

Dr Stuart Hodkinson, University of Leeds, [s.n.hodkinson@leeds.ac.uk](mailto:s.n.hodkinson@leeds.ac.uk)  
Phil Murphy, Manchester Sustainable Communities,  
[Phil@ManchesterSustainableCommunities.com](mailto:Phil@ManchesterSustainableCommunities.com)

A Briefing Paper for Residents on the current Government Consultation

## **Building a Safer Future: Proposals for Reform of the Building Safety Regulatory System**

Following the Grenfell Tower fire, the UK government commissioned the Independent Review of Building Regulations and Fire Safety, led by Dame Judith Hackitt. The Hackitt Review concluded in May 2018 that “the current system of building regulations and fire safety is not fit for purpose and that a culture change is required to support the delivery of buildings that are safe, both now and in the future”. In particular:

- the roles and responsibilities of those procuring, designing, constructing and maintaining buildings are unclear;
- the package of regulations and guidance can be ambiguous and inconsistent;
- the processes that drive compliance with safety requirements are weak and complex with poor record keeping and change control in too many cases;
- competence across the system is patchy;
- the product testing, labelling and marketing regime is opaque and insufficient; and
- the voices of residents often goes unheard, even when safety issues are identified.

The Hackitt Review made 53 recommendations and proposed a number of new regulatory structures to strengthen regulation and oversight of four critical aspects of building safety:

- a **new Joint Competent Authority to oversee high-rise safety**, involving fire and rescue services, Local Authority Building Control and the Health and Safety Executive;
- a **new industry-led Overarching Competence Body to oversee** the competence of those working on buildings, and particularly higher risk residential buildings
- a **new market surveillance body to ensure that construction products** are effectively tested, marketed and traced
- a **reformed system oversight structure** to ensure that the **building safety and wider regulatory system** – including the above functions - is performing effectively, and how it could be strengthened

On 6 June 2019, the government launched an 8-week consultation on its 192-page proposal document, *Building a Safer Future: Proposals for Reform of the Building Safety Regulatory System*, setting out a “radically new building and fire safety system which puts resident’s safety at its heart”. The government has also launched a call for evidence about the Regulatory Reform (Fire Safety) Order 2005 and its success in regulating fire safety in non-domestic premises in England including high-rise residential blocks.<sup>1</sup> This briefing paper briefly summarises the main proposals in the main Building Safety consultation.

---

<sup>1</sup> The two consultations can be found here: <https://www.gov.uk/government/collections/independent-review-of-building-regulations-and-fire-safety-hackitt-review>; and <https://www.gov.uk/government/consultations/the-regulatory-reform-fire-safety-order-2005-call-for-evidence>

# 1. The Existing Safety System for High-Rise (and All) Buildings

There are three main stages of the current regulatory framework governing the fire safety aspects of high-rise and indeed all residential buildings in England.

*Stage 1 is the **planning application stage** for a new building / major refurbishment of an existing building as primarily set out in the Town and Country Planning Act 1990.*

Fire safety is not normally considered at this stage except for emergency service vehicle access to buildings. Neither applicants nor adjudicators are required to have any specific fire safety knowledge; Fire and Rescue Services (FRS) are not statutory consultees and although may be consulted, Hackitt found this practice varies across local planning authorities.

*Stage 2 is the **building regulations stage** as per the Building Act 1984, the Building Regulations 2010 and the Approved Documents.*

The Building Act 1984 enshrines in law building standards, which are translated into performance-based<sup>2</sup> requirements – technical standards that building work must achieve once completed – as set out in Schedule 1 to the Building Regulations 2010. Building Regulations apply to both new buildings, and normally when a building is either being refurbished or its use is being changed (although there are important exceptions – see below). The most relevant for safety are Part A – Structural Safety; Part B – Fire Safety including (B1) ensuring a means of warning and escape, (B2, B3) preventing internal spread of fire, (B4) preventing external fire spread over walls and roof, (B5) ensuring access and facilities for fire fighting; and Regulation 7 – Materials and Workmanship. Statutory guidance, known as Approved Documents, provides specific examples of how each requirement could be met. Building regulations are primarily enforced by statutory bodies known as Building Control Bodies (BCBs) who check all significant new building work for compliance unless the work is very limited or can be covered by a competent person scheme (see below). Those undertaking building work can choose to use either Local Authority Building Control (LABC) or a private sector Approved Inspector (AI). Breaches of building regulations can lead to prosecution and unlimited fines as well as orders to remove or alter offending work.

