

### Introduction



Empiric Student Properties is a responsible provider and operator of student accommodation. We are committed to conducting all our activities in a safe, considerate and secure manner that supports the wellbeing of our residents, staff and visitors. We are always learning and continually striving to improve our health and safety performance. Fire safety is an integral part of this.



Our comprehensive and robust risk management strategy puts people first. We recognise the additional responsibilities that come from providing accommodation for young adults, some of whom are away from home for the first time. Our motivation is 'doing what's right' and 'keeping all our occupants safe' in line with our corporate values, leading to the development of a more proactive, risk-based approach to fire safety, embedded across our entire business.

This presentation outlines the steps we have already taken and the continued efforts we are making, including how we are taking a lead for the purpose-built student accommodation (PBSA) sector on this important aspect of our business.

Our approach to risk management is to reduce risk throughout our business, internally and externally, wherever we can. We acknowledge our management approach has been enhanced and developed in response to recent incidents such as the tragic Grenfell Tower fire.

We welcome the increased scrutiny and believe that the emerging Building Safety Bill and revisions to Building Regulations will encourage and support a safer, more sustainable built environment that will benefit stakeholders as well as residents and the wider community.

Our strategy is to do more and go further and to keep our buildings safe to operate at all times.

Our driving force is always 'doing the right thing' to make a safe home for our students, and we will always consider going above and beyond regulation if it's the right thing to do.

## Our risk-based approach — how this works in practice

- Given the type and use of our buildings we ensure that all necessary measures are in place to prevent an incident.
- Since the Grenfell Tower tragedy there has been considerable focus from government and key stakeholders on the combustibility of the materials used on residential buildings, particularly those over 18 metres in height.
- The External Wall System (EWS) is the terminology used to describe the combination of materials and construction methodology used from the outer facade, through the insulation, firebreak system and to internal wall coverings.
- EWS's are now the subject of enhanced regulation, including intrusive inspections by qualified responsible parties, and auditable information trails for residential buildings by local and national government authorities who are now requesting full disclosure from building owners.
- Fire safety has always been a critical part of our Health and Safety Strategy but in response to changes in regulation and industry practice, we have enhanced our risk-based approach, assessing the potential fire risks at each of our properties.
- We have a strategy in place to the inspect and assess EWS's and a risk-based mitigation and remediation programme starting with, but not limited to, buildings over 18m in height.
- In addition to a comprehensive review of the design and construction methods against best practice and regulatory requirements, the programme extends much deeper and includes scrutiny of fire prevention technology and equipment and understanding how buildings are being used by students. Each assessment seeks to identify potential fire risks and define appropriate mitigations.
- Contributions from stakeholders including Fire Safety Officers, Local Brigades and Government have helped develop the EWS1 which continues to be an important part of the required information and certification pack, the Golden Thread.

### Our approach Key elements -Implementation

- Our internal maintenance teams carry out a proactive programme
  of planned maintenance across all our properties. For example,
  important equipment such as fire doors, alarms, automatic opening
  vents (AOVs) which control smoke ventilation in a fire, fire
  extinguishers and other equipment such as kitchen-hob suppression
  systems and shut off points.
- Fire alarm tests and regular full evacuations are carried out at all our properties.
- Periodic fire risk assessments are undertaken at the required intervals.
- We work closely with a trusted external supply chain, to support our planned approach which involves detailed surveys of our properties and linking these with our lifecycle policy.
- We systematically monitor compliance using our facilities maintenance system and provide monthly updates to the Group management board. In the event that action needs to be taken, an action plan with clear timelines and responsibilities is developed.
- Our regional teams, supported by the central estates team, have responsibility for making sure all remedial actions identified through fire risk and planned maintenance inspections are completed. When required, we provide specific training to our teams as a result of inspection findings.

### Our approach – Key elements - Implementation

### **Safe Homes**

- 1) Our customers feel safe in their homes
- 2) Our colleagues feel safe, healthy and secure at work
- 3) Our properties are legally compliant and operating safely

### **Fire**

- Documented Management
   System Blueprint/Standards
- Fire Strategy
- Fire Risk Assessment
- Primary Authority
- Technical Support
- Life Safety System Mgt
- PPM
- Training & Information
- Record Keeping
- Incident Reporting
- Legal Compliance
- Audit and Inspection
- Accountability/Responsibility

### **Health & Safety**

- Documented ManagementSystem Blueprint/Standards
- Risk Assessment
- Training and Information
- Technical Support
- Insurance
- A & I Reporting
- Accountability / Responsibility
- Legal Compliance
- Employee Consultation
- Audit and Inspection
- PPM
- Legal Register

### Security

- Documented Management
   System Blueprint/Standards
- Risk Assessment
- Training and Information
- Physical Security
- Personal Security
- Conflict Management
- Local Community Engagement
- Audit and Inspection
- Incident Reporting
- PPM
- Lone Working

### **BC/Crisis Mgt**

- · Crisis and Incident Planning
- Robust procedures
- Risk Assessment
- Documented Procedure
- Business Continuity Plans
- Test Preparedness
- · Training & Information

Plan, Do, Check, Act

**Safety Leadership and Culture** 

### Removal of non-compliant materials

A viable delivery

strategy

A pragmatic approach that is tailored to our portfolio and creates viable solutions that align with our longterm strategic focus.

