

Building Safety Management Plan

Pinnacle Group



Contents

Document control and application.....	2
Role applicability	2
1. Building Safety Commitment.....	2
2. Purpose and scope	3
3. Regulatory framework and Building Safety Regulator	4
4. Roles, responsibilities and governance	4
5. Building safety risk management	5
6. Resident engagement, complaints and the resident voice	7
7. Managing building safety information and the Golden Thread	7
8. Managing work in existing higher-risk buildings	8
9. Contractor and competence management	10
10. Mandatory Occurrence Reporting and safety concerns	10
11. Emergency response and resilience	11
12. Assurance, monitoring and continuous improvement.....	12
13. Key principles by Pinnacle role	12
14. References	13
15. Related procedures	13
Appendix A Building-specific responsibility schedule.....	14
Appendix B RACI-style control summary	15
Appendix C Minimum supporting procedures and records	15

Document control and application

This Building Safety Management Plan (BSMP) sets the framework by which Pinnacle Group manages its statutory and operational building safety responsibilities for occupied higher-risk residential buildings (HRB). It should be read with each building's building-specific safety case information, fire and structural risk assessments, resident engagement arrangements, emergency information, compliance records and local operating procedures.

Important accountability principle

Nothing in this Plan transfers statutory accountability from an AP, PAP, Responsible Person, client, principal designer, principal contractor or other duty holder. Pinnacle may arrange for employees, managing functions, consultants or contractors to perform activities, but statutory accountability remains with the person or organisation on whom the relevant duty is imposed.

Role applicability

Pinnacle role	How this Plan applies
Pinnacle is AP but not PAP	AP duties apply to the common parts for which Pinnacle is legally responsible. Pinnacle cooperates and coordinates with the PAP and other APs and supplies relevant information. PAP-only duties remain with the building's PAP.
Pinnacle is PAP	AP duties and the additional PAP duties apply. This currently applies to six buildings. Building-specific records must identify these assets.
Pinnacle performs a management/service function	The service is delivered to the agreed scope and supports the relevant statutory duty holder. A management activity alone does not make Pinnacle the statutory AP, PAP or Responsible Person (RP)

1. Building Safety Commitment

Pinnacle is committed to managing buildings so that residents and other building users are protected from building safety risks with particular focus on the spread of fire and structural failure. We will provide proportionate governance, competent resources, reliable information and effective controls to support compliance with the Building Safety Act 2022 (BSA) and associated legislation.

- Prioritise life safety when making decisions about building management, maintenance and investment.
- Assess and manage building safety risks in the parts of HRBs for which Pinnacle is accountable.
- Where Pinnacle is PAP coordinate whole building arrangements and the activities of other APs as required.
- Engage residents and provide clear routes for raising building safety concerns and complaints.
- Maintain accurate, accessible, secure and up-to-date building safety information within Pinnacle's responsibility.

- Use competent employees, consultants and contractors and monitor work that can affect fire or structural safety.
- Cooperate with the Building Safety Regulator (BSR), fire and rescue authorities, local authorities, RPs, clients and other APs.
- Record, escalate and act on defects, incidents, overdue safety actions and emerging risks.
- Promote continuous learning from inspections, incidents, complaints, mandatory occurrences and regulatory feedback.

2. Purpose and scope

2.1 Purpose

The BSMP provides the overarching management system for Pinnacle's in-occupation building safety responsibilities. It describes governance, accountability, risk management, information control, competence, resident engagement, works control, assurance, incident response and regulatory interfaces. It is not a substitute for a building-specific safety case or Safety Case Report.

2.2 Scope

The Plan applies to occupied higher-risk residential buildings in England where Pinnacle is an AP and/or PAP. For Part 4 of the BSA an in-scope HRB is generally at least 18 metres in height or at least seven storeys and contains at least two residential units, subject to the statutory definitions and exclusions.

The design and construction regime is relevant where building work is undertaken to an existing HRB. In those circumstances the client and appointed duty holders must determine and follow the applicable building control route. Pinnacle will ensure that work it commissions or controls is appropriately screened before work starts.

