



Fire Safety Policy

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Person responsible:	Director of Homes
Customer consultation arrangement:	Customers consulted via Tenants' Committee.
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Approved by:	Board
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1. Purpose and Scope

Purpose

South Lakes Housing (SLH) is a registered provider (housing association) and we own and manage approx. 3300 homes across a wide geography in South Lakeland and Lancashire.

This Policy outlines how SLH will comply with the Regulatory Framework for Social Housing in England as outlined below: Registered Providers must meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

The Fire Safety Management Policy details how SLH will maintain safe buildings for all its customers, leaseholders and employees, that meets the requirements of the Regulatory Reform (Fire Safety) Order 2005 (FSO), Fire Safety (England) Regulations 2022 and Building Safety Act 2022. These place a duty on persons responsible for buildings in England, Wales, and Scotland to manage and implement adequate fire prevention and risk mitigation measures within the premises that they own and/or manage (including risk assessments).

To be compliant under these duties, Fire Risk Assessments (FRA) need to be undertaken within recommended timescales they can be reviewed or renewed. Renewals will mean that a full FRA is carried out whereas reviews will be a lighter version of the FRA that looks at any significant changes in the building that have occurred since the previous FRA renewal.

This policy provides assurance that measures are in place to not only ensure compliance with the regulations, but that SLH has a management system in place to proactively identify, manage, record, and mitigate risks associated with the risk of fire.

Scope This Policy applies to all properties owned or managed by SLH including non-residential premises.

This policy applies to all fire safety risks, fire safety systems and equipment within all qualifying buildings owned or managed by SLH.

SLH will undertake renewal of Fire Risk Assessments (FRAs) Type 3 (which also captures HHSRS) in qualifying buildings. SLH will carry out and document FRAs for:

- Offices and business premises occupied and managed by SLH.
- The communal areas of blocks of flats
- The communal areas of Extra Care, Sheltered and Supported Housing Schemes
- Houses in Multiple Occupation
- Buildings containing two or more domestic premises
- Commercial buildings

FRAs are not required in individual private dwellings

This policy applies to SLH employees, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.

2. Regulatory and Legislative Requirements

Regulatory Standards The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, introduced by the Regulator of Social Housing (RSH).

Legislation

This policy complies with the following legislation and its purpose is to ensure SLH meets its obligations under:

- Fire Safety Act (2021)
- Building Safety Act (2022)
- The Health and Safety at Work Act 1974.
- The Management of Health and Safety at Work Regulations 1999.
- The Regulatory Reform (Fire Safety) Order 2005

Code of Practice

- The Housing Act 2004, which introduces the Housing Health and Safety Rating System (HHSRS)
- Building regulations Approved Document B 2109 (2020/2022 amendments 2018 +A2: 2022)
- Gas Safety (Installation and Use) Regulations 1998 (amended)
- Electrical Equipment (Safety and Use) Regulations 1994
- IET Regulations 18th Edition (BS 7671) : 2018 +A2: 2022
- Furniture and Furnishings (Fire Safety) Regulations 1998
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Corporate Manslaughter and Corporate Homicide Act 2007
- The Construction (Design and Management) Regulations 2015
- Equality Act 2010.
- Fire Safety Act -Approved Codes of Practices

- Fire Safety Risk Assessment - Offices
- Statutory fire safety guidance:
- National Fire Chiefs Council Fire Safety Specialised Housing Guide 2018

SLH acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and regulatory intervention and downgrade from the Regulator of Social Housing.

3. Our Approach

SLH will ensure that a Fire Risk Assessment (FRA) for the purpose of identifying the general fire precautions and other measures needed to comply with the Regulatory Reform (Fire Safety) Order 2005 (FSO) will be carried out on recommended and regular intervals based on the risks associated with the property.

The purposes of defining the period in which a FRA is undertaken by asset type, is based upon a reassessment priority determined by the fire risk assessor and detailed within the FRA report and recorded within the Asset Management System as follows:

Reassessment Priority	Priority	FRA Frequency
Level 1 Fire Risk Assessment	High	Annual
Level 2 Fire Risk Assessment	Medium	Two years
Level 3 Fire Risk Assessment	Low	Three years

SLH will carry out a programme of regular servicing and maintenance to all fire detection, prevention and firefighting systems and equipment within buildings owned or managed by the association. The intervals of testing and servicing will be in accordance with the appropriate legislation and manufacturer's instructions and will be recorded/evidenced on our Asset Management System

SLH will carry out an annual programme of fire door inspections once all fire doors have been inspected under the first round of Type 3 FRA renewals. A fire door register has been set up on our Asset Management System. We will engage with customers about the importance and correct use of fire doors.

