

# **fire safety management policy**

December 2024

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## 1. Policy statement

believe housing is committed to providing a safe environment for its colleagues, customers, visitors, and contractors. Part of this safety responsibility is to manage the risks associated with fire in line with current regulatory requirements.

believe housing will also work closely with customers to provide information and advice around fire safety and act upon any concerns raised by customers, leaseholders' colleagues and contractors.

## 2. Policy aims

Fire is a potential hazard in buildings under the control of believe housing and therefore the aim of this policy is to provide robust frameworks which will detect, record and manage fire safety risks.

We recognise our legal and moral fire safety obligations, and will ensure, as far as reasonably practicable, that the risk of fire will be managed in accordance with the legislation and guidance below; please note this list is not exhaustive:

- Regulatory Reform Order 2005 (FSO)
- Building Safety Act 2022
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022
- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- The Building Regulations (Approved Document B) 2019
- Construction (Design and Management) Regulations 2015
- Housing Act 2004
- BS9999:2017 Fire safety in the design, management, and use of buildings – Code of practice
- BS5839-1:2017 – Fire detection and fire alarm systems for buildings. Code of practice for design, installation, commissioning and maintenance of systems in non-domestic premises
- BS5839-6:2019 – Fire detection and fire alarm systems for buildings. Code of practice for the design, installation, commissioning and maintenance of fire detection and fire alarm systems in domestic premises.
- BS9991:2015 – Fire safety in the design, management, and use of residential buildings
- BS5499- Safety signs, including fire safety signs

- BS5266 – Guide to the design and provision of emergency lighting to reduce the risks from hazards in the event of failure of the normal lighting supply.
- BS6266:2011 – Fire protection for electronic equipment installations
- BS8214 2016 – Timber based fire door assemblies. Code of Practice
- Home Office: fire safety in purpose-built blocks.
- PAS79: 2020 Fire risk assessment. Housing.
- PAS9980: 2022 Fire risk appraisal of external wall construction and cladding of existing blocks of flats.

We must also ensure we comply with the Regulator for Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

Under fire safety legislation believe housing will adhere to the following requirements

### **Regulatory Reform (Fire Safety) Order 2005 (FSO)**

As the Responsible Person, believe housing must:

- carry out fire risk assessments (FRAs) in all workplaces, commercial buildings and non-domestic parts of multi-occupied residential buildings. The FRA shall identify general fire precautions and other measures needed to comply with the FSO. Although under the FSO this requirement only applies to common parts of premises, in practice believe housing will consider the entire premises, including units of residential accommodation
- consider who may be especially at risk
- implement all necessary general fire precautions and any other necessary measures identified by an FRA to remove or reduce any risks
- implement a suitable system of maintenance and appoint competent persons to carry out these requirements
- periodically review FRAs in a timescale appropriate to the premises and/or occupation fire risk. This timescale is determined by the fire risk assessor carrying out the FRA.

### **Fire Safety Act 2021**

- The Act amends the FSO by clarifying that in buildings with two or more sets of domestic premises, the FSO applies to:
  - the structure and external walls of the building, including cladding, balconies, and windows
  - all doors between the domestic premises and common parts, for example, entrance doors to individual flats which open on to common parts.

All believe housings FRAs have been reviewed by a competent person to ensure they meet the requirements of the Fire Safety Act 2021.

### **Fire Safety (England) Regulations 2022**

believe housing is required to:

- provide customers and leaseholders with fire safety instructions and information on fire doors.

believe housing does not operate any buildings over 11 meters and therefore the other provisions of the Fire Safety (England) Regulations do not apply.

### **Building Safety Act 2022 – Section 156**

Section 156 of the Building Safety Act amends the FSO and requires Responsible Persons to:

- record FRAs in full and record fire safety arrangements
- record the name of the individual and/or organisation undertaking the FRA and share this with customers and leaseholders
- identify other Responsible Persons/Accountable Persons and cooperate with them
- share relevant fire safety information with other Responsible Persons, customers and leaseholders
- provide customers and leaseholders with easy to understand, relevant fire safety information.

There will be an additional requirement to appoint a competent person to undertake and review FRAs which will come into force at a later date. This may result in future changes to this policy.

We acknowledge and accept our responsibilities under all legislation set out above and will meet all requirements of this.

