Mandatory Occurrence Reporting (MOR) Summary

Summary

MOR is a **statutory, structured reporting system** for higher-risk buildings that ensures:

- **Life safety** through timely detection, escalation, and reporting.
- **Regulatory compliance** and defensibility.
- **Transparency and resident engagement**.
- **Integration with Safety Case, Golden Thread, and Board oversight**.
- **Training, auditing, and continuous improvement** ensure organisational accountability and resilience.

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1. Purpose

MOR is a statutory reporting duty for higher-risk buildings that ensures serious safety incidents are escalated, documented, and acted upon. It strengthens regulatory compliance, corporate governance, insurance defensibility, and resident trust through its integration with the Safety Case, Golden Thread, and Board oversight.

- MOR is a **legal requirement** under the Building Safety Act (BSA) 2022, Sections 84–87.
- Ensures serious incidents in **Higher-Risk Buildings (HRBs)** are identified, escalated, and reported to the **Building Safety Regulator (BSR)**.
- Key features:
    - **Initial notification** within 72 hours.
    - **Full report** after investigation (14–28 days).
    - Creates an **audit trail** for Principal Accountable Persons (PAPs) and Accountable Persons (APs).
    - Non-compliance is a **criminal offence**.

1,1 Applicability

- Applies to HRBs ≥18m or ≥7 storeys with ≥2 units, and hospitals/care homes at same threshold.
- **PAP** is responsible; APs must cooperate.
- Contractors and designers are duty holders during works.

1.2 Integration with Safety Case & Golden Thread

- MOR feeds into **Safety Case Report (SCR)** and **Golden Thread** (digital, version-controlled record).
- Ensures transparency for regulators, emergency services, and residents.
- Supports resident engagement (BSA Section 91) and Board-level risk oversight.

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2. Legal and Regulatory Context

The **BSA 2022** sets the statutory MOR duty; the **2023 Regulations** provide operational requirements; and **DLUHC*/HSE guidance** ensures consistent application in practice. Combined, they create a legally enforceable, standardised, and practical MOR system, embedding accountability, cooperation, and transparency across higher-risk buildings.

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- **Building Safety Act 2022 (Sections 84–87):** Defines PAP duties, reporting timescales, cooperation, and enforcement.
- **Higher-Risk Buildings Regulations 2023:** Operationalises MOR:
  - Regulation 20: Initial notification details.
  - Regulation 21: AP cooperation.
  - Regulation 22: Two-stage reporting (initial + full).
- **DLUHC*/HSE Guidance:** Defines "major occurrences," timelines, escalation culture, templates, and record-keeping for compliance.

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3. Policy Statement

The Charity pledges full compliance with MOR law and embeds it in operations. By following **transparency, timeliness, and accuracy**, MOR becomes not just a legal duty but a proactive safety and governance tool.

- The Charity commits to **full compliance**.
- Key principles: **Transparency, Timeliness, Accuracy**.
- MOR embedded in operations, Safety Case, Golden Thread, and regulatory engagement.

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4. Definitions & Thresholds

This section defines what counts as a **major occurrence**, differentiates it from routine internal reporting, and enforces a **precautionary, resident-first approach**. Escalation to the PAP ensures legal compliance, transparency, and prioritisation of life-safety risks.

- **Major Occurrence**:
  - Structural safety failure.
  - Fire safety system failure.
  - Serious incident affecting residents (injury, fatality, evacuation).
- **Routine incidents**: Minor defects, near-misses, or maintenance; not reportable under MOR.
- **Precautionary principle**: Escalate uncertain cases to PAP.

MOR Triage Checklist (Front-Line Use)

Category	Examples (Routine – No MOR)	Examples (Potential MOR – Escalate Immediately)
Structural Safety	Minor plaster cracking in one flat.	Repeated/progressive cracking in load-bearing walls, beams, or columns.
Fire Alarm Systems	Single detector fault, quickly repaired.	Fire alarm loop failure disabling multiple floors/zones.
Smoke Control/AOV	One window actuator faulty, others working.	Whole staircore system fails to open during smoke test/event.
Fire Doors/Compartmentation	One door closer slightly misaligned.	Multiple fire doors across a corridor not closing/latching.
Resident Incidents	Small kitchen fire, contained immediately.	Corridor fire requiring evacuation beyond one unit.
Contractor Observations	Localised missing fire stopping in riser.	Multiple, systemic breaches discovered across compartments.

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5. Roles and Responsibilities

PAP holds ultimate MOR responsibility, supported by APs, contractors, staff, and residents. Clear escalation routes, training, and reporting processes ensure compliance, transparency, and resident safety. The Board oversees compliance through annual assurance reports and independent legal review, embedding MOR governance at all organisational levels.

- **Principal Accountable Person (PAP):** Ultimate MOR responsibility, ensures reporting, SCR updates, resident communication.
- **Deputy PAP:** Covers PAP absence; trained and authorised.
- **Other APs:** Monitor, escalate incidents, train staff, cooperate with PAP.
- **Contractors & duty holders:** Escalate safety-critical risks; integrate MOR into site processes.
- **Staff & residents:** Report potential occurrences promptly.
- **Board of Trustees:** Oversight via annual assurance reports and independent review.

