

# BUILDING SAFETY POLICY

## Building Safety Statement of Intent

Brenmar Ltd is committed to work to the standards laid out within the Building Safety Act 2022 c. 30 (BSA) and support all of the directives it contains. The Act makes reforms to give residents and homeowners more rights, powers, and protections – to increase the safety of homes and buildings across the country.

Under the Building Safety Act, organisations are required to show that they have the necessary organisational capability to carry out their roles, as defined in Regulation 11Q of the Building Regulations in the secondary legislation and several PAS documents, such as PAS8672, PAS8671, and BS 8670-1:2024.

Companies must prove they have the proper policies, procedures, and systems in place to obtain certification, which must be updated to align with the new Building Safety Regulations.

This Act has 6 Parts, and contains provisions intended to secure the safety of people in or about buildings and to improve the standard of buildings.

Part 2 contains provision about the building safety regulator and its functions in relation to buildings in England.

Part 3 amends the Building Act 1984.

Amendments made by Part 3—

- (a) provide that the regulator is the building control authority in relation to higher-risk buildings in England, and
- (b) require the regulator (for England) and the Welsh Ministers (for Wales) to establish and maintain registers of building control approvers and building inspectors.

Part 4 is about occupied higher-risk buildings in England, and imposes duties on accountable persons.

Part 5 contains further provisions, including—

- (a) provisions about remediation and redress;
- (b) provision requiring a new homes ombudsman scheme to be established;
- (c) powers to make provision about construction products;
- (d) further provision about fire safety;
- (e) provision about the regulation of architects;
- (f) provision about housing complaints.

Part 6 contains general provisions.

The Act creates three new bodies of management: the Building Safety Regulator, the National Regulator of Construction Products and the New Homes Ombudsman. Brenmar Ltd will work with these organisations, work to best practice and work within the new regulations at all times ensuring compliance with the BSA in all areas.

Brenmar will:

- Comply with any relevant duty holder requirements and competencies throughout projects.
- Ensure a competent workforce is created, nurtured and maintained.
- Ensure effective and efficient communication lines between key responsible persons.
- Ensure that occurrence reporting is completed timely throughout projects.

- Utilise Golden Thread requirements for managing and sharing building information.
- Ensure suitable and sufficient material sourcing and procurement.
- Have an evolving management strategy to manage the key requirements of the BSA.
- Ensure inspections, audits and checks are carried out at key intervals of the project.
- Ensure the safety, health and wellbeing of our operatives as so far as reasonably practicable.
- Ensure that all operatives are given key information on Health and Safety & Fire Safety along with any other relevant areas of compliance.

This policy is developed in compliance with the UK Building Safety Act 2022. It applies to all individuals working for Brenmar on its behalf in any capacity, including employees (permanent and temporary), directors, agency workers, contracted staff, consultants, and third-party representatives, regardless of their location.

The policy applies to all of our projects as defined in the Building Safety Act (BSA) and is subject to regular review and updates as required. The Policy also details some of our Fire arrangements, which must be followed always across all projects.

## Golden Thread

'Golden Thread' is the term used to describe the information and documents that must be collated and stored in order to safely occupy, manage and operate a Higher-Risk Building (HRB) throughout its lifecycle. The Golden Thread is required for existing HRB's, HRB's under construction before 1st October 2023; using what information is possible and also for new HRB's from 1st October 2023 onwards.

The Golden Thread will generally be used:

- During the design and construction phases to collate, record and provide relevant information about a Building.
- During the occupancy phase by the Principal Accountable Person and other Accountable Persons as part of their role in using and operating the building; including tasks such as undertaking maintenance, refurbishment or further construction work; and compiling the Safety Case Report.
- To provide residents with information about their homes and to provide reassurance that the building is Being managed safely by competent duty holders.
- To provide the emergency services with relevant information about the building so that any response required can occur as safely and effectively as possible. Contact details, copies of the building's floor plans, fire strategy and details of key firefighting equipment are available.

## Duty Holders

Duty holders such as the Principal Designer and Principal Contractor under the BSA are required to manage building safety risks, with clear lines of responsibility during the design, construction and completion of all buildings, which ties in directly with our arrangements to manage CDM, although BSA responsibilities may differ from Construction Design Management regulations 2015 (CDM).

During construction works Brenmar Ltd will complete key requirements from the Act in order to support the BSA, such as site inspections at key milestones, reporting certain occurrences, manage any potential changes and identifying and storing the golden thread of key information about the building. We will ensure the client is aware of their duties under The Building Safety Act 2022.

Accountable persons within Brenmar Ltd must demonstrate they have effective, proportionate measures in

place to manage building safety risks in the higher-risk buildings for which we are responsible. Building safety risks will need to be considered from the initial design phase.

