the client to ensure the competence of relevant dutyholders. Requirements for relevant dutyholders to meet the provision of prescribed documents required for each gateway submission will be put in place.

4.2 Building Safety Levy

We will take reasonable measures to meet requirements for the building safety levy and provision of associated costs.

4.3 Gateways

We are committed to taking all reasonable and necessary measures to comply with the statutory requirements of the 'Gateway' regime for the design and construction of higher-risk buildings, in line with the transitional arrangements set out by the [Building Safety Act 2022](#).

The Gateway process, overseen by the Building Safety Regulator (BSR), which will become an independent body from 27th January 2026, mandates the submission and approval of prescribed documentation at defined project stages to ensure building safety is embedded throughout the lifecycle of a higher-risk building.

Gateway 1 – Planning Stage, came into effect on 1st August 2021 and is integrated within the existing planning permission process. The Building Safety Regulator acts as a statutory

consultee at this stage, reviewing fire safety considerations relevant to land use planning decisions.

Gateway 2 – Pre-Construction Stage, marking the transition from planning to construction, came into force on 1st October 2023. At this stage, construction cannot begin until the Building Safety Regulator, acting as the Building Control Authority, has assessed and approved a full set of prescribed design and safety documents, including the design intent, fire and structural safety details, and a Construction Control Plan.

Gateway 3 – Completion and Handover, also in effect from 1st October 2023, Gateway 3 represents the final check before occupation. Upon completion of construction, a higher-risk building must receive either a Completion Certificate or a Partial Completion Certificate (for phased occupation), issued by the Building Safety Regulator. This follows a comprehensive review of the as-built information to confirm that the building has been constructed in accordance with the approved design and regulatory requirements.

An expected 12-week determination period applies at Gateway 3, during which the Building Safety Regulator will assess submitted documentation before issuing the appropriate completion certification.

We will continue to work proactively with dutyholders and stakeholders to ensure all Gateway requirements are met in full, maintaining compliance and upholding the highest standards of safety and transparency throughout the process.

4.4 Change Control

We take all necessary measures to ensure that change control is actively managed and transparently communicated to the Building Safety Regulator (BSR) throughout the design and construction of higher-risk buildings, in line with the requirements of the [Building Safety Act 2022](#) and associated secondary legislation.

Any changes to the design, construction, or refurbishment of a higher-risk building must be formally recorded by the relevant dutyholders - including the Client, Principal Designer, and Principal Contractor. Where a change is classified as notifiable or major, prior approval ('permission to proceed') must be obtained from the BSR before the change is implemented.

Key requirements include:

- Documenting all design and construction changes accurately;
- Submitting notifiable or major changes for approval by the BSR in a timely manner;
- Maintaining up-to-date records as part of the Golden Thread of information;
- Ensuring consistency with approved plans and compliance with safety standards throughout the project lifecycle.

This requirement applies to both new developments and refurbishment projects involving higher-risk buildings (refer to Section 5.10 for more detail on refurbishment protocols).

Reporting and Coordination of Building Safety Breaches

When Capital Sky Ltd acts in the role of Contractor under a Principal Contractor, we have established formal arrangements to coordinate with the Principal Contractor and report any concerns or breaches relating to the compliance of building work with relevant requirements under the [Building Safety Act 2022](#), [Building Regulations 2010](#), or other legislation. Any identified or suspected non-compliance, particularly where it may affect fire or structural safety, is immediately reported to the Principal Contractor's Site Manager or Building Safety Lead both verbally and in writing. These reports are recorded in the Site Inspection Log and, where applicable, referenced in Toolbox Talks or Safety Meetings to ensure corrective action is taken. The Project Manager and Health & Safety Department review all such reports to confirm that

corrective measures have been implemented and that the Principal Contractor and other duty holders have been formally notified. Where the issue cannot be resolved through normal coordination channels, it will be escalated in accordance with our Building Safety Escalation Procedure and, if necessary, referred to the Building Safety Regulator in line with our legal obligations under the Act.

