



# Fire Safety Management Policy 2024

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## **1. INTRODUCTION**

- 1.1 Residents of properties left unprotected against fire have a much higher than average chance of being injured or killed in their home. There were 261 fatalities recorded between April 2016 and March 2017 and the Fire and Rescue Services in England attended 161,770 fires in that same period (Home Office 10th August 2017 – Statistical Bulletin 13/17).
- 1.2 In addition to this there have been high profile fires in social housing high-rise blocks (most notably Lakanal House in 2009 and Grenfell Tower in 2017) which resulted in many tenants losing their lives.
- 1.3 Most fires are preventable. Those responsible for buildings to which the public have access can avoid them by taking responsibility for and adopting the right behaviours and procedures. In October 2006, the Regulatory Reform (Fire Safety) Order 2005 (FSO) came into force. This FSO places a duty on persons responsible for buildings to carry out risk assessments and implement adequate fire prevention measures to their buildings.

## **2. SCOPE OF THE POLICY**

- 2.1 Granville Community Homes (GCH) must establish a policy which meets the requirements of the Regulatory Reform (Fire Safety) Order 2005 (FSO), which came into force in October 2006. In addition to this, the policy must provide assurance to GCH that measures are in place to identify, manage and/or mitigate risks associated with fire.
- 2.2 GCH must also ensure that compliance with fire safety legislation is formally reported at Senior Management Team (SMT) and board level, including the details of any non-compliance and planned corrective actions.
- 2.3 The policy applies to all companies within the GCH and therefore is relevant to all the employees, tenants, 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.
- 2.4 It should be used by all to ensure they understand the obligations placed upon GCH to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties owned and managed (offices, commercial shops, etc.).



### 3. RESPONSIBILITY

#### 3.1 Key Roles and Responsibilities

- 3.1.1 In order to ensure that this Fire Risk Assessments Policy, and the supporting procedure is adhered to, the Group will appoint suitably competent personnel to act as the 'Responsible Person' on behalf of the individual Duty Holder and oversee the implementation and review of these documents.
- 3.1.2 Although the organisation has an appointed Duty Holder, the Group's Chief Executive will be ultimately responsible for ensuring compliance with current legislation and to ensure that the organisation fulfils its duties and responsibilities as outlined in this policy document and the supporting procedure.
- 3.1.3 Appointed Duty Holders – GCH Directors will fulfil the role of the appointed 'Duty Holders' on behalf of GCH in order to ensure the appropriate management of the risks associated with fire safety. As a result, GCH Directors will hold responsibility for the implementation of this document, and supporting procedure, as well as ensuring fire safety compliance is achieved and maintained.
- 3.1.4 Acting Responsible Persons – GCH Directors shall ensure that there are suitable arrangements in place for the implementation of the Fire Risk Assessments Procedure, as well as overseeing the delivery of the agreed risk assessment programmes and the prioritisation and implementation of any works arising from the assessments. They are also responsible for overseeing the delivery of service, maintenance and repair programmes to all fire detection, alarms and fire-fighting equipment within property assets owned or managed by GCH.
- 3.1.5 GCH board will have overall governance responsibility for ensuring the Fire Safety 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 this policy and review it periodically. The first review will be undertaken 18 months after the approval of this new policy, and then every two years thereafter (or sooner if there is a change in regulation, legislation or codes of practice).
- 3.1.6 The board will receive regular updates on the implementation of the Fire Safety Policy and fire safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.



- 3.1.7 The SMT will receive reports in respect of fire safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.1.8 The housing teams will provide key support in gaining access into properties where access is proving difficult and use standards methods to do so. They will also facilitate the legal process to gain access as necessary.
- 3.1.9 All staff will have a responsibility to identify to the compliance team where circumstances have changed within a scheme/block/property, which may result in a new fire risk assessment being required.