The key role of the principal responsible person is to prevent and reduce the severity of building safety incidents in relation to fire or structural failure in higher risk buildings. This is actively managed by our management safety through an ongoing programme to identify and remediate potential building safety defects.

## Breaches

It is essential that communication is effective throughout the project, especially in the case of any breaches. Breaches found during the project MUST be raised to both the Principal Contractor and Principal Designer who will seek to rectify the breach as soon as reasonably practicable in line with regulatory requirements.

In the role of Principal Contractor, Brenmar Ltd will forward all breaches to the SHEQ team to investigate and provide suitable information, advice and guidance, or seek such from appropriately qualified and experienced third party. All breaches and potential breaches are to be reported. All Breaches will be recorded and fully documented in order to maintain transparency throughout the project.

Brenmar Ltd operate an open-door policy across all management levels to ensure all staff, contractors and subcontractors can raise breaches or concerns with the appropriate supervisor or manager without reprisal. The supervisor or manager will be competent to deal with and record any breaches found or be able to seek an appropriate other on the project and will communicate effectively to the other relevant duty holders.

All managers and supervisors have the authority to suspend works should a breach have the potential to pose an immediate risk directly or indirectly to those present on the project or affected by the project. Whilst the work is paused, control procedures and emergency arrangements will be put in place to contain and reduce the risk and help control the risk during the temporary stoppage. Works will only resume once breaches have been rectified, mitigated and suitable controls, training are in place and communicated.

## Change Log

Brenmar Ltd will communicate with all key duty holders within the projects they undertake to ensure that the change log is kept up to date and revisions are made by only competent persons within the organisation. Changes are recorded via ProCore along with drawing and design changes.

Brenmar Ltd will take on the duties required and ensure competency throughout. All relevant changes are to be recorded with justification, regardless of what may or may not seem important at the time of change. Each change will include a description of the change and why we consider it to be a potentially major or notifiable change.

The Building Safety Regulator (BSR) will be notified of:

- Why the change is to be made.
- All advice sought, regardless if it disagrees with the proposal.
- Who supplied the advice, their occupation and contact details.
- Which documents the change effects.

## Competency

Brenmar Ltd will ensure competency of anyone individual or group carrying out BSA roles within our business, as well as ensuring competency from the beginning of each project; from initial design, on-site build. It is Brenmar

Ltd's directive to ensure that information, instruction and training on the BSA and its directives are provided to our operatives & staff, regardless of their level.

Brenmar Ltd measure competence by ensuring the operatives at all levels have the right knowledge, skills, experience and training in regards to Fire Safety and the BSA. This will ensure that they complete their duties safely and within the framework of the BSA framework. It is important that all duty holders complete a quality check on the Project Strategy and ensure it is communicated to appointed persons.

Brenmar Ltd will ensure fire safety training is kept up to date and that refresher training is carried out at specified intervals. Further in house training, Toolbox Talks and Inductions are also provided. Operatives that feel they do not have the necessary competence, information, instruction or training to carry out their duties safely will be suitably supervised and guided until their competency has been assessed to be sufficient.

The BSA specifies that only "Competent Contractors" can work in or on buildings within the scope of the BSA. Brenmar Ltd will ensure that all contractors undertaking work on our behalf are competent to do so. We will do this by ensuring they complete a pre-qualification questionnaire which will assess various areas of their compliance and competence, including the requirements set under the BSA.

Brenmar Ltd are committed to ensuring ongoing regulatory and legal compliance and are aware of the ever-developing standards, especially around newer legislation such as the BSA.

In order to maintain compliance and continue using relevant practices Brenmar Ltd monitor changes using such Professional Memberships as IOSH, IIRSM, CIEH who provide weekly bulletins and monthly updates and guidance. Brenmar have invested in external BSA awareness training and internal BSA training to further intern competency.

Further compliance amendments are monitored directly from the HSE who are responsible for BSA compliance. Other sources such as Barbour updates, and other third parties are also engaged to ensure continued compliance and competency. Particular attention is given to BSA, Part B: Fire safety and any relevant structural integrity guidance.

Benmar Ltd have a high electrical bias and as such use the NICEIC for technical guidance along with annual compliance, safety and quality checks outside of its own and project related competency checks.

## Training and Awareness

To ensure a high level of understanding of BSA, we provide all employees mandatory BSA awareness training on the requirements and organisational processes and how to report concerns. Training materials are reviewed and updated annually or as new information is released.

## Reporting

Any person who suspects or has concerns regarding BSA must report it immediately.

**Report concerns immediately to Louise Hinckley on 01489 891196.**

Brenmar will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We ensure that no individual suffers detriment as a result of reporting a genuine concern related to BSA.