4.5 Coordination, Cooperation and Interface Management

In addition to our change control and reporting arrangements, Capital Sky Ltd has established formal procedures to ensure effective coordination, cooperation, and management of interfaces with other contractors and duty holders throughout the construction phase.

Prior to commencing works, we review all relevant project information including drawings, specifications, the Construction Phase Plan, and programme of works to identify potential interface risks between our activities and those of others. Particular attention is given to safety-critical elements such as fire stopping, structural components, and sequencing of works. Where necessary, we participate in pre-start and design coordination meetings to ensure our methods of work align with those of the Principal Contractor and other trades.

During the works, we maintain ongoing communication with the Principal Contractor, design team, and other contractors through regular site meetings, briefings, and daily coordination activities. Our supervisors are responsible for monitoring work interfaces on site to ensure that both our activities and those of others do not create non-compliance with the [Building Safety Act 2022](#), [Building Regulations 2010](#), or relevant industry standards. This includes reviewing adjacent and preceding works where they may impact the integrity or compliance of our own works.

Where a risk of non-compliance is identified, whether arising from our work or that of others, it is immediately raised with the Principal Contractor both verbally and in writing. All concerns are recorded within site inspection records and the project's Golden Thread information system to ensure traceability and appropriate corrective action. Our Project Manager and Health & Safety Department oversee the management of such issues to confirm that they are resolved in a timely and compliant manner.

If coordination issues cannot be resolved at site level, they are escalated through our internal escalation procedures to senior management and, where required, to the relevant dutyholders or the Building Safety Regulator in accordance with statutory obligations.

Through these arrangements, Capital Sky Ltd ensures that our works are effectively coordinated with others, that potential conflicts are identified and managed proactively, and that all activities contribute to overall compliance with building safety legislation and standards.

4.6 Information Sharing and Duty Holder Coordination

Capital Sky Ltd has established formal arrangements to ensure that relevant information relating to our works is communicated effectively to other duty holders, and that information received from others is used to maintain full compliance with the [Building Safety Act 2022](#), [Building Regulations 2010](#), and applicable industry standards.

Prior to commencing works, we provide the Principal Contractor and relevant duty holders with key documentation including risk assessments and method statements (RAMS), technical specifications, product information, and evidence of competence. This information demonstrates how our proposed works will comply with statutory requirements and allows other duty holders to assess the impact of our activities on the overall project.

During the construction phase, we ensure that all relevant updates relating to our works, including design changes, material substitutions, inspection records, and test results, are

communicated in a timely manner through site meetings, formal reports, and digital project systems forming part of the Golden Thread. This ensures that other duty holders have accurate and up-to-date information to support their own compliance obligations.

In parallel, we actively obtain and review information from other duty holders, including updated drawings, design changes, sequencing information, and details of adjacent or related works.

This information is reviewed by our supervisors and project management team to confirm that our works remain compliant and are not adversely affected by the activities of others.

Where information received identifies a potential risk to compliance, we take appropriate action, including revising our method statements, adjusting sequencing, or raising formal queries with the Principal Contractor or design team. All such actions are recorded to provide a clear audit trail within the Golden Thread.

Through this two-way exchange of information, Capital Sky Ltd ensures that our works both support and are supported by other duty holders in achieving compliance with all relevant building safety legislation and standards.

4.7 Product Assurance, Defect Identification and Quality Control

Capital Sky Ltd has established formal arrangements to ensure that all construction products, materials, and workmanship meet the required standards of safety, performance, and compliance under the [Building Safety Act 2022](#).