Hackitt found the current system to be deeply flawed:

- Box-ticking culture led to combustible cladding at Grenfell Tower;
- Obstacles to proper compliance-testing
- Unsatisfactory fire service role
- Opt-outs and loopholes for refurbishment work
- Self-certification of too much building work
- No laws on professional standards for building inspectors
- Race-to-the-bottom due to part-privatisation and competitive market for building inspectors
- Limited enforcement powers

---

<sup>2</sup> This contrasts with a 'prescriptive' system (which existed in the post-war era) listing precisely how any building must be constructed.

*Stage 3 is the **residential occupation (and ongoing maintenance) stage** as primarily set out in the Regulatory Reform (Fire Safety) Order 2005 and the Housing Act 2004*

#### *The Fire Safety Order 2005*

The FSO requires that in residential buildings with common parts – for example, common staircases, corridors and the external doors to each flat – the “responsible person” (normally the building owner, landlord or managing agent) must ensure that general fire precautions are in place. The relevant fire safety information must be handed over to the “responsible person” immediately prior to occupation / completion of refurbishment. The responsible person must then carry out, and regularly review, a fire risk assessment (FRA) and implement and maintain improved fire safety measures. Fire and rescue services (FRS) are normally the statutory enforcing authorities, discharging this duty by visiting premises and reviewing the adequacy of the FRA. Minor infractions usually lead to an informal notice recommending that improvements be made. In cases of significant risk to life, FRS can issue a range of notices, including a Prohibition Notice to shut the premises; refusal to comply with statutory notices can lead to court action. Minor penalties can lead to fines of up to £5,000. Major penalties can lead to potentially unlimited fines and up to two years in prison.

Hackitt found serious weaknesses with the FSO regime with respect to high-rise flats:

- It only covers common parts of buildings;
- Based on self-regulation and is not prescriptive
- No minimum requirements of competency for fire risk assessor
- No requirement that every building is inspected by fire and rescue service
- Handover of fire safety information from construction to occupation often fails to occur
- Cuts to fire and rescue services, lower inspections etc

#### *The Housing Health and Safety Rating System 2005 (HHSRS)*

Unlike the FSO, the HHSRS applies to all parts of residential buildings, including both individual flats. It is a largely reactive system normally triggered by a complaint from a tenant about their housing conditions. The HHSRS provides local authority EHOs with a framework of 29 identified hazards, including one for fire risk, a range of powers to investigate and, where necessary, can require landlords to improve standards and remove hazards. Local authorities have powers of entry without the landlord’s permission. Any category 1 hazards (serious risks to the health and safety of the occupants) compel the local authority to take appropriate action whether an Improvement Notice with required improvements within a set period of time, a Prohibition Notice that requires landlords to stop renting their property, Emergency Remedial Action by the local authority re-charged to the landlord, or Demolition/Slum Clearance Order to demolish the building. Where there is a category 2 hazard of less serious risk, local authorities may take action but are not obliged to do so. Failure to comply with an Improvement Notice is a criminal offence for which local authorities can impose a financial penalty of up to £30,000 or prosecute in the courts, which have the power to impose an unlimited fine. A local authority can also seek a Rent Repayment Order covering up to 12 months’ rent. Ignoring a Prohibition Notice is also a criminal offence and the courts have the power to impose an unlimited fine.

Hackitt found:

- EHOs cannot take enforcement action against local authorities.
- Primarily reactive system that does not proactively manage fire risks
- Expertise on fire safety issues by EHOs is not high

## 2. The Government's Proposals for a New Building Safety Regime for high-rise residential buildings

The key features of the government's new building safety system for England are:

- it will cover **all multi-occupied residential buildings of 18 metres (approx. 6 storeys) or more in height**;
- a new **Building Safety Regulator** will oversee and enforce the new safety regime with new civil and criminal enforcement powers;
- named **dutyholders** – people involved in the design, construction and management of high-rise buildings – will have clear legal responsibilities **at each stage of the building's life-cycle** (planning, design, construction, occupation) or face enforcement action;
- every building will be required to have an **accountable person** (i.e. the owner, landlord, managing agent) who must register themselves, the building, and a new legally-required Building Safety Manager with the regulator;
- occupation can only commence once a **building safety certificate** has been issued, meaning that a **safety case**, a **resident engagement strategy** and a **golden thread of building safety information** have been deposited and approved by the regulator;
- where **residents safety concerns** have not been satisfied through the internal complaints process, they will be able to escalate them to the regulator with the possible removal of the building safety certificate as a penalty.