## Material Sourcing

Selection of materials will be the responsibility of our management team with guidance from the procurement and design team, who will communicate this information to operatives at all levels as required.

Brenmar Ltd will ensure that suitable and sustainable materials are sourced in line with the projects Construction Phase Plan (CPP). The CPP is to be concise, focused, clear and easy for our operatives and others to understand – emphasising key points and avoiding irrelevant and potentially unsafe materials being used on site.

Brenmar Ltd have a robust environmental management system to ISO 14001, which also details further information in regard to material sourcing being environmentally friendly on all projects. Operatives will be given information, instruction and training on materials sourcing to ensure they are competent in fulfilling their duties.

All materials are procured in line with BS & EN safety standards in line with their manufactured use and environment of installation. All materials will reflect the requirements specified by regulation and along with the principal designers specifications. These specifications will include but not be limited to fire resistance, sustainability and durability.

## Supply Chain Management

Brenmar operates a multi-tiered supply chain. The following measures are taken to ensure compliance:

**Supplier Vetting** We require all new and existing suppliers, contractors, and sub-contractors to:

- Confirm they have their own policies and procedures in place to ensure compliance to BSA along with other SHEQ requirements.
- Complete a Pre-Qualification Questionnaire as part of our procurement process.

**Contractual Requirements** All contracts issued by Brenmar contain:

- A specific clause requiring adherence to the BSA.
- The right to terminate the contract immediately if any instance or breach of BSA or other relevant HSEQ regulation is found within their organisation or supply chain.

**Auditing and Monitoring** We conduct periodic risk-based audits. These audits focus on:

- Recruitment practices and verification of identity documents.
- HSE policy and practices, specifically BSA.
- Quality Processes and procedures.

## Design & Build

Brenmar Ltd require all contractors including designers to complete a Pre-Qualification Questionnaire (PQQ) to prove competence within their field and to relevant regulatory and legislative statutes including to but not limited to BSA.

Design requirements area evaluated to ensure compliance with legislation, addressing structural integrity environmental impact, accessibility etc prior to release to site or client.

All Brenmar Ltd build processes whether they involve structural elements follow approved building practices as laid down by the appropriate sector skills council and industrial partnerships or appropriate body; (IET, CITB, Chartered Institute of Building, Institute of Civil Engineers). Contractors must also work to the same standards to ensure that structural design specifications are met and to ensure the stability & safety of works carried out.

All relevant works are reviewed and signed off by a reputable building control officer to further ensure quality of works and legal compliance.

## Inspections and Checks

All Brenmar Ltd projects are subject to regular inspections, audits and quality checks. Inspections, audits and quality checks are carried out by competent individuals at intervals required by the project itself.

All sites are subject, but not limited to the below key inspection areas:

- Health and Safety.
- Fire Safety.
- Environmental Safety.
- Welfare and First Aid.
- Information, Instruction and Training.
- Compliance Documentation.

Expert advice will be sought and taken as and when required, through a full and thorough yearly audit and regular safety inspections carried out to examine, develop and improve compliance controls, techniques and applications already in place.

Formal audits and inspection will happen on a monthly basis or as required with any non-compliance reported and rectified as soon as reasonably practicable to do so.

Site Monitoring shall be carried out on a daily basis by the management team on regular site visits and formally by Brenmar's Ltd internal SHEQ Manager and by the clients third party external Safety Advisor at regular intervals, dependant on the complexity of the project and the clients requirements.

## Fire Safety

BSA fire safety refers to precautions that are taken to:

- Prevent or reduce the likelihood of a fire starting that could result in death, injury or property damage
- Alert inhabitants of a building if a fire starts
- Enable those that are threatened by fire to survive
- Reduce the damage caused by a fire.

Fire safety measures include those that are planned during the construction of a building or are implemented in structures that are already standing. The term includes the actions that occupants of the building have been trained to take in the event of, or prevention of, a fire. Safety systems in place or installed must be fully compliant to the relevant standards and include both detection systems and suppression systems.

Threats to fire safety are referred to as fire hazards. Fire hazards may include situations that increase the likelihood of a fire starting or those that may impede escape once a fire has started.

To ensure that all our activities are undertaken safely and that the risks from a fire are clearly understood throughout the company, we will:

- Carry out and record fire risk assessments for our operations.
- Adopt a smoke-free policy.
- Prepare an emergency fire action plan taking into consideration employees and disabled people.
- Provide appropriate fire safety information and training for employees and others who may be affected.
- Carry out periodic fire drills.
- Maintain the fire safety measures identified by our fire risk assessments such as clear emergency exits; and

- Record information and maintain records.
- Materials used conform to fire resistance standards as indicated through legislation, planning and design.
- Fire stopping is maintained throughout works, or reinstated where works breach existing controls.