We implement a structured process for:

- Product verification – ensuring all materials are checked prior to installation for correct specification, CE/UKCA marking, certification, and suitability for use.
- Testing and inspection – including concrete cube testing, drainage testing, instrument calibration, environmental monitoring, and other checks required by project specifications and British Standards.
- Identification of defects and non-conformances – through daily inspections, QA sheet reviews, snagging, NCRs, SHEQ inspections, and testing results.
- Defect management and escalation – all defects are recorded, investigated, and assigned corrective actions. Safety-critical defects (e.g. fire stopping, structural integrity) are escalated immediately to the Principal Contractor, Client, Designers, Contracts Directors, and SHEQ Department.
- Recording and Golden Thread compliance – all quality records, NCRs, test results, and inspection data are maintained as part of the Golden Thread and retained for the lifecycle of the project.
- Performance monitoring and continual improvement – including NCR trend analysis, monthly SHEQ inspections, internal audits, management reviews, and lessons learned.

These arrangements are detailed in the company's Quality Site Procedures and apply to all projects, ensuring that any issues affecting building safety are identified early, managed effectively, and communicated to all relevant duty holders.

4.8 Handover Review

In line with our [Building Safety Act 2022](#) compliance programme, we conduct a structured cross-discipline review of the handover process at the completion of each higher-risk building project.

This review is designed to:

- Evaluate the effectiveness and readiness of our handover procedures under the fully implemented Gateway 3 framework;

- Ensure accurate and complete as-built documentation and Golden Thread information are prepared and submitted for final review by the Building Safety Regulator;
- Identify areas for continuous improvement in our internal processes and stakeholder coordination;
- Confirm all duties have been discharged in accordance with the Act prior to registration and occupation of the building.

This proactive approach supports our commitment to maintaining the highest standards of safety, compliance, and transparency in the delivery and occupation of higher-risk buildings.

5. Occupation

To support the safety of future residents in higher-risk buildings, we will implement robust construction-stage safety processes, in line with the [Building Safety Act 2022](#) and relevant statutory guidance.

While we are not responsible for resident engagement during construction, we recognise our key role in ensuring the building is delivered to a high standard of safety and that the Principal Accountable Person (PAP) is equipped with the necessary information to meet their ongoing obligations after occupation.

We will:

- Assign clear responsibilities across our Building Safety Team, including project managers, Health & Safety professionals, and document controllers;
- Collaborate closely with clients, design teams, and third parties (e.g. fire consultants, BSR, and building control) to maintain safety throughout construction;
- Ensure accurate and complete Golden Thread information is developed, maintained, and handed over at Gateway 3;
- Facilitate early engagement with the client or appointed PAP where required, to support planning for future resident engagement and occupation readiness.

This approach ensures that, while residents are not present during our works, the buildings we deliver are safe, compliant, and ready for safe occupation under the new building safety regime

5.1 The Principal Accountable Person (PAP)

Under the [Building Safety Act 2022](#), the Principal Accountable Person (PAP) is the dutyholder legally responsible for ensuring a higher-risk building is compliant with all relevant safety obligations once it is occupied. This includes the registration of the building with the Building Safety Regulator (BSR) and ongoing management of building safety risks.

The PAP is usually the entity or individual who either:

- Owns the building's structure and exterior, or
- Is legally responsible for repairing and maintaining the common parts of the building (e.g. communal areas, external walls, structural elements).

Where more than one Accountable Person (AP) exists—due to multiple parties managing different parts of a building—the PAP is the one with responsibility for the structure and exterior. This entity leads coordination across all APs.

Key responsibilities of the Principal Accountable Person include:

- Registering the higher-risk building with the Building Safety Regulator;
- Applying for and maintaining a valid Building Assessment Certificate (renewed on a five-year cycle or as directed by the BSR);
- Coordinating with other Accountable Persons to share information and ensure compliance;
- Managing and maintaining the Safety Case Report and Golden Thread information;

- Taking reasonable steps to engage residents, address their concerns, and promote awareness of building safety measures;
- Notifying the BSR of any changes in ownership or responsibility, including changes to the PAP or any AP.

An Accountable Person may be a legal entity such as a housing association, council, management company, or a named individual, depending on the building's ownership and management structure.

5.2 Building Safety Manager (BSM)

While the Building Safety Manager (BSM) is not a statutory requirement under the [Building Safety Act 2022](#), the role may be appointed voluntarily to support the Principal Accountable Person (PAP) in fulfilling their duties, particularly for complex or high-occupancy higher-risk buildings.

