



Title:	Fire Safety Policy
Person responsible:	Director of Property Operations
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EIA required:	Yes
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1	March 2023	Original
2	March 2026	Review and Reapproval.

## 1. Purpose

- 1.1 The purpose of this policy is to ensure South Lakes Housing (SLH) meets its statutory obligations as a landlord and seeks to provide assurance that Fire Safety is adequately managed, ensuring the safety of our residents, leaseholders, colleagues and the public.
- 1.2 At SLH, we are committed to ensuring that all our residents' homes, offices and commercial properties are safe and secure places in which to live and work.
- 1.3 The aim of the policy is to ensure, so far as reasonably practicable, that our residents, leaseholders, employees and the public are not exposed to any risks to their health or safety and wellbeing from fire.

## **2. Scope**

- 2.1 SLH owns and manages a range of properties, including single dwellings and non-domestic buildings. The key objective of this policy is to describe how SLH will manage fire safety as far as is reasonably practicable.
- 2.2 This policy explains how SLH's commitments to fire safety will be met. The scope of this policy includes:
- The undertaking of fire risk assessments (FRA) and the remedial works and actions arising from the FRA.
  - Cyclical maintenance of fire safety systems and equipment, including but not limited to automatic fire detection and alarm systems; emergency lighting; automatically opening smoke vents or smoke control systems; portable fire-fighting equipment; dry or wet risers; sprinkler/mist systems.
  - General repair, maintenance and management activity which could have an impact on Fire Safety within a building or individual property.
  - A commitment to resident engagement on fire safety matters, including ensuring access to residents' homes to address fire risks.

## **3. Regulatory and Legislative Requirements**

- 3.1 SLH will seek to comply with all current and relevant statutory obligations, primarily as detailed in the following.
- Fire Safety (England) Regulations 2022
  - The Building Safety Act 2022
  - The Fire Safety Act 2021
  - The Building Regulations 2010
  - The Regulatory Reform (Fire Safety) Order (RRFSO) 2005
  - The Housing Act 2004
  - LACORS Fire Safety Guidance
  - NFCC protection guidance
- 3.2 SLH takes the view that delivery of the commitments within this Policy will ensure that the requirements of other legislation, such as the Health and Safety at Work Act 1974 and Landlord Tenant Act 1985, will also be met.
- 3.3 Our primary objective is to ensure that residents, leaseholders, contractors, colleagues, and visitors remain safe in our premises. Failure to properly discharge our legal responsibilities may also result in:
- Prosecution under the Regulatory Fire Safety Order 2005, Health and Safety at Work Act 1974, or Corporate Manslaughter, Corporate Homicide Act 2007, or Building Safety Act 2022
  - Regulatory intervention
  - Reputational damage

- Loss of confidence by stakeholders in the organisation

## 4. Our Approach

### 4.1 Fire Risk Assessments

4.1.1 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 at recommended and regular intervals based on the risks associated with the property.

4.1.2 Defining the timeframe for conducting an FRA according to asset type relies on a reassessment priority set by the fire risk assessor. This priority is described in the FRA report and documented in the Asset Management System as follows:

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

4.1.3 SLH will record the significant findings and aim to undertake recommended remedial work within the timescales set by the competent person conducting the FRA.

4.1.4 SLH will ensure that fire risk assessments are reviewed no later than the review date set by the current fire risk assessment.

4.1.5 The fire risk assessment of a building will be reviewed following a fire, a change in building use, a change in working practices that may affect fire safety, following refurbishment works to the building or as and when required following an independent fire safety audit.

### 4.2 External Wall Assessments

4.2.1 SLH will undertake Fire Risk Appraisal of External Walls (FRAEW) following the British Standards Institution (BSI) code of practice (PAS9980) to any multi-occupied residential building which is identified as having the requirement based on the FRA assessment.

4.2.2 Where the FRA identifies a requirement to conduct a Fire Risk Appraisal of External Walls (FRAEW), SLH will appoint a Competent Person to undertake the assessment, which will consider external wall construction and cladding of existing multistorey and multi-occupied residential buildings, applying the methodology set out in PAS 9980 Code of Practice.