We now explore in more detail the proposals in three ways: the scope of the regulations; the role of the regulator and enforcement system; and the role and rights for residents.

### 2.1 The Proposed Scope

The proposed new system will cover **all multi-occupied residential buildings of 18 metres (approx. 6 storeys) or more in height and apply** at the design and construction stage to new builds, and as appropriate, to major refurbishments; and at the occupation stage both to new builds and to existing buildings (after a suitable transition period).

The government is also consulting on whether other types of high-rise and low-rise residential buildings should be included such as prisons, detention centres, hospitals and other health care premises with overnight accommodation, supported/sheltered housing, educational buildings such as boarding schools and halls of residence, and 'higher risk workplaces' that may – as a result of their use – also present the potential for catastrophic incidents that could cause multiple fatalities such as care homes.

### 2.2. The New Building Safety Regulator and Enforcement System

The government is proposing a new **Building Safety Regulator** to oversee and enforce a more stringent safety regime for 18m+ residential high-rise buildings with responsibilities for: maintaining a building register, ensuring an effective building and information inspection system, acting upon evidence of safety non-compliance, regulating the competence of professions and trades working on buildings, and ensuring that the wider building safety and regulatory system as a whole is fit for purpose.

#### 2.2.1. The Dutyholder Regime

At present the legal duties under building regulations are only vested in the person undertaking building work. The government is proposing a new Dutyholder Regime

encompassing everyone involved in the design, construction and management of high-rise buildings. Dutyholder roles in design and construction will align with the Construction (Design and Management) Regulations 2015 (CDM): the **Client; the Principal Designer; the Principal Contractor, and other Designers and Contractors**. When a building is in occupation, the dutyholder will be the **Accountable Person** who has control of the building – normally the building owner or its management company.

### **2.2.2. The Gateway Process**

To address the existing regulatory regime's over reliance on a flawed building control system to identify and assess building safety risks, the Government will establish **Gateway Points** during the design and construction (or major refurbishment) at which Dutyholders' safety compliance must satisfy the Regulator or they will be stopped from moving to the next stage of development, accompanied by civil penalties and criminal prosecutions.

- Gateway one occurs at the planning application stage – but only for residential buildings of 30 metres or more in height

Applicants will have to produce a **Fire Statement**, setting out how fire and rescue services will access the building and water supplies in the event of a fire proportionate to the development's scale and type, and include details of any height, width or layout constraints that may impact on fire service access. Before the Regulator is set up, the government proposes that **Fire and Rescue Authorities become statutory consultees** to the planning process on these matters, and that they / the Regulator are also consulted on **applications for developments within the 'near vicinity' of 30m buildings**.

- Gateway two occurs at the full plans building design application stage as per the Building Regulations 2010 before construction begins

Relevant dutyholders will be required to provide: full detailed plans/specification of building works in respect of fire and structural safety; supply chain information including competency to perform roles; a 3D digital model of the building 'as planned'; a Fire and Emergency File containing key building safety information including building type, fire strategy, fire protection systems, and evacuation strategy; and a Construction Control Plan for maintaining building safety and regulatory compliance during the construction phase. Gateway two will be a "hard stop" before the regulator gives permission for construction to begin, to incentivise dutyholders to consider fire and structural risks at the earliest opportunity.

- Gateway three take place before the building is permitted to be occupied / or at the point of the current completion certification/final notice stage under the building regulations.

The dutyholder will be required to hand over all required building safety information about the final, "as built" building before occupation is permitted, including any deviations from the original design. During construction the Principal Contractor will be required to consult and get approval from the Client / Principal Designer before deviating from original full plans and then notify the Regulator of any proposed major changes before carrying out the relevant work. Any work that contravenes requirements would be pulled down, or removed, or laid open for inspection if necessary to adequately check compliance with the building regulations. Building work would not be allowed to restart unless non-compliant work is remedied. Unlike the current system, where building control bodies verify compliance with the regulations through a completion certificate or a final notice, the government is proposing that the principal contractor be required to produce a final declaration with the principal

designer confirming that the building complies with building regulations. The regulator would decide whether to accept the declaration or request further information.