The BSM provides an assurance function, helping ensure the building's safety management systems are robust and compliant. Where appointed, the BSM may contribute to:

- Developing and maintaining a building safety dashboard with key safety metrics;

Purpose

This section establishes Capital Sky Ltd's arrangements for providing appropriate supervision, instruction and information to its workforce and subcontractors to ensure all works undertaken comply with the [Building Safety Act 2022](#), [Building Regulations 2010](#), and relevant industry standards. It ensures that all activities on site are supervised by competent personnel and that legal responsibilities are clearly allocated and evidenced.

Supervisor Appointment and Accountability

- Each operational team engaged on a project subject to the [Building Safety Act 2022](#), shall have a formally appointed Supervisor responsible for ensuring the team's work is executed in compliance with statutory building safety requirements.
- Supervisors will be appointed using the company's Project Appointment Letter.
- Supervisors must:
 - Be competent for the activities they oversee.
 - Ensure work is carried out in line with approved designs, risk assessments, method statements, and relevant legislation.
 - Act as the first line of escalation for building safety concerns.
- A Supervision Organogram will be maintained for each project, identifying named supervisors and their reporting lines up to the Project Manager and Building Safety Lead.
- Supervision ratios will be applied based on activity risk:
 - Low-risk activities: 1 Supervisor per 10 operatives
 - Medium-risk activities: 1 Supervisor per 8 operatives
 - High-risk activities (e.g. façade, structural, fire-stopping): 1 Supervisor per 5 operatives

Instruction and Information to Workforce and Subcontractors

- All employees and subcontractors shall receive:
 - A site-specific induction covering the [Building Safety Act 2022](#) obligations, building-specific risks, and key contact points.
 - Task-specific pre-start briefings and toolbox talks delivered by supervisors or safety leads.

- Ongoing communication on regulatory changes or safety alerts.
- Records of inductions, briefings, and toolbox talks will be retained in the project file and Golden Thread system.

Competence and Skills Framework

- Capital Sky Ltd will maintain a Skills and Supervision Matrix (Training Matrix) that aligns supervision levels with activity risk and competency requirements.
- Supervisors and operatives must hold qualifications appropriate to their roles (e.g. CSCS, NVQ, PAS 8670 series, TWS/TWC certification).
- Subcontractors are required to provide evidence of competence prior to starting work and to maintain compliance throughout the project lifecycle.

Extraordinary Operating Framework (EOF) for Higher-Risk Work

For works governed by the [Building Safety Act 2022](#):

- An EOF will be implemented to ensure heightened supervision, communication, and record keeping.
- The EOF includes:
 - Defined roles and responsibilities for supervisors and managers
 - Mandatory task briefings and record keeping
 - Communication and escalation procedures
 - Competence and supervision verification prior to commencing work
 - Subcontractor alignment with EOF procedures

Monitoring, Review and Record Keeping

- Project teams will carry out regular supervision and training audits using the Supervision & Training Audit Checklist.
- Records (Project appointment letters, induction logs, toolbox talk records, competence verifications, meeting notes) will be:
 - Maintained in the Golden Thread system
 - Available for review by the Building Safety Regulator and auditors.

Non-conformance with supervision or competence requirements will trigger immediate escalation and corrective action.

Building Safety Supervision, Competence and Communication

- Monitoring and reviewing building safety risks and controls in the Safety Case;
- Supporting the preparation and maintenance of the Safety Case Report for submission to the Building Safety Regulator (BSR);
- Engaging with residents and other stakeholders (e.g. contractors, managing agents, fire and rescue services) to promote a culture of safety and build a resident engagement strategy;
- Supporting the implementation of a Building Safety Management Policy and related procedures.