The responsible person to deal with fire safety within the companies and works premises will be named and be made known to the workforce. The responsible person will be suitably trained and competent to carry out the duties posed to them.

A Fire Risk Assessment will be completed on our premises and routinely reviewed in line with fire safety regulations. The Fire Risk Assessment will be readily available. Alongside the Risk Assessment Brenmar Ltd will record our fire safety arrangements in a clear and concise manner which will be made available to staff.

## Site Fire and Emergency Procedures

Prior to the commencement of a project, potential emergency situations must be considered. These may include Fires, confined spaces, lifts and dangerous environments to bomb threats. Considerations must be given to not just the reduction of risk but also to the rescue planning and emergency aid.

The emergency response arrangements will differ from project to project, but in each case, emergency contingency plans should be considered at the planning stage.

Fire evacuation procedures will vary from site to site. These will be communicated within the site induction. When working on some premises, a copy of the existing fire procedures will be provided. The fire procedures in place for the site will be included within the Construction Phase Plan and displayed. In all cases employees must follow the instructions given.

Where such arrangements are in place, employees must sign in and out whenever they enter or leave a site. All employees must familiarise themselves with the site fire procedures and escape routes before commencing work.

## As a Principal or Sole Contractor

Brenmar Ltd primarily act as a Principal Contractor Whilst doing so Brenmar Ltd we will ensure that the fire procedures relevant to the site are clearly communicated to employees, visitors and sub-contractors. These procedures will be reviewed as the work progresses, and any changes will be communicated to the relevant persons. Site fire and emergency procedures will align with the requirements of HSG168 as a minimum.

## As a Contractor or Sub-Contractor

Where the Client or Principal Contractor provides a Site Induction, All Brenmar Ltd employees must attend. Where Clients provide copies of fire procedures. All Brenmar Ltd Employees or Sub-Contractors are expected to read and understand the content in addition to following all verbal instructions given.

Where such arrangements are in place, employees and sub-contractors must sign in and out whenever they enter or leave a site.

If employees or sub-contractors are not informed about the fire procedures on a site, they must attempt to familiarise themselves with the site fire procedures and escape routes before commencing work. In the event of uncertainty, work must be suspended until each employee or sub-contractor is aware of the local site fire procedures and escape routes.

## Fire and Emergency Action

Each site or workplace shall be assessed for the potential for fire or emergencies. Where assessments identify high risks, an action plan will be established at that site to deal with such situations. Provision shall be made at each workplace for access on to sites of emergency and rescue service vehicles.

In the event of an emergency, the most senior person on site shall summon by telephone all necessary emergency and rescue services. Provision shall be made for the emergency services to be met at the site entrance and directed to the site of the emergency.

All persons not required to assist in any rescue operation shall be removed from the area of the emergency. Planned escape routes shall be identified at every temporary site accommodation, permanent building and any structure under construction. Appropriate signage in accordance with the Health and Safety (Signs and Signals) Regulations shall be provided to ensure all persons are directed to a place of safety. Instructions in case of fire or emergency shall be included in all induction training.

## Fire Prevention

Rubbish and combustible material shall be regularly cleared away to reduce the risk of fire hazards within the premises or site. Suitable fire extinguishers shall be positioned at workplaces and available to use in the event of a small fire.

In partially built premises and premises being refurbished, arrangements shall be made to ensure that the building can be evacuated safely. Such arrangements shall include providing 'Fire Exit' signs and means of raising the alarm. Where appropriate, fire detection equipment shall be provided

## Hot Works

Hot Work comprises work activities that involve the application or generation of heat during their execution. Such activities include cutting, grinding, chasing, brazing, soldering and the use of blow-lamps etc.

Before any employee or sub-contractor commences hot works, they must ensure that these activities have been adequately covered by the risk assessments for that task. These should be carried out by a suitably competent person(s). The Works Supervisor should have sufficient technical knowledge, training and practical experience of the Hot Work Processes and their associated hazards to supervise any hot work activity

Hot works are controlled by the use of a "Hot works permit". Before any employee or sub-contractor carries out any hot work, they must ensure that these activities have been adequately covered by the risk assessments for that task.

All the control and preventative measures stipulated in the permit to work must be rigorously followed by the employee or sub-contractor and the other members of the work party (where appropriate).

These should be carried out by a suitably competent person(s). The Works Supervisor should have sufficient technical knowledge, training and practical experience of the Hot Work Processes and their associated hazards to supervise any hot work activity.

No "Hot Works" will be allowed on any site without prior approval.

## Review

This policy will be reviewed annually, or more frequently if there are changes in legislation, the organisation's structure, or the nature of its supply chain.

Signed



Mark Harvey

Director

**January 2026**