

# Fire Safety Policy



**Reference:** HS\_POL\_FIR\_2.2

**Author:** Assistant Director of Property Services

**Scope:** Housing Solutions properties, residents, 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  
Fire Safety (England) Regulations 2022  
Building Safety Act 2022  
Landlord and Tenant Act 1985

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**Date of next review:** July 2025

**Related Policies:** Health and Safety Policy  
Access Policy  
Repairs & Maintenance Policy  
Planned Maintenance investment Policy  
Communal area policy

## 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 residents, employees, and others, inclusive of visitors in respect of fire safety
- 1.3 This Fire Safety Policy covers how Housing Solutions complies with applicable legislation. All records are suitably held within the RiskHub management solution, for assets which fall under the regulatory reform (fire safety order) 2005 (RRFSO). Risk hub holds dates relating to Fire Risk Assessments (FRA), and target dates relating to FRA remedial actions.
- 1.4 Housing Solutions will take all reasonable steps to establish and manage effective control systems

and processes to monitor, manage and deliver its fire safety obligations within its 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, as required.
- 1.6 HS will ensure that all contractors internally and externally 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 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 work.
- 1.7 Housing Solutions shall ensure that where identified, prompt remedial actions resulting from tenancy audits & welfare visits, shall be taken to safeguard persons in properties where there is a serious risk from fire.
- 1.8 Housing Solutions provides fire safety advice to residents upon first occupation of their property and send targeted fire safety related updates as necessary.
- 1.9 Evacuation procedures are communicated to the residents on first occupation, 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, irrespective of whether they fall under the remit of the Regulatory Reform Fire Safety Order 2005 (RRFSO) or the Fire Safety Act 2021.
- 2.2 Where a Third-Party Management Agent (TPMA) operate within a building where HS are the Landlords both parties will co-operate and co-ordinate with each other to ensure suitable and sufficient measures are in place for the safety of residents, staff, contractors and other "relevant persons

## 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
Responsible person Housing Solutions	<ul style="list-style-type: none"> <li>• Housing Solutions is the “Responsible Person” as defined under the Fire Safety Act 2021</li> </ul>
HS Board	<ul style="list-style-type: none"> <li>• Strategic overview of all HS policies.</li> </ul>
Chief Executive	<ul style="list-style-type: none"> <li>• Overall responsibility for the implementation of the Fire Policy in line with the Corporate Strategy.</li> </ul>
Executive Director of Property and Development	<ul style="list-style-type: none"> <li>• Responsible for ensuring that the policy is fully implemented and that the Chief Executive and Executive Team are kept informed of</li> </ul>

	<p>required resources and any incidents in relation to the policy.</p> <ul style="list-style-type: none"> <li>• Agree and set budgets that are sufficient to meet the compliance requirements.</li> <li>• 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.</li> <li>• Delegate appropriate authority to Operational Managers for in house delivery or procurement to meet the requirements.</li> <li>• Seek assurance that the Regulations are being adhered to and regularly review internal service and contractor operational practices and performance.</li> <li>• Ensure that the conditions of all contracts are being fulfilled either by internal service or contractors</li> <li>• Report to the Chief Executive and Board significant risks, both detrimental to life safety, the business plan or those that attract significant reputational risk</li> <li>• To update the corporate risk register with associated risks</li> </ul>
Fire Safety Advisors (Savills)	<ul style="list-style-type: none"> <li>• To advise and act as Housing Solutions competent person in respect of fire safety, as required</li> <li>• To carry out fire risk assessments annually, as defined through the programme</li> </ul>
Assistant Director of Property Services	<ul style="list-style-type: none"> <li>• Ensuring that all persons are provided with the necessary information, instruction, and training to fulfil their roles and responsibilities under this policy and relevant procedures.</li> <li>•</li> <li>• To lead on the relationship with our fire safety advisors and fire risk assessors, Savills, ensuring that risks are known to Housing Solutions</li> <li>• Ensure that this policy is up to date, legally compliant and fully implemented</li> <li>• To ensure the Executive Director of Property and Development is fully appraised of upcoming risks, both in the sector and through the fire risk assessment process</li> <li>• To update the operational risk register with associated risks</li> </ul>
Head of Fire & Compliance	<ul style="list-style-type: none"> <li>• Monitor the status of fire related actions allocated to the Asset Management team through RiskHub</li> <li>• Work with our fire safety consultants to produce and maintain a robust and comprehensive fire risk programme and ensure any changes to legislation and building regulation are taken into account.</li> <li>• Maintain and build relationships with stakeholders, including, but not limited to local Fire and Rescue Services/authorities, managing agents, care providers in regard to fire safety across our stock. Ensuring a point of contact for the service.</li> <li>• Resolving and leading on any deficiency and enforcement notices in relation to Fire Safety, including joint visits with the fire service, and ensuring actions are communicated and completed effectively.</li> </ul>
Fire Project Surveyor	<ul style="list-style-type: none"> <li>• To identify technical solutions for fire safety works, in conjunction with Savills</li> <li>• To provide a programme of delivery for necessary remedial actions</li> <li>• To procure contracts and consultants for projects in line with</li> </ul>

