


Housing Solutions Fire Safety Policy			
Reference:	HS_POL_FIR_2.1	Author:	Daniel Hooper
Scope:	Housing Solutions properties, staff, and contractors	Approved by:	Executive Team
Legislation:	The regulatory Reform (Fire Safety) Order 2005 Health and Safety and Work Act 1974 The Management of Health and Safety at Work Regulations 1999 Fire Safety Act 2021 Building Safety Act 2022	Date of approval:	14 September 2022
Related Policies:	Health and Safety Policy Access Policy Repairs & Maintenance Policy Planned Maintenance investment Policy Fire safety management plan	Date of next review:	September 2023

1. Policy Statement

- 1.1 Housing Solutions (HS) accepts its responsibilities under the applicable legislation covered in section 2 of this policy with regards to fire safety.
- 1.2 The scope of this policy is applicable to all buildings owned by Housing Solutions, taking into account their legal and moral obligations as a landlord and duty holder regarding fire safety. HS acknowledges that it has both legal obligations and a duty of care towards tenants, employees, and others, inclusive of visitors in respect of fire safety
- 1.3 This Fire Safety Management Policy covers how Housing Solutions complies with applicable legislation. All records are suitably held within the Riskhub management solution and within Keystone the Asset Register, for assets which fall under the RRFSo, dates relating to Fire Risk Assessments (FRA's) anniversary, and target dates relating to FRA remedial actions and work streams are monitored and maintained, along with the next expected test date or fire safety related components which are included in current and future HS servicing regimes.
- 1.4 Housing Solutions will take all reasonable steps to establish, and manage effective control systems and processes are in place to monitor, manage and deliver its fire safety obligations within our properties and wider asset portfolio.
- 1.5 HS will ensure that a suitably competent, and compliantly procured supply chain is in place to deliver all planned and responsive fire safety works on HS's properties
- 1.6 HS will ensure that all contractors internally and externally form the organisation carrying out fire safety remedial works on HS properties are competent, experienced, and where necessary registered or certified with the relevant body to undertake and certify the works. This will

include suitable and sufficient arrangements are in place relating to the risk assessments, methods statements, and safe systems of work for all activities associated with fire safety works or the servicing and inspection of passive and active fire safety equipment. This will be applicable to both HS in-house operations and any contractors employed to execute such works.

- 1.7 Housing Solutions shall ensure that where identified prompt remedial action identified in tenancy audits & welfare visits, shall be taken to safeguard persons in properties where there is a serious risk from fire.
- 1.8 Housing Solutions will ensure that the resident service improvement team is briefed on the revisions within the fire safety policy and that regular communications and updates on performance is provided and explained.
- 1.9 Housing Solutions provides fire safety advice to tenants on sign up as a new tenant, and the Housing Management team send targeted fire safety related updates as necessary.
- 1.10 Evacuation procedures are communicated to the tenants on sign up, and notification as to the fire strategy for the premises are identified on signage on the communal areas of the building

2. Scope

- 2.1 This policy applies to all properties owned or managed by HS, or where third-party managing agents are responsible, the principles of Fire Safety will be applied to all assets irrespective to whether or not they fall under the remit of the Regulatory Reform Fire Safety Order 2005 or the Fire Safety Act 2021.
- 2.2 Where a Third-Party Management Agent (TPMA) is responsible for a building and HS has no legal or contractual obligation to undertake the FRA or the remedial actions falling out of the FRA, in these situations HS will engage and work with the TPMA team to review the FRA and ensure that suitable and sufficient arrangements are in place to ensure the ongoing safety of our residents.

3. Roles and Responsibilities

- 3.1 Roles and overall responsibilities for fire safety are outlined in the table below. Detailed roles and responsibilities are included in the fire safety management plan.

Role	Responsibilities
HS Board	Strategic overview of all HS policies.
Chief Executive	Overall responsibility for the implementation of the Fire Policy in line with the Corporate Strategy.
Executive Director of Property and Development	Responsible for ensuring that the policy is fully implemented and that the Chief Executive and Executive Team are kept informed of required resources and any incidents* in relation to the policy.
Head of Asset Management	Ensuring that the policy is fully implemented and that all persons are provided with the necessary information, instruction, and training to fulfil their roles and responsibilities under this policy and relevant procedures.
Fire and	Ensuring that the policy is up to date, legally compliant and fully

<p>Health & Safety Manager</p>	<p>implemented in line with all safety policies of the organisation.</p>
<p>Fire and Health and Safety Manager</p>	<p>Responsible for ensuring technical, maintenance, property management staff and contractors have received adequate information, instruction, and training and that they comply fully with the policy and procedure and are working safely in accordance with the policy.</p> <p>Responsible for ensuring that immediate action is taken where staff/contractors are not working safely or complying with HS policy.</p> <p>Formally reporting to ET and Board level, including the details of any non-compliance, and planned corrective actions.</p> <p>Ensure that all records are to be kept for five years from the date of the last entry and are available on demand for inspection by internal auditors.</p> <p>Identifying all locations where the property falls under the scope of the RRFSO or the Fire Safety Act either owned or managed by the Association.</p> <p>Making and keeping an up-to-date register of all passive and active fire safety components within HS stock</p> <p>Ensuring that any property, and any fire safety equipment provided to a specific property is tested and maintained during the duration of its requirement in the domestic setting.</p> <p>Obtaining and storing on-going work records so to evidence the maintenance of fire safety equipment in communal areas.</p> <p>Ensure that HS's tenants and residents are informed of Fire Safety issues and changes to ways of working impacting on their homes</p>
<p>Head of Housing</p>	<p>Ensuring that the policy is implemented and that all persons are provided with the necessary information, instruction, and training to fulfil their roles and responsibilities under this policy and relevant procedures.</p> <p>Ensure that appropriate arrangements are in place to identify, record and monitor the suitability and necessity of Personal Emergency Evacuation Plans (PEEPs) relating to our residents in multi-story residential buildings, extra care, supported or sheltered schemes</p> <p>Ensure that the housing teams have access to the training and resources to record and escalate any fire safety related risks or queries they identify, or which are brought to their attention</p> <p>Provide assurance that the external contracted services provided within the extra care, supported or sheltered schemes are operating in a manner which complements the Fire Safety arrangements</p>

	<p>Monitor the status of fire related actions allocated to the Housing Management team through Riskhub</p> <p>Ensure that ongoing tenant engagement and communication relating to fire safety in their home and the sterile communal areas with multi story residential building is maintained</p> <p>Ensure that all current and new residents are informed of the evacuation strategy of their specific building</p>
Estate Services Manager	<p>Record planned visits by the cleaning contractor to evidence that communal areas and stairwells are sterile and free from risks</p> <p>Manage the removal of items from the communal areas of our buildings which contravene the fire safety arrangements for the building</p> <p>Report any breaches to the Health and Safety and Fire Manager</p> <p>Monitor the status of fire related actions allocated to the Estate Services team through Riskhub</p>
Health and Safety Panel	<p>Ensuring compliance with all aspects of fire safety legislation. Keeping abreast of changes to legislation and associated guidance documents.</p> <p>Developing, monitoring, and reviewing policies and procedures that reflect the role stated above.</p> <p>Ensuring consistency of approach to fire safety through effective communication.</p> <p>Ensuring fire safety training is adequate and up to date for all staff.</p> <p>Monitoring, recording and measure performance. Liaising with the Fire and Rescue Service and any other appropriate body</p> <p>Reviewing investigation reports and lessons learnt from all fire related incidents</p> <p>Providing information and assurance to the Board</p>
All Staff Operatives / Contractors	<p>Responsible for ensuring that they are working safely and in accordance with policy and procedures and that departmental / senior managers are immediately informed of any incidents Responsible for reporting any non-compliance with procedures (i.e., where a contractor or HS staff are not complying with procedures).</p>

4. Overall approach to fire safety

4.1 We have a risk adverse appetite to health and safety and in order to minimise the risks arising

from fire in our properties we have adopted the following approach:

- Ensure that a high priority is given to managing fire safety in our properties.
 - Ensure that all existing and new properties meet relevant fire safety legislation and regulation.
 - Ensure that the risk profile of all of our properties in respect of fire safety is understood.
 - Ensure that effective, suitable, and sufficient fire risk strategies and assessments are in place to manage fire safety risks in our properties.
 - Implement a fire safety management plan which will provide clarity about roles and responsibilities within our overall approach to fire safety.
 - Appoint a responsible person who is a Senior Manager to take the lead on our overall approach to fire safety.
 - Ensure that colleagues are appropriately trained and aware of fire safety.
 - Ensure that all people who work on our behalf in discharging our fire safety responsibilities are competent.
 - Ensure that residents and other people have access to information to enable them to know what to do in the event of a fire occurring where they live.
 - Appoint a competent person with the skills, training, and experience to provide independent advice and assurance on fire safety and ensure that they remain up to date with changes in the law, regulation, and best practice.
- Implement Emergency evacuation procedures as required
 - Maintain and monitor the requirement for evacuation procedures to be in place
 - Maintain a register of accurate and accessible property and resident information
 - Undertake ongoing servicing and maintenance on all fire safety equipment across HS's stock
 - Ensure that HS has open and transparent communication with the regulator on all matters Fire related
 - Ensure that HS adapts communication strategies with residents as appropriate to the risk or update
 - Continues to maintain and monitor all other compliance safety measures including gas and electric as part of the overall fire safety strategy for our buildings

5. Procedure

- 5.1 This policy is supported by the fire safety management plan which is included as Appendix A. The aim of our fire safety management plan is to minimise the risk to residents, their visitors, colleagues, and people who work on our behalf by effectively managing fire safety within properties.
- 5.2 The plan defines roles and responsibilities and our overall approach in more detail. It adopts the 'plan do check act' (PDCA) cycle of risk management in accordance with BS9997: 2019. This ensures that we comply with our overall legal and regulatory responsibilities in relation to fire safety.
- 5.3 The plan outlines fire safety procedures and explains how we will know if the actions we are

undertaking to manage fire safety are achieving the expected results.