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Principal Accountable Person (PAP):	Director of Property & Places
Deputy PAP	Head of Property
Other APs	Property Managers

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6. Reporting Procedure

The MOR reporting procedure ensures **rapid internal escalation**, **timely statutory notification**, and **comprehensive investigation and reporting**. Post-incident review and Golden Thread updates embed lessons into governance, supporting resident safety, regulatory compliance, and organisational accountability.

1. **Identification & Internal Escalation:** Staff, contractors, residents report incidents; escalation pathways defined, tested, and audited.
2. **Initial Notification (within 72h):** To BSR, including building ID, occurrence type, impact, immediate actions.
3. **Full Report (14–28 days):** Root cause analysis, technical evidence, remedial actions, SCR updates.
4. **Post-Incident Review:** Lessons learned embedded into SCR and Golden Thread; residents updated.

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7. Communication & Record-Keeping

Communication must be timely, accurate, and accessible to all stakeholders—internal staff, APs, residents, regulators, and FRA. Robust **documentation and evidence retention** in the Golden Thread guarantees compliance, auditability, and transparency while protecting residents and supporting enforcement defensibility.

- **Internal notifications:** Rapid escalation via documented matrix.
- **External notifications:** BSR, Fire & Rescue Authority (if applicable).
- **Resident communications:** Clear, accessible, plain language, multi-format (letter, SMS, portal), inclusive (Equality Act 2010).
- **Evidence retention:** Golden Thread, version-controlled, retained for building lifecycle + 6 years.
- Templates ensure consistency, auditability, and defensibility.

Templates provide a **consistent, auditable approach** to resident communication. They should focus on **plain language, accessibility, transparency, and reassurance**. They should support **resident engagement**, legal compliance, and regulatory defensibility. To ensure auditability and regulatory defensibility, the following retention periods will apply:

Data Type	Retention Period	Notes
Raw Evidence (photos, system logs, inspection reports)	Lifecycle of the building + 6 years	Supports Safety Case and regulator audits.
Resident Communications (letters, newsletters, SMS logs, portal records)	Lifecycle of the building + 6 years	Aligns with civil limitation periods and Section 91 BSA duties.
Contractor Logs and Reports (maintenance records, defect reports, site notes)	Minimum 15 years	Reflects latent defect liability and statutory record-keeping expectations.
Full MOR Reports (initial + final submissions)	Lifecycle of the building	Cross-referenced to Safety Case Report.
Training & Exercise Records	10 years	Provides evidence of competence under PAS 8673 / PAS 8671.

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8. Training and Assurance

Training, competence, and assurance activities must be formalised, measurable, and embedded into governance, supporting legal compliance, resident safety, and organisational accountability.

- **Training categories:** Awareness (residents/staff), operational (APs), leadership (PAP/senior managers), specialist (contractors).
- **Competence assessment & CPD:** Scenario-based exercises, refresher training.
- **Internal audits & lessons learned:** Post-incident review, scenario evaluation, continuous improvement.
- **Competence matrix & metrics:** Ensure ≥90% recognition/escalation accuracy; reported to Board.
- All training, exercises, and reviews integrated into Golden Thread and SCR.

Role	Minimum Competence Standard	Requirement
Principal Accountable Person (PAP)	PAS 8673: Level 6 (Leadership and Governance Competence)	Ability to interpret statutory duties, make threshold decisions, liaise with the BSR, and integrate MOR into the Safety Case Report.
Accountable Persons (APs)	PAS 8673: Level 4 (Operational Competence)	Ability to identify potential occurrences, escalate to PAP, maintain logs, and engage with residents under Section 91 BSA.
Building Safety Manager / Governance Leads	PAS 8671: Advanced Competence	Ability to coordinate evidence, prepare full reports, and ensure Golden Thread integration.
Frontline Staff (Caretakers, FM, Security, etc.)	Awareness Training (Basic competence aligned to PAS 8673 entry level)	Ability to recognise potential occurrences and escalate immediately via prescribed channels.
Contractors & Designers (Dutyholders, Part 2 BSA)	Induction + Contractual MOR Obligations	Ability to identify safety-critical defects during works and escalate to PAP/AP.

9. References & Appendices

- **Statutory basis:** BSA 2022, Higher-Risk Buildings Regulations 2023, DLUHC & HSE guidance.
- **Flowchart:** Step-by-step MOR decision process (Appendix A).
- **Notification Form:** Standardised internal template (Appendix B).
- **Worked Example:** Demonstrates a fictional MOR scenario (Appendix C).
- **Quick Reference Checklist:** Frontline staff tool for rapid escalation.
- **Resident-Facing Guide:** Explains MOR, reporting channels, and engagement.
- **Lessons-Learned Log:** Standardised post-incident recording, integrated into Golden Thread.

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