To ensure we can fulfil our responsibilities in relation to the management of fire safety we will:

- clearly define the responsibility of believe housing to our customers, leaseholders, colleagues, visitors, and contractors
- provide suitable and sufficient resources to manage fire safety effectively
- implement suitable and sufficient governance arrangements to manage the risks associated with fire
- allocate responsibilities and duties for fire safety management

- employ competent persons to manage fire safety
- undertake an FRA, carried out by a competent fire risk assessor, at buildings falling under the legislative scope. FRAs will be compliant with the British Standards Institution's PAS 79-1:2020 and PAS79-2:2020 specifications for non-residential and residential buildings respectively
- review all FRAs no later than the review date set within the most recent FRA and in the event of
  - a fire, fire safety incident or near miss
  - change in building use
  - change in working practice that may affect fire safety
  - following refurbishment works
  - change in applicable legislation
  - if required following an independent fire safety audit
- determine suitable fire evacuation strategies on a building-by-building basis, in accordance with the recommendations of the competent fire risk assessor and with any guidance from the Fire and Rescue Service
- manage, complete and evidence actions raised from FRAs
- provide suitable and sufficient fire safety training where required
- manage servicing regimes to ensure all fire protection systems, including fire doors, are maintained in accordance with manufacturer's instructions and any relevant British Standards
- implement effective record keeping in relation to fire safety
- operate effective contract management arrangements with the contractors responsible for delivering services, including ensuring contracts are in place, conducting client-led performance meetings and ensuring the contractors employee and public liability insurances are up to date on an annual basis
- implement a robust process to manage immediately dangerous situations
- use the legal remedies available within the terms of the tenancy or lease agreement should any customer, leaseholder or shared owner refuse access to conduct essential fire safety related inspection and remediation works
- engage with customers, leaseholders and suppliers to inform and promote fire safety awareness
- adopt a managed approach in all communal areas, requiring customers and leaseholders to keep the areas free of combustibles and exit routes clear. The storage of mobility scooters in communal areas will not be permitted
- install, test and replace (as required) smoke alarms and carbon monoxide alarms as part of annual visits
- support and work with vulnerable customers (including cases of hoarding) in relation to fire safety
- consider the suitability of the accommodation for the prospective customers in respect to fire safety when letting properties

- work with the Fire and Rescue Service to create safer places to live and work, including advising customers of the opportunity to request a free home fire safety visit
- conduct and maintain a risk and control self-assessment for fire safety management and operations, setting out our key risks from fire and appropriate mitigations.

### 3. Scope

This fire safety management policy applies to all believe housing colleagues, customers, leaseholders and contractors who may work in, occupy or use the premises under the control of believe housing. This includes:

- Housing plus units
- General needs flat blocks
- Offices
- Community hubs
- Commercial premises
- Dwellings.

This document also covers work within other areas demanding fire management protocols, such as:

- New build properties
- Ancillary rooms (such as high-risk service cupboards/lift plant rooms)
- Refurbishment projects
- Contractor health and safety.

We will also support any customer who may be vulnerable and ensure the risk of fire is lowered so far as reasonably practicable with assistance external organisations such as the Fire and Rescue Service.

### 4. Roles and responsibilities

The FSO requires the identification of a 'Responsible Person' to oversee the management of fire safety risks within our properties.

The Chief Executive is the Responsible Person under the FSO, and, through the director of Assets and Compliance, the Compliance Manager is the Competent Person.

Fire safety is a collective organisational responsibility and therefore this policies implementation is delegated throughout the business as follows:

**Audit Committee and Board will:**

- challenge internal fire safety control procedures and performance.

**The Chief Executive will:**

- scrutinise the implementation of the fire safety policy and its related procedure
- provide sufficient resource for the implementation of a robust and compliant systems in relation to fire safety, in line with relevant legislation.

**The Assets and Compliance Directorate will:**

- promote awareness of this fire safety policy and the relevant procedures across the organisation
- report fire safety performance and updates on an agreed consistent basis.
- promote fire safety awareness with our customers and leaseholders
- provide guidance on fire safety throughout the organisation and liaise with other departments to advise on fire safety matters
- ensure FRA's are completed and reviewed within the required timescale
- implement programmes to inspect, service and maintain fire protection provisions, including fire doors
- implement a programme to survey the compartmentation of relevant buildings and oversee the completion of remedial actions required
- procure and oversee the management of fire safety contractors
- liaise with stakeholders, including the Fire and Rescue Service and other agencies/bodies
- ensure relevant fire safety data is recorded, updated, monitored, and held in an appropriate location
- ensure that customer communication is clear and robust and, where necessary, issued in line with regulatory requirements
- ensure any faults, defects or deficiencies relating to a buildings structure and its systems, including active and passive fire protection are rectified in a timely manner
- develop a suitable fire safety training programme for the organisation
- provide all leaseholders with information on fire safety at the beginning of their tenancy and make them aware of their fire related obligations.

**The Property Repairs Directorate will:**

- undertake emergency lighting and communal fire alarm testing where required, in line with the fire safety procedure



- undertake annual smoke alarm testing in customers properties.