### **3.2 Competent Persons**

- 3.2.1 GCH will ensure they appoint a competent person that hold the NEBOSH National Certificate in Fire Safety and Risk Management.
- 3.2.2 GCH will ensure that only suitably competent fire risk assessors; certified by BAFE and on a UKAS accredited certification scheme that meets the competency criteria established by the Fire Risk Assessment Competency Council, are procured and appointed to undertake fire risk assessments.
- 3.2.3 SMT will check the relevant accreditations for the work that they are carrying out. These checks will be undertaken as part of the procurement process and/or on an annual basis thereafter and evidenced appropriately.
- 3.2.4 GCH will ensure that only suitably competent contractors and engineers, certified by a UKAS accredited certification scheme, are procured and appointed to undertake works to fire safety equipment, systems and installations. SMT with responsibility for delivery will check the relevant accreditations for the work that they are carrying out. These checks will be undertaken as part of the procurement process and/or on an annual basis and evidenced appropriately.

## **4. POLICY**

### **4.1 Obligations**

- 4.1.1 The appointed responsible person must carry out 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). Although under the FSO this requirement only applies to the common parts of premises, in practice the responsible person will need to take into



account the entire premises - including, to some extent, the units of residential accommodation (known as a Type 3 FRA survey).

- 4.1.2 The responsible person must implement all necessary general fire precautions and any other measures identified by a fire risk assessment.
- 4.1.3 The responsible person must put in place a suitable system of maintenance and appoint competent persons to implement any procedures that have been adopted.
- 4.1.4 The responsible person must periodically review fire risk assessments in a timescale appropriate to the premises and/or occupation fire risk level. This timescale is determined by the fire risk assessor carrying out the fire risk assessment.

#### **4.2 Statement of Intent**

- 4.2.1 GCH acknowledges and accepts its responsibilities under the Regulatory Reform (Fire Safety) Order 2005 (FSO) and the Fire (Scotland) Act 2005.
- 4.2.2 The evacuation strategies in place across the different property types will be implemented and followed as per the recommendations of the competent fire risk assessor. Therefore, the future fire safety strategy to be adopted will be confirmed on a building by building basis in accordance with the fire risk assessor's recommendation.
- 4.2.3 GCH will hold accurate records against each property it owns or manages setting out the requirements for having a fire risk assessment in place.
- 4.2.4 FRA inspection and re-inspection dates, FRA surveys and FRA actions will be held electronically.
- 4.2.5 The Group will hold accurate records against each property it owns or manages setting out the requirements for servicing, maintenance and repair of fire prevention, detection and fire-fighting equipment. These include fire alarm systems, emergency lighting, smoke/heat detectors, hose reels, dry and wet risers, auto window/door openers, fire extinguishers, fire blankets, sprinkler systems and any other equipment relating to fire safety.
- 4.2.6 GCH will establish and manage programmes to deliver servicing and maintenance in accordance with all relevant British Standards and manufacturer's recommendations for all fire detection, prevention and fire-fighting systems and equipment within buildings owned or managed by the organisation.



- 4.2.7 GCH will ensure that each property requiring a fire risk assessment has a fire risk assessment in place that is PAS79 compliant (Publicly Available Specification) from the British Standards Institute (BSI) that has been carried out by a competent fire risk assessor.
- 4.2.8 GCH will ensure that all fire risk assessments are reviewed no later than the review date set within the fire risk assessment and that this review is carried out by a competent fire risk assessor.
- 4.2.9 GCH will ensure that the fire risk assessment to a building is reviewed following a fire, change in building use, change in working practices that may affect fire safety, following refurbishment works to the building or if required following an independent fire safety audit and that this review is carried out by a competent fire risk assessor.
- 4.2.10 GCH will ensure that robust processes are in place to implement all mandatory fire precaution measures identified by fire risk assessments.
- 4.2.11 GCH will implement a programme of regular property inspections to all properties with a fire risk assessment in place to audit that all required management actions are taking place. These inspections will be carried out by caretakers and housing advisors and be undertaken at regular intervals, with inspection records evidenced and kept against each property. In addition to this GCH will ensure regular testing of all fire alarms and emergency lighting systems.
- 4.2.12 GCH will ensure that robust processes are in place to record and action any 'near miss' reports with regard to fire safety. A 'near miss' is an unplanned event which does not result in an injury but had the potential to do so.
- 4.2.13 GCH will test hard-wired smoke alarms as part of the annual safety check visit (or at void stage).
- 4.2.14 GCH will liaise with property owners/landlords of accommodation we lease or manage on their behalf to ensure that evidence of compliance is available.
- 4.2.15 GCH will ensure that all disabled residents and/or employees within buildings requiring a fire risk assessment (i.e. independent living or supported living and housing schemes), will have a Personal Emergency Evacuation Plan (PEEP) and that this PEEP will be reviewed annually by a competent person. This 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.