- 5.4 All those who are responsible for the management of fire safety are required to have read both the policy and the management plan and will, subject to receiving the necessary training, also confirm their understanding of their responsibilities for fire safety.

6. Fire Risk Assessments

- 6.1 The Regulatory Reform (Fire Safety) Order 2005 (RRFSO) places a duty on organisations to ensure suitable and sufficient fire risk assessments are undertaken in non-domestic premises on a frequency which reflects the risk rating of the property, its use, its condition and its occupancy demographic, HS has adopted a stand 1, 2, or 3 year cycle dependent on the risk rating attached to the specific properties
- 6.2 We will undertake fire risk assessments for all of our properties which meet the requirements of the RRFSO. This means that risk assessments will be carried out for all of the following:
- Our offices and other places of work, including locations where staff 'sleeping in' is a condition of their employment.
 - The communal areas of houses in multiple occupation.
 - The communal areas of flats and maisonettes.
 - The communal areas of our care homes and sheltered and supported living schemes.
- 6.3 In addition, when undertaking Type 3 and Type 4 fire risk assessments, we will obtain access to a proportion of residents' flats/apartments in order to assess fire risks within those properties and the building. Definitions of Type 3 and Type 4 fire risk assessments is detailed in Appendix D.
- 6.4 Our approach is to develop a risk-based programme to fire risk assessments, the purpose of which is to help us to identify, evaluate, remediate, and manage all the fire hazards.
- 6.5 In addition, we will undertake Type 3 fire risk assessments in all other blocks on the programme followed by further assessments based on the risk profile of the building or after any form of refurbishment programme - these could be Type 1, 2, 3 or 4.
- 6.6 Further detail on what is involved in each Type (1 to 4) of fire risk assessment is set out in the fire risk management plan.
- 6.7 The programme will be ratified with our professional advisors (the competent person) to ensure that the requirements of the RRFSO are met.

7. Monitoring and Reporting

- 7.1 We will ensure that we maintain comprehensive and accurate records in relation to fire safety in our properties. This will enable us to manage our fire safety responsibilities and be able to demonstrate how we have met our legal and regulatory obligations, those contained within this policy and within our fire safety management plan.
- 7.2 We will ensure that all records comply with the requirements of our data protection policy and are managed in accordance with our arrangements for data governance.

8. Training Requirements

- 8.1 We will ensure that all relevant colleagues receive training in relation to fire safety. We will provide awareness training where necessary to colleagues and specialist training for colleagues who are responsible for managing fire safety on a day-to-day basis or whose work could impact upon fire safety measures within our properties.
- 8.2 Training records will be maintained, and refresher training delivered annually or as and when required.

9. Vulnerable Residents

- 9.1 Where the Housing Management Team are informed or identify that a PEEP is required for a resident in one of HS's properties they should consider if the arrangements identified within the PEEP are temporary, or if more permanent arrangements need to be considered.
- 9.2 Where following a PEEP it is identified that a People Centered Fire Risk Assessment (PCFRA) is required, this will be completed by the Housing Management team in conjunction with the resident and a decision will be made as to what actions or control measures need to be taken to reduce the risk.
- 9.3 Where it is identified that adaptations or the introduction of permanent passive or active fire safety arrangements are required in order for the resident to remain in the property, then the Housing team should seek technical advice from the Health and Safety & Fire Manager who will provide technical advice and guidance on the options available
- 9.4 The PEEP and the PSFRA will be added to the block information file in the fire document box where the fire service can access the information
- 9.5 This information and documentation will be assessed on a 6 months basis from October 2022 and the information updated accordingly.

10. Equality & Diversity

- 10.1 Housing Solutions recognises the needs of a diverse population and always acts within the scope of its own Equality and Diversity Policy, the Human Rights Act 1998, and Equalities Act 2010. Housing Solutions works closely with its partners to ensure it has a clear understanding of its resident community with clear regularly updated service user profiles. Housing Solutions will record, analyse, and monitor information on ethnicity, vulnerability, and disability

11. Confidentiality

- 11.1 Under the Data Protection Act 2018, UK General Data Protection Regulation (UKGDPR) and the Human Rights Act 1998, all personal and sensitive organisational information, however received, is treated as confidential. This includes:
 - anything of a personal nature that is not a matter of public record about a resident, client, applicant, staff or Board Member
 - sensitive organisational information.
- 11.2 Housing Solutions employees will ensure that they only involve other agencies and share information where there is a legal basis for processing the information.

12. Review

- 12.1 The review period for this version of the Fire Safety Policy has been set at 12 months from the date of adoption. This 12-month review period allows HS to understand the changes and altering approach to fire safety within the sector and nationally, and to positively adapt its approach to ensure it continues to deliver a proactive fire safety function.
- 12.2 The review period from 2023 onwards will be representative of the risks across HS stock and the national landscape, as well as any new or emerging regulatory guidance, good practice, or changes in other relevant Housing Solutions' policy.
- 12.3 Our performance in relation to the delivery of the services and activities set out in this policy will be monitored on an ongoing basis through our established reporting mechanisms to our Senior Management Team, Executive Team, Board and associated Committees.

13. Appendices

- 13.1 Appendix A: Fire Safety Management Plan
- 13.2 Appendix B: Explanation of Fire Risk Assessment types
- 13.3 Appendix C: Fire Risk Assessment annual programme process map
- 13.4 Appendix D: Fire Risk Assessment remedial action process map
- 13.5 Appendix E: New Fire Risk Assessment process map

FIRE SAFETY MANAGEMENT PLAN

Document Control

Date Issued		Produced by	Michael Lyons - External Consultant
Responsible Role		Service Area	
Approved by		Consulted	
Version		Date	

Who should read?

- Asset Management
- Development
- Compliance
- Delivery
- Business Support
- Finance
- Housing Management

Introduction

1. Background and Purpose

Background

- 1.1 In the context of the Policy and the associated management plan, Housing Solutions (HS) are the Registered Provider and the landlord, and therefore their Board are the responsible legal entity and Duty Holder.
- 1.2 At the time of writing the management plan Housing Solutions has some 414 multi occupancy residential properties that were identified as falling within the remit of the Regulatory Reform (Fire Safety) Order 2005 and requiring a Fire Risk Assessment (FRA), these FRA's are undertaken by Savills.
- 1.3 The management plan underpins Housing Solution's Fire Safety Management Policy. It covers the properties owned by HS, or where a contractual responsibility exists for the management of fire safety.

Purpose

- 1.4 The management plan explains how Housing Solution's commitment to fire safety will be met. It provides more detailed guidance and procedures which define how the commitments given within the Fire Safety Management Policy will be delivered.
- 1.5 The management plan will be available to Housing Solutions colleagues on the intranet, and training will be provided to explain its content and use. Contractors and supporting consultants will be provided with a copy of the management plan to ensure clarity in how the services must be delivered.
- 1.6 Housing Solutions must also undertake a monitoring role to ensure that they are able to demonstrate a validated landlord compliance position and can provide assurance to other 3rd Parties that statutory, contractual, and regulatory standards are being achieved. The management plan will provide guidance on Performance and Assurance.

2. Objectives and Scope

Objectives

- 2.1 The key objective of this management plan is to describe how Housing Solutions will meet the required statutory, contractual, and regulatory requirements in relation to fire safety. It will also cover the roles and responsibilities in respect to landlord compliance from the Board and Executive to teams and individual posts.

Scope

- 2.2 The management plan includes guidance on the delivery of our policy commitments in the following areas:
 - Fire risk assessment (FRA)
 - Actions arising from FRA
 - Management of buildings in relation to fire safety
 - The testing, inspection, and servicing of fire safety systems

2.3 It also covers / includes guidance on:

- Data- how data in relation to the above area is captured and controlled in each of the four areas detailed above
- Access- the process relating to gaining access
- Performance and assurance- how and when performance is monitored and report and assurance in place

2.4 It covers the following properties

- All non-residential properties: (which include offices, depots, shops, other commercial buildings, blocks and communal areas, remote plant, and garages).
- All residential properties: (which include general needs housing, supported housing, sheltered housing, and other rented properties owned and managed by Housing Solution.
- Also including leaseholders/ shared ownership properties and other rented housing managed by Housing Solutions on behalf of a third party unless other parties are explicitly specified as having statutory responsibility in a lease or management agreement.

3. Regulatory Standards and Legal Obligations

3.1 Housing Solutions will comply with all current and relevant legislation and specifically as detailed in the following.

- the Building Regulations
- the Housing Act 2004 and
- the Regulatory Reform (Fire Safety) Order (RRFSO) 2005
- the Fire Safety Act 2021

3.2 Housing Solutions also acknowledge their obligations under the Health and Safety at Work etc. Act 1974 and Landlord and Tenant Act 1985.

