



Property and Housing Services
Mandatory Occurrence
Reporting Policy
(2025)

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1. Introduction

- 1.1 A Mandatory Occurrence Reporting (MOR) system has been established through the secondary legislation, under the umbrella of the Building Safety Act 2022 (BSA).
- 1.2 The Principal Designer (PD) and Principal Contractor (PC) must establish and operate a MOR system during the construction activities pertaining to current or future (new build) buildings in scope of the BSA. Similarly, the Accountable Person (AP) must establish and operate the system for the higher risk buildings during their occupation.
- 1.3 The purpose of this document is to outline the Council's approach and arrangements for an MOR system within the London Borough of Havering.

2. Scope

- 2.1 This document applies to higher-risk buildings only.
- 2.2 This document applies to all Havering Council employees, most notably, the Housing and Property Directorate and those directly involved in construction, (including activities leading up to construction, e.g. procurement), building maintenance and housing management activities.
- 2.3 This document outlines the reporting system, which runs concurrently to Council's existing arrangements for reporting of accidents, incidents, near misses and dangerous occurrences as part of the Reporting of Incidents and Dangerous Occurrences Regulations and requirements. However, while there may be similarities between them, this document outlines how we comply with the Building Safety Act 2022 and relevant secondary legislation.

3. Purpose of the MOR System

- 3.1 The Mandatory Occurrence Reporting system ensures that any incident or risk that could lead to structural failure or the spread of fire or smoke — and which poses a serious risk to life — is reported, recorded, and acted upon promptly.

A report is triggered when the risk:

- Has caused or is likely to cause death, serious injury, or permanent disability to a significant number of people.

4. Definitions and Abbreviations

- 4.1. **Mandatory Occurrence Reporting (MOR)** – is the requirement set out in the Building (Higher-Risk Building Procedure) (England) Regulations 2023 and relates to reporting of safety occurrences within the building in scope of the Building Safety Act by the respective principal duty holder.
- 4.2. **Principal Duty holder** – is the person/entity responsible for reporting of the safety occurrence when they become aware of it and notifying the BSR within 10 days of being aware of it. They are either Principal Contractor (PC), Principal Designer (PD) or Principal Accountable Person (AP).
- 4.3. **Higher-risk building (HRB)** – or a ‘building in scope’ is a building in England that is at least 18m in height or has 7 storeys and contains at least 2 residential units.
- 4.4. **Safety Occurrence** – is an incident involving, or a risk that could cause structural failure of the building or the spread of fire or smoke in the building. It is essentially something, which if not remedied, could cause serious harm to people when the building is in use.
- 4.5. **Mandatory Occurrence Register** – a register used by the Council to record and monitor all mandatory occurrences, known as ‘Twinedit’ system.
- 4.6. **BSR** – Building Safety Regulator
- 4.6.1. Examples of safety occurrence relating to construction work (PC/PD duty):
- Defective building work
 - Fire safety issues likely to result in the spread of fire
 - The use of non-compliant products or incompatible compliant products
 - Inappropriate or incorrect installation of construction products
 - Product failure against specification and claimed performance
 - Faults in the design plans, caused by either design software or human error
- 4.6.2. Examples relating to ‘in occupation’ buildings (PAP duty):
- The spread of fire
 - Total or partial collapse of the building
 - Defective building work
 - Unexpected failure or degradation of construction materials
 - The discovery of structural defects
 - Failure of a critical fire safety measure, such as AOV, smoke extraction or fire doors

5. Relevant legislation and connected documents

- 5.1. The Building Safety Act 2022
- 5.2. The Health and Safety at Work etc. Act 1974
- 5.3. The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023
- 5.4. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

6. Roles and Responsibilities

6.1. Assistant Director of Housing Property and Assets

- 6.1.1. Ensure that sufficient resources are available for the effective and efficient completion of the policy.
- 6.1.2. Support the Resident Safety and Compliance Manager with raising awareness and profile of H&S compliance matters within Corporate Management Team and the rest of the LBH.

6.2. Complaints Compliance and Information Governance Team Lead

- 6.2.1. Ensure that residents have the facility and ability to raise a building safety and fire safety concerns and that these concerns are promptly recorded and forwarded to relevant teams/individuals for action.

