

FIRE SAFETY POLICY

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Executive Summary:
<p>This policy sets out our legal and regulatory duties in respect of fire and building safety and what we will do to ensure we comply with them. The policy includes details of the safety programmes we will operate to achieve this, and the measures we will take to ensure the programmes are delivered safely and in a timely manner. It also sets out how we will monitor delivery of the policy and of the programmes.</p>

Policy Grouping/Directorate	Property Compliance / Property Services	
Owner Name / Job Title	Siobhan McCoy, Director of Property Services	
Author Name / Job Title	Siobhan McCoy, Director of Property Services	
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Notes:		

1 Introduction and Aims

- 1.1 As a landlord, RBH is responsible for is responsible for carrying out fire risk assessments, and taking action to identify, manage and mitigate risks associated with fire within the common areas of buildings we own and manage.
- 1.2 We have a duty to take general fire precaution measures to ensure, as far as is reasonably practicable, the safety of the people on our premises and in the immediate vicinity.
- 1.3 The key objective of this policy is to ensure our Senior and Executive Leadership Teams, colleagues, partners and customers are clear on our legal and regulatory fire and building safety obligations and what we will do to comply with them. This policy provides the framework our colleagues and partners will operate within to meet these obligations.
- 1.4 The aims of the policy are:
 - To ensure that RBH has identified and complied with all relevant legal duties in respect of fire and building safety.
 - To ensure that RBH is meeting our regulatory duties in respect of fire and building safety.
 - To help deliver our objectives within our Corporate Strategy to ensure our customers live in safe homes and that we are delivering customer focused services which meet their needs.
- 1.5 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst colleagues and contractors and it will be shared with all relevant RBH colleagues and partners.

2 Context

- 2.1 RBH is the 'Responsible Person' for the purposes of the Regulatory Reform (Fire Safety) Order 2005 (the Fire Safety Order) because we own and manage homes and buildings where tenants and leaseholders (our customers) live. RBH, as the Responsible Person, is the duty holder under the Fire Safety Order and must therefore:
 - Carry out a fire risk assessment (FRA) for the purpose of identifying the general fire precautions and other measures needed to comply with the Fire Safety Order. Although this requirement only applies to common parts of premises, in practice we will need to 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 any procedures that have been adopted.
 - Periodically review FRAs 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 FRA.
- 2.2 The Fire Safety Act 2021 amended the Fire Safety Order by clarifying that in buildings with two or more sets of domestic premises, the Fire Safety Order applies to:

- The structure and external walls of the building, including cladding, balconies and windows; and
- All doors between the domestic premises and the common parts, for example, entrance doors to individual flats which open on to common parts.

RBH, as Responsible Person, must ensure that FRAs comply with these criteria by appointing a competent person to review them (if the previous FRAs did not already comply).

2.3 The Fire Safety (England) Regulations 2022 require RBH, as Responsible Person:

- For all buildings - provide residents with fire safety instructions and information on fire doors.
- For buildings over 11 metres – undertake:
 - Quarterly checks of communal fire doors
 - Annual checks, on a best endeavour basis, of flat entrance doors.
- For buildings over 18 metres:
 - Install and maintain Secure Information Boxes, containing specified information, and check these boxes at least annually;
 - Provide the Fire and Rescue Service with up-to-date Building Floor Plans and information about the design and materials of the External Wall Systems of the building;
 - Undertake monthly functionality checks on all lifts and other key fire-fighting equipment; and
 - Ensure Wayfinding Signage complies with regulations.

2.4 The Building Safety Act 2022 requires RBH:

- For all buildings:
 - Record FRAs in full and record fire safety arrangements;
 - Appoint a competent person to undertake/review FRAs and record their identity;
 - Ascertain whether other Responsible Persons have duties in respect of the premises, and share relevant information with them; and
 - Provide relevant fire safety information to residents of any building with two or more domestic premises.
- For occupied buildings over 18 metres:
 - Register the buildings with the Building Safety Regulator, and apply for Building Assessment Certificates when directed to do so;
 - Carry out a building safety risk assessment and review it regularly;
 - Produce a Residents' Engagement Strategy and complaints procedure;
 - Prepare and maintain Building Safety Cases and Reports;
 - Establish and operate a Mandatory Occurrence Reporting system; and
 - Maintain the Golden Thread of Information.

2.5 This policy will support RBH to comply with the following regulatory standard:

Consumer Standards – Safety and Quality Standard

The delivery of this policy will support us to comply with the requirement to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas. This policy has identified the legal requirements that relate to gas and heating system safety, and sets out what we will do to comply with them.

3 Values

3.1 The policy fits with all the mutual values of RBH:

Putting People First: We listen with empathy, respond with compassion, and make it easy for our customers to access our services. We will share information with and respond