3.3 In addition, as a Registered Provider Housing Solutions must meet the requirements of the Regulator for Social Housing's Homes Standard.

3.4 It is essential to ensure residents, residents, employees, and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our legal responsibilities may result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work etc. Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- Regulator of Social Housing's serious detriment judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

4. Commitments

4.1 This section covers the commitments HS makes in order to comply with Regulatory Standards and legal obligations, and to ensure the safety of their residents, staff, contractors, and other visitors to their properties. It also cross references associated process maps and guidance that support the delivery of these commitments.

4.2 Where there is a duty to manage the risk associated with fire HS will ensure:

- A suitable Fire Risk Assessment (FRA) is undertaken by an appropriately trained and experienced competent person.
- Where necessary a suitable fire risk appraisal and assessment (FRAA) of the external wall construction (PAS9980 compliant) will be undertaken by a competent person
- That management actions and remedial works arising from the FRA are actioned and tracked to completion, including evidence of completion, including photographs and relevant certification.
- Fire Safety systems and fire safety equipment, where fitted, are maintained to the recommended standards through regular programmes of cyclical maintenance
- That those within HS with a fire safety responsibility are appropriately trained to fulfil their roles

Data

4.3 Understanding and recording our requirement is a key part of effectively managing and monitoring our requirements. The guide below sets out the data we will hold and how it will be maintained:

The FRA

4.4 Housing Solutions will maintain a Master Database of all properties where it has a responsibility to provide an FRAs. All of the assets within the groups identified in the table below will be classified either **'Yes'** or **'No'** in respect of if an FRA is required.

	Dwelling	Common Part	Block	Depots	Office	Shop
FRA Requirement	ü	ü	ü	ü	ü	ü

Note: Houses/Flats are recorded as dwellings in our data if they are occupied as single private dwellings.

- 4.5 A monthly reconciliation check will be undertaken to ensure that all properties in the categories above have a confirmed yes or no status. Any exception (i.e., an asset without an FRA requirement status) will be reported along with an explanation of any changes to the numbers. The results of the reconciliation check will be signed off on a monthly basis. The methodology for this will be outlined in the Fire Safety Manual.
- 4.6 All properties with a **'No'** status will require evidence to support the case that no FRA is required, HS has elected to have Savills undertake a Type B FRA to evidence this.
- 4.7 Some properties will have a **'Yes'** status where there is a requirement to undertake one, but where Housing Solutions holds suitable and sufficient evidence to identify that it is not their responsibility to do so. For example, where a shop unit is let on a commercial basis, and it is the specific responsibility within the lease that the shopkeeper is responsible to produce the FRA. HS will request evidence of such from the shopkeeper, and in these cases, they will hold the information on the current FRA date, and the date the FRA should be renewed. This will facilitate a process for checking that the third-party responsibility has been fulfilled.

4.8 The following information will be held on all assets with a 'Yes' status:

- Full address details including UPRN
- The date the current and the previous FRAs were undertaken
- The date of the last desktop review
- The outcome of the last desktop review (i.e., if the previous FRA remains valid)
- The target date for the renewal of the FRA
- The risk category of the building
- The evacuation strategy for the building
- A link to the full FRA report (for the current and previous FRAs in Riskhub)
- A link to the full list of remedial works in Riskhub

Remedial Actions

4.9 HS will maintain a collated list of remedial actions for assets with a Yes status. For each remedial action we will hold the following information:

- Full address details including UPRN
- The date the FRA was undertaken
- The risk category of the building
- Description of the required remedial action
- The priority of the remedial action
- The target timeframe for the remedial action
- The completion dates
- A link to evidence of completion
- The date the action was verified as complete
- The date that the action was post inspected

4.10 We will follow a clear process relating to the completion of actions. This will include photographic, or document evidence being held and uploaded, and a sign off that the action is complete. A post inspection activity will be undertaken by the Fire Door Inspector and Fire Door Project Surveyor as part of the close down and sign off activity for remedial and fire door work.

Fire safety Management

4.11 Housing Solutions will maintain a Master Database of all properties where specific cyclical management activities are identified. All of the assets in the groups listed below will have a 'Yes' or 'No' status (indicating if the activity is or isn't required) against each of the elements listed below:

	Dwelling	Common Part	Block	Depots	Office	Shop
Person-centred Fire Risk Assessment	Specialised housing only					
PEEP	Specialised housing only			When required	When required	
Management Inspection		✓	✓	✓	✓	✓

Fire Drill		Where required by recommended best practice
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4.12 All properties with a **'No'** status will require evidence to support the case that the activity is not required. This is likely to be confirmed by the competent person undertaking the assessment.

4.13 HS will maintain a collated list of assets where the above activities have a **'Yes'** status. For each asset we will hold the following information:

- Full address details including UPRN
- The type of activity required
- The frequency of the activity required - note one record will be held per activity/frequency combination
- Last and previous completion dates (i.e., the last two completed actions)
- A link to evidence of completion
- The date the next action is due

4.14 A monthly reconciliation check will be undertaken to ensure that all properties in the categories above have a confirmed yes or no status. Any exception (i.e., an asset without a requirement status for any of the activities listed) will be reported along with an explanation of any changes to the numbers. The results of the reconciliation check will be signed off by the H&S and Fire Manager and the Head of Assets on a monthly basis. This process will be captured in the Fire Safety Manual,

Fire safety systems and equipment

4.15 Housing Solutions will maintain a Master Database of all properties where fire safety systems and equipment are installed. All of the assets below will have a **'Yes'** or **'No'** status (indicating if the activity is or isn't required) against each of the elements listed below:

	Dwelling	Common Part	Block	Depots	Office	Shop
Fire Alarm System	*	ü	ü	ü	ü	ü
Emergency Lighting	*	ü	ü	ü	ü	ü
Sprinklers /Misting Systems	*	ü	ü	ü	ü	ü
AOV		ü	ü	ü	ü	ü
Dry/Wet Riser		ü	ü	ü	ü	ü
Fire Fighting Equipment		ü	ü	ü	ü	ü

* Dwellings linked to common parts where a system is present will have a Yes or No status indicating if related equipment existed within the dwelling.

4.16 All properties with a **'No'** status will require evidence to support the case that no systems or equipment is present. This is typically the result of an inspection (stock condition survey or the asset schedule accompanying the FRA) showing that the above elements are not present.

4.17 HS will maintain a collated list of fire safety systems and equipment for assets with a **'Yes'** status. For each record we will hold the following information:

- Full address details including UPRN of system
- Location of the equipment (includes UPRN if the equipment is in a dwelling linked to main UPRN)
- The type of equipment
- The type and frequency of the activity required (i.e., test/service etc.)- note one record will be held per activity/frequency combination
- Last and previous completion dates (i.e., the last two completed actions)
- A link to evidence of completion (e.g., certification)
- The date the next action is due
- The date that the action was post inspected (where appropriate)

4.18 A monthly reconciliation check will be undertaken to ensure that all properties in the categories above have a confirmed yes or no status. Any exception (i.e., an asset without a requirement status for any of the systems/equipment listed) will be reported along with an explanation of any changes to the numbers. The results of the reconciliation check will be signed off by the H&S and Fire Manager and the Head of Assets on a monthly basis This process will be captured in the Fire Safety Manual.

Additions/Reductions to Stock

4.19 The following circumstances will require a controlled amendment to the Master Database where there is a responsibility for fire safety:

- New build property
- Acquisition of property
- Property disposal
- Property demolition
- Any other addition or reduction to the stock

4.20 The following circumstances will require a review of fire safety responsibilities and any changes to the existing responsibility should be updated in the Master Database:

- Property refurbishment.
- Change of property tenure
- Change of property use

4.21 Please see HS Data Management Protocol for guidance on management of the core data.

Delivery

4.22 A high-level summary of the delivery process for the fire safety route is provided in the fire safety manual

Access

4.23 Residents are required to provide reasonable access to Contractors to undertake fire safety checks and maintenance in accordance with their tenancy agreement. HS follows a consistent access process where access is required, this is detailed in the fire manual

4.24 HS will proactively assess available data for relevant information about the resident to help gain access (disability, vulnerability, local connections, etc.).