6.3. Major Works Direct Delivery Manager

- 6.3.1. Ensure that MOR arrangements of incoming and current contractors and designers are scrutinised at the procurement stage.
- 6.3.2. Ensure that principal contractors, principal designers and others involved in the construction activities and projects comply with and operate within the regulatory requirements and requirements of this policy.
- 6.3.3. Ensure that arrangements are in place so that Mandatory Occurrence Notice and Report are received by the Resident Safety and Compliance Team within the timescales.

6.4. Assistant Director of Housing Operations

- 6.4.1. Ensure sufficient resources are available to comply with the content of this policy in relation to their work area.
- 6.4.2. Ensure all relevant staff are aware of the content of this policy and the expectations placed upon them.

- 6.4.3. Ensure all accidents, incidents, near misses and dangerous/safety occurrences are reported as per this policy and Accident reporting policy.

6.5. Repairs and Voids Manager

- 6.5.1. Ensure all relevant staff are aware of this policy and their roles and responsibilities within.
- 6.5.2. Ensure all accidents, incidents, near misses and dangerous/safety occurrences are reported as per this policy and Accident reporting policy.

6.6. Resident Safety and Compliance Manager

- 6.6.1. The overall responsibility for monitoring, recording, and reporting incidents under this policy sits with the Resident Safety and Compliance Manager, supported by colleagues throughout the LBH.
- 6.6.2. Ensure operational arrangements are in place to comply with the requirements of the legislation and this policy.
- 6.6.3. Provide the scrutiny and oversight of the policy and arrangements within.
- 6.6.4. Ensure safety occurrences are investigated and advise on action to reduce the risk of further adverse events
- 6.6.5. Operational responsibility for arrangements to report safety occurrences as per this policy.
- 6.6.6. Monitor and report on safety occurrences KPIs as part of the health and safety governance framework, including lessons learned.
- 6.6.7. Provision of advice about Health and Safety regulations, safe working practices and controls.
- 6.6.8. Share promptly accident, incident, and safety occurrence reports with the Finance team (insurance) to support insurance investigations and claims.
- 6.6.9. Provide the Executive Leadership Team, Housing and Property Management Team and Health and Safety Committee with regular updates about accident, incident, and dangerous occurrences in the workplace and any changes to relevant legislation and HSE guidance.

6.9. Resident Safety and Compliance Group

- 6.9.1. Review and approve the Mandatory Occurrence Reporting Policy.
- 6.9.2. Scrutinise regular updates about safety occurrences that fall within the scope of this policy.

- 6.9.3. Commission internal/external audit to get assurance that the MOR process is compliant.

7. Reporting Requirements

7.1 Immediate Notice (As Soon As Possible)

The initial notice to the Building Safety Regulator (BSR) should include:

- Name and contact details of the reporter
- Building control reference or building registration number
- Occupancy status and details of any ongoing construction
- Building address
- Brief description of the risk or incident
- Date and time the incident occurred or was identified
- Actions already taken to protect people

7.2 Full Report (Within 10 Days)

A detailed report must include:

- Reporter's role (e.g., Principal Contractor or Principal Designer)
- Whether it refers to an incident or a risk
- Whether it relates to structural failure, spread of fire, or both
- Detailed description of what happened and the cause
- Impact on people (injury, risk, or damage)
- Actions taken to keep people safe and to mitigate the issue
- How the risk or incident was discovered

7.3 Examples of Mandatory Occurrences

- Defective building work
- Unauthorised construction or modifications
- Discovery of structural defects
- Fire breaching compartmentation
- Failure of critical fire safety measures (e.g., vents, fire doors, alarms)

7.4 Internal MOR System

The MOR system is open to:

- Residents
- Visitors
- Contractors
- Staff
- Accountable Persons
- Other users of the building

- Awareness and Training Channels
- Site notice boards in common areas
- Mobile app for residents
- Contractor engagement terms and conditions
- Health & Safety policy and staff training
- Resident Engagement Strategy (shared and consulted with residents)

7.5 Information Provided to Stakeholders

- What to report (safety incidents or risks)
- How to report:
- Portal or app form
 - Email
 - Phone call
 - Directly to the Building Manager
- Process updates: how reports will be handled and how to track updates
- Data protection: Compliance with GDPR and data retention policies
- Direct reporting option: Residents can submit reports directly to the BSR
- Transparency: Information is posted on notice boards and stored digitally for at least 7 years as part of the golden thread of building safety information.

