

# Mandatory Occurrence Reporting (MOR) Policy

## 1 Purpose

Metropolitan Thames Valley Housing (MTVH) is committed to protecting residents, colleagues, contractors and building users from harm arising from fire and structural safety risks. Mandatory Occurrence Reporting (MOR) is a statutory mechanism under the Building Safety Act 2022 designed to ensure that serious safety incidents and near-misses in Higher-Risk Buildings are identified, reported to the regulator and used to prevent recurrence. This policy sets out MTVH's corporate approach to Mandatory Occurrence Reporting. It establishes how MTVH will comply with its statutory reporting duties, how MOR will be governed and overseen, and how information arising from reportable occurrences will be used as safety intelligence to improve building safety performance and risk management.

This policy is supported by MTVH's internal Mandatory Occurrence Reporting processes and working tools used by the Building Safety Team to record, assess and report occurrences in line with statutory requirements. It also supports and must be read in conjunction with MTVH's:

- Complaints Policy
- Building Safety Policy
- Fire Safety Management Plan
- Resident Engagement Strategy

## 2 Scope

This policy applies to all Higher-Risk Buildings owned or otherwise subject to building safety duties held by MTVH and to all colleagues, contractors, consultants and managing agents whose activities may affect fire or structural safety in those buildings

Where MTVH is the Principal Accountable Person (PAP), the PAP will operate the Mandatory Occurrence Reporting regime in accordance with statutory requirements.

Where MTVH is not the PAP but holds Accountable Person or management responsibilities, MTVH will identify and escalate potential Mandatory Occurrences to the relevant PAP and cooperate in the discharge of statutory reporting duties in line with agreed governance arrangements.

This policy applies to any fire or structural safety incident or near-miss that meets the statutory criteria for Mandatory Occurrence Reporting under the Building Safety Act 2022 and associated regulations. It operates alongside, but does not replace, other established reporting and escalation mechanisms, including:

- Health and safety incident reporting systems
- Fire safety incident reporting arrangements
- Complaints Policy and procedures

### 3 Our Approach

MTVH will ensure that all Mandatory Occurrences are:

- Identified promptly
- Assessed against statutory reporting criteria
- Reported to the Building Safety Regulator within required timescales
- Investigated to identify root causes and necessary corrective actions

MTVH recognises Mandatory Occurrence Reporting as a:

- Statutory duty
- Key element of building safety governance
- Critical source of safety intelligence for continuous improvement

MTVH will use information arising from Mandatory Occurrence Reporting to:

- Inform Safety Case reviews
- Improve risk assessment and mitigation
- Strengthen assurance arrangements
- Support organisational learning.

#### 3.1 Definitions

##### **Mandatory Occurrence**

A Mandatory Occurrence is a fire or structural safety incident or near-miss in a Higher-Risk Building that presents, or if not remedied would be likely to present, a significant risk of death or serious injury requiring immediate hospital treatment or resulting in permanent or irreversible harm to a significant number of residents or other building users, and meets the statutory reporting criteria.

Mandatory Occurrences may include, but are not limited to:

- Serious failures of fire protection systems or measures
- Structural defects or degradation affecting load-bearing elements
- Failures of evacuation or emergency arrangements
- Systematic or management failures that significantly undermine fire or structural risk controls in a Higher-Risk Building
- Significant near misses which could reasonably have resulted in serious harm

Detailed thresholds, criteria and examples are set out in MTVH's Mandatory Occurrence Reporting Procedure.

##### **Higher-Risk Building (HRB)**

For the purposes of this policy, a Higher-Risk Building is a residential building that meets the definition set out in the Building Safety Act 2022 and associated regulations, generally being a building that is at least 18 metres in height or has at least 7 storeys and contains two or more residential units.

## 4 Responsibilities

Role	Responsibility
<b>Board</b>	The Board receives assurance that MTVH is complying with Mandatory Occurrence Reporting duties and that learning from reportable occurrences is embedded within governance and assurance arrangements.
<b>Chief Executive</b>	The Chief Executive ensures that MTVH has adequate systems, resources and competencies in place to discharge its statutory Mandatory Occurrence Reporting duties.
<b>Principal Accountable Person (PAP)</b>	The Principal Accountable Person holds overall accountability for compliance with Mandatory Occurrence Reporting duties for Higher-Risk Buildings and ensures that qualifying occurrences are reported to the Building Safety Regulator.
<b>Accountable Person (AP)</b>	Accountable Persons support the identification and management of reportable occurrences within their areas of responsibility and cooperate with the PAP in investigation and learning.
<b>Responsible Person (RP)</b>	Responsible Persons identify and escalate fire safety-related occurrences and support investigation of failures or near-misses affecting fire safety measures.
<b>Principal Designer (PD) and Principal Contractor (PC) – Design and Construction Phase</b>	Where MTVH is undertaking works to a Higher-Risk Building prior to first occupation, the Principal Designer and Principal Contractor appointed under the Building Regulations (as amended by the Building Safety Act 2022) hold the statutory duty to determine and submit Mandatory Occurrence Reports during that phase. They must notify MTVH (as client) of any Mandatory Occurrence submitted to the Building Safety Regulator and provide relevant information for inclusion in project safety information and handover documentation.
<b>Building Safety Manager (BSM)</b>	The Building Safety Manager supports and coordinates the assessment, investigation and recording of occurrences, on behalf of the PAP and AP, maintains MOR records and Golden Thread evidence, and supports regulatory engagement.
<b>Directors, Heads of Service and Managers</b>	Senior managers ensure that their teams and contractors understand Mandatory Occurrence Reporting duties and that potential occurrences are escalated without delay.
<b>Colleagues and Contractors</b>	All colleagues and contractors are required to report hazards, incidents and near-misses that may constitute Mandatory Occurrences through MTVH's approved reporting systems and procedures.