The **Neighbourhoods and Customer Experience Directorate** will:

- provide all customers with information on fire safety at the beginning of their tenancy and make them aware of the fire related obligations in their tenancy agreement
- provide resource and implement procedures to check internal and external communal areas in residential buildings monthly, and work with relevant departments to resolve any issues these inspections highlight
- support in cases of no access in relation to the inspection and remediation requirements of this policy
- consider the suitability of the accommodation for the prospective customers in respect to fire safety when letting properties.

The **Development Directorate** will:

- ensure all new build properties that are commissioned by the organisation or purchased under Section 106 are compliant to the relevant fire legislation for residential properties.

The **Corporate Strategy and Assurance Directorate** will:

- provide competent health and safety advice as stipulated in regulation 7 of the Management of Health and Safety at Work Regulations 1999
- investigate accidents and incidents involving fire safety with a view to highlighting opportunities for improvement.

The **Transformation and Culture Directorate** will:

- Make fire safety training available for relevant colleagues and reissue this, where required, on a cyclical basis.

All **believe housing colleagues** will:

- be aware of the fire safety management policies and procedures and their duties under this
- immediately report any fire safety issues to the Compliance Team and Health and Safety Team.
- familiarise themselves with the location of assembly points and fire exits within believe housing offices

- cooperate with fire evacuation procedures in event of a fire alarm sounding in a believe housing office
- complete believe housing’s fire safety training when required.

All **customers and leaseholders** will:

- not put anyone at risk in relation to fire safety in their homes, common areas or the surrounding estate
- follow the guidance issued by believe housing in relation to fire safety
- report any faults/defects in and around their home
- report any fire safety concerns to believe housing tell believe housing of a change in circumstance where they become unable to evacuate a communal flat block or their ability to evacuate is significantly slowed down.

## 5. Programmes and remedial works

### Fire risk assessments (FRAs)

Where we have a legal obligation to do so, we will ensure our communal blocks, offices and commercial premises have an FRA in place.

We will undertake a new FRA in a timescale appropriate to the premises and occupation risk level. This timescale will be determined by the fire risk assessor and will be between one and three years. As the Housing Plus Units are categorised as higher risk buildings by believe housing, these will receive a new FRA annually.

All FRAs will be Type 3 surveys, assessing the internal and external communal areas and 10% of the dwellings.

Within the assessment the fire risk assessor will designate actions recorded as immediately dangerous, urgent, high, medium or low risk. Following receipt of the FRA believe housing utilises the following target timescales for completion.

Risk level	Timescale for completion
Immediately dangerous	24 hours
Urgent	One week
High risk	One month
Medium risk	Three months
Low risk	Six months

Anything identified on site that is considered immediately dangerous will be resolved, or have mitigation put in place to reduce the risk, within 24 hours. The fire risk assessor will

contact believe housing while on site if anything determined as immediately dangerous is identified while completing the FRA.

### Fire door inspections

We will undertake regular inspection of all fire doors believe housing properties. Where the property cannot be accessed for a full inspection, a visual inspection will be undertaken to confirm there is no significant damage.

Fire door inspections will be conducted at the following frequencies

Location	Inspection frequency
Housing Plus Units	Six-monthly
General needs flat blocks	Annually
Offices	Annually
Communal hubs	Annually

Repairs identified in the inspections will be completed by a competent contractor working under BM Trada accreditation.

### Servicing

We will carry out a programme of servicing, maintenance and testing, in accordance with all relevant British Standards and manufacturers recommendations, to all fire detection, prevention and firefighting equipment within buildings we own and manage.

We will ensure there is a robust process in place to manage follow up works arising from servicing and maintenance checks to fire system and equipment.

### Compartmentation

A programme of compartmentation surveys will be conducted on properties which fall under the scope of the FSO to confirm their ability to contain the spread of fire and smoke. Any works identified as a result of these surveys will be undertaken by an accredited contractor.

### Regular inspections

We will carry out a programme of monthly inspections to all blocks containing a communal area. Due to the elevated risk this will be increased to weekly in the Housing Plus Units.

## 6. Data and records

We maintain a core asset register of all properties we own and manage in our asset management system. The data from this is used to identify properties which require FRA, fire door inspection and fire related service, maintenance and testing.

We will operate a robust process to manage all changes in stock, including property acquisitions and disposals, to ensure that properties are not omitted, and the programmes remain up to date.

All cyclical fire programmes are managed through appropriate software. When they are received all FRAs, compartmentation surveys and servicing and maintenance reports are checked for accuracy and then saved on the organisations document management system. All records relating to fire safety are held for the lifetime of the building they relate to.

## **7. Competent persons**

believe housing's Compliance Manager and Compliance Officer (Fire) will hold a relevant qualification in fire safety, accredited a recognised body such as NEBOSH or the Institute of Fire Safety Managers. believe housing's Fire Door Inspector will undertake a suitable fire door inspection course, accredited by a recognised body such as FDIS or Fire Qual.