### **2.2.3. Duties in occupation**

#### *The accountable person*

An **Accountable Person** will be named for the occupation phase of residential buildings who will be legally responsible for ensuring that building safety risks to occupants are reduced so far as is reasonably practicable and adequate measures are in place to manage building safety. The Accountable Person may be an individual, partnership or corporate body, but should have control of the building and therefore in most cases be the relevant building owner (freeholder or head lessee, including overall landlord, or Commonhold Association) or a management company. They must have an address in England or Wales to where notices can be served. A named **Building Safety Manager** must be appointed and registered with the regulator for each building who meets the competency requirements set by the regulator. As a last resort, where there is no one suitable, the Regulator would appoint an independent building safety manager, funded by a cost order on the accountable person. The Accountable Person may not delegate or transfer this legal accountability to another party – only the Regulator can upon application by the Accountable Person. Prior to the transfer of the interest or management of the building, the prospective new accountable person would have to apply to the Regulator and if successful would become liable for conditions applicable for the whole period of the registration including any previous liabilities that fell to previous accountable persons. For new residential buildings, the Accountable Person must register themselves and the building with the Regulator before the building can be lawfully occupied. For existing residential buildings, similar requirements will be implemented following a transitional period.

#### *Building safety certificate*

The Accountable Person will be legally required to obtain a **Building Safety Certificate** for their building from the Regulator or face criminal prosecution. Obtaining a Certificate would rest on submitting a satisfactory **Safety Case** to the Regulator, which would go beyond a fire risk assessment and demonstrate that fire and structural risks are being managed so far as is reasonably practicable, emergency preparedness and that legislation, requirements, standards and policies applicable, have been met or complied with. The Certificate would contain the agreed conditions for ensuring the building is safe for residents and a summary would have to be displayed in a prominent part of the common parts of the building for occupants to see. These conditions should extend to all parts of the building including, for example, individual flats where they can access them, in so far as they form part of the safety system of the building as a whole and, in the case of complex buildings, parts of the building which are owned by others.

For new buildings, the Regulator would not permit the building to be occupied until a certificate has been issued and the building has been successfully registered. For existing buildings, a transitional implementation period is proposed and the Regulator may require less information in order to avoid placing unreasonable requirements on existing building owners. In such circumstances, the accountable person will need to explain why this is reasonable and what steps have been taken in mitigation against the (potentially unknown) risks, so far as is reasonably practicable. The Accountable Person may decide to undertake an intrusive survey as a first step to build an accurate record to support the safety case, such as a Type 4 fire risk assessment, which looks at fire and structural risks, in both the

common parts and the flats, carried out on a sampling basis and only in those that are vacant.

### *Remediation costs after a failed safety case*

Currently such costs fall on leaseholders and landlords in the same way that costs for other major works in multi-occupied residential buildings would, including those arising from Fire Risk Assessments required under the Fire Safety Order. The government is seeking views on how costs for leaseholders could be mitigated whilst ensuring that crucial safety works issues are assessed and addressed in a proportionate way and that, where needed, they are conducted quickly, to keep residents safe whilst allowing for costs to be recovered.

### *Duties that run throughout a building's life cycle*

Government will require a **golden digital thread** of accurate and up-to-date information about the design, construction and ongoing maintenance of residential buildings through the whole lifecycle of a building. This golden thread will record the original design intent and capture subsequent changes to buildings so that this crucial information is easily available to the right people at the right time. It will include a 'key dataset' that will always be publicly available and be maintained through the lifecycle of the building held in a specified format that should be open and accessible by default and could include: unique building identifier; location; size (e.g. height, storeys, footprint, number of dwellings); building type/purpose; years built and refurbished; minimal information (e.g. quantity and location) on safety-related features (e.g. fire doors, sprinkler systems); façade and structure information; dates and outcomes of gateway points and safety case reviews; and current and past dutyholders, accountable persons and building safety managers. Some of the information in the golden thread will not be made publicly open for security reasons.

A system of **mandatory occurrence reporting will be introduced** with a legal responsibility on the dutyholders to establish an internal reporting mechanism and report to the Regulator specific occurrences such as product failures, installation defects, structural defects, failures of safety components and systems. Failure to do so will be seen as non-compliance and the Regulator will intervene. A 'just culture' will be created where workers have confidence to report safety concerns without fear of blame; that their confidentiality will be maintained; and that the information they report will be acted upon. To enable this, the Regulator would become a prescribed person under the Public Interest Disclosure Act 1998 (PIDA) so as to protect workers from detrimental treatment or victimisation by their employer for whistleblowing in the public interest.