- 4.2.16 Where GCH have been notified that a resident within a building requiring a fire risk assessment is storing Oxygen in their home for medical use the organisation will ensure that they have a Personal Emergency Evacuation Plan (PEEP) in place and that this PEEP will be reviewed annually by a competent person.
- 4.2.17 GCH will have robust processes and controls in place to ensure that consideration is made when letting properties to the suitability of the accommodation for the prospective tenant with regards to fire safety.
- 4.2.18 GCH will refer all new tenancies (general needs and independent living) and other tenants (via general information) to Fire and Rescue Service for a free home safety check (also known as 'Safe and well visits').
- 4.2.19 GCH will ensure that only suitably competent fire risk assessors and fire safety engineers appropriately certified under BAFE and UKAS accredited certification schemes undertake fire safety assessments or works for the organisation.
- 4.2.20 GCH will have a robust process in place to gain access should any tenant or leaseholder refuse access to carry out essential fire safety related inspection and remediation works.
- 4.2.21 GCH will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.
- 4.2.22 GCH considers good communication essential in the safe delivery of fire safety and will therefore ensure that information about fire safety and fire prevention measures is available to residents and building users.
- 4.2.23 GCH will ensure that tenants have a copy of customer friendly version of Fire Safety Handbook. A full version of the fire risk assessment will be made available upon request.

#### **4.3 Compliance Risk Assessment/Inspection Programmes**

- 4.3.1 Risk assessment – GCH will establish and maintain a risk assessment for fire safety management and operations. This risk assessment will set out the organisations' key fire safety risks together with appropriate mitigations.
- 4.3.2 CDM - to comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan



will be completed for all void property, component replacement and refurbishment works where applicable.

- 4.3.3 Fire risk assessments (non-domestic and other) – GCH will complete a programme of fire risk assessments to all non-domestic (communal blocks) and ‘other’ properties in its management and ownership.
- 4.3.4 Thereafter, GCH will carry out a programme of fire risk assessment reviews ensuring that all fire risk assessments are reviewed no later than the review date set by the fire risk assessment and that this review is carried out by a competent fire risk assessor (usually between 1 and 4 years).
- 4.3.5 All future fire risk assessments will be Type 3 (to be confirmed) surveys as a minimum, along with a fire door audit (100% of all communal doors and a 25% sample of the resident’s front doors). This sample will need to increase if issues are found on the initial sample. Type 2 and Type 4 surveys will only be commissioned where it is deemed appropriate for a particular property.
- 4.3.6 GCH will ensure that each property requiring a fire risk assessment has a fire risk assessment in place that is PAS79 compliant (Publicly Available Specification) from the British Standards Institute (BSI) and that it has been carried out by a competent fire risk assessor.
- 4.3.7 GCH will carry out a programme of servicing and maintenance, in accordance with all relevant British Standards and manufacturer’s recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings owned or managed by the organisation.
- 4.3.8 Fire Risk Assessments (Supported Living) - GCH will complete a programme of fire risk assessments to all supported living properties in its management and ownership.
- 4.3.9 Thereafter, GCH will carry out a programme of fire risk assessment reviews ensuring that all fire risk assessments are reviewed no later than the review date set by the fire risk assessment and that this review is carried out by a competent fire risk assessor (usually between 1 and 4 years).
- 4.3.10 GCH will ensure that each property requiring a fire risk assessment has a fire risk assessment in place that is PAS79 compliant (Publicly Available Specification) from the British Standards Institute (BSI) and that has been carried out by a competent fire risk assessor.