## 5 Building Safety Complaints

Complaints relating to fire or structural safety risks, or to the performance of statutory duty holders, may constitute or give rise to a Mandatory Occurrence. Where a complaint raises a potential Mandatory Occurrence, MTVH will ensure that it is assessed and escalated in line with this policy and MTVH's Mandatory Occurrence Reporting procedures, while continuing to manage the complaint in accordance with the Complaints Policy and the Housing Ombudsman's Complaint Handling Code.

## 6 Reporting and Escalation

MTVH will ensure that for Higher-Risk Buildings in occupation:

- Potential Mandatory Occurrences are identified and escalated promptly
- Occurrences are assessed against statutory criteria
- Qualifying occurrences are reported to the Building Safety Regulator within required timescales
- Investigations and corrective actions are recorded and tracked through MTVH's Mandatory Occurrence Reporting processes

Residents will be informed where incidents affect their safety or where reassurance or additional information is required. Where a Mandatory Occurrence arises from a complaint, the complaint will continue to be managed under the Complaints Policy while the occurrence is escalated and reported in line with this policy.

## 7 Mandatory Occurrence Reporting During Design, Construction, Regeneration and Major Remediation

Where a Higher-Risk Building is in the design or construction phase prior to first occupation, including regeneration or major remediation works undertaken before occupation, the statutory duty to determine and submit a Mandatory Occurrence Report rests with the relevant duty holders appointed under the Building Regulations (as amended by the Building Safety Act 2022), namely the Principal Designer (PD) and Principal Contractor (PC) for that project.

During these phases, oversight of Mandatory Occurrence Reporting will sit within the Development and Major Works governance framework. The Principal Designer and/or Principal Contractor must notify MTVH, as client, of any Mandatory Occurrence submitted to the Building Safety Regulator.

Evidence of all Mandatory Occurrences reported during the construction phase, including regulatory submissions, investigations and corrective actions, must be incorporated into the Golden Thread of information, which is the accurate and up-to-date digital record of building safety information required under the Building Safety Act 2022, and formally provided to MTVH as part of Gateway 3 and handover documentation.

Upon occupation of a Higher-Risk Building, any relevant historic Mandatory Occurrences will be formally recorded and considered as part of Safety Case development, risk assessment and ongoing building safety management.

## 8 Relationships with Building Governance

8.1 Mandatory Occurrence Reporting forms part of MTVH's:

- Safety Case and Golden Thread arrangements
- Monitoring, audit and assurance framework.

8.2 MOR information will be used to inform:

- Risk reviews and mitigation planning
- Audit and assurance activity
- Executive and Board reporting

## 9 Monitoring and Assurance

MTVH will monitor:

- The number and type of Mandatory Occurrences
- The timeliness of reporting
- Investigation outcomes
- Implementation of corrective actions
- The quality and completeness of regulatory submissions

In addition, independent assurance may be provided through internal audit, external review and regulatory engagement.

## 10 Training and Awareness

MTVH will ensure that colleagues and contractors:

- Are aware of Mandatory Occurrence Reporting duties
- Have access to appropriate guidance and training
- Understand how and when to escalate potential occurrences

Learning from Mandatory Occurrences will be shared, where appropriate, to improve awareness and strengthen prevention.

## 11 Background Legislation and Regulations

- Building Safety Act 2022
- Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023
- Fire Safety Act 2021
- Regulatory Reform (Fire Safety) Order 2005
- Fire Safety (England) Regulations 2022

## 12 Our Commitment to Equality, Diversity, and Inclusion



In implementing this policy, MTVH will not discriminate against any colleague, customer, or stakeholder on the grounds of their sex, sexual orientation, gender reassignment status, ethnic origin, age, religious belief, disability, marital status, and pregnancy/maternity.

An Equality Impact Assessment has been completed for this Policy and is retained by the Policy Team.

### 13 Key Policy Information

Policy Owner	Director of Property - Asset Management
Author	Building Safety Consultant
Approved by	Director of Property - Asset Management
Effective from	March 2026
Approach to review	This Policy & associated Procedures will be reviewed as required by the owner for changes in legislation, regulation, and operational need. Any amendments will be appropriately consulted on and signed off before being clearly communicated to customers and colleagues. Next expected review is 5 years from the 'Effective date' of this document.
<p>This is a controlled document maintained and accessible via MTVH's intranet, The Hub. When viewed outside of the intranet, this document should be checked against the master copy held by MTVH to verify that it is the current version, or it shall be considered uncontrolled.</p>	