8. Internal reporting requirements

8.1. MOR for Construction projects and major/capital works

- 8.1.1. All contractors and designers must have a written MOR system setting out how their processes allow for the building and fire safety concerns and incidents in scope of the regulations to be raised, investigated, and reported, including training and monitoring arrangements for their staff. The system must be in place before the construction phase begins and maintained throughout the construction phase.
- 8.1.2. The Principal Contractor must ensure an appropriate frequency of inspections of the work for safety occurrences throughout the construction phase.
- 8.1.3. The Principal Designer (or sole or lead designer) must ensure an appropriate frequency of inspections of HRB design work for safety occurrences throughout the construction phase.
- 8.1.4. Contractors must report all relevant incidents/reports to the Council via the respective client Project Manager. They will then subsequently notify the Building Safety Team or respective Building Safety Manager via our usual internal reporting channels.
- 8.1.5. The reporting system must cover risks, incidents (including fires or evidence of fires), accidents and near misses.

8.1.6. The reporting system must specify how residents, stakeholders and any person involved in, or affected by, the construction project can report incident or concern – e.g. via phone, email, in person, submission of written form, etc.

8.1.7. Outline of the process can be found within the flowchart (**Appendix 1**).

8.2. In-occupation MOR system – Principal AP responsibilities

8.2.1. **Appendix 2** outlines the MOR system arrangements for in-occupation phase. It considers the different sources of information that Council, as Principal Accountable Person, have arrangements for.

8.2.2 Customer Service Centre

8.2.3. Customers have an opportunity to raise relevant building and fire safety incidents, complaints, and concerns. Complaints team collate the information received from residents, members or public and process the matter via their existing processes.

8.2.4 Building inspections

8.2.5. As part of our active monitoring, a number of inspections is carried out within the buildings in scope that allow for prompt identification of concerns by members of staff. These include:

- Inspections by caretakers and caretaking managers
- Inspections by engineers (e.g. function testing)
- Building Safety Managers' inspections
- Housing officers' inspections

9. Communication and Publication

9.1. The requirements of this policy will be communicated to relevant internal stakeholders via the H&S governance and consultation process followed by the selection of briefings, memos or Toolbox Talks.

9.2. External stakeholders, e.g. residents and local councillors, will be made aware.

- during the construction stage via the respective [Principal] Contractor residents' liaison activities, and
- during the in-occupation stage via our building safety management activities (e.g. website, Building Safety Cases, periodic communication)

9.3. The current version of this policy will be made available and published in the Property H&S section on Essentials.

10. Staff training

- 10.1 Recognising that well-trained staff are key to the successful delivery of this policy, it will be covered in inductions for new officers and “refreshers” will be mandatory for current staff.
- 10.2 Unconscious bias training will also be made available to ensure that the important intersections with other inequalities and disproportionalities are well understood by officers.

11. Equal Opportunities Statement

11.1 Public Sector Equality Duty (PSED)

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires all councils, when exercising its functions, to have ‘due regard’ to:

- i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- iii) Foster good relations between those who have protected characteristic and those who do not.

Note: ‘Protected characteristics’ are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

LBH is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, LBH is committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

11.2 EqHIA

An EqHIA (Equality and Health Impact Assessment) has been carried out and accompanies this policy.

LBH seeks to ensure equality, inclusion, and dignity for all in all situations. It will seek to ensure that this policy is, at all times, implemented in a manner that is fair to all sections of the local community.

All applicants for housing or re-housing will be invited to indicate if they wish to make use of the Council's translation and interpretation services, or if they require additional services to enable them to access and understand the policy to ensure that they are not disadvantaged in any way.

They also will be invited to provide details of ethnic origin, sexuality, disability and other equalities information. Provision of this information is not obligatory or a requirement for acceptance of an application.

However, such information will help monitor the number and types of protected characteristics requiring hostel support, and will help ensure that service improvement evolves in line with any changing local needs.

11.3 Our Commitment

This policy will be regularly reviewed ensure it is not operated in any way that could discriminate or disadvantage against any particular group of people.

All information provided will be kept confidential and treated with respect at all times.

12. Data Protection Statement

LBH takes personal privacy matters very seriously and will never share the individual's personal data without their prior knowledge, unless required to do so by law.

For full details about how LBH protects personal data, please visit [Havering Council Data Protection policy](#).

13. Dissemination and communication of this policy

Housing Services will consult with all affected stakeholders, directly or indirectly, to ensure this policy fulfils its purpose to be clear and transparent.

This policy will be made available internally and externally in hard copy and electronic versions, as well as various formats – such as easy read, multi-lingual, braille and audio - upon request.

14. Implementation of this policy

This policy will take effect from September 2025.