The Fire Risk Assessment (FRA)

General

- 4.25 All properties subject to the RRFSO will be subject to an FRA. FRAs will only be undertaken by contractors deemed competent in accordance with this Plan. Reports shall follow PAS 79 with a separate action plan.
- 4.26 For new build properties of refurbished premises, an FRA will be undertaken prior to occupation.
- 4.27 A type 3 FRA shall be the initial assessment. The inspection of the building is non-destructive. But, as well as considering the arrangements for means of escape and so forth, the fire risk assessment includes examination of at least a sample of flat entrance doors. It also considers, so far as reasonably practicable, the separating construction between the flats and the common parts without any opening up of construction. However, in this Type of fire risk assessment, entry to flats beyond the area of the flat entrance door, is not involved. Where there are demountable false ceilings in the common parts, it may be appropriate to lift a sample of readily accessible false ceiling tiles. In addition, it will normally be appropriate to open a sample of service risers, provided access is practicable at the time of inspection.
- 4.28 Unless there is reason to expect serious deficiencies in structural fire protection (such as inadequate compartmentation, or poor fire stopping) a Type 3 inspection will normally be sufficient for most blocks of purpose-built flats. Where doubt exists in relation to these matters, the competent person undertaking the assessment may recommend that either a Types 4 FRA or an external wall survey are conducted by specialists. This recommendation will carry a timeframe in accordance with the risk. However, this should not be a generic recommendation of all Type 3 fire risk assessments and should be based on identification of issues that justify reason for doubt.
- 4.29 The FRA will establish the current and recommended evacuation strategy for the building (see general guidance below).
- 4.30 The FRA will establish a risk rating against each applicable property. This will be identified by the competent person undertaking the FRA along with a recommended date for a new FRA to be undertaken (see section below). Our risk categories and typical examples are as follows:

Risk Profile of the Premises	Example of Property Type
Level 3	Purpose built, general needs residential blocks of no more than 2 storeys above ground.
Level 2	Purpose built, general needs residential blocks of between 3 and 5 storeys (inclusive) above ground.
Level 1	Premises with vulnerable occupants (e.g., sheltered and supported housing), HMO's, converted premises, high rise blocks (greater than 5 storeys), assembly buildings, offices etc.
Category B Stock	Buildings where some element of common part exist but there is no foreseeable risk in

	relation to that common part at the time of inspection
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Review and Renewal of FRA

4.31 The FRA is a living document and needs to remain valid.

4.32 HS will undertake new FRAs following any of the events below:

- a fire, near miss or threat of arson.
- the introduction of new work practices.
- any works affecting the means of escape or alarm systems.
- structural or material changes to the building or its use.
- widespread changes in the type of residents occupying the building; and
- a significant change in legislation or guidance.

4.33 If there is a reason to suspect that the FRA may no longer be valid, this will prompt a new FRA. This decision is made by the Responsible Person.

4.34 Outside the circumstances outlined above, FRAs will be renewed on or before the date recommended by the competent person undertaking the previous assessment. In any event renewals of FRAs will be undertaken at frequencies not greater than those in the table below:

4.35

Risk Profile of the Premises	Example of Property Type	New FRA
Level 3	Purpose built, general needs residential blocks of no more than 2 storeys.	Every 3 years
Level 2	Purpose built, general needs residential blocks of between 3 and 5 storeys (inclusive).	Every 2 years
Level 1	Premises with vulnerable occupants (e.g., sheltered and supported housing), HMO's, converted premises, high rise blocks (greater than 5 storeys), assembly buildings, offices etc.	Annual
Category B	Buildings where some element of common part exist but there is no foreseeable risk in relation to that common part at the time of inspection	NA

Actions Arising from the FRA

4.36 Actions arising from the FRA are categorised into the following areas:

- Management Actions
- Remedial Works

Management Actions

4.37 Defined as actions to be taken in relation to the management of the building or where or where further confirmation is required, or further site checks needed.

Management Action Priority

4.38 Management Actions will be prioritised according to the nature of the risk identified within the FRA and timescales for completion will be provided by the fire risk assessor (having previously been established as a risk matrix in consultation with HS). As a general guidance Management Action priority are likely to be as follows:

Priority
Urgent
Man1
Man2

Remedial Works

4.39 Defined as works which generally involve the need for contractors to complete.

4.40 Examples of remedial actions are replacement or repair of fire doors, compartmentation improvements, automatic fire detection and alarm works etc.

Remedial Works Priority

4.41 Remedial actions will be prioritised according to the nature of the risk identified within the FRA and timescales for completion will be provided by the competent person. As general guidance Remedial Action priorities will be categorised as follows:

Priority
Urgent
A
B
C
R

Timescales

4.42 Actions arising from the FRA will be dealt with in accordance with the priorities and timeframes set out by the competent person undertaking it. As a guide the following priorities and timeframes will be used:

Building Risk / Action Priority	Level 1	Level 2	Level 3
Urgent	1 Day	1 Day	1 Day
A	3 Months	3 Months	3 Months
B	12 Months	12 Months	18 Months
C	18 Months	24 Months	24 Months
Man 1	1 Month	1 Month	1 Month
Man 2	3 Months	3 Months	12 Months

R	Unspecified	Unspecified	Unspecified
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4.43 There are circumstances where it is appropriate to review and potentially extend the timeframes attached to actions. However, it is essential that any changes are appropriate, risk based, and the process is controlled and visible. Action timeframes will only be changed if the fire risk assessor agrees in writing that it is appropriate to do so. Evidence of the same will be held. Changes to timeframes will be signed off by the Director of Property and Development and shall be clearly explained when the first subsequent set of KPIs are recorded. This process will be captured in the Fire Safety Manual

Management of Buildings

Evacuation

4.44 Ensure each building has an evacuation strategy stated clearly in the FRA. The FRA will record the current and recommended evacuation strategy. Any exceptions, i.e., where the current and recommended strategy differ will be reported and referred to the Fire Safety Group. The recommended evacuation strategy will be confirmed or proposed by the fire risk assessor, however as a general principle:

4.45 Residential accommodation (with common parts):

- Purpose built accommodation will generally have a 'stay put' policy. Occupants have the option to stay in the building provided they feel it is safe to do so. The 'stay put' policy may change based on the instructions of the Fire and Rescue Service during an emergency situation.
- Aged, converted accommodation will have a 'total evacuation' policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds
- Residential buildings which are managed 24 hours or which house vulnerable residents may require bespoke evacuation strategies specific to the premises (outlined below in 'Assisted Evacuation').

4.46 Commercial accommodation and community premises:

- Premises to have a 'total evacuation' policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds.

4.47 Assisted Evacuation:

- For commercial, community and non-residential premises it is the responsibility of each employee to inform their line manager of any physical or sensory impairment he/she may have, including temporary impairment, which may affect how they evacuate the premises. HS will be proactive in becoming aware of people who may need assistance to escape in the event of a fire.

4.48 In residential premises:

- General Needs - where practicable and should assistance be requested, and where HS is made aware, it will provide advice and guidance to assist residents in developing their own means of escape plan in general needs premises. This will not involve the assistance of HS staff in the evacuation.
- Specialised Housing – assessment of individuals will be made by the specialist care providers. This will involve detailed and up to date records of occupants, in some

buildings will require person centred fire risk assessments (PCFRAs). Assistance in evacuation provided by staff will be determined on a case by case basis. The Fire and Rescue Service will be included in the process. PCFRAs will be undertaken at the start of tenancy and reviewed on the same basis as FRAs for the premises.

- Where appropriate, provide equipment to aid evacuation which should only be used by appropriately qualified or trained persons e.g., the Fire and Rescue Service.
- Evacuation drills will be carried out in all non-residential buildings and a selected set of residential buildings. This will be determined by the FRA. In non-residential buildings HS will conduct drills twice annually. Residential premises with alarms will be assessed as to the appropriateness of regular fire drills as part of the FRA. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.

Communication/Fire Emergency Evacuation Plan (FEED)/Fire Action Notice (FAN)

4.49 All new staff to the organisation will be instructed in the fire evacuation procedure relating to their workplace on induction.

4.50 It is imperative that HS plan and inform relevant parties on the site-specific procedures in the event of a fire emergency. For all relevant properties an emergency plan will be provided which will include the following:

- How occupants are warned in the event of a fire.
- What staff, occupants should do if they discover a fire.
- How the evacuation of the premises should be carried out.
- The needs or risks relating to individuals.
- Where occupants should assemble after they have left the premises and procedures for checking whether the premises have been evacuated.
- Identification of key escape routes, how people can gain access to them and escape from them to a place of total safety.
- The duties and identity of staff that have specific responsibilities if there is a fire e.g., Fire Wardens.
- Arrangements for the safe evacuation of people identified as being especially at risk, such as occupants and others with disabilities, children, people working alone and members of the public.
- Any machines, processes, appliances, or power supplies that need to be stopped or isolated if there is a fire.
- Specific arrangements, if necessary, for high-fire-risk areas.
- Contingency plans, such as restrictions on the use of the building for when life safety systems, such as evacuation lifts, fire detection and warning systems, sprinklers or smoke control systems are out of order.
- How the Fire and Rescue Service and any other necessary services will be called and who will be responsible for doing this.
- Procedures for meeting the Fire and Rescue Service on their arrival and notifying them of relevant information such as the locations of any persons still in the building or any special risks, e.g., the location of highly flammable materials.

4.51 The Fire Emergency Evacuation Plan outlined above (and specifically detailed in the FRA) will, in most cases, be communicated in the form of a Fire Action Notice situated in areas of high footfall and/ or near final exits. The FRA will make recommendations if the FANs within the buildings are not currently sufficient, and the rectification of any issues will be

dealt with as actions outlined above.

- 4.52 Critically, a fire action notice will inform occupants of the building's evacuation strategy (for example stay put or total evacuation) and on actions to take in the event of a fire as follows:
- I. **Raising the alarm** - Advise occupants on the recommended way to raise the alarm. If appropriate whether it is verbally or through using an available fire alarm call point.
 - II. **Fire and Rescue Services** - Advise occupants on the method of contacting the fire brigade.
 - III. **Assembly Point** - Advise occupants of the location of the assembly point as a safe area.
 - IV. **Lift** - Advise Occupants that in the event of fire, not to use the lift.
 - V. **Do not collect belongings** - Advise occupants to vacate the premises without delay in the event of a fire.