Dutyholders will be responsible for ensuring their employees and contractors have the **appropriate competency** to discharge their functions. These competencies will be developed by industry and other experts and maintained as part of the suite of national standards that comprise the overarching competence framework under the stakeholder-led governance of the national standards body. New training and qualification for the enhanced competence requirements will be developed by market providers which should be accredited by UKAS or other suitable body. A register of competent Principal Designers, Principal Contractors and building safety managers will be maintained by the Regulator.

#### **2.2.4. The Regulator's enforcement powers**

The Regulator will have statutory powers to proactively intervene and monitor the design, construction and occupation of high-rise buildings where non-compliant behaviour is alleged or proven. A three-step process is envisaged: informal dialogue with the dutyholders to

incentivise compliance; where this fails, or where the offence in question warrants more serious action, stop notices or improvement notices would be issued; and where these stages fail to achieve compliance, the Regulator will take enforcement action through formal orders, penalty fines, by reviewing and revoking the building safety certificate, and/or prosecuting the dutyholders. It would be a criminal offence: to carry out work without having acquired the necessary permission by the building safety regulator to proceed through the gateway regime; for an accountable person not to make a valid application for its registration within the relevant time limit; and to breach conditions imposed by the Regulator when issuing, reviewing or renewing a building safety certificate.

Under Section 35 Building Act 1984 a person convicted of contravening relevant building regulations is liable to an unlimited fine, plus a further fine of up to £50 for each day on which the default continues after conviction. The maximum time limit for bringing such a prosecution is up to two years after the offence was committed. Section 36 Building Act 1984 empowers a local authority to require a building owner to pull down or remove non-compliant work or alter the work to make it compliant. The time limit for serving such a notice is up to one year after the work has been completed. The government is proposing to change these laws for all building work, not just for high-rise, as follows: the time limits under sections 35 and 36 of the Building Act would be increased to six or 10 years respectively; the trigger point for these powers should be following the completion of non-compliant work; where a latent defect is not obvious upon a reasonable inspection, or is deliberately covered up, the time limitations would apply from when the defect is discovered. To overcome the delays and costs inherent in prosecution, the Regulator will be permitted to introduce fixed and variable monetary penalties for building safety breaches. So lesser offences will be dealt with through quick fines, while criminal sanctions will be used for the worst offenders and repeated non-compliance. Section 38 Building Act 1984 provides a private right of action where a breach of building regulations causes damage (including the death of, or injury to, any person) and enables the Secretary of State to make regulations to set out defences to a claim for such a breach of duty. However, no such regulations have been made and the section has not been brought into force to enable claims to be made. Government is seeking views on whether it should commence section 38 and, if so, whether section 38 requires any amendment before being brought into force.

### **2.3. The Proposed Role and Rights for Residents in the New Regulatory System**

The safety of residents is of paramount importance and the Government is determined to ensure that the views and interests of residents are at the heart of the new building safety regulatory framework... It is crucial that Government ensures that the views and concerns of residents can never be ignored by those responsible for managing the safety of their buildings.<sup>3</sup>

Under the new high-rise safety system, the building owner / landlord (Accountable Person) will be required to:

- proactively provide residents the necessary information to help them understand the building safety protections in place in a clear and accessible format, and provide further and more detailed information about these safety measures upon request unless exemptions are in place;

---

3

- develop with residents a Resident Engagement Strategy so they are empowered to play an effective role in keeping their building safe; and
- address and resolve residents' concerns about fire and structural safety, with residents being able to use a clear route of escalation to the Regulator if their safety concerns are not being dealt with effectively.

### **2.3.1. Information sharing with residents**

The accountable person will be required to proactively provide residents with the information they need to help them understand the protections in place to keep their building safe in a clear and accessible format. This would include the measures in place to mitigate potential fire and building safety risks to residents, how to reduce the risk of fire in individual dwellings, the process for reporting a fire risk and raising other safety concerns, what to do in the event of a fire, the different roles and responsibilities of the accountable person, building safety manager and residents, and contact information for the Building Safety Manager. The Accountable Person would also have to provide residents with further and more detailed safety information upon request including: full, current and historical fire risk assessments; planned maintenance and repairs schedules; outcome of building safety inspection checks; how assets in the building are managed, e.g. lift maintenance; details of preventive measures, e.g. smoke alarms; fire protection measures in place, e.g. sprinklers, fire extinguishers; information on the maintenance of fire safety systems; the fire strategy for the building; structural assessments; and planned and historical changes to the building. Exemptions would prevent information being released that would compromise building and resident safety, privacy of residents, or any intellectual property rights. Residents would have the right to appeal to the Regulator if they thought exemptions were being used incorrectly.