Responsibility for the successful implementation of this policy will be with Havering Council's Assistant Director of Property and Housing Services.

15. Monitoring and review of this policy

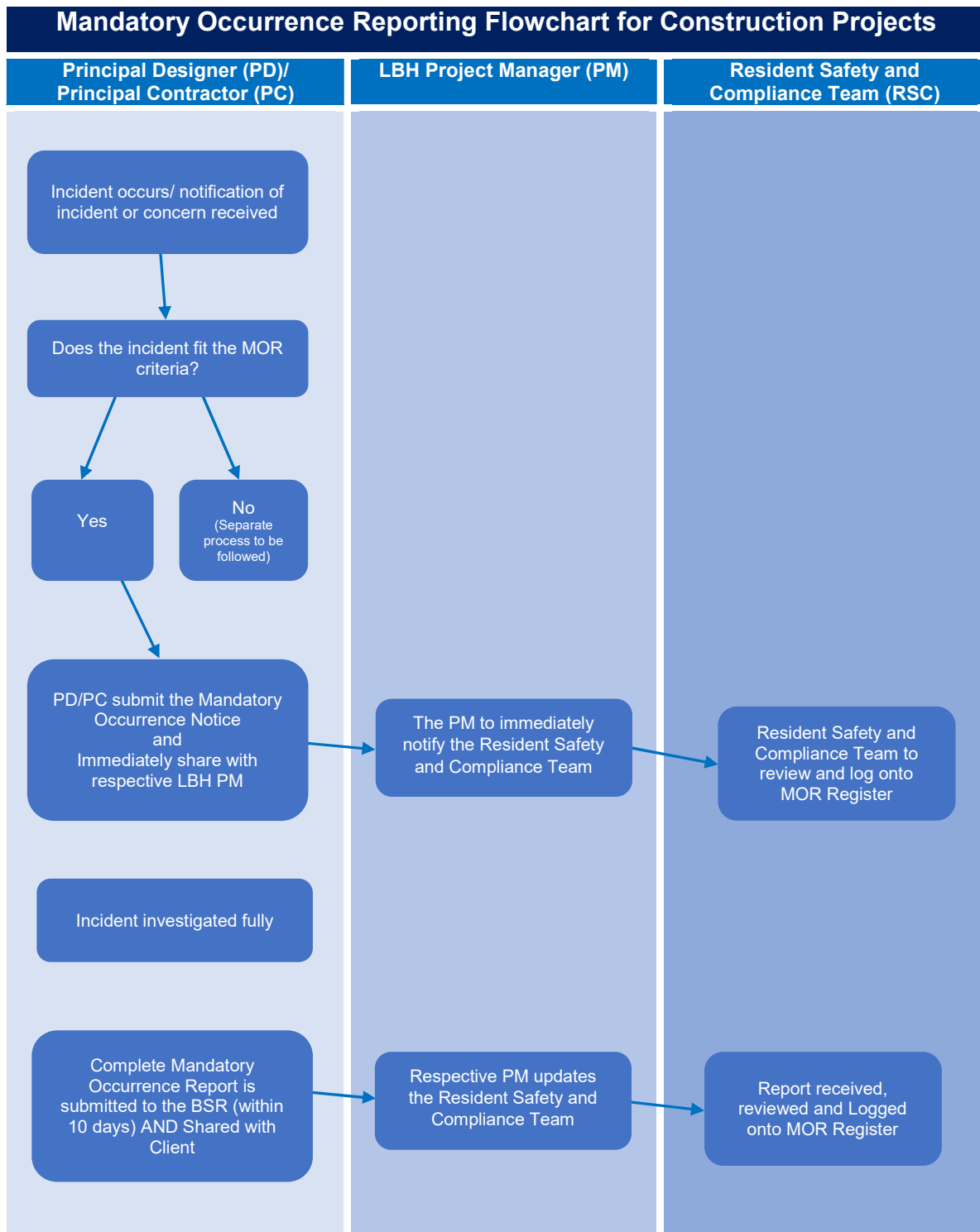
This policy will be reviewed every year, or when any significant change in relevant legislation or best practice guidelines take place.

16. Delegated authority to make minor changes to this policy

The Assistant Director of Property, Housing and Assets, in consultation with the Director of Housing, will be able to approve minor amendments; i.e. amendments that do not significantly change this policy or associated procedures.

Appendix 1

MOR flowchart for construction projects



Appendix 2

MOR flowchart for in-occupation stage