2.3 Building-specific application

Each higher-risk building shall have an identified record setting out:

- the legal entity acting as PAP;
- all APs and their areas of responsibility;
- Pinnacle's legal and operational role;
- the RP under the Fire Safety Order and areas of control;
- the building's current Safety Case Report status and Building Assessment Certificate status;
- the location of Golden Thread information and document owners;
- key risk controls, emergency arrangements and resident communication routes.

3. Regulatory framework and Building Safety Regulator

3.1 Regulatory framework

Pinnacle's arrangements are informed by the BSA, Building Regulations 2010 as amended, Building Act 1984, Regulatory Reform (Fire Safety) Order 2005 as amended, Fire Safety Act 2021, Fire Safety (England) Regulations 2022 and relevant secondary legislation made under the Building Safety Act. Requirements will be monitored for change and this Plan updated where necessary.

3.2 Building Safety Regulator

The BSR regulates the higher-risk building regime in England. Pinnacle will cooperate openly with the BSR, provide information for which it is responsible, meet statutory deadlines and ensure regulatory correspondence, submissions, decisions and actions are controlled and retained.

3.3 Enforcement and escalation

Potential non-compliance, enforcement correspondence or a significant deterioration in a building safety control must be escalated promptly through Pinnacle's governance arrangements. Immediate risk reduction takes priority. Actions, owners, timescales, interim measures and evidence of closure must be documented.

4. Roles, responsibilities and governance

4.1 Accountable Person

An AP is the person or organisation that owns, or has a legal obligation to repair, relevant common parts of an occupied HRB. Where Pinnacle is an AP it will assess and manage building safety risks for the parts for which it is responsible, keep and provide prescribed information, cooperate and coordinate with other APs and the PAP and fulfil applicable reporting duties.

4.2 Principal Accountable Person

Every occupied HRB has one PAP. Where there is one AP, that AP is the PAP. Where there is more than one AP the PAP is normally the AP responsible for the structure and exterior. Pinnacle currently acts as PAP for six buildings.

For those six buildings, Pinnacle will undertake the additional PAP functions including the applicable arrangements for registration and key building information, building assessment certification, preparation and maintenance of the Safety Case Report, operation of the building-wide resident engagement strategy, complaints arrangements and a single mandatory occurrence reporting system together with coordination of APs where this applies.

4.3 Other APs and the PAP where Pinnacle is not PAP

Where Pinnacle is AP but another entity is PAP, Pinnacle will provide timely building safety information relating to its area of responsibility, cooperate on whole-building risk controls, notify relevant changes and occurrences, support the building assessment process and resident engagement arrangements and respond to reasonable information requests. Pinnacle will not describe itself as performing or owning statutory PAP duties that sit with another organisation.

4.4 Responsible Persons

The RP under the Fire Safety Order is determined by the statutory test and the extent of control over relevant premises. The AP/PAP and RP regimes can overlap but are not interchangeable. Building-specific responsibility mapping will identify the relevant parties and coordination arrangements.

4.5 Pinnacle governance

Role/function	Core responsibility
Senior leadership	Set expectations, provide resources, oversee material building safety risk and regulatory issues.
Head of Building Safety / Building Safety function	Technical governance, interpretation, assurance, AP/PAP framework, regulatory coordination, escalation and continuous improvement.
Operational/Property Management	Day-to-day building management, resident interface, contractor coordination, inspections, action management, local records and escalation.
Technical/Compliance functions	Planned compliance activity, specialist review, asset data, maintenance standards, remedial work and evidence of completion.
Employees and site teams	Follow controls, report defects and incidents, maintain records and escalate concerns within competence and authority.
Consultants and contractors	Demonstrate competence, follow approved scope and controls, report changes/defects and provide completion evidence and updated information.

5. Building safety risk management

5.1 Risk management objective

Pinnacle will take all reasonable steps within the scope of its AP responsibilities to prevent a building safety risk materialising and to reduce the severity of any incident should one occur. Building safety risks concern the spread of fire and structural failure.