Although the BSM is no longer a mandatory duty holder under the Act, the role can add operational value and help ensure effective safety oversight — particularly in complex management structures or buildings with elevated risk profiles. All supervision, training, and safety activities overseen by the BSM will be recorded and maintained within the Golden Thread system, ensuring full traceability and accessibility of evidence for the Building Safety Regulator, the Principal Accountable Person, and other relevant duty holders.

5.3 Building Safety Case (BSC)

The Principal Accountable Person (PAP) holds legal responsibility for the development, maintenance, and oversight of the Building Safety Case, in accordance with the [Building Safety Act 2022](#), and associated regulations.

The Building Safety Case provides evidence-based assurance that fire and structural risks in a higher-risk building are being identified, managed, and controlled effectively to prevent major incidents. It is a core component of the Golden Thread of information and must be kept accurate, accessible, and up to date throughout the lifecycle of the building.

A concise summary of the safety case, known as the Safety Case Report, must be:

- Prepared and maintained by the PAP;
- Submitted to the Building Safety Regulator when applying for a Building Assessment Certificate, or upon request;
- Reviewed regularly to reflect changes in building condition, occupancy, or risk profile.

The Safety Case Report may also support information-sharing requirements between the PAP, other Accountable Persons, and external stakeholders such as the Fire and Rescue Service.

Where a Building Safety Manager is appointed (as a voluntary best-practice role), they may assist the PAP in preparing and maintaining the Safety Case and supporting evidence.

All building safety cases and related reports will be underpinned by a robust Building Safety Management Policy and supporting procedures, aligned with statutory guidance and the operational requirements of the Building Safety Regulator.

5.4 Competence and Training

Competence

In line with the requirements of the [Building Safety Act 2022](#), and to support evidence of competence within the Building Safety Case, we will undertake a structured competence review process across all relevant roles and functions involved in the delivery, management, and oversight of higher-risk buildings.

This process will involve:

- Reviewing roles and responsibilities to ensure clarity of safety-critical functions;
- Liaising with key departments such as Human Resources, Training Department, and Procurement to assess and document individual and organisational competence;
- Developing and maintaining a Competency Matrix aligned with relevant national standards, including BSI Flex 8670 and the PAS 8671–8673 series;
- Ensuring that anyone carrying out duties under the Act - whether during design, construction, or occupation - is appropriately trained, qualified, and experienced;
- Supporting the Principal Accountable Person or other duty holders with evidence of competence as part of the Golden Thread and Safety Case Report.

Our approach will ensure that competence is not treated as a one-off requirement, but as a continual process of monitoring, assessment, and development, fully embedded into our operational, hiring, and subcontractor selection procedures.

Training

At Capital Sky Ltd, we are fully committed to ensuring the highest standards of safety, compliance, and performance in all our projects, especially those involving higher-risk buildings. Our training and development approach integrates SKEB (Skills, Knowledge, Experience, and Behaviours) to ensure our workforce is equipped to meet evolving safety standards, regulatory requirements, and best practices.

Key Training Areas for Capital Sky Ltd

- Safety Procedures & Protocols:
 - All employees will undergo comprehensive training to ensure they are well-versed in the latest safety protocols, including fire safety, structural integrity, and evacuation procedures, particularly in high-risk buildings.
 - Through SKEB, we will enhance our team's skills and knowledge to continuously improve safety measures.
- Regulatory Compliance:
 - Compliance with the [Building Safety Act 2022](#), the [Regulatory Reform \(Fire Safety\) Order 2005 \(as amended by the Fire Safety Act 2021\)](#), and other safety-related regulations is essential for our business.
 - We will use the SKEB framework to ensure our teams not only meet but exceed regulatory requirements by continuously expanding their skills and knowledge in building safety.
- Resident Engagement & Communication:
 - We recognise the importance of keeping residents informed and engaged regarding building safety. Training through SKEB will help us better understand residents' needs, particularly those with mobility issues or other challenges that affect self-evacuation.
 - This training will also support our efforts in maintaining clear and effective communication with residents and external stakeholders, such as fire and rescue services.
- Risk Management & Incident Prevention:
 - Capital Sky Ltd is dedicated to actively identifying and mitigating risks throughout our projects.
 - Through SKEB, we will build on our collective experience, enhance our knowledge of best practices, and ensure the team's behaviour consistently reflects a proactive approach to safety and risk management.