### **4.3 Evacuation**

- 4.3.1 SLH will ensure that all residents living in independent living (category 2 with communal areas) will have a Person-Centred Fire Risk Assessment (PCFRA) completed, regardless of the evacuation policy for that building.
- 4.3.2 SLH will ensure that all residents living in independent living (category 2 with communal areas) will have a Person-Centred Fire Risk Assessment (PCFRA) completed, regardless of the evacuation policy for that building.
- 4.3.3 Any residents identified following the completion of a PCFRA as being unable to self-evacuate in the event of a fire will have a Personal Emergency Evacuation Plan (PEEP) completed. The PEEP will consider individuals on a case-by-case basis and consider a person's ability to evacuate or understand their responsibility, and their capacity. This information will be kept in the Fire Safety Log held securely on site and made available to the fire service in the event of an evacuation.
- 4.3.4 Any employees who are unable to evacuate 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 to the People and Culture Team at the onboarding stage of starting their employment at SLH or if there is a change in personal circumstances during their employment.

### **4.4 Evacuation Drills**

- 4.4.1 Evacuation drills will be carried out in all non-residential buildings and will be determined by the FRA.
- 4.4.2 In non-residential buildings, SLH will endeavour to conduct drills twice annually.
- 4.4.3 All new colleagues to the organisation will be instructed in the fire evacuation procedure upon induction.

### **4.5 Fire Door Inspection**

- 4.5.1 Fire Doors will be sample inspected as part of the FRA process and at regular intervals as recommended within the FRA.
- 4.5.2 SLH will provide residents with information on the importance of fire doors to a building's fire safety on an annual basis.

### **4.6 Remedial Actions**

- 4.6.1 All remedial actions arising from the FRA or further investigations shall have clear completion timescales and priorities determined by the competent Fire

Risk Assessor appointed by SLH. The timescales and priority rating will be determined through a risk-based assessment score and will consider a reasonably practicable approach.

- 4.6.2 All fire safety remedial work will be carried out in accordance with the relevant British Standard, approved code of practice or associated good practice guidance. Any contractors undertaking specialist fire safety remedial works should be third-party accredited.
- 4.6.3 Large remediation programmes following further investigations may be monitored as distinct projects outside of general remedial actions.

#### **4.7 Domestic Smoke/Heat Detection**

- 4.7.1 SLH will ensure that all dwellings owned by SLH (excluding leasehold and shared ownership) will have working mains-powered smoke/heat alarms installed (or battery-powered smoke alarms as an interim measure until mains-powered can be installed).
- 4.7.2 These smoke/heat alarms will comply with the requirements of The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022. Ensuring at least one smoke alarm is equipped on each storey of homes where there is a room used as living accommodation.
- 4.7.3 The appropriate level of provision will be installed in accordance with British Standard (BS 5839:6 2019) and will include either an LD2 (Additional Protection – a Smoke Alarm also in the ‘principal habitable room’ i.e. Living Room and a Heat Detection Alarm in the Kitchen), or Category LD1 (Maximum Level Protection – detection installation in all rooms and all circulation spaces).
- 4.7.4 SLH will check smoke detection annually as part of the gas servicing contract and every 5 years through the electrical servicing contract.

### **5. Data**

- 5.1 SLH acknowledges that to meet its obligations, it must maintain a robust approach to identifying the properties and components for which it has responsibility. SLH will:
  - Conduct a monthly asset stock reconciliation to ensure that all property additions and disposals are updated accordingly in the asset system.
  - Hold accurate records against communal areas of each property it owns or manages, setting out the requirements for having a fire risk assessment.
  - Accurate records are also held against each property it owns or manages, setting out the frequency for undertaking servicing, maintenance and repair of fire prevention, detection, and firefighting equipment.

- Maintain an up-to-date database of all properties that will indicate both where it does and does not have a responsibility to provide Fire Risk Assessments (FRAs) and/or maintain fire safety 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.
- Maintain current and auditable records of remedial works arising from the FRAs or other fire safety-related inspection or testing.

## **6. Management**

6.1 As a responsible landlord, SLH will ensure that buildings are designed, maintained and managed to support safe evacuation, as well as taking the following actions to reduce the risk of fire:

- Prohibit the storage of any items in communal areas, including communal or service cupboards and escape routes.
- Maintain a no smoking & vaping policy in all communal areas.
- Implement a risk-based approach to the periodic inspection of communal areas and escape routes in line with the fire safety management plan to enforce the above.
- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).
- Ask residents to alert SLH to the presence of stored oxygen so that it can alert the fire and rescue service of its presence.
- Enforce resident responsibilities where required, considering a balance of individual residents' rights with the need for effective, timely action where there is a risk to the safety of other residents.
- Appoint competent fire safety consultants.