5.2 Risk management cycle

- Understand the building, its construction, systems, occupancy and interfaces.
- Identify fire-spread and structural hazards using suitable assessments, inspections, records and specialist advice.
- Evaluate risk and identify the preventive and protective measures relied upon.
- Assign actions to competent persons with proportionate priority and target dates.
- Implement interim controls where a defect cannot be immediately rectified.
- Verify completion and effectiveness, not merely administrative closure.
- Update relevant building information and safety case evidence.
- Monitor changes, incidents and emerging information which could invalidate an existing risk argument.

5.3 Building Safety Case and Safety Case Report

The building safety case is the body of information and evidence used to understand and manage building safety risks. The Safety Case Report (SCR) is the structured report demonstrating how those risks are identified, assessed and managed and how the required risk management steps are being taken.

Where Pinnacle is PAP it will ensure the SCR is prepared, maintained and capable of being provided to the BSR when required. Where Pinnacle is AP only, Pinnacle will provide the PAP with information and evidence relevant to Pinnacle's area of responsibility and notify material changes that may affect the whole-building safety case.

5.3.1 Review triggers

- new information indicating a previously unidentified or increased fire-spread or structural risk;
- significant building work or change to systems, layout, structure, external wall or fire strategy;
- a mandatory occurrence or serious incident;
- material findings from FRA, FRAEW, structural appraisal, intrusive investigation or compliance inspection;
- significant change in use, occupancy or management arrangements;
- regulatory feedback or enforcement;
- change of AP/PAP or responsibilities;
- significant legislative or guidance change.

5.4 Building Assessment Certificate

Where Pinnacle is PAP, it will respond to a BSR direction to apply for a Building Assessment Certificate (BAC) and provide the required information within the applicable timeframe. The submission will be governed, quality-assured and retained. Any certificate and required prescribed information will be displayed or provided

as required. Where Pinnacle is AP only, it will support the PAP by supplying relevant information in sufficient time.

5.5 Statutory compliance and action management

Fire safety, structural safety and supporting statutory compliance activities will be planned and monitored through Pinnacle's approved systems. Findings will be risk-rated, assigned to an accountable owner and tracked to verified closure. Overdue high-risk or safety-critical actions will be escalated and suitable interim measures considered by competent persons.

6. Resident engagement, complaints and the resident voice

6.1 Resident engagement

Residents are an important source of information about how a building operates in practice. Pinnacle will provide accessible routes for residents to raise safety concerns, report defects and obtain relevant information. Communications should be clear, timely and appropriate to the needs of residents.

Where Pinnacle is PAP, it will prepare operate and review the statutory Resident Engagement Strategy (RES) for the building and involve residents in decisions about building safety matters in accordance with legal requirements. Where Pinnacle is AP only it will cooperate with the PAP's strategy and provide information and support relevant to Pinnacle's responsibilities.

6.2 Building safety complaints

Building safety complaints will be recorded, acknowledged, assessed, allocated and tracked. Urgent life-safety issues are escalated immediately. Where Pinnacle is PAP it will ensure the statutory complaints system is in place and that escalation to the BSR is supported where the statutory route applies. Records will demonstrate the issue raised, assessment, communications, decision, action and closure.

6.3 Resident responsibilities

Residents will be encouraged to avoid damaging safety measures, allow lawful access where required for safety work, follow relevant fire and building safety information and report defects or concerns promptly. These expectations do not reduce Pinnacle's statutory duties.

7. Managing building safety information and the Golden Thread

7.1 Information principles

Pinnacle will manage Golden Thread information within its responsibility so that it is electronic, accurate, intelligible, secure, accessible to authorised users, transferable and kept up to date with an appropriate record of changes. The Golden Thread is an information-management requirement not a single software product.

7.2 AP and PAP boundaries

Where Pinnacle is AP only it is responsible for creating, keeping and providing the prescribed information for the areas for which it is accountable and for sharing relevant information with the PAP and other APs. Pinnacle does not claim ownership of the entire building Golden Thread solely because it provides management services.