4.3.11 GCH will carry out a programme of regular property inspections to all properties with a fire risk assessment in place to audit that all required management actions are taking place. These inspections will be undertaken at regular intervals by caretakers and housing operations staff and inspections records will be kept.

4.3.12 GCH will carry out a programme of servicing and maintenance, in accordance with all relevant British Standards and manufacturer's recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings owned or managed by the organisation.

#### **4.4 Compliance Follow up Work**

4.4.1 GCH will ensure that robust processes are in place to implement all mandatory fire precaution measures identified by fire risk assessments. This will be done on the following timescales:

- High risk actions – 1 month
- Medium risk actions – 3 months
- Low level actions – captured with a programme of works to be completed within a reasonable timescale

4.4.2 GCH will ensure that robust processes are in place to implement all fire precaution measures identified by the regular property inspections carried out by caretakers and housing officers.

4.4.3 GCH will ensure there is a robust process in place for the management of any follow-up works required following the completion of servicing and maintenance checks to fire detection, prevention and fire-fighting systems and equipment.

#### **4.5 Record Keeping**

4.5.1 GCH will establish and maintain a core asset register of the communal blocks and 'other' properties that require a fire safety risk assessment. This register should also identify all fire safety equipment, systems and installations within each building.

4.5.2 The register must show the date of the previous and current fire risk assessment (where applicable), along with the due date of the next fire risk assessment. The register will also be used to record and track all fire safety actions required as identified from the fire risk assessments.

4.5.3 FRA inspection and re-inspection dates, FRA surveys and FRA actions will be electronically stored.



- 4.5.4 GCH will establish and maintain a register against each property asset of any smoke/heat detection equipment contained within domestic dwellings.
- 4.5.5 GCH will establish and maintain accurate records of all completed fire risk assessments, fire risk assessment reviews and associated completed remedial works from these reports and keep these as per the organisation's Data Retention Policy.
- 4.5.6 GCH will establish and maintain accurate records of all completed servicing and maintenance checks on fire safety equipment, systems and installations and details of associated completed remedial works and keep these as per the organisation's Data Retention Policy.
- 4.5.7 GCH will maintain an appropriate Fire Safety Logbook and keep securely on site, where practical, for all communal blocks, supported living schemes and 'other' properties requiring a fire risk assessment.
- 4.5.8 GCH will establish and maintain records of all fire safety related training undertaken by staff.
- 4.5.9 GCH will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all fire safety related data.

## 5. REGULATORY STANDARDS, LEGISLATION, AND APPROVED CODES OF PRACTICE

- 5.1 **Regulatory Standards** - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH) in April 2012.
- 5.2 **Legislation** - the principle legislation applicable to this policy is the Regulatory Reform (Fire Safety) Order 2005 (FSO), which came into force in October 2006. These regulations place a duty on GCH to take general fire precaution measures to ensure, as far as is reasonably practicable, the safety of the people on their premises and in the immediate vicinity. GCH is the 'responsible person' for the purposes of the legislation by virtue of the fact that they own and manage GCH homes and buildings housing tenants/leaseholders through the tenancy agreement and lease obligations. The principle applicable legislation for GCH properties located in Scotland in the Fire (Scotland) Act 2005 which also place fire safety obligations on the duty holder, including the production of a fire risk assessment.



5.3 **Codes of Practice** - the principle approved codes of practice applicable to this policy are:

- LACORS - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing
- HHSRS Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9
- Department for Communities and Local Government (DCLG) - Update on Interim Mitigation Measures Requiring Pending Remediation of Cladding (29.09.2017)
- National Fire Chief Council's Guidance (NFCC) - Fire Safety in Specialist Housing – April 2017, covers sheltered schemes, supported schemes and extra care schemes
- Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation 2018 – guidance for those with responsibility for ensuring fire safety in certain premises within sleeping accommodation in Scotland.