SKEB Engagement Process for Capital Sky Ltd

- Mandatory Training:
 - All employees will be required to participate in SKEB-based training, covering critical topics such as fire safety collar installation familiarisation training, fire warden, temporary works coordinator / temporary works supervisor and more.
 - Training will include a mix of in-person and online sessions to accommodate the different needs of our teams.
- Continuous Skills Development:
 - SKEB ensures that our workforce is constantly learning and applying their skills and knowledge on site. This involves:
 - Regular updates on building safety standards.
 - Sharing experiences and solutions within the company and across the wider industry.
 - Reflecting on and improving behaviour to ensure a safety-first approach in all activities.
- Knowledge Sharing:
 - We will encourage employees to actively engage in knowledge-sharing activities within SKEB, allowing them to contribute their experiences, learnings, and best practices with peers across the company and the industry.

Monitoring and Evaluation

- Performance Reviews:
 - We will track employee engagement with SKEB-based training and use the framework to evaluate how effectively they apply their skills, knowledge, experience, and behaviours on the job.
 - Regular performance reviews will include assessments on safety knowledge, risk management, and overall compliance with safety standards.
- Continuous Improvement:
 - Capital Sky Ltd is committed to continuous improvement. If gaps in skills, knowledge, or safety behaviour are identified, we will act swiftly to implement additional training and support, ensuring our teams are always equipped to manage the safety risks of high-risk buildings.
- Subcontractor Training and Competency Management:
 - At Capital Sky Ltd, we apply the same rigorous SKEB (Skills, Knowledge, Experience, and Behaviours) framework to all subcontractors as we do to our direct employees. Subcontractors are required to provide evidence of their training, qualifications, and experience prior to starting work on site, and they must participate in mandatory inductions, toolbox talks, and site-specific training. Their competencies are recorded and monitored within our training and competency matrix, and ongoing performance is reviewed through supervision, audits, and behavioural observations. This ensures that every individual working under Capital Sky Ltd – whether an employee or subcontractor – meets the same high standards of safety, compliance, and professionalism.

5.5 Registration

Existing HRBs: Principal Accountable Persons (PAPs) were required to register occupied HRBs with the BSR by **30th September 2023**. [press.hse.gov.uk](https://www.hse.gov.uk/press/2023/09/30/)

New HRBs: For buildings completed after the commencement of sections 76 and 77 of the [Building Safety Act 2022](https://www.legislation.gov.uk/ukpga/2022/25/sections/76-77), registration must occur before occupation.

Key Points:

- **Registration Process:** PAPs must submit key building information to the BSR either at the time of registration or within 28 calendar days thereafter. [GOV.UK](https://www.gov.uk)
- **Enforcement:** From **1st October 2023**, failure to register an occupied HRB without a reasonable excuse constitutes an offence.

5.6 Certification

All registered higher risk buildings will have a valid building assessment certificate provided after review by the Building Safety Regulator that will be clearly displayed in the building and will provide the principal accountable person's details, the current building assessment certificate and copies of any compliance notices relating to the building which are still in force. If the Building Safety Regulator has put a special measures order in force for the building at any point, the building assessment certificate will be removed.

5.7 Resident's Voice

While the formal duties under the Resident Voice provisions of the [Building Safety Act 2022](#) apply to the Principal Accountable Person (PAP), we recognise the importance of supporting a culture of safety and transparency for residents during our work on higher-risk buildings. As a contractor, we will:

- Support resident communication efforts by cooperating with the Principal Accountable Person in providing clear and accurate information related to our works and their potential impact on building safety.
- Promote a safety-conscious environment by ensuring our on-site teams are aware of and follow building safety protocols, especially those that may affect residents during the course of construction or maintenance.
- Respond professionally to resident concerns by directing any safety-related questions or complaints raised by residents to the appropriate accountable person or safety representative.
- Minimise disruption and risk by working to agreed standards and maintaining safe practices throughout all stages of the project.