Responsive Repairs

- 4.53 All responsive repairs must consider fire safety and should be carried out in accordance with the relevant British Standard, approved code of practice or associated best practice guidance.
- 4.54 The adequacy of proposed 'temporary' repairs should be approved by the relevant Manager in consultation with the Compliance Manager.
- 4.55 Key staff and contractors involved in the delivery of repairs will be trained in the key risks to Fire Safety resulting from the repairs activity. This is outlined in the competence section below.
- 4.56 Level 1 Buildings will be designated permit to work areas. Signage will be displayed in the premises to explain the procedure. Before any work can commence a suitable method, statement will be prepared to ensure continuity of fire safety, particularly relating to work on fire safety systems or when hot works are being undertaken. This will be agreed in advance by the Contract Manager or Line Manager as appropriate.

Planned Investment and Refurbishment Programmes

- 4.57 Where required, HS will ensure that all relevant building control legislation is complied with, in particular for fire safety. HS will ensure that a building regulations approval and completion certificates are obtained and that the premises are fire risk assessed prior to occupation.
- 4.58 Before commencing any planned maintenance or upgrade programmes a risk assessment must be undertaken. The risk assessment will consider the scope of work and the premises included, against the available fire safety information (FRA, current reports/examinations, remedial works, management actions etc.). The primary purpose of the risk assessment shall be to assess if there is a foreseeable risk relating to the impact on fire safety and if the current proposals adequately manage that risk. See process map 7
- 4.59 Where the risk assessment indicates that work being carried out by a contractor has a foreseeable risk of an impact on existing fire safety measures in a building, HS will ensure that an appropriate volume of post project fire safety checks, proportionate to risk, will be completed by a competent person independent to the contractor. This check will provide confirmation that all existing fire safety measures remain in place and are fully functional.
- 4.60 As it is not unusual for fire doors, fire compartmentation and fire stopping to be disturbed or breached in the course of construction or services work, the post project fire safety check will include visual inspection of vulnerable locations such as roof voids and services risers

etc.

4.61 For major refurbishment projects the following principles will be applied:

- The design responsibility matrix should be developed as early as practical and should target early consideration of Building Regulations requirements, and must, in particular, result in full sign-off of fire safety design prior to any construction.
- Early involvement of competent people (e.g., from RIBA stage 2) to ensure design, and again in particular that relating to fire safety, is well considered, and coordinated.
- early involvement of the fire consultant, local Fire Authority and Building Control should be sought
- Care will be required to ensure that the design team has the appropriate skills, knowledge, and experience in accordance with the requirements and timing set out in the design responsibility matrix.
- An evaluation of the potential conflict in the design and procurement strategies and, in particular, to and risk associated with the contractor being incentivised to deliver the lowest cost solution to meet employer's requirements.
- Client appointed independent inspection by a competent person during the construction phase should be used to provide assurance.
- Agreed mandatory activities prior to occupation to include an FRA and involvement of the Fire Authority at this stage will be key.

Residential Properties

4.62 All residential properties will receive the following which contribute to reducing the risk of fire:

4.63 An annual gas and heating installations safety check, thereby reducing the risk of fire from gas faults (see Gas Safety policy)

4.64 An electrical safety test in general needs accommodation (dwellings), communal areas and specialist housing accommodation on a five-yearly cycle.

4.65 An additional gas safety check and electrical safety test when a property is re-let (including mutual exchanges)

4.66 Regular checks and testing where electrical equipment (such as vacuum cleaners, microwave ovens or toasters) are provided and maintained by HS, in line with the EET – Electrical Equipment Testing (Previously known as PAT) procedure located in the Electrical Safety policy

4.67 Beyond the scope of the RRFSo, all dwellings owned across HS's portfolio (excluding leasehold and shared ownership) will have mains operated smoke detection systems installed as part of tailored planned improvement programmes, void improvement works or cyclical maintenance contracts such as electrical testing All residential properties in blocks will be fitted with mains operated smoke alarms by April 2024, all HS residential stock will continue to be fitted with mains operated smoke alarm during the void works as they become vacant.

4.68 All residents are responsible for their own fire safety within their homes, including carrying out regular tests of their individual fire detection system.

Furniture and Furnishings

4.69 In all residential properties where furniture and furnishings are provided, whether in common areas or as part of a furnished tenancy, all will be in compliance with the Furniture

and Furnishings (Fire Safety) Regulations 1988 (as amended).

4.70 Furniture and furnishings will be checked for condition every 2 years and replaced as necessary.

Communal Area Inspections

4.71 All properties subject to the RRFSO will receive regular inspection of communal areas.

4.72 The frequency of inspections will be determined by the individual risk within each building as identified within the FRA and prescribed by the competent person. In the absence of specific guidance, the following frequencies will apply:

Priority	Timescale
Level 1 - High Risk Buildings: 1. Attended 2. Non-Attended	Weekly
Level 2 - Medium Risk Buildings	Monthly
Level 3 - Low Risk Buildings	Monthly

Common Areas and Escape Routes

4.73 Goods left in communal areas by tenants, residents, leaseholders can be a source of ignition and support combustion, as well as potentially blocking escape routes. For this reason, storage of goods in communal areas is not allowed without our express permission and all tenancy agreements include a clause prohibiting the storage of goods in communal areas.

4.74 HS will take action to remove items that are left in communal areas. In particular, bicycles, motorbikes, mobility scooters and items of furniture can present a hazard by blocking important access and escape routes.

4.75 The storage of bicycles, motorbikes and other resident goods will not be permitted in communal areas, except in designated storage areas.

4.76 In the case of mobility scooters, where no designated storage area exists, they must not be stored in access or escape routes. Under no circumstances should mobility scooters be charged in any communal areas other than specially equipped designated charging/storage rooms.

4.77 Where it is identified that residents are storing goods in communal areas, if the owner is known HS will contact them directly to request removal. If the resident is not known the items will be stickered and a 7-day grace period provided following which the items will be removed.

4.78 To deal with a general problem a range of approaches will be considered, including for example putting up signs, or carrying out a mailshot to all residents in the building.

4.79 Under no circumstances should flammable materials be stored in any communal areas other than designated storage rooms.

Managing Resident Influences on Fire Safety

4.80 **Stored Oxygen** - Where residents have stored medical oxygen in their properties, they are responsible for informing HS so the Local FRS can be alerted to the presence of stored oxygen in the premises. Arrangements are in place for information to be exchanged

between the health service's oxygen provider and the local FRS. Where HS is informed that oxygen is present appropriate records will be kept.

- 4.81 **Security gates and grills** - Residents (including leaseholders) should not fit metal security gates to their homes without seeking permission. Where residents have already fitted metal security gates and these have been identified as an unacceptable fire risk in the fire risk assessment, HS will request for them to be removed.

Fire Investigation

- 4.82 Following a fire at any HS property, the Compliance Manager and the H&S and Fire Manager will lead an internal fire investigation. The investigation will assess the current FRA and management and remedial actions completed, as well as the effectiveness of any fire precautions present, how procedures worked including learning outcomes.
- 4.83 A fire investigation report will be requested from the local FRS which will be integrated within the internal investigation report. Additionally, a fire within any property may trigger a new FRA re-assessment to be undertaken (see above).
- 4.84 The internal fire investigation and the Fire Authority report will be considered by the Health and Safety Panel (H&SP) at the next meeting, and any resulting actions agreed.
- 4.85 The fire investigation reports should be electronically stored on a central file and a running count kept of fire incidents within a twelve-month period, with any learning points and actions arising /changes in process, recommendations of H&SP, captured on the central file.

Enforcement

- 4.86 Due to the locations of HS's property portfolio the Royal Berkshire Fire and Rescue Service will be the enforcing fire authority. They have the power to inspect all premises to establish if a suitable and sufficient FRA has been carried out, and if significant findings have been recorded and the assessments have been acted upon.
- 4.87 If they are dissatisfied with the outcome of the FRA or the action taken an Enforcement Notice may be issued. This may contain specific improvements, or in extreme cases a Prohibition Notice may be issued to restrict the use of all or part of the premises until improvements are undertaken.
- 4.88 If the premises are considered by the Fire and Rescue Services to be high risk, they may issue an Alterations Notice that requires they be informed before any changes are made to the premises or the way it is used.
- 4.89 Failure to comply with any duty imposed by the Order or any notice issued by the Fire Service is a criminal offence.
- 4.90 HS will follow a procedure to ensure that the appropriate steps are taken within agreed timescales once a notice is served. This timeline will be outlined in the notice
- 4.91 HS has the right of appeal (as a last option) to a Magistrate's Court against any notice issued. This may be where they agree there is a need for improvements to the fire precautions but disagree with the enforcing authority on the technical solution to be used (e.g., what type of fire alarm system is needed). This may be referred for an independent determination.
- 4.92 During any inspection the inspecting officer may wish to view the following documents:
- FRA.
 - Fire logbook.

- Records of colleague training and fire evacuation drills.
- Records of testing and maintenance of firefighting equipment.
- Records of testing and maintenance of all fire safety systems including fire alarms, emergency lighting, sprinkler systems and smoke ventilation systems.
- Evidence of other test and inspection regimes present within the premises – gas, electrical, asbestos, lifts, etc.
- Records of inspections of communal areas
- The Fire Inspector may also wish to inspect all or part of the premises and to talk to employees based on site.

Maintenance of Fire Systems and Equipment

4.93 The testing of fire detection systems will be undertaken by competent engineers (as defined in section 5 below).

4.94 The frequency for inspection/ testing will be determined through manufacturers guidelines and taking into account the age and condition of the system and any other local circumstances which could affect the performance of specific fire safety systems. The specific maintenance needs for each system will be agreed with the competent person, the engineering representatives of the maintenance company.