	standing orders
Fire Contracts Supervisor	<ul style="list-style-type: none"> <li>• To ensure fire risk assessment actions are completed in a timely manner following the fire risk assessment</li> <li>• Scheduling all fire risk assessment actions received and ensuring completion</li> <li>• Ensuring effective contract management of the delivery supply chain</li> </ul>
Fire Safety Coordinator	<ul style="list-style-type: none"> <li>• Administration of the organisation's fire safety management system, Risk Hub and assurance that actions have the necessary evidence uploaded</li> <li>• Liaison with fire risk assessors for access issues</li> <li>• Allocation of all fire risk assessment actions</li> <li>• Raising works orders for works required</li> <li>• Resident liaison</li> <li>• Managing agent liaison</li> </ul>
Assistant Director of Housing and Resident Engagement	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• Monitor the status of fire related actions allocated to the Housing Management team through RiskHub</li> <li>• Ensure that ongoing resident engagement and communication relating to fire safety in their home and the sterile communal areas with multi story residential building is maintained</li> <li>• Ensure that all current and new residents are informed of the evacuation strategy of their specific building</li> </ul>
Compliance Manager	<p>The Compliance Manager has overall responsibility in relation to the operational management of fire safety equipment in properties managed or occupied by HS.</p> <p>They are responsible for the following:</p> <ul style="list-style-type: none"> <li>• Managing the programmes of fire safety equipment maintenance, fire equipment includes, but is not limited to, the following items:</li> <li>• Automatic opening doors.</li> <li>• Actuation of release mechanisms for doors.</li> <li>• Fire doors.</li> <li>• Fire alarms.</li> <li>• Fire detection systems.</li> <li>• Automatic smoke vents, smoke control systems for means of escape.</li> <li>• Evacuation lifts.</li> </ul>

	<ul style="list-style-type: none"> <li>• Emergency and escape lighting.</li> <li>• Dry risers.</li> <li>• Fire blankets and extinguishers.</li> <li>• Electrical installations.</li> <li>• Lightning protection systems.</li> <li>• Sprinkler systems.</li> <li>• Supporting in the delivery of actions (linked to the above) from the fire risk assessments, including remedial actions are managed accordingly through either direct labour or contractors.</li> <li>• Ensuring that regular minuted meetings will take place with any contractor which undertakes fire safety equipment maintenance or servicing on our behalf in order to monitor performance, quality and progress.</li> <li>• Ensuring that any fire safety related issues which arise are properly addressed during repairs, servicing, major works and planned investment in existing communal areas and customers' homes.</li> </ul>
Estate Services Manager	<ul style="list-style-type: none"> <li>• Record planned visits by the cleaning contractor to evidence that communal areas and stairwells are sterile and free from risks</li> <li>• Manage the removal of items from the communal areas of our buildings which contravene the fire safety arrangements for the building</li> <li>• Report any breaches to the Fire and Health and Safety Manager</li> <li>• Monitor the status of fire related actions allocated to the Estate Services team through RiskHub</li> </ul>
Fire Safety Core Group	<ul style="list-style-type: none"> <li>• Ensuring compliance with all aspects of fire safety legislation.</li> <li>• Developing, monitoring, and reviewing policies and procedures that reflect the role stated above.</li> <li>• Ensuring consistency of approach to fire safety through effective communication. Monitoring, recording and measuring performance.</li> <li>• Share and shape best practice and provide a central forum for fire safety related matters across the group</li> <li>• Providing assurance to the Executive Team and Strategic Leadership team that the organisation is managing fire risk in a clear and proportionate manner</li> <li>• Reviewing investigation reports and lessons learnt from all fire related incidents.</li> </ul>
All Staff Operatives / Contractors	<ul style="list-style-type: none"> <li>• 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</li> <li>• Responsible for reporting any non-compliance with procedures (i.e., where a contractor or HS staff are not complying with procedures).</li> </ul>
Residents	<ul style="list-style-type: none"> <li>• Agreeing to and keeping appointments to provide access.</li> <li>• Liaising with Housing Solutions colleagues in relation to any poor service, failure to attend/poor repair etc.</li> <li>• Ensuring they adhere to guidance issued for fire safety</li> <li>• Not tampering with anything provided to assist in protecting them from the effects of fire</li> </ul>

## 4. Overall approach to fire safety

4.1 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 regulations, through annual fire risk assessments
- 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.
- Utilise the fire safety management plan which provides clarity about roles and responsibilities within 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 are provided with 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.
- Appoint a competent person to inspect fire doors throughout our stock to ensure we meet the legislative requirements of Regulation 10, Fire Safety Act.
- 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
- Conduct targeted and sampled fire assurance inspections of fire safety related works carried out to monitor quality and compliance of both in-house staff and contractors.
- Conduct post fire investigations of all fire incidents to establish, cause, whether residents or others were injured, that fire precautions were suitable sufficient, had not been tampered with or damaged, and gather appropriate learning to prevent such incidents occurring again, identify trends, to inform future policy decision making.
- Engage with the local Fire Authorities on legislative and community fire safety matters. Work with lead authority partner to deliver consistent approach, and foster good partnership working.