We understand our role in upholding the wider building safety culture and commit to supporting engagement efforts that help residents feel safe, informed, and respected.

5.8 Engagement Strategy

While the Principal Accountable Person is responsible for developing the formal resident engagement strategy, we will support this by contributing to the communication and coordination elements related to our works on higher-risk buildings. This includes:

- Sharing relevant information with the building safety team about how our activities may impact residents or building access.
- Cooperating with other key stakeholders, such as fire and rescue services, managing agents, and utility providers, as part of the broader safety and engagement strategy.
- Ensuring our teams follow the agreed engagement protocols, including providing advance notice of works, maintaining safe access, and supporting emergency preparedness measures.
- Responding promptly and appropriately to any building safety-related queries or issues raised by residents or the accountable person during the project.

We understand that our role on site influences how safe and informed residents feel, and we are committed to helping implement effective, building-specific engagement strategies.

5.9 Leaseholder Protections

While leaseholder protections under the [Building Safety Act 2022](#) are not enforced by contractors, we acknowledge their importance in shaping the remediation landscape. When engaged to undertake safety-related works on relevant buildings (11m or 5+ storeys), we will:

- Support the responsible parties (e.g. developers, landlords, building owners) in complying with leaseholder protections, including the provision of documentation and cost transparency as needed.
- Ensure our scope of works and records are clear, traceable, and compliant with funding criteria (e.g. Building Safety Fund, cladding remediation schemes).
- Cooperate with the client's appointed professionals (legal, building safety managers, etc.) where our involvement is relevant to historic or ongoing liability assessments.
- Acknowledge that any costs for remediation works may be subject to limitations under the leaseholder protections and structured funding agreements.

These protections reinforce a broader commitment to safety, accountability, and fairness across the industry - values we support through the quality and integrity of our work.

5.10 Refurbishments

We acknowledge that refurbishment and remediation works in higher-risk buildings (HRBs) fall under a stricter regulatory regime introduced by the [Building Safety Act 2022](#). As a contractor, we will:

- Ensure all refurbishment works, particularly those involving Schedule 3 and 3A activities, comply with the relevant building control and safety requirements.
- Work closely with the Principal Accountable Person and the Building Safety Regulator (where applicable) to support any gateway-style approvals required for major works.
- Maintain detailed records of work specifications, materials, methods, and risk mitigation to support compliance and future safety case reviews.
- Operate under appropriate certification or oversight schemes as required for the nature of the works.
- Align our construction and project delivery practices with the client's evolving safety governance frameworks, including any internal toolkits or policy updates issued during the transitional phase.

We are committed to carrying out refurbishment work to the highest standards of safety and transparency in line with the new legal framework.

5.11 Remediation

As a contractor undertaking remediation works in higher-risk buildings (HRBs), we play a key role in delivering safe, compliant, and timely solutions to address fire and structural safety defects identified by the Principal Accountable Person (PAP) or other responsible parties. While the legal obligation to initiate and manage building safety remediation lies with the PAP, our role is critical in supporting these efforts through professional delivery, coordination, and adherence to all regulatory requirements.

Our responsibilities include:

- **Executing Remediation Works:** We carry out remediation works in accordance with approved safety strategies, technical designs, and regulatory frameworks, including those governed by the Building Safety Regulator (BSR). Our focus is on ensuring all works mitigate identified risks related to fire or structural safety.
- **Supporting Temporary Safety Measures:** Where instructed, we assist with the implementation of temporary mitigation measures (e.g. waking watch, temporary alarms) during remediation. We work in coordination with fire engineers and building safety teams to ensure measures are installed and maintained correctly while permanent solutions are implemented.
- **Facilitating Personal Emergency Evacuation Plans (PEEPs):** We support the responsible parties by enabling access, installations, or systems that assist in resident evacuation planning — particularly for those identified as vulnerable. This may involve working alongside waking watch teams or alarm system installers to ensure building layout and access routes are understood and preserved during works.
- **Minimising Disruption and Ensuring Communication:** We acknowledge the importance of clear, respectful communication with residents during remediation projects. We will support the PAP in keeping residents informed about works affecting safety and access, and adhere to any protocols for on-site signage, access restrictions, or resident briefings.