## **7. Construction**

7.1 There are detailed requirements on SLH as a client during construction projects in relation to fire safety to ensure buildings are designed to support safe evacuation. SLH will ensure:

- Ensure a complete and accurate golden thread of fire safety information is created, maintained and handed over in a useable digital format.
- Develop a fire strategy at an early design stage, with clear ownership and review at each project stage.
- Implement robust change control processes to ensure any design changes are assessed against the approved fire strategy.
- Where appropriate, and for higher risk or complex developments (e.g. apartments or taller buildings) appoint a suitably qualified fire consultant to develop, review and validate the fire strategy throughout construction compliance with the Building Regulations and specific regulatory requirements imposed upon it.

- There is involvement with key SLH stakeholders through Development user group to influence building design at key stages prior to, and during construction.
- Ensure compliance with all relevant Building Regulations, and where applicable, requirements of the Building Safety Regulator.
- Clearly define and fulfil dutyholder roles (Client, Principal Designer, Principal Contractor) in line with current legislation.
- Ensure all contractors and designers demonstrate appropriate competence, including the use of recognised accreditation or certification schemes where applicable.
- Ensure all necessary approvals are obtained, and comprehensive fire safety and Health & Safety documentation is completed and handed over prior to project completion
- A Fire Risk Assessment is undertaken prior to occupation.
- Provide full and accurate handover information, including fire strategy, as-built drawings, and operation and maintenance manuals for fire safety systems

## **8. Communication & Resident Engagement**

8.1 SLH will provide advice and information to residents & leaseholders regarding fire safety instructions to help keep themselves and their neighbours safe through the following methods:

- Provide a copy of an FRA or evidence of Fire Equipment Servicing to a relevant resident within 28 days when reasonably requested to do so.
- Provide relevant fire safety instructions to make residents & leaseholders feel safe.
- Inform residents of the importance of fire safety, through the provision of information via website, newsletters, leaflets and information at new tenancy sign-up.
- Maintain a clear approach to gaining access to carry out surveys and undertake works, and be clear that enforcement action may be taken when it is necessary to do so.
- Communicate with residents & leaseholders through appropriate 'Fire Action' signage.
- Communicate and enforce a sterile block approach to all common parts as part of our tenancy agreement.

## **9. Access**

9.1 SLH will take all reasonable steps to obtain access to properties to maintain fire safety.

9.2 In the event of exhausting all available options to secure access, we will carry out a risk assessment, taking account of the property and occupier and will seek to engage with residents to address any issues, considering

any known or identified vulnerabilities, to facilitate access and ensure the well-being of the resident.

- 9.3 If we believe the integrity of the property, its fabric and/or the safety of the resident or those in the vicinity of the property is compromised. This may include, but is not limited to, obtaining an injunction for access, and any costs incurred would be recharged to the resident.

## **10. Contractors Competency**

- 10.1 SLH will ensure that contractors are competent, with the following controls operated to ensure competence can be demonstrated:

- Ensure that FRAs are undertaken by appropriately accredited organisations and all FRAs are subject to validation.
- Appoint an external Competent Person to provide retained support and advice in relation to fire safety. This will be (or include access to) a Chartered Fire Engineer and experienced Fire Risk Assessor.
- For any buildings with combustibile external wall materials in higher risk categories, the assessor should be part of a professional body that is within a scheme able to demonstrate third party accreditation or validation, from UK Accreditation Service (UKAS) or UK Engineering Council (EngC), demonstrating the ability to apply the Code of Practice PAS9980.
- Approved SLH contractors must follow SLH policies to maintain fire safety and protect residents during repairs and maintenance.
- Ensure that no compartmentations are compromised during the execution of works. Should any breaches occur, they must be promptly reported to SLH.
- Any contractors (internal or external) undertaking hot works as part of repairs activity must have an approved hot works procedure. This should include avoidance of hot work unless no alternative method is feasible.

## **11. Internal Competency**

- 11.1 SLH will maintain a skills/training matrix to ensure that all colleagues undertaking key roles within the scope of this policy have appropriate training. SLH will establish and maintain records of all fire safety-related training undertaken by colleagues through the HR system.
- 11.2 It is not possible to succinctly define competence requirements for all roles and activities outlined in this policy. In many areas, competence will be assessed based on skills, knowledge, experience, and behaviours as opposed to a single qualification or standard.