## 5. Fire Risk Assessments

- 5.1 The Regulatory Reform (Fire Safety) Order 2005 (RRFSO) places a duty on Responsible Persons 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 have adopted a full compliance approach and will complete a fire risk assessment at least in line with the requirements of the act.
- 5.2 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.
  - The communal areas of our care homes and sheltered and supported living schemes.
- 5.3 Our approach is to develop a risk-based programme for fire risk assessments, the purpose of which is to help us to identify, evaluate, remediate, and manage all the fire hazards.
- 5.4 In addition, we will undertake Type 1 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.
- 5.5 The programme will be ratified with our professional advisors (the competent person) to ensure that the requirements of the RRFSO are met.

## 6. Acquisitions and Disposals

- 6.1 The following circumstances will require a controlled amendment to risk hub 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
- 6.2 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

## 7. Access

- 7.1 Residents are required to provide reasonable access 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 our Access Policy.
- 7.2 HS will proactively assess available data for relevant information about the resident to help gain access (disability, vulnerability, local connections, etc.).

## 8. Review and Renewal of Fire Risk Assessments

- 8.1 The FRA is a living document and needs to remain valid.
- 8.2 HS will undertake a review of the FRAs (in line with Savills guidance) 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
- 8.3 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.

## 9. Fire Door Inspections

- 9.1 To ensure we meet our legislative requirements under Regulation 10 of the Fire Safety Act, HS have appointed a directly employed competent fire door inspector.
- 9.2 The minimum requirement is to undertake a regular inspection of all fire doors to identify any obvious damage or issues. A fire door inspection includes the following;
  - If there have been any alterations or damage to a door's glazing apertures or air transfer grille
  - If there are any gaps around the door frame and that the seals and hinges are fitted correctly
  - That the door closer shuts the door
  - That the door closes fully into the whole frame
  - That there is no visible damage (either deliberate or wear and tear) to the door or door closer
- 9.3 If any issues are identified from these checks, we will undertake more detailed checks of doors (or the self-closing device) if any damage is identified from the initial inspection, then a job will be raised to remediate.
- 9.4 All fire doors will be checked on a rolling programme, in line with the level associated with the building, as defined through the fire risk assessment and with Savills advice. All details of inspections and records will be maintained on risk hub.

## 10. Communicating with residents

- 10.1 All residents living in a block where Housing Solutions undertake an FRA, will receive a Housing Solutions safety and information leaflet relating to Fire Safety as part of the new tenancy pack.
- 10.2 The full range of resident leaflets will also be available on the Housing Solutions website and through the intranet for all internal colleagues.
- 10.3 Residents will regularly be signposted to the website in communication relating to Fire Safety, this will have the ability to be provided in a format suitable for our residents' needs.
- 10.4 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.
- 10.5 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.

10.6 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.

## **11. Monitoring and Reporting**

11.1 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. We carry out this duty through a software management tool, risk hub.

11.2 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.

## **12. Training Requirements**

12.1 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.

12.2 Training records will be maintained, and refresher training delivered annually or as and when required.

## **13. Vulnerable Residents**

13.1 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

13.2 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.

13.3 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 Fire and Health and Safety Manager who will provide technical advice and guidance on the options available.

13.4 The PEEP and the PCFRA will be added to the block information file in the fire document box where the fire service can access the information.

13.5 This information and documentation will be assessed on a 12 monthly basis or sooner if a new PEEP is required.

## **14. Equality & Diversity**

14.1 Housing Solutions recognises the needs of a diverse population and always acts within the scope of its own Equality, Diversity & Inclusion Strategy and Policy, the Human Rights Act 1998, and Equalities Act 2010 to ensure that all tenants and prospective tenants are treated fairly and equally in making decisions under this policy. 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 to support the fair application of this policy.

## **15. Confidentiality**

15.1 Under the Data Protection Act 2018 and UK General Data Protection Regulation (UKGDPR), all personal and sensitive 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.

15.2 Housing Solutions employees will ensure that they only involve other agencies and share information allowed either by statute or by an agreed Information Sharing Protocol relevant to this Policy where there is a legal basis for processing the information.

## **16. Review**

16.1 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.

16.2 The review period 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.

16.3 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

## **17. Appendices**

17.1 Appendix A: Explanation of Fire Risk Assessment types

## Appendix A

### 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 than 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.