4.95 Typical systems to be included in the fire safety equipment maintenance programme will include:

- Automatic Fire Detection (AFD) and alarm systems (and associated equipment such as hold open devices, door release mechanisms, fire curtains, UPS etc.)
- Smoke control systems (such as automatically opening smoke vents AOVs)
- Emergency lighting systems
- Portable firefighting equipment
- Rising (dry and wet) mains
- Firefighting lifts
- Fire suppression systems such as sprinklers / mist systems
- Lightning protection systems

Publicity

4.96 All Housing Solutions residents will receive a Housing Solutions safety and information leaflet relating to Fire Safety as part of the new tenancy pack in addition the full range of safety leaflets will be available in all Housing Solutions reception areas where residents visit.

4.97 The full range of resident leaflets will also be available on the Housing Solutions website and through the intranet for all internal colleagues.

4.98 Residents will regularly be signposted to the website in communication relating to Fire Safety.

4.99 All letters in connection with the fire safety inspection including appointment letters, no access letters and general communication will reference the need for fire safety in the home providing advice. Information will be available in different formats upon request.

4.100 Safety awareness campaigns will be proactively supported and will include the distribution of media materials and initiatives as considered appropriate and will be used to proactively promote and improve residents understanding of fire safety issues and the importance of the annual safety inspection, service, and reporting repairs promptly.

4.101 All front-line colleagues will receive training on the importance of remaining vigilant relating to fire safety issues and the visual signs that can alert colleagues of a concern relating to safety. The Policy and this Management Plan will be available to all staff via the intranet on finalisation and publication.

4.102 Through the provision of publicity information, encouragement will be given residents to allow access to carry out fire safety checks and inspections and remedial works which will contribute to their own safety.

5. Competency

Contractors Competency

5.1 Housing Solutions has responsibility to ensure that contractors are competent, and the following controls will operate to ensure competence can be demonstrated.

Competency of Fire Risk Assessors

5.2 HS will ensure that any fire risk assessors undertaking fire risk assessments on their premises are competent to do so.

5.3 External consultant fire risk assessors should be able to demonstrate competency individually via registration on a recognised national scheme such as the Institution of Fire Engineers Register of Fire Risk Assessors or similar.

5.4 Companies providing fire risk assessment services should be assessed and registered under BAFE SP205-1. External fire risk assessment providers (whether individuals or companies) should be able to demonstrate reasonable experience of undertaking fire risk assessments in the type of properties concerned.

5.5 In selecting fire risk assessors HS will make reference to the document 'A Guide to Choosing a Competent Fire Risk Assessor' by the Fire Risk Assessment Competency Council.

Contractor Controls

5.6 All contractors used by HS will be assessed as being suitably competent to undertake the work for which they are being considered. Contractors, where possible, should be third party accredited to a nationally recognised scheme, such as BAFE SP203 (relevant part) for fire alarm contractors, BAFE SP101 for firefighting equipment etc. (or equivalent).

5.7 HS will ensure there are appropriate fire safety conditions imposed on all outside contractors. This will be work specific but should ensure that contractors do not place themselves at risk or place any other relevant persons at greater risk from their acts (or omissions).

5.8 In addition, HS will ensure satisfactory control over works carried out by both outside and in-house contractors, for example work permits. This will involve confirmation of competent contractors and controlling and monitoring safe working practices and procedures.

5.9 Control over work and contractors within high risk fire safety buildings is particularly important and HS will consider a hierarchy of measure to manage such situations:

- Through regular review of Contractor competencies and the qualifications and training of individual operatives
- By the use of signage within high risk buildings prohibiting contractor actions without notification of the relevant building manager in advance.

- Through the use of a Permit to Work process to enable monitoring and inspection of all work activity within a particular building and establishing a golden thread of all work (repairs, cyclical maintenance, and major investment) undertaken
- By post inspection of works
- Through regular review of the FRA for the building

5.10 It is the responsibility of the contractor to conduct a risk assessment before carrying out any repairs. This risk assessment may:

- Demonstrate that no further action needs to be taken before works can proceed.
- Demonstrate that works can proceed but methods need to be adjusted to account for fire safety issues highlighted.
- Require the contractor not to proceed with works until they have looked at the fire risk assessment for the property; and
- Require the contractor to request a survey/testing to be undertaken.

5.11 Contractors must provide suitable Method Statements prior to work commencing and HS will require contractors to replace any fire stopping on completion of any works and interim and post work inspections will be carried out to ensure this is completed.

5.12 If any responsive repair needs to be carried out to a related fire safety installation, the appointed contractor attending the address must review the examination reports on the compliance database and any other available related information. The correct use of fire-rated materials must also be taken into account and agreed with HS prior to any works commencing.

5.13 Where contractors may undertake works which could disrupt fire compartmentalisation such as satellite TV and telecoms installations, and HS is aware, it will put in place a contract that will require the contractor to seek appropriate approvals prior to commencing works.

5.14 All contractor competencies will be subject to a periodic assessment or at change of contract /contractor, as detailed within the Management Plan.

Internal Competency

5.15 Housing Solutions maintain a skills/training matrix to ensure that all colleagues undertaking key roles within the scope of this management plan have appropriate training.

Management of Contractors

Contractor Details

5.16 The Asset and Compliance team will keep a central register (excel spread sheet), with the colleague /contractors' details relevant to the actions required within this management plan. This will include the contractors contact details as follows:

Contract Details Register

Contractor Details	
FRA Provider Remedial Works Contractor	Contractor Business name
	Trading address
	Key Contact Name
	Contact details
	Office Contact Phone Number and Mobile Phone
	Emergency phone number.

5.17 The same	Cyclical Maintenance Contractors	E-mail contacts
		Copy of the Company registration /accreditation -BAFE SP205-1, SP203, SP101, or similar (including expiry/renewal date)
		Completed and satisfactory HS performance questionnaire
	Details	Outcome of the annual financial appraisal
		Insurance details including policy numbers and insurance cover details and excess etc.
		Details of prosecutions served or pending before and throughout the contract award including RIDDOR
	Operatives Details	Full name
		Mobile phone number
		Copy of Individual Engineer's Registration Number – IFE or Register of FRAs (if required for sub-contractors)
		Individual accreditation
		Training received – type and date and the date refresher training is required.
	The qualifications of the operative against the competence assessment. Including mandatory training: <ul style="list-style-type: none"> ➤ CSCS Skill Card ➤ UKATA CAT B Asbestos training 	

information will be held in respect to internal delivery operatives who are engaged with fire safety work.

Updating Details of Contractors Operatives

5.18 The contractor will provide an updated list of operatives working on the contract by the 28th of each month. This information will be used to update the contractor information spreadsheet as above and will be updated by the Compliance Team within 5 working days of receipt of the information.

Updating Operative's Qualifications and Training

5.19 The contractor will provide an updated list, by the 28th of each month, of new qualifications/training/refresher training for all operatives working on the contract.

5.20 This information will be used to update the contractor information spreadsheet as above and will be updated by the Compliance Team within 5 working days of receipt of the information.

5.21 NOTE: Unless Housing Solutions holds documentary proof that any operative has the relevant and up to date qualifications, the operative in question will not and is not permitted to carry out any fire safety works.

5.22 In order for Housing Solutions to discharge their duties under [\(CDM 2015, Regulation 8\(1\)\)](#) they must check that any colleague /contractor carrying out any fire safety works is competent to do so. Prior to the commencement of the works the Housing Solutions Responsible Person will undertake the following:

- Provide pre-construction information to the contractor, indicating if any fire related works are to be undertaken.
- The contractor will provide a construction phase plan, including their fire safety competencies.

- Record the competencies in a fire competency matrix for that project.

Details of the fire contractor competence must be held on the contract file by the Housing Solutions contractor administrator.

Operational Meetings

5.23 The lead Contract Manager will meet with contractor representatives on an agreed frequency (normally every month). At this meeting the following documents will be issued, discussed, and updated as required:

- Agenda
- Minutes of previous meeting and any agreed actions
- Service programme (updated to reflect the current position at the time of the meeting)
- Continuous service Improvement Plan
- Compliments and Complaints
- Resident contact information
- Health and Safety
- Performance reports and agreed KPIs MPIs and OPIs
- Independent External Audit reports identifying the key trends
- Invoicing, budget, and finance (against the predicted costs)
- Operative competence validation check including details of any changes to operatives working on the contract

5.24 The Contract Manager will ensure that all required documentation is provided at least 7 working days before the meeting and ensure all issues with the contractor in relation to complaints and/or operative changes are dealt with at the meeting and the action is noted with a timescale for full completion and report back to the Contract Manager. This will then be reviewed as an update at the next meeting.