Where Pinnacle is PAP it will additionally coordinate the building-wide information required of the PAP while recognising that other APs remain responsible for the accuracy and provision of information within their respective areas.

7.3 Information controls

- defined document/data owner and approval status;
- consistent asset/building identifiers and naming conventions;
- version control and retention of superseded records where relevant;
- controlled access and appropriate data security;
- linkage between risk assessments, actions, works and completion evidence;
- change records identifying what changed, why, by whom and when;
- timely sharing with prescribed persons and incoming APs/PAPs;
- quality checks for completeness, currency and accessibility.

7.4 Typical information

- building plans, specifications, surveys and construction information;
- fire strategies, evacuation information, FRA/FRAEW records and fire-safety system information;
- structural assessments, inspection records and identified structural safety measures;
- inspection, test, maintenance and certification records;
- building work approvals, change control and completion information;
- Safety Case Reports and supporting evidence;
- RES, complaints and MOR records where applicable;
- AP/PAP, Responsible Person and relevant duty holder information.

8. Managing work in existing higher-risk buildings

8.1 Principle

No work that may affect fire or structural safety should proceed without appropriate screening, competent design and delivery arrangements, approval through the correct building control route where required, and

controls for change and information handover. The project client has a central role under the building regulations duty holder regime; AP/PAP responsibilities in occupation must also be protected.

8.2 Work classification and building control

Before work starts the competent project team must establish whether the proposal is building work, whether BSR is the building control authority and whether the work falls within an applicable route such as Category A work, Category B work, work under a competent person scheme, exempt work or emergency repairs under the current regulations. Where BSR approval is required before work, work must not commence until the statutory requirements have been met.

8.3 Pre-start controls

- confirmed scope, client and duty holder appointments;
- competence assessment proportionate to the work;
- building control route and approvals confirmed;
- assessment of impact on fire spread, structural safety and safety-critical systems;
- RAMS, construction phase arrangements and permit requirements;
- resident and operational interfaces, including access and emergency arrangements;
- required Golden Thread outputs and handover deliverables defined before appointment.

8.4 Permit and access controls

Pinnacle will use proportionate permit/access controls for safety-sensitive activities, which may include hot work, impairment of fire precautions, compartmentation penetrations, work to fire doors or active fire systems, roof/access equipment, structural intervention and other activities identified by risk assessment. A permit does not replace statutory building control approval.

8.5 Change control and completion

Unapproved deviation from an approved or safety-critical design is not acceptable. Changes must be assessed by competent persons and processed through the applicable statutory and project change-control route. At completion, the required evidence, certificates, test results, marked-up drawings, product information and other Golden Thread outputs must be checked and transferred to the relevant information owner. Safety case information must be reviewed for consequential change.

8.6 Emergency repairs

Where urgent work is necessary to address an emergency, the team will make the situation safe, follow the emergency-repairs provisions and notification requirements applicable to the work, record the decision and ensure retrospective information and regulatory steps are completed as required.

9. Contractor and competence management

9.1 Competence

Pinnacle will take reasonable steps to ensure that people and organisations undertaking building safety-related work have the skills, knowledge, experience and behaviours and organisational capability appropriate to the functions they perform. Competence assessment will be proportionate to risk and will consider qualifications, experience, relevant standards, supervision, quality systems, previous performance and limitations of competence.

9.2 Procurement and appointment

- scope and safety outcomes defined clearly;
- competence and capability checked before appointment;
- statutory duty holder roles identified where applicable;
- requirements for permits, change control and MOR communicated;
- information and evidence deliverables specified in the contract/order;
- performance monitored and non-conformance managed.

9.3 Performance assurance

Contractor performance will be reviewed using relevant service levels, compliance performance, audit findings, defects, repeat failures, timeliness and quality of evidence. Serious or persistent failures will be escalated and may lead to increased supervision, corrective action, suspension or termination in accordance with contractual arrangements.