- Compliance with Remediation Orders: While contractors are not the subject of remediation orders or remediation contribution orders under the [Building Safety Act 2022](#), we are expected to:
 - Cooperate fully with the responsible party (e.g. building owner, developer) if a remediation order is in effect.
 - Deliver work within the timelines and specifications required by such orders.
 - Maintain thorough records of work progress, materials, methods, and risk controls to support legal and regulatory compliance.
- All remediation works, temporary safety measures, and supporting documentation will be recorded within the Golden Thread to ensure traceable evidence of risk management, compliance, and coordination with the Principal Accountable Person and the Building Safety Regulator.
- Awareness of Funding and Leaseholder Protections: We understand that remediation projects may be subject to funding arrangements (e.g. via the Building Safety Fund) and leaseholder protections under the Act. We support cost transparency and will ensure our pricing, scope, and delivery align with the principles that costs must first be borne by those responsible for the original defects.

6. Monitoring and review

This policy is initially issued for the period from March 2026 through January 2027 as part of the transitional implementation phase. Following this, it will be reviewed annually in line with the agreed policy review schedule. However, if there are significant changes in legislation, regulation, or recognised best practices, an immediate review will be carried out to ensure the policy remains current and compliant.

7. Our approach

Although no formal assessments were carried out during the development of this policy, we have actively considered principles of equality, diversity, and inclusion. These considerations are particularly relevant in the context of our involvement in higher-risk building projects, where resident engagement strategies may identify individuals with mobility, sensory, or cognitive impairments that could affect their ability to self-evacuate in an emergency.

We recognise our responsibility to support the safe sharing and protection of this information - both internally and when coordinating with relevant external bodies such as fire and rescue services - in accordance with data protection and safeguarding requirements.

During the drafting of this policy, we consulted key internal stakeholders across our business, including representatives from building safety, health and safety, project management, and resident liaison teams, to ensure the approach reflects operational realities and supports our commitment to inclusive and safe practices on site.

8. Reference

The Building Safety Act - GOV.UK

<https://www.gov.uk/guidance/the-building-safety-act>

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Building Safety Regulator - Building Safety

<https://www.gov.uk/government/organisations/building-safety-regulator>

Architects Registration Board - GOV.UK

<https://www.gov.uk/government/organisations/architects-registration-board>

Construction Products Regulation in Great Britain - GOV.UK

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www.nhos.org.uk

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Responsible Person and Duty Holder: Roles and Fire Safety Responsibilities - GOV.UK

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<https://builduk.org/wp-content/uploads/2025/07/Building-Safety-Regime.pdf>

Legislation

Building Safety Act 2022 - Legislation.gov.uk

<https://www.legislation.gov.uk/ukpga/2022/30/contents>

Building Act 1984 - Legislation.gov.uk

<https://www.legislation.gov.uk/ukpga/1984/55>

The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 - Legislation.gov.uk

<https://www.legislation.gov.uk/ukdsi/2023/9780348242812/contents>

The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 - Legislation.gov.uk

<https://www.legislation.gov.uk/uksi/2021/746/contents/made>

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[https://www.legislation.gov.uk/ukpga/1972/35#:~:text=\(1\)Where%20premises%20are%20let,is%20reasonable%20in%20all%20the](https://www.legislation.gov.uk/ukpga/1972/35#:~:text=(1)Where%20premises%20are%20let,is%20reasonable%20in%20all%20the)

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<https://www.legislation.gov.uk/ukxi/2005/1541/contents>

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Dated: 15/05/2026

Signature: 

Latest Review Date: 15/05/2027