SLH will have a zero-tolerance approach to sterility of communal areas. However, SLH will look at a managed approach on a block-by-block basis, where it has been brought to the attention of the Building Safety Team that the zero-tolerance approach is significantly impractical for a particular block.

SLH are implementing proactive communal inspections, the frequency of which will be based on the risk rating of the communal area. These will be with a view of proactively managing management issues in respect to Fire (and other building safety areas). The purpose of the inspection is to ensure that any management recommendations required by the FRA is being adhered to, and that the communal areas are being kept in a sterile condition.

SLH will adopt a 'Stay Put' policy for all its general needs and sheltered housing blocks unless specifically advised against by the FRA assessor.

SLH will ensure that all customers living in Independent/ sheltered living (category 1 and category 2 with/without attached communal areas) will have an annual Person-Centered Fire Risk Assessment (PCFRA) completed regardless of the evacuation policy for that building.

Any employees who are unable to evacuate a work premises independently will require a PCFRA and subsequently a possible Personal Emergency Evacuation Plan (PEEP). Any employees who consider that they are unable to independently evacuate the offices are to highlight this at Induction and if occurring later, to the building safety team. However, PEEPS should only be given as an exception.

Where SLH have been notified that a customer within a building requiring an FRA, is storing Oxygen in their home for medical use, the association will ensure that they have a PCFRA in place immediately and that this will be reviewed annually by a competent person. SLH will also review the FRA and whether additional fire risk mitigation methods are required. SLH will maintain a register on the Housing Management System which identifies properties where this applies. The FRA assessor will be notified of oxygen users.

Where hoarding is found in customers properties SLH will offer help and advice to support them to help reduce this, where it creates a fire hazard and a threat to life. The FRA assessor will be notified of customers with hoarding tendencies.

SLH will ensure that processes and controls are in place to undertake FRA's and Fire Door Inspections and manage the completion of recommended actions resulting within recommended timescales.

No Access

Most customers provide timely access for SLH to carry out routine safety inspections, testing, maintenance, and repair but there will be occasions when gaining access can be difficult. In these circumstances SLH will carry out a risk assessment, taking account of the property and occupier, and will seek to work with customers to address any issues, taking into account any known or identified vulnerabilities, to ensure the wellbeing of the customer.

SLH will use the legal remedies available within the terms of the lease agreement should any Leaseholder or Shared Ownership Customer refuse permission and/or access to carry out essential fire safety related inspection and remediation works.

Protecting Customers

All customers who are to "stay put" in sheltered housing (both category 1 and category 2), will have their succinct details (GDPR dependent) along with their Personal Emergency Evacuation Plans, recorded in the Fire Log and will also be placed in the 'Secure Information Box' adjacent to the fire controls of each building for fire authority purposes. PCFRA s will be carried out as a matter of course for all those in category 2 sheltered housing.

The PCFRA (and PEEPS) will be reviewed annually by a competent person. If it becomes known that the customer has significant changes to their lifestyle that affects the Risk Assessment, then this will be revised before the anniversary date and updated accordingly.

Under new legislation (FSO 2022 Article 21), we have a duty to ensure our customers are informed in respect of fire safety to their blocks. SLH will ensure that fire safety information is available on its website, through signage in its communal areas, information given at first letting and through a portal or website.

SLH will work with customers to raise awareness of building safety and the steps SLH will take to keep customers safe, including:

- Inform residents of the importance of reporting any issues through the provision of information via the website, newsletters, and leaflets.
- Maintain a clear approach to gaining access to carry out works and be clear that enforcement action may be taken when it is necessary to do so.
- Maintain a clear complaints process and monitor and record complaints that indicate a risk to safety.

At all stages of this process SLH will ensure customers understand fire safety and if necessary, information will be translated or provided in large print.

Competent Persons

SLH will ensure that the colleagues responsible for operational delivery receive appropriate training to be able to manage the service.

SLH will ensure that all contractors and consultants working for, or on behalf of the association have the relevant training, qualification and licensing required for their role before undertaking works. This will include the internal direct work force who carry out repairs and other maintenance duties on areas such as fire doors, compartmentation, and protected corridors etc.