5.4 **Sanctions** – GCH 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 via a serious detriment judgement from the Regulator of Social Housing.

5.5 **Tenants** – GCH will use the legal remedies available within the terms of the tenancy agreement should any tenant refuse access to carry out essential fire safety related inspection and remediation works.

5.6 **Leaseholders** – GCH will use the legal remedies available within the terms of the lease agreement should any leaseholder or shared owner refuse permission and/or access to carry out essential fire safety related inspection and remediation works (as tested in the case Croydon Council v. Leaseholder 1st August 2014).

5.7 **Additional Legislation** – This fire safety policy also operates in the context of the following additional legislation:

5.7.1 Housing Act 2004

5.7.2 Health and Safety at Work Act 1974

5.7.3 The Management of Health and Safety at Work Regulations 1999



- 5.7.4 Management of Houses in Multiple Occupation (England) Regulations 2006
- 5.7.5 Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- 5.7.6 Gas Safety (Installation and Use) Regulations 1998
- 5.7.7 The Furniture and Furnishings (Fire Safety) Regulations 1988
- 5.7.8 The Health and Safety (Safety Signs and Signals) Regulations 1996
- 5.7.9 The Building Regulations 2000: Approved Document B Fire Safety
- 5.7.10 Electrical Equipment (Safety) Regulations 2016
- 5.7.11 Construction, Design and Management Regulations 2015
- 5.7.12 Data Protection Act 2018
- 5.7.13 RIDDOR 2013

5.8 This policy also links to the following GCH Policies:

- 5.8.1 Health and Safety Policy
- 5.8.2 Data Archival, Retention and Disposal Policy

## 6. IMPLEMENTATION

### 6.1 Training

- 6.1.1 GCH will ensure that all operatives working for, or on behalf of the organisation 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.

### 6.2 Performance Reporting

- 6.2.1 Robust key performance indicator (KPI) measures will be established and maintained to ensure GCH is able to report on performance in relation to fire safety.
- 6.2.2 KPI measures will be produced and provided at SMT level on a monthly basis and at board level on a quarterly basis. As a minimum these KPI measures will include reporting on:

**Data – the total number of:**

- Properties – split by communal blocks and 'other' properties



- Properties on the FRA programme
- Properties not on the FRA programme
- Properties with a valid 'in date' FRA. This is the level of compliance expressed as a number and a %
- Properties where the FRA has expired and is 'out of date'. This is the level of non-compliance expressed as a number and a %
- Properties which are due for a new FRA within the next 90 days. This is the early warning system.

**Narrative - an explanation of the:**

- Current position
- Corrective action required
- Anticipated impact of corrective action
- GCH with completion of follow-up works – number of high, medium and low risk actions – 'completed', 'in time' and 'overdue'

**In addition:**

- Compliance with the fire safety equipment, systems and installations servicing and maintenance programme

6.2.3 GCH will instruct an independent audit of fire safety at least once every two years. This audit will specifically test for compliance with the regulation, legislation and approved codes of practice and identify any non-compliance issues for correction.

**6.3 Non-Compliance/Escalation Process**

6.3.1 Any non-compliance issue identified will be formally reported to the SMT in the first instance.

6.3.2 The SMT will ensure the board are made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

6.3.3 In cases of a serious non-compliance issue the SMT and board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.



## **7. CONSULTATION**

7.1 A series of consultation meetings have taken place when reviewing this policy, including a policy principles session with GCH board.

## **8. REVIEW**

8.1 Ordinarily this policy will be reviewed following GCH standard three yearly timeframes. However, an initial review timeframe of eighteen months is being adopted to ensure that any changes required, following the implementation of new systems and processes, can be captured at the earliest opportunity.

## **9. EQUALITY IMPACT ASSESSMENT**

9.1 An EIA is currently being drafted alongside this policy review.