Only competent contractors will be used to complete fire safety related activities.

All organisations delivering FRAs shall be accredited to at least one of BAFE SP-205 or FRACS. Individuals carrying out FRAs will be a member of an approved fire risk assessors register.

Organisations conducting remedial repairs in relation to compartmentation works or fire doors will be BM Trada or FIRAS accredited.

Organisations undertaking servicing and maintenance work will be suitably accredited and qualified to undertake these tasks, including BAFE accreditation for those conducting fire alarm servicing.

We will check that our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis, and relevant certification will be saved accordingly.

## **8. Commitments to our customers**

We consider good communication essential in the effective delivery of fire safety programmes and therefore we will develop a customer engagement plan. This will support customers and leaseholders in their understanding of fire safety, advise them of how they

can keep themselves and other residents safe, and encourage them to report any fire safety concerns.

We aim to engage with vulnerable and hard to reach customers. We will share information clearly and transparently and will ensure that information is available to customers through regular publications and information on our website.

In line with the requirements of Section 156 of the Building Safety Act, we will provide customers and leaseholders information regarding the risks identified in the FRAs at their flat block. A full version of the FRA will also made available upon request.

In addition to this believe housing will:

- implement a programme of FRAs at properties which fall under the scope of the FSO
- conduct a programme of compartmentation surveys in properties which fall under the scope of the FSO
- conduct a programme of regular fire door inspections
- act upon any faults or issues highlighted by the survey and inspection programmes, in a timely manner
- maintain any fire safety measures installed, in line with current legislation and/or manufacturers guidelines
- share information on fire door safety, the block evacuation strategy, and general fire safety with all customers and leaseholders living in flat blocks with internal communal areas. This will be shared when a new occupier moves in and annually thereafter
- annually, publish data relating to the tenant satisfaction measure for fire risk assessment, on believe housing's website
- regularly promote fire safety awareness with our customers
- act upon any fire safety concerns reported by our customers
- keep customers updated on any fire remedial works taking place in residential buildings
- consider any suggestions made by our customers that could improve their fire safety
- liaise with our customers to discuss local fire safety precautions and other compliance matters.

## **9. Performance reporting**

We will report key performance indicator (KPI) measures for FRAs that follow the requirements set out in the Tenant Satisfaction Measures (TSM's), which came into force on 1 April 2023 and must be reported to the Regulator for Social Housing on an annual basis.

We will also report to the following in relation to fire safety.

Report recipient	Frequency
Regulator of Social Housing	Annually
Audit Committee	Quarterly
Senior Management Team	Fortnightly

The content of these report differs; however, overall the following will be reported annually:

#### Data

- Number of properties on the cyclical fire safety programmes
- Properties with a valid in date FRA
- Properties without a valid in date FRA
- Status of FRA actions
- Status of fire door inspection programme
- Status of the compartmentation programme
- Information on no access.

#### Narrative

- Current position
- Progress of remedial works from overdue FRA actions.

### 10. Quality assurance

We will internally review 100% of FRA reports, compartmentation surveys and servicing and maintenance paperwork.

We will check all evidence from remedial works to confirm that the issues raised have been fully addressed before closing these down. Photographic evidence will be required to close remedial actions.

We will ensure that there is a programme of external quality assurance audits of FRAs. 10% of FRAs per year will be independently audited by a BAFE SP-205 accredited organisation.

We will carry out an independent audit of fire safety management at least every three years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

## **11. Policy review**

This policy will be reviewed every two years or unless there is:

- a significant fire safety incident
- important change in circumstances or legislation, which would warrant a review being carried out at an earlier date
- significant issues raised regarding the policy, by an independent organisation undertaking audit or review.

## **12. Significant non-compliance and escalation**

Our definition of a significant non-compliance is any incident which has the potential to result in a major breach in legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.

All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident or of a colleague becoming aware.

Any non-compliance issues at an operational level will be formally reported to the Compliance Manager and, where necessary, the Health and Safety Manager in the first instance, who will agree an appropriate course of corrective action.

In cases of serious non-compliance, the Senior Management Team and Board would consider whether it is appropriate to disclose the issue to the Regulator for Social Housing as required by the regulatory framework, or any other organisations such as the Health and Safety Executive.

We will ensure that there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to fire safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

## **13. Links to other policies and procedures**

The policy detailed in this document should be read and reviewed in conjunction with:

- The Health and Safety Policy Statement
- The Fire Safety Management Procedure
- Flat Block Inspection Procedure
- Gas, and Solid Fuel Policy
- Electrical Safety Policy

- Assured (shorthold) Tenancy Agreement
- CDM Procedure
- Customer Home Improvements Policy
- Tenancy Policy
- Tenancy Management Toolkit
- Equality, Diversity and Inclusion.