## **12. Monitor and Review**

- 12.1 We will utilise business intelligence reports to track Fire Safety compliance, linked to Fire Risk Assessments, remedial works, and servicing and maintenance of fire prevention, detection, and firefighting equipment.
- 12.2 Key Performance Indicators will support the Fire Policy and will be reported monthly to the Senior Leadership Team and quarterly to the SLH Board of Management.
- 12.3 An update on Fire Safety will be detailed in a Property Compliance report to provide SLH Board of Management with a quarterly update on the progression of completing fire safety actions.
- 12.4 SLH will complete quarterly fire safety remediation surveys for the Regulator for Social Housing.
- 12.5 Fire Safety will be reviewed as part of the SLH Internal Audit Programme.

### **13. Responsibilities / Duties and Governance**

- 13.1 The SLH Board is responsible for ensuring the Fire Safety Management Policy is implemented in compliance with regulations. As such, the Board will formally approve the policy and review it periodically.
- 13.2 Key performance indicators, including Tenant Satisfaction Measures BS02 Fire Safety Checks, will be reported to Board and Senior Leadership Team and through operational risk updates to provide assurance of how we meet the compliance requirements and areas of non-compliance.

#### **13.3 Duty Holder/ Accountable Person**

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

#### **13.4 Responsible Persons**

- 13.4.1 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.

The responsible person(s) will 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.

### **14. Non-Compliance**

- 14.1 Any non-compliance issue identified at an operational level will be formally reported to the Head of Assets and Building Safety and the Building Safety

Manager in the first instance, and will agree an appropriate course of corrective action with the operational team to address the non-compliance issue and report details of the same to the Senior Leadership Team.

- 14.2 The Senior Leadership Team will ensure the Board and Audit & Risk Committee are made aware of any non-compliance issue so they can consider the implications and act appropriately.
- 14.3 The Senior Leadership Team and Board will consider whether it is necessary to disclose the issue to Regulator of Social Housing in the spirit of coregulation as part of the Regulatory Framework.

## 15. Glossary

<b>Accountable Person</b>	The organisation or individual legally responsible for ensuring fire safety in a building. For South Lakes Housing, this is the organisation itself, with specific duties delegated to specific roles within the organisation.
<b>Asset Management System</b>	A database used to record and track properties, fire risk assessments, and maintenance activities.
<b>British Standards (BS)</b>	Official standards that set out best practices for fire safety equipment, alarms, and procedures (e.g., BS 5839 for fire alarms).
<b>Competent Person</b>	A person with the necessary skills, knowledge, and experience to carry out fire risk assessments or fire safety tasks.
<b>Evacuation Strategy</b>	A plan for how residents and staff should leave a building safely in the event of a fire. This may include “stay put” or “simultaneous evacuation” approaches.
<b>Fire Action Notice</b>	A sign displayed in buildings explaining what to do in case of fire, including escape routes and emergency contacts.
<b>Fire Door</b>	A specially constructed door designed to resist the spread of fire and smoke, helping to protect escape routes.
<b>Fire Risk Assessment (FRA)</b>	A systematic review of a building to identify fire hazards, assess risks, and recommend measures to reduce those risks. FRAs must be reviewed regularly and after significant changes.
<b>Fire Risk Appraisal of External Walls (FRAEW)</b>	A specific assessment of the fire risk posed by a building’s external walls and cladding, following national guidance (PAS 9980).
<b>Hot Works</b>	Any work involving open flames or heat (e.g., welding, cutting) that could start a fire. Hot works require special procedures and controls.
<b>Leaseholder</b>	A person who owns a property within a building but does not own the building itself. Leaseholders may have specific fire safety responsibilities.

<b>Personal Emergency Evacuation Plan (PEEP)</b>	A tailored plan for helping individuals who may need assistance to evacuate during a fire, such as those with mobility or sensory impairments.
<b>Premises Information Box (PIB)</b>	A secure box at a building's entrance containing key fire safety information for the fire and rescue service.
<b>Regulatory Reform (Fire Safety) Order 2005 (FSO)</b>	The main law governing fire safety in non-domestic premises and communal areas of residential buildings in England and Wales.
<b>Remedial Actions</b>	Steps taken to fix fire safety issues identified in a fire risk assessment.
<b>Responsible Person</b>	The individual or organization in control of a building, responsible for carrying out fire risk assessments and ensuring fire safety measures are in place.
<b>Stay Put Policy</b>	A fire safety strategy where residents are advised to remain in their flats unless directly affected by fire or smoke, based on the building's design.
<b>Sterile Block Approach</b>	A policy requiring communal areas and escape routes to be kept clear of obstructions and combustible materials.