10. Mandatory Occurrence Reporting and safety concerns

10.1 General reporting culture

All employees, residents, contractors and partners should be able to raise building safety concerns without unnecessary barriers. Internal reporting thresholds should be deliberately wider than the statutory MOR threshold so that emerging risks are identified early.

10.2 In-occupation MOR

For occupied higher-risk residential buildings, APs must submit mandatory occurrence notices and reports for safety occurrences in the parts for which they are responsible. A safety occurrence concerns structural failure or the spread of fire or smoke and meets the statutory serious-harm threshold. Where Pinnacle is an AP it will assess occurrences within its responsibility and make required notifications/reports. Where Pinnacle is PAP it will also establish and operate the single MOR system for the building.

10.2.1 Minimum response

- make the situation safe and implement appropriate interim measures;
- preserve relevant evidence;
- notify the appropriate internal building safety lead and relevant AP/PAP;
- assess promptly against the statutory MOR threshold;
- where reportable, submit the notice as soon as possible and the report within the statutory timeframe;
- record investigation, causal factors, mitigation, corrective actions and learning;
- consider whether the safety case, risk assessments, resident information or other buildings are affected.

10.3 Construction-phase MOR

Where building work on an existing HRB is within the higher-risk building control regime, construction-phase MOR duties sit with the principal designer and principal contractor as prescribed. Pinnacle, when acting as client or otherwise commissioning the work will ensure the required MOR arrangements are established and that relevant occurrences are communicated to the in-occupation AP/PAP so consequential risks and Golden Thread information can be addressed.

11. Emergency response and resilience

11.1 Objective

Pinnacle will maintain appropriate arrangements to respond to serious building safety events, system failures and emergencies. The immediate priorities are protection of life, support to emergency services, stabilisation of building safety risks, communication, preservation of critical information and coordinated recovery.

11.2 Life-safety system failures

Failures affecting fire alarms, smoke control, firefighting lifts, sprinklers, dry/wet risers, emergency lighting, fire doors or other key precautions will be assessed promptly. Required notifications to the fire and rescue authority will be made where the applicable Fire Safety (England) Regulations require this. Interim measures will be determined by competent risk assessment rather than applied automatically.

11.3 Incident management

- establish incident leadership proportionate to severity;
- liaise with emergency services, residents, PAP/other APs, Responsible Persons and specialist advisers;
- maintain a contemporaneous incident and decision log;

- assess the need for evacuation, temporary accommodation or access restrictions with appropriate competent input;
- make statutory/regulatory notifications;
- plan safe recovery and verify controls before returning to normal operation;
- capture lessons learned and update relevant plans and safety case information.

12. Assurance, monitoring and continuous improvement

12.1 Performance monitoring

Pinnacle will monitor leading and lagging indicators proportionate to its portfolio and responsibilities. Measures may include completion of statutory inspections, overdue safety-critical actions, significant defects, FRA/structural actions, resident complaints, MORs, contractor performance, Golden Thread completeness, competence assurance and regulatory actions.

12.2 Assurance

Assurance will use a combination of management review, technical review, sampling, audit, site inspection and evidence verification. Findings will be recorded and tracked to closure. Material themes will be escalated through corporate governance and used to identify portfolio-wide learning.

12.3 Management review

This Plan will be reviewed at least annually and following significant legislative change, regulatory feedback, serious incident, material organisational change or evidence that the management system is not operating effectively. Building-specific arrangements and Safety Case Reports will be reviewed at the frequencies and trigger points required by law and risk.

13. Key principles by Pinnacle role

Activity	Pinnacle as AP	Pinnacle as PAP (six buildings)
Manage building safety risks	Manage risks in the parts for which Pinnacle is accountable; cooperate/coordinate with others.	Same AP duty plus whole-building PAP coordination.
Golden Thread	Create, keep, update and provide prescribed information for Pinnacle's area; share as required.	Additional PAP information responsibilities and building-wide coordination.
Safety Case Report	Provide relevant evidence and changes to PAP.	Prepare and maintain the SCR and provide it to BSR when required.
Resident engagement	Participate and provide information relevant to Pinnacle's responsibilities.	Prepare, operate and review the statutory Resident Engagement Strategy.