6. Performance and Assurance

Performance

6.1 The following KPIs will be reported to Audit and Risk Committee and Board:

Cat	Indicator	Frequency
KPI	% Of properties with a completed and in date FRA where required	Quarterly
KPI	Total no of actions outstanding (but in date) and total number of actions overdue	Quarterly
KPI	% Buildings with outstanding and overdue remedial actions	Quarterly
KPI	% Of buildings with fire safety systems/equipment present where all systems/equipment has been tested/maintained in accordance with this management plan.	Quarterly
KPI	Number of notices received from the Fire and Rescue Services in the reporting period	Quarterly
KPI	Number of outstanding notices received from the Fire and Rescue Services	Quarterly

6.2 Commentary will be provided for any properties out of date to include the date they became

overdue, days overdue, and the action proposed to bring them back into a compliant position. To provide additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

6.3 In addition to Board KPIs a detailed PI suite will include the following:

Cat	Indicator	Frequency
KPI	The Audit and Risk Committee and Board KPIs will be produced on a monthly basis and reported to the Exec Team	Monthly
KPI	Number of properties requiring an FRA re-assessment	Monthly
KPI	Number of properties which require remedial actions and timeline	Monthly
KPI	Number of up to date evacuation plans and personal emergency evacuation plans (PEEPS) required	Monthly
KPI	The number of fire incidents and completed fire investigation reports	Weekly
KPI	The number of re-inspection surveys to communal areas	Weekly
KPI	Improvement and prohibition notices issued, and actions completed in accordance with the required timescales	Monthly
KPI	Audit checks undertaken in relation to FRA remedial works undertaken, and cyclical maintenance engineers work on a minimum of 10% sample	Monthly
KPI	The number of reportable incidents in accordance (RIDDOR)	Quarterly
MPI	Communal Inspections Completed in Time	Monthly
MPI	Resident Satisfaction	Monthly
OPI	Contractor/consultant accreditations and operative qualifications	Monthly
OPI	Fire alarm/emergency lighting and fire-fighting equipment tested on time	Monthly
OPI	Fire Alarm repairs completed right first time	Monthly
OPI	Average cost of FRA inspection	Monthly

Assurance

6.4 The following assurance activity will be undertaken and reported to Audit and Risk Committee:

Activity	Description
Internal Audit	This service area will be included within the annual Internal Audit programme which will review, in particular, adherence to process, data and record keeping. H&S and Fire Manager will undertake a programme of internal contractor audits.
3rd Party Assurance	In addition to the internal QA process, from March 2023 a third party, external, independent specialist will be engaged to regularly inspect, monitor, and report on the technical performance and quality of the FRA remedial works programme, and cyclical servicing programme.

Changes to		The independent specialist shall inspect a minimum of 10% of completed works and servicing programme and report their findings each month.
	Strategic review	Fire Safety is a high-risk area, and this policy will be reviewed on an annual basis. A full strategic review will be undertaken every 2 years which will include all operating procedures, emerging legislation, and sector issues
	Early Strategic intervention	If as a result of either the finding of the internal audit process or the independent quality assurance work, the service is not performing to the desired level then this will trigger an earlier external strategic review.

Regulations, Legislation and Annual Review

- 6.5 The Compliance Team and Service Managers will proactively monitor legislative and regulatory developments and changes in consultation with the Head of Assets and the Director of Property & Development. This will ensure Housing Solutions effectively prepare for potential changes and consistently operate within the most up to date regulations/legislation at all times.
- 6.6 Potential changes in legislation will be identified where there is considered to be an impact upon policy and changes will be disseminated to all relevant colleagues across Housing Solution, contractors, consultants, and residents. This will be undertaken through internally circulated briefing note which will be discussed in all relevant team meetings dependent upon the nature and implications of the change.
- 6.7 All colleagues have a responsibility to remain alert and share knowledge and good practice across all teams and across Housing Solution. This includes dissemination from statutory regulators, institutions, media articles from heating Installers, professional bodies and other trade media throughout the appropriate HS and repairs teams.
- 6.8 HS are working to ensure that all Fire safety related activities comply with the introduction of the Fire Safety Act 2021 and any additional implications that may emerge from the Building Safety Act 2022.

Resident Complaints and Compliments

- 6.9 Resident complaints and compliments are a further indicator of service performance and will be monitored. Individual complaints will be directed to the appropriate manager and will be responded to in accordance with the Complaints Policy.

7. Roles and Responsibilities

7.1 The following table provides guidance on the key roles and responsibilities:

Role	Responsibilities	Frequency
The Board	<ul style="list-style-type: none"> They are the responsible legal entity and must oversee the discharge of the required standards. They act as Duty Holders and are accountable for ensuring the implementation of this management plan and the associated policy. They will receive assurance through regular performance reports that the management plan and policy are being implemented and that the regulations are being fully complied with. 	6 Monthly/ Annually

	<ul style="list-style-type: none"> • In doing so they will ensure the safety of colleagues, residents, contractors, and the wider general public has not been compromised. • They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested 3rd parties, informed of the regulatory landlord compliance position. • The Board will be responsible for ensuring that any necessary remedial action, arising from performance reports, are undertaken to comply with the policy and ensure that a regulatory landlord compliant position is maintained. 	
Audit and Risk Committee And / or Health and Safety Working Group	<ul style="list-style-type: none"> • Will receive quarterly KPI reports and commentary on landlord compliance performance. • They will receive Internal Audit reports and monitor the delivery of Action Plans arising through to successful completion • They will draw any concerns they may have arising from such reports to the attention of the Board. 	Quarterly
The Chief Executive Officer	<ul style="list-style-type: none"> • Retains the overall responsibility for the monitoring of the consistent implementation of this management plan and policy. • Through the implementation of the management plan and policy to effectively comply with the regulatory standards • If the regulatory standards are not maintained to report and breach in standards to the Regulator of Social Housing. 	Ongoing
	<ul style="list-style-type: none"> • 	
Director of Property and Developments	<ul style="list-style-type: none"> • Will ensure the operational delivery of this management plan and policy and compliance with the Regulations. • Agree and set budgets that are sufficient to meet the compliance requirements. • They shall appoint /nominate sufficient resources to fulfil the Responsible Person roles for all fire safety requirements and use this Management Plan to define their duties. • Delegate appropriate authority to Operational Managers for in house delivery or procurement to meet the requirements. • Seek assurance that the Regulations are being adhered to and regularly review internal service and contractor operational practices and performance. 	Ongoing

	<ul style="list-style-type: none"> • Ensure that the conditions of all contracts are being fulfilled either by internal service or contractors 	
Executive Director of Finance & Director of Corporate Services	<ul style="list-style-type: none"> • Will ensure that resources are available to deliver the following: • Ensure that an effective performance management framework that will strengthen risk control and provide greater levels of assurance. • Will implement Data Governance protocols • Will manage the availability of accurate stock data and landlord compliance data subsets against which to prepare work programmes and contracts • Will oversee the preparation of the KPI/MPI and OPI reporting suite. • Will assist the implementation of this management plan and policy through monitoring implementation. • Will receive audit feedback and act upon the findings. • Seek assurance that the Regulations are being adhered to and regularly review internal service and contractor operational practices and performance. • Will oversee the programme of policy and strategic review. 	Ongoing
The Compliance Team Or Service Managers	<ul style="list-style-type: none"> • Will manage the strategic implementation of this management plan and policy and ensure compliance with all regulations. • Will formulate programmes of work consistent with the delivery of this management plan and policy. • Will instruct /liaise with internal operational managers and contractors in respect to the operational delivery of this management plan. • Will liaise with Housing Management /Neighbourhood colleagues and residents to explain the importance of landlord compliance and the need to achieve access to complete safety checks and works. • Managing resident feedback (enquiries, complaints, and compliments) handling and progress. • Liaise with Internal Audit and Assurance partners and ensure data is updated accurately and in time. • Liaise with IT and Asset Management and ensure system(s) and interfaces operate effectively. 	Ongoing

	<ul style="list-style-type: none"> • Inform the Director of Property and Development and the Director of Corporate Services of any performance issues. • Receive feedback from 3rd Party External Validation Consultants and liaise with Operational Managers and Contractors to address any delivery shortfalls • Monitor the quality and correct storage of all certification and documents required to demonstrate landlord compliance. 	
Fire Safety Group	<ul style="list-style-type: none"> • Receiving fire risk assessments, letters of fire safety matters, enforcement inspections and monitoring progress in closing out any actions and recommendations from different sources (fire actions log) • Developing and monitoring building fire strategies to ensure consistency in standards for ongoing maintenance, refurbishments, and projects • Formalising and monitoring procedures to ensure that maintenance or refurbishment work that could affect the adequacy of arrangements within the Fire Risk Assessments or Building Fire Strategies are identified and that relevant updates or temporary arrangement are in place • Review changes to fire legislation and standards • Share and shape best practice and provide a central forum for fire safety related matters across the group • Ensuring that internal processes are in place for the management of fire safety (evacuation, drills inspection etc.) • Providing assurance to the Executive Team and Strategic Leadership team that the organisation is managing fire risk in a clear and proportionate manner • The remit of the Health and Safety Panel is defined in their terms of reference 	Ongoing
Responsible Person(s)	<ul style="list-style-type: none"> • To be appointed as required by the Director of Property & Development in consultation with the Fire Safety Group 	
Resident	<ul style="list-style-type: none"> • Agreeing to and keeping appointments to provide access. • Liaising with Housing Solutions colleagues in relation to any poor service, failure to attend/poor repair etc. • Provide resident satisfaction information. 	As required
Independent External Auditor	<ul style="list-style-type: none"> • Undertake 10% external validation of fire safety inspection in line with the management plan. 	Ongoing

8. Process Maps Supporting Delivery

- 8.1 The Process Maps which support the delivery of this management plan will be finalised and issued for comment following the review and approval of this Fire Safety Management Plan and the associated Fire Safety Management Policy and will be made available within the Process and Procedure Index once drafted.