### **2.3.2. The Resident Engagement Strategy**

This must be produced as part of the Safety Case prior to occupation for new buildings / as part of the registration of existing buildings, to empower residents to play an effective role in making sure that their building is, and remains, safe. The Resident Engagement Strategy would have two parts:

- a Management Summary setting out how the accountable person will deliver genuine resident involvement and participation in their buildings, their approach to communication with residents including information sharing, complaints handling, resident involvement in decision-making, meeting the diverse needs of residents, and measuring the success of their resident engagement, resident satisfaction.
- an Engagement Plan setting out how the strategy will work in practice in their building, setting out as a minimum the roles, responsibilities, and contact details of those responsible for the building's safe management, what communication and engagement residents can expect from their building safety manager, how often, and how residents can then get more involved if they want to, how the building safety information will be proactively provided to residents, how residents can access the information that they are entitled to see on request, details of the internal complaints process and how issues can be escalated where the accountable officer is unable to resolve the issues, how the building safety manager will report the results of safety case reviews and other safety checks to residents; and how the building safety manager will measure the effectiveness of their resident engagement. The building safety manager would be responsible for delivering the engagement plan on a day-to-day basis, as the first point of contact for residents. Where necessary, proportionate special provision would be required for residents who are vulnerable or have additional needs, for example, residents who have

a physical or visual impairment, have other disabilities or who do not speak English. The Regulator would review, approve and sign off the Engagement Strategy as part of either issuing the certificate under gateway three for new buildings or approving the safety case for existing buildings. The Strategy should be reviewed as part of all future reviews of the building safety case, and when the building safety regulator investigates concerns that the Strategy is not being put into practice.

### **2.3.3. The route to the regulator**

Where the internal process has failed to resolve a fire and structural safety concern, residents will be able to escalate them to the Regulator. Failure to comply with the Regulator would in most cases lead to a formal review of the accountable person's building safety certificate. Residents will also be able to challenge the decisions made by the Regulator through a clear and transparent appeals process. Residents may also request a review of the building safety certificate by the Regulator where there is evidence that the accountable person is not complying with its conditions. Residents may go direct to Regulator where failure to act to address **the urgent safety concern could lead to injury or loss of life**.

Wider investigations by the Regulator may follow to consider whether the accountable person's internal process was fit for purpose. The Regulator will also collect information about concerns raised against individual accountable persons/building safety managers and will act to review the building safety certificate where systemic issues emerge. Where a building safety certificate is revoked the Regulator will be able to intervene and fulfil the functions of the accountable person by appointing a building safety manager. These arrangements will stay in place until the Regulator is able to grant a new building safety certificate. There should be a 'no wrong door' approach to building safety. If residents raise concerns via existing redress schemes or their local authority, those bodies will then escalate the concern to the building safety regulator on the resident's behalf. To prevent residents from having to approach multiple bodies with the same complaint this escalation route will be supported by a **duty to cooperate** between a range of interested parties such as existing redress schemes and other new regulatory bodies.

### **2.3.4. Proposals for residents' responsibilities**

Where residents do not fully play their part in ensuring the fire and structural safety of their home and building, they could be putting others in and around the building at risk. One way of addressing these concerns would be to introduce a requirement on residents to cooperate with the accountable person and/or building safety manager. This would be similar to existing requirements that apply to residents in certain types of Houses in Multiple Occupation (HMO) to cooperate with a manager in ensuring the safety of the building. Any new requirements on residents would need to be specific to fire and structural safety and relevant to the ability of accountable persons or their agents to fulfil their duties under the new regime. They could, for example, include residents providing reasonable information on works carried out to their property and providing reasonable access by allowing the accountable person or building safety manager to inspect and carry out necessary works (such as fitting fire alarms) or undertaking fire and structural safety-related maintenance. Where information or access is required, the accountable person or the building safety manager will provide the resident with reasonable notice.