Only qualified, competent, certified, and registered persons, under a recognised Fire Risk Assessors Register, can be engaged to undertake Fire Risk Assessments. Until SLH has trained and suitably experienced resources available, all SLH FRA's to non-domestic properties, including common parts of blocks of flats will be undertaken by accredited consultants. This is due to the Building Safety Act Section 156 making a requirement for competence of FRA assistance under an expansion of Fire Safety Order Article 9A.

At procurement, SLH will ensure that any external contractors or consultants have the relevant and appropriate qualifications to carry out the assigned work. Licenses, governing body membership and insurances of external contractors will be checked annually by the Building Safety Manager. A copy of the Policy and Management Plan will be included within any tender documents. Consultants will be required to report formal documentation such as FRAs and action plans in the SLH format that may not be consistent with what they normally produce. They will also be required to work through SLH portals.

External (Contractors/Suppliers Behaviours)

It should be noted that the Duty Holder status is also extended externally to any person outside of SLH engaged in any fire safety duties, thus Contractors who are approved to work for SLH will be advised of their requirements to comply with SLH policy as part of the approval processes. This is as follows:

- Assessing the fire safety risks arising from their works/activities and implement control measures in accordance with the principles defined in the Regulatory Reform (Fire Safety) Order.
- Co-operating with members of the association on all matters of fire safety and obey all instructions relating to fire safety.
- Ensuring existing fire safety measures and customers living in their homes are not put at risk.

- Refraining from breaching any compartmentations whilst undertaking works. If any breaches should occur then ensuring that they are reported, rectified, and certificated (with supporting evidence).
- Ensuring suitable and sufficient Risk Assessments and Method Statements are in place before any works commence. Ensuring fire prevention measures are in place to reduce the risk of fire e.g., hot work permits, permit to work systems and other controls.

Failure to comply with the requirements of this Fire Safety Policy and Procedure could result in the contractor being removed from site.

Colleague Training

All SLH colleagues will have an ongoing understanding of fire safety management in their roles and responsibilities in ensuring that we maintain full compliance. This will be relevant to the role they undertake.

Appropriate training will be provided to colleagues on fire safety management at least every 3 years or where relevant to legislation change. This will include team and contractor briefings, e-learning, and access to external training.

SLH will also ensure that all trade operatives working for the associations internal work force have the relevant training required for their role. This will be managed via periodic assessments of training needs and resulting programmes of internal and/or external training.

SLH will establish and maintain records of all fire safety related training undertaken by colleagues through the HR system.

Data

South Lakes Housing acknowledges that to meet its obligations it must maintain a robust approach to identifying the properties and components for which it has responsibility.

South Lakes Housing will:

- Conduct a monthly asset stock reconciliation to ensure that all property additions and disposals updated accordingly in the asset system.
- Hold accurate records against communal areas of each property it owns or manages setting out the requirements for fire safety including fire risk assessment, servicing, maintenance and repair of fire prevention, detection, and firefighting equipment.
- Where a requirement for an FRA exists, hold full electronic copies of the current and previous FRAs along with key reportable and auditable information.
- Where fire safety equipment exists, hold reportable and auditable information.
- Maintain current and auditable records of remedial works arising from the FRAs or other fire safety-related inspection or testing.

4. Responsibilities/Duties

Governance

SLH Board will have overall governance responsibility for ensuring the Fire Safety Management Policy is fully implemented to ensure full compliance with the regulatory standards, legislation, and approved codes of practice. As such, the Board will formally approve the policy and review it periodically.

The Board or its delegated Committee will receive regular updates on the implementation of the Fire Safety Management Policy along with notification of any non-compliant issues identified. This is to provide assurance that the policy is operating effectively in practice.

Executive Leadership and Senior Management Team and Audit & Risk Committee will receive reports, at least quarterly, in respect of Fire Safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issues identified.

Roles and Responsibilities

The list below sets out the delegated hierarchy of responsibility within the association according to the requirements of legislation: -

Duty Holder/Accountable Person

The Accountable Person under this policy will be South Lakes Housing. The Duty Holder is the Director of Homes who will delegate certain tasks to the responsible and competent persons.

The 'Duty Holder' is responsible for Health and Safety and must take the right precautions to reduce the risk of exposure to harm. They will appoint a person or persons to take day-to-day responsibility as an authorised deputy for controlling/assessing any identified risk, prevent/control risks to employees and all stakeholders under their responsibility and putting in place a servicing regime and mitigating actions including that of record keeping and reporting.