Types of fire risk assessments

1

Type 1

This is the most common type of fire risk assessment and is usually sufficient for most purpose-built blocks of flats and conversions. Type 1 is a non-destructive assessment of the common parts of the building, not the private dwellings. In general, access to these occupied areas (such as flats) is not expected or required unless there is reason to believe that there may be significant health and safety issues inside. The only exception is where flat front doors may be reviewed as part of the assessment. In some occurrences, the action plan of the Type 1 may recommend one of the other types be carried out. Recommendations of other types of fire risk assessment should be backed up with a clear justification as to why a more intrusive inspection is required.



2

Type 2

Type 2 only includes the common parts of the building. However, it involves an element of destructive sampling for which a contractor will normally be required. A Type 2 fire risk assessment may be suggested following a Type 1, however, should not be recommended as standard procedure. A Type 2 fire risk assessment is usually a rarity, carried out only if there is good reason to believe there are serious structural flaws that need further investigation due to the risk that this could lead to breaches in compartmentation and the spread of fire throughout the building.



3

Type 3

Type 3 fire risk assessments go beyond the requirements of the law by considering the flats as well as the common parts. Areas such as means of escape, compartmentation between flats and means of fire detection are considered in all areas including the flats. The Type 3 fire risk assessment, like the Type 1, is non-destructive and is usually considered necessary if it is thought there may be a fire risk inside of the flats. Arranging a Type 3 fire risk assessment can be difficult in leaseholder flats and are more easily conducted in vacated flats or where the flat is rented rather under leasehold ownership.



4

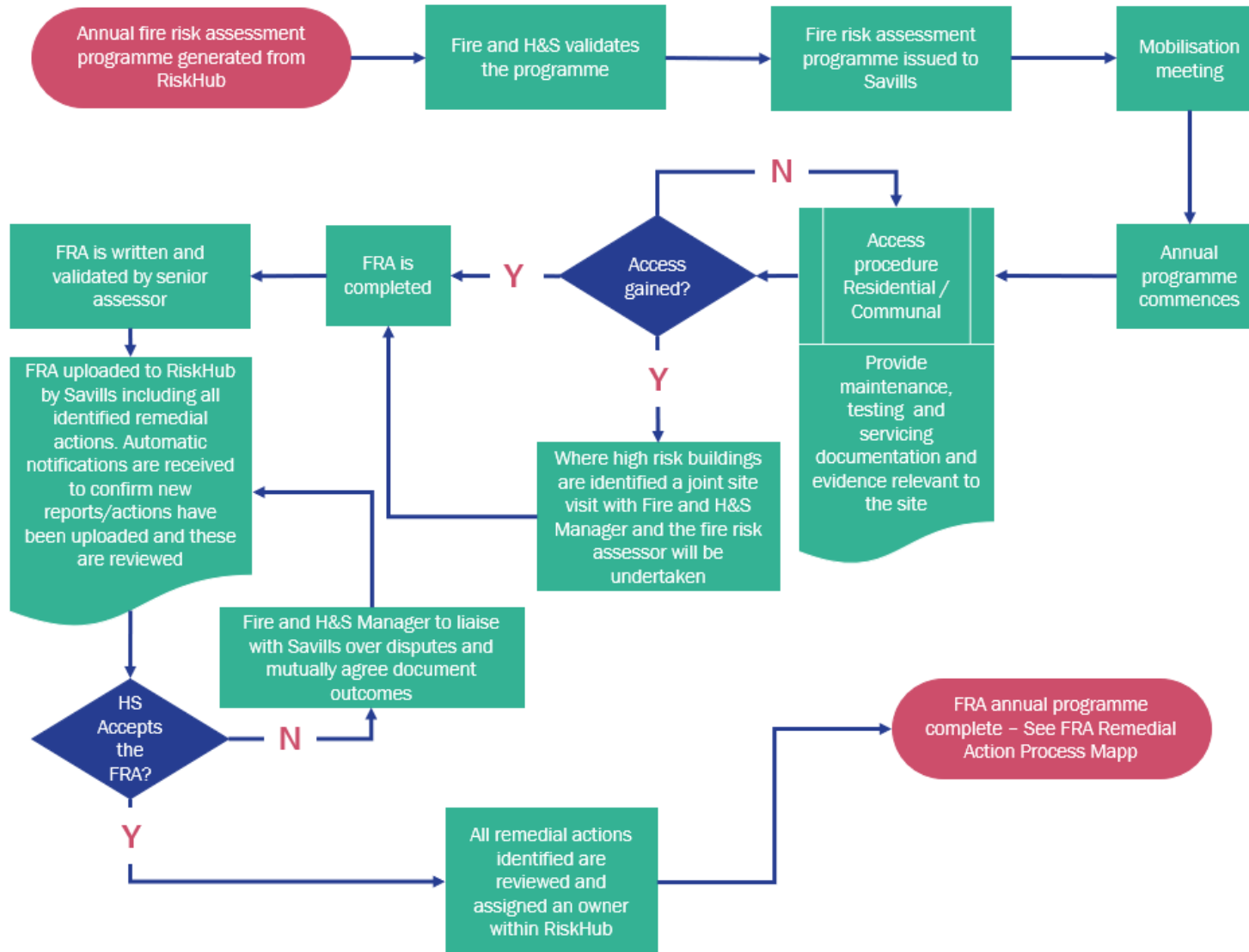
Type 4

Type 4 fire risk assessments, like Type 2, include a destructive assessment, however in this case it involves both the common parts of the building, and the flats. Type 4 fire risk assessments are more complicated than the other types of assessments. As with the Type 3 assessment, access to flats can be difficult and the destructive nature of the assessment will involve a contractor to open up and repair damage after the inspection.



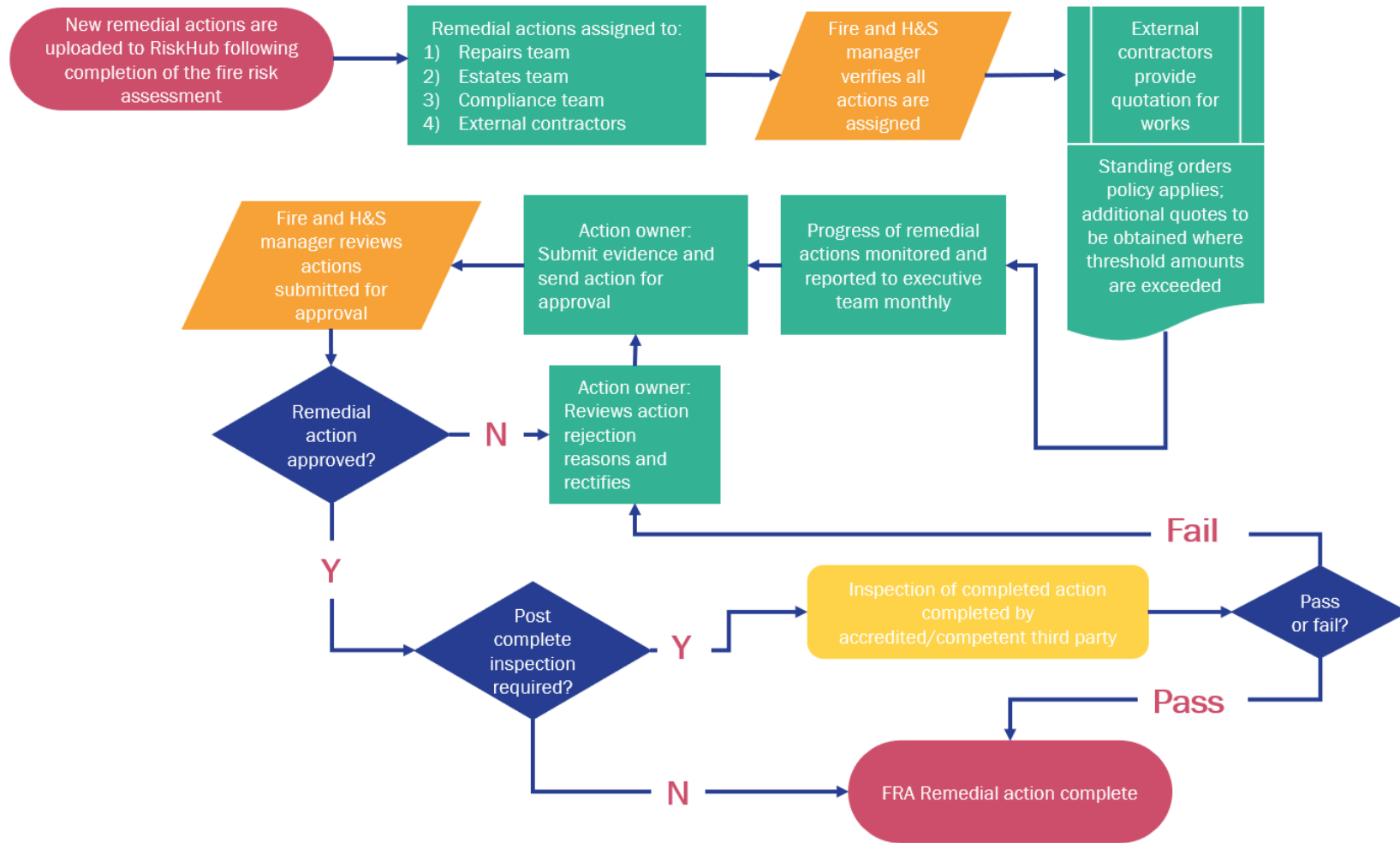
Appendix C

Fire Risk Assessment annual programme process map



Appendix D

Fire Risk Assessment remedial action process map



Appendix E

New Fire Risk Assessment process map