2 Ensure safety of occupants during works

Manage security of tenure and experience for occupants and event that may give rise to loss of life and revenue

3 Manage
Local
Authorities
and comply
to National
Legisaiton

To ensure that all requirements are met and that ESP remain able to meet the adopting and anticipated requirements of future regulation

4 Establish
Viable
Delivery
Strategy
covers all
building
heights

Ensure our strategy considers the short terms actions for validation and then delivery of the higher risk buildings at this height category.

Our drive to do more to keep our residents safe prompted a further review of façades across our estate. This included an audit of all buildings and a thorough assessment of any potential risks arising from materials, construction or design. The audit included buildings both over and under 18 metres. Buildings below 18 metres have a separate compliance procedure under the new, emerging regulations.

Our Fire Safety Team, supported by our panel of independent, external experts identified any fire risks on a property-by-property basis and developed our proactive programme of inspection and remedial work as required to ensure appropriate safety improvements.

This approach, which began 18 months ago, provides the foundation for how we now tackle fire safety improvements across our estate and ensures we go over and above current regulatory requirements.

This exercise highlighted the need to replace sections of insulation, some ACM and cavity barriers to 11 properties of over 18 metres in our portfolio. All remedial work identified through the complete audit of our estate will be achieved within a two-to-three-year period. The programme of works will be determined by the capacity of our suppliers and partners to complete this substantial volume of work.

### Communicating with students

- We recognise the importance of engaging with students on the part they can play in their own safety.
- Each year we conduct campaigns on fire safety, focusing on the areas of greatest risk along with the statutory topics such as evacuation procedure.
- We always take the opportunity to emphasise personal responsibility with our students.
- We look to create awareness around our resident communities with information and robust procedures surrounding fire on our sites.

### Removal of non-compliant materials

- All our buildings are independently confirmed as safe to operate by fire safety experts, even those awaiting the start or completion of remedial work.
- We have put in place proactive interim arrangements at each affected building. Measures include increased safety patrols by our staff 24/7, contractor fire precautions and full evacuation when a fire alarm is activated (rather than phased evacuation) and restricted parking close to properties, while the work is procured.
- Over the next 3 to 5years, the business is investing £27 million in remedial works to ensure long term building safety. We are pursuing claims against contractors but we are committed to immediate action as the best way to support the safety and wellbeing of our students, staff and visitors.

### Our Fire Safety Expertise

### **Industry Uniting Alliance**



Industry Safety
Steering Group (ISSG)
MCHLG



Construction Industry Advisory Committee



Approved Documentation Steering Review



Advice for Multi-occupied Residential Buildings



Advice for Multioccupied Residential Buildings



National Housing Data Structure



Property Safety Review To increase building safety awareness across our business we have broadened the specialist knowledge on fire safety by augmenting our team of experienced health and safety experts, driven by clear leadership from our Group Main Board, Executive team and Health and Safety Executive.

The expertise in our dedicated Fire Safety Team has been strengthened with Fire Safety counsel from Anthony Taylor (EurOSHM, HonRICS, MSc, CMIOSH, MBCI, MIIRSM, PIEMA,OSHCR) acting on behalf of Working Group 8. Anthony Taylor is a key advisor to MHCLG and the Industry Safety Steering Group (ISSG) and has contributed to the Building Safety Bill with regards the role of Building Safety Managers.

Our own specialist team, with critical and constructive contributions from external advisers, informs our decision-making and keeps the business, including the Executive Board, abreast of changes in legislation, guidance and best practice.

The Fire Safety Team leads on our Fire Safety Policy and plans, training, simplified employee guides and advice to students. The team has already developed a Fire Safety Policy with supporting guidance and a Fire Safety Three Year Plan.

# Drawing on a wide breadth of external expertise

- Given the scale and rate of change over the past few years, we have extended the panel of experts available to provide advice and to assist with specific projects.
- We have a new partnership with Tyne and Wear Rescue Service as a primary fire authority. This arrangement enables us to access assurance and advice, reducing duplication of documentation and inspections with other fire services across the country.
- Specialist consultancies ARUP Fire and CPC provide technical direction while RICS' EWS specialist training. Their support has helped us to carry out the audit of our portfolio and to prioritise any remedial work.
- Fire engineering firm, Part B, provides expert fire engineering assessment of our buildings and we work with The Harris Partnership, as well as other planning and structural engineering experts, to ensure correct interpretation of changing regulations.
- Part B fire engineers liaise with the responsible person at each property and report to the business and to Avon Fire and Rescue Service, when required, on the implementation of remedial actions.
- We have appointed Hyrock Consulting to assess existing fire strategies and to undertake fire safety risk assessments at each property, in line with the anticipated requirements in the new Fire Safety Bill.













## Maintaining engagement and dialogue

We know that students and their families can worry about safety and security, which is why we ensure clear and supportive communication at every step.

Our purpose is to provide high quality homes that are safe, secure and support wellbeing.

Telling people how we do this is part of how we push ourselves to go further.

The risk-based approach we now take on fire safety, combined with the depth of expertise from across our business and from external consultants who independently verify our assessments, mean that we are able to say with greater conviction than ever before that our residents and staff are right to feel safe and

Our people's first duty is the safety of our student residents.

secure in our buildings.

Please contact us using the contact details below if you are interested to find out more.

Spencer Neal 07798621395 Spencer.neal@keeblebrown.com

**Further Information** 

Tel: +44 20 8078 8791 Email: info@empiric.co.uk Website: empiric.co.uk **Press Enquiries** 

Tel: +44 (0)20 7379 5151
Email: empiric-maitland@maitland.co.