Responsible Persons

The Responsible Person(s) for SLH are the Head of Assets and Building Safety and the Building Safety Manager who will ensure the implementation of the policy and procedures across SLH. They will also ensure all operational procedures are carried out in a timely and effective manner. They will ensure all appointed organisations / individuals have the appropriate levels of training, skills, and knowledge to undertake the tasks and monitor training

They are to make sure that all servicing/ inspections are undertaken, and remedial actions are put in place, reviewed, and monitored within a timely manner. On top of this they are to develop, implement, communicate and continually improving SLH's Fire Safety Policy following discussion and agreement with the duty holders and following significant or emergency events/ reviews. They are to ensure the competent person/contractor carries out their duties.

Other Teams

Building Safety requires collaboration and effective communication between teams and the Building Safety Team will work in collaboration with teams across SLH to maintain safety.

The Neighbourhood Team who will offer support to gain access where this is proving difficult. They will also support where management actions arising from FRA are identified to ensure communal areas are kept free from combustible items.

Operational Delivery Team will manage and deliver minor works to fire doors, signage replacement and fire door renewals.

Consideration should be given when letting properties (all property types) to the suitability of the accommodation for the prospective tenant as regards fire safety and the necessary support to accommodate any vulnerability or disability for evacuation in the event of a fire.

Fire Risk Assessment Findings

SLH will ensure that Fire Risk Assessment reports (renewals and reviews) once received, are forwarded to the Building Safety Team, who will review the findings and recommendations.

Results and FRA reports along with remedial actions are uploaded onto the Asset Management System and classified to the appropriate timescales. Each action will require evidence prior to completion to ensure there is an audit trail of steps taken to remediate this issue.

All colleagues who have responsibility for or visit a home have a responsibility to notify the Building Safety Team where circumstances have changed or customers behaviours are posing a risk within a scheme/block/property, which may result in a new Fire Risk Assessment or review being required.

The Development Team will have responsibility for ensuring that any newly built or acquired properties are handed over in line with the Building Safety Teams requirements and any fire fighting systems or equipment are handed over with recommended safety regimes..

5. Monitoring & Review

Records and Management of Data

SLH will hold accurate and up to date records against each property it owns and/or manages, identifying when the FRA was last undertaken. From this it will identify the next renew or review date and ensure a programme is implemented before the test date expires.

All fire fighting systems, fire doors or equipment will be stored under the 'equipment' section of the Asset Management System.

SLH will also establish and maintain accurate and up to date records of all certification in relation to alarms, emergency lighting and other equipment testing and checks such as flick tests.

SLH will ensure processes and controls are in place to provide and maintain appropriate levels of security for all Fire Safety related data.

Data Protection

When handling data sheets colleagues and contractors will come into contact with personal information. The handling and use of the data will be carried out under the General Data Protection Regulations 2018.

Independent Audit/Assurance

SLH will carry out an independent third-party quality assurance audit of completed New Fire Risk Assessments. This will be a 10% sample of the total number of assessments carried out.

Non-Compliance/Escalation Process

Any non-compliance issues identified at an operational level will be formally reported to the Director of Homes in the first instance as soon as this is identified. The Director of Homes will agree an appropriate course of corrective action with the Head of Assets and Building Safety to address the non-compliant issue and report details of the same to the Chief Executive within 24 hours. The Chief Executive or Director of Homes will ensure the Board are made aware of

any non-compliance issue so they can consider the implications and act as appropriate, including notification to the Regulator of social Housing.

Review

This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory changes or to incorporate best practice. In addition, SLH will ensure that the policy is reviewed and if necessary amended, following any significant event or issue such as:

- Independent audit highlighting failings in process or policy.
- Any significant changes to the building.
- Required following an independent audit on Fire Risk Assessments and with the result that surveys need to be reviewed by another competent assessor/ surveyor.
- Change in business risk appetite.
- Change in legislation or Code of practices

An independent audit of Fire safety and will be included in the 3 year Internal Audit plan

KPI'S

KPIs will be used to ensure that SLH is compliant with its own policy and is keeping its customers, contractors and the public safe. KPIs will be monitored and recorded on a monthly basis and reported as detailed above.

Equality Impact Assessment

In implementing this policy, we aim to treat all customers fairly. An equality impact assessment has been carried out. Where customers require additional support, we will endeavor to provide a service that seeks to meet the needs of a particular individual.