



Major Works Policy

| Name | Reason for change | Date |
|--------------|-------------------|------------|
| Barry Waller | Original author | April 2026 |
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Approval process for current version

| Presented to | Date | Outcome |
|---------------------------|-------------|----------|
| Health & Safety Committee | 19 May 2026 | Approved |
| Services Committee | 2 June 2026 | Approved |

1. Introduction

- 1.1. This policy sets out Poplar HARCA's approach to the planning, approval, procurement, delivery and assurance of major works and capital investment. It ensures works are delivered safely, lawfully, transparently and in a manner that provides value for money, minimises disruption to residents, and meets statutory, regulatory, and contractual obligations.
- 1.2. This policy applies to all major works programmes and capital investment projects undertaken by Poplar HARCA, including planned maintenance programmes, fire and building safety works, structural repairs, and estate works. It applies to mixed tenure buildings and covers works to dwellings, common parts and building fabric.
- 1.3. Poplar HARCA's major works and capital investment programs ensure its homes are safe, decent, and well maintained.
- 1.4. Poplar HARCA is committed to safeguarding the health, safety, and wellbeing of everybody living, working, or visiting our buildings and to protecting our property.
- 1.5. Residents and leaseholders will be engaged early and communicated with clearly on all major works programs.
- 1.6. Investment decisions will reflect whole-life value and asset performance.
- 1.7. Works will be procured and delivered transparently using approved governance and controls.
- 1.8. Quality, resident experience and contractor performance will be actively managed.

2. Regulatory standards, legislation, definitions, and codes of practice

2.1. Poplar HARCA's premises must comply with:

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| Regulator | <ul style="list-style-type: none"> • Building Safety Regulator (Health and Safety Executive) • Regulatory framework and consumer standards (Home Standard) set out by the Regulator for Social Housing |
| Legislation | <ul style="list-style-type: none"> • Landlord and Tenant Act 1985 (including Section 20 consultation requirements) • Building Safety Act 2022 and associated regulations • Fire Safety Order 2005 and Fire Safety Act 2021 • Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 • Procurement Act 2023 • Equality Act 2010 • Homes (Fitness for Human Habitation) Act 2018 • Health and Safety at Work etc. Act 1974 and CDM Regulations 2015 • Building Regulations 2010 |
| This policy also operates in the context of: | <ul style="list-style-type: none"> • Poplar HARCA's Repairs policy • Poplar HARCA's Health and Safety policy • Poplar HARCA's Building Safety policy • Poplar HARCA's Fire Safety policy • Poplar HARCA's Alterations policy • Poplar HARCA's Aids & Adaptations policy • Poplar HARCA's Procurement policy • Poplar HARCA's Probity policy • Poplar HARCA's Anti-Fraud & Bribery policy • Poplar HARCA's Anit money laundering policy • Poplar HARA's Financial regulations policy • Poplar HARCA's Delegated authorities for purchase orders and invoices policy |

2.2. Definitions

Major Works

For the purposes of this policy, *major works* are planned or cyclical works that:

- Are significant in scale, cost, or complexity; and/or
- Are rechargeable to leaseholders under the terms of their lease; and/or
- Require formal consultation under Section 20 of the Landlord and Tenant Act 1985.

Examples include full external refurbishments, replacement of major building elements, and large-scale compliance programmes.

Consumer Standards (Regulator of Social Housing (RSH))

Tenant facing regulatory standards set by the Regulator of Social Housing (RSH) for all registered providers of social housing in England. Set clear expectations about service quality, safety, tenant engagement, and neighbourhood management.

Providers must:

Homes are **safe, decent, and well maintained**

- Landlords meet all **statutory health and safety duties**, including:
 - Building Safety Act 2022
 - Health and Safety at Work etc. Act 1974
 - Fire safety
 - Gas, electrical, asbestos, legionella, and lift safety
- Homes are **free from hazards**, including **damp and mould**
- Repairs and maintenance are **timely and effective**
- Properties meet the **Decent Homes Standard** (as a minimum)

Decent Homes Standard

The Decent Homes Standard is the minimum condition standard that social housing in England is expected to meet. A home is considered “decent” if it satisfies all four of the following tests:

- It meets the **statutory minimum standard for housing**
 - This is the Housing Health and Safety Rating System (HHSRS), meaning the home must be free from Category 1 hazards (serious risks to health or safety).
- It is in a **reasonable state of repair**
 - Key building components (such as roofs, walls, windows, heating systems) must not be old and in poor condition.
 - The test focuses on both age and condition, particularly of major components.
- It has **reasonably modern facilities and services**
 - Including a reasonably modern kitchen, bathroom, adequate insulation against noise, and appropriate layout and facilities for modern living.
 - “Modern” is judged against benchmarks set in government guidance, not current best practice.
- It provides a **reasonable degree of thermal comfort**
 - The home must have effective insulation and efficient heating, allowing it to be heated cost-effectively and maintain a comfortable temperature.

The Building Safety Act 2022 (BSA)

The Building Safety Act 2022 became law in April 2022. The act was developed following Dame Judith Hackitt’s independent review of building regulations and fire safety. The act introduces wide ranging reforms to how buildings are designed, constructed, and managed.

2.3. Sanctions

If Poplar HARCA fail to discharge their responsibilities in full, this could result in -

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution by the Fire and Rescue Service under the Building Safety Act 2022, RRFSO and/or Fire Safety Act 2021
- Prosecution by the Local Authority under the Housing Act 2004
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007 11
- A judgement of serious detriment by the Regulator of Social Housing
- Reputational damage
- Loss of confidence by stakeholders in the organisation
- An inability to occupy new buildings.
- An inability to secure grants and new funding revenues

3. Planning and programming

3.1. Major works programmes will be created by:

- Stock condition surveys and asset data
- Building safety and fire risk assessments
- Repair trends
- Compliance requirements
- Long term asset management and investment business plans
- Resident feedback and priorities
- Estate regeneration
- Emergency or unforeseen events. For example, storm damage

3.2. Programmes will be reviewed regularly and updated to reflect risk, condition, funding, resident impact, and changes in legislation.