Complaints	Participate in and respond through building arrangements.	Ensure the statutory building safety complaints system is operated.
Mandatory occurrence reporting	Assess and report statutory safety occurrences in Pinnacle's part.	Also establish and maintain the single building MOR system.
Building Assessment Certificate	Provide the PAP with required information.	Apply when directed and manage the PAP submission/response.
Other APs	Cooperate and coordinate.	Coordinate the AP interface for whole-building management while each AP retains its own duties.
Legal accountability	Cannot delegate Pinnacle's statutory AP duties.	Cannot delegate Pinnacle's statutory PAP/AP duties.

14. References

The controlled version of this Plan should be read with current legislation and official BSR/GOV.UK guidance. Key references include:

- Building Safety Act 2022.
- Building Act 1984 and Building Regulations 2010 as amended.
- Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023.
- Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023.
- Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024.
- Building (Higher-Risk Buildings Procedures) (England) Regulations 2023, as amended.
- Building Regulations etc. (Amendment) (England) Regulations 2023 and relevant duty holder requirements.
- Regulatory Reform (Fire Safety) Order 2005 as amended.
- Fire Safety Act 2021.
- Fire Safety (England) Regulations 2022.
- Current Building Safety Regulator guidance on AP/PAP duties, building assessment, Safety Case Reports, Golden Thread information, MOR and building control approval.

15. Related procedures

- Building safety Complaints Procedures
- Change Management Procedure
- Mandatory Occurrence Procedure
- Management of safety performance
- Building safety and compliance monitoring

- Client works management procedure
- Maintenance Management procedure
- PTW guidance
- PTW template
- Post works contractor checklist
- Safety management Plan

Appendix A | Building-specific responsibility schedule

Complete and maintain this schedule for each HRB. It is intended to prevent ambiguity between Pinnacle's AP duties, any PAP responsibilities and operational management services.

Field	Building-specific entry
Building / address	
BSR registration number	
PAP legal entity	
Is Pinnacle PAP?	Yes / No
Pinnacle AP legal basis / area	
Other AP(s) and areas	
Responsible Person(s)	

Field	Building-specific entry
Pinnacle operational service scope	
Safety Case Report owner / current version	
Resident Engagement Strategy owner	
MOR system owner	
Golden Thread system/location	
Key emergency contacts	
Current BAC status	

Appendix B | RACI-style control summary

Control	AP-only position	PAP position
Risk assessments and measures	Responsible for Pinnacle area and relevant coordination.	Responsible for own AP area; coordinates whole-building PAP arrangements.
Information provision	Provide prescribed/relevant information to PAP, other APs and prescribed persons.	Coordinate additional PAP information and requests.
Material building change	Notify PAP; update Pinnacle records; support safety case review.	Ensure whole-building impact and SCR implications are assessed.
Resident concerns	Receive, record, act/escalate and support PAP process.	Operate/oversee statutory building safety complaints and engagement arrangements.
Safety occurrence	Assess and report if within Pinnacle's AP responsibility and threshold met.	Operate building MOR system and fulfil own reporting duties.
Regulatory contact	Respond on Pinnacle AP matters and coordinate with PAP.	Lead PAP interface for PAP statutory functions.

Appendix C | Minimum supporting procedures and records

- AP/PAP responsibility matrix and building register.
- Building Safety Case and Safety Case Report procedure.
- Golden Thread / building safety information management procedure.
- Resident Engagement Strategy and resident information arrangements.
- Building safety complaints procedure.
- Mandatory Occurrence Reporting procedure and decision record.
- Works in HRBs / building control screening and change-control procedure.
- Permit-to-work / impairment management arrangements.
- Contractor competence and procurement controls.
- Fire and structural action-management process.
- Emergency and major incident response arrangements.
- Regulatory correspondence and Building Assessment Certificate tracker.
- Assurance/audit programme and management review records.