4. Stock condition surveys and asset data

4.1. Poplar HARCA inspect every home, on a five year cycle, via a Property MOT inspection or stock condition program. The data captured is recorded in the Asset register.

4.2. Data on the condition and age of components and stock is captured when a property is void or when a Property MOT inspection is undertaken.

4.3. Contractors and consultants capture information and data, when visiting our homes, blocks, and estates.

4.4. Data from IoT devices in homes is used to help make decisions on the long term investment.

- 4.5. Our hyper local model and neighbourhood approach allows us to utilise local knowledge from across our teams to plan investment in our homes and estates.

5. Section 20 consultation and leaseholder engagement

- 5.1. Section 20 consultation and leaseholder engagement will be followed to ensure Poplar HARCA is statutory compliant, transparent, and fair.
- 5.2. Section 20 consultation will be undertaken for all major works defined as Qualifying Works or Qualifying Long-Term agreements. Consultation will include Notices of Intention, Statements of Estimates, Notice of Reasons, and responding to observations within statutory timescales.
- 5.3. A clear audit trail for consultation, tendering and contract award decisions will be maintained.
- 5.4. Major works identified as an emergency, which need to be undertaken to protect our buildings and residents will be delivered and dispensation requested, to reclaim costs back from leaseholders.

6. Procurement and delivery

- 6.1. Major works will be procured in line with Poplar HARCA’s procurement policy and be compliant with the Procurement Act 2023.
- 6.2. An appropriate procurement route will be used based on the type of work, duration, and value.
- 6.3. The tender process will be managed inhouse or delivered via external consultants based on the type of work and value.
- 6.4. All statutory H&S obligations will be met during delivery and there will be clear communication regarding the nature, timing, and duration of works.
- 6.5. Poplar HARCA’s contract management framework will be used to deliver all major works programs, with regular review and progress meetings in place to monitor performance.

7. Performance monitoring and reporting

- 7.1. There is a robust procedure in place for monitoring performance and compliance.
- 7.2. Key performance indicator (KPI) measures are in place, regularly reviewed and reported to senior management, H&S Committee, Services Committee and the Board.
- 7.3. KPI(s) will be agreed for each major work and capital investment project and will be tailored for the type of works being delivered.
- 7.4. Poplar HARCA’s contract management framework will be used to deliver all major works programs, with regular review and progress meetings in place to monitor performance. Any underperformance will be addressed through the contract and improvement plans implemented and monitored.

8. Roles and responsibilities

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| Poplar Board | Overall governance responsibility for ensuring that the organisation is compliant with regulatory standards, legislation, and codes of practice. |
| H&S Committee | Governance responsibility (officer-led, reporting to Poplar Board) for ensuring that the organisation is compliant with regulatory standards, legislation, and codes of practice. |

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| Services Committee | Provide assurance on the delivery of services & community. |
| Chief Executive | Overall accountability for this policy |
| Chief Development Officer | Responsible for strategic policy implementation |
| Director of Assets | Accountable for policy development and for ensuring compliance is achieved and maintained. Responsible for securing and assigning resources. |
| Association operational directors (CMT Directors and ADs) | Implementing the requirements of the policy within the responsibilities of their directorates, e.g., building management, tenancy and leasehold management, resident behaviour, waste removal. |
| Senior Asset Manager | Responsible for delivery, performance, and monitoring of policy objectives. |
| Asset Managers | Responsible for managing the delivery of major works and capital investment projects. |
| Competent contractor(s) | Responsible for the operational delivery of major works and capital investment projects. |

9. Policy review

- 9.1. This policy will be reviewed every two years or if there are any changes in legislation or regulatory guidance.

10. Policy impact assessment

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| How does the policy/procedure/strategy contribute to Poplar HARCA's aims? | The policy is a statement of our intention to meet all statutory obligations to ensure we meet Consumer Standards and are Decent Homes compliant and meet the targets set out in our Asset Management strategy. |
| Which group(s) of people benefit from the policy/procedure/strategy? If any group could be disadvantaged, what is the mitigation or justification? | All groups benefit from this policy in terms of providing safe, decent, and well maintained homes. It is also beneficial for residents, staff, and the Board to be aware of Poplar HARCA's statutory obligations. |
| How have residents been involved in developing the policy/procedure/strategy? If they have not been involved, why not? | The policy is a statement of our intention to meet statutory obligations. There is no scope for resident involvement other than Board approval. Residents will be involved in developing the Poplar HARCA homes standard and service delivery. |
| How will the policy/procedure/strategy be monitored and measured? (e.g. performance indicators?) | Performance will be monitored monthly by the Director of Assets, with quarterly performance reports to Services Committee and annually to Board. |
| If any, what are the Value for Money implications? | The policy is a statement of our intention to meet all statutory obligations. |

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| | <p>All major works and capital investment decisions are based on asset data, to ensure we invest correctly in our homes.</p> <p>All works are procured to ensure we comply with legislation and achieve value for money.</p> |
| <p>Will personal data be collected, stored, used, or shared?</p> <p>If yes, a privacy impact assessment must be carried out.</p> | <p>Yes, personal information may be shared with contractors, suppliers, and consultants (e.g. name, address, contact details) in order to allow them to carry out major works and capital investment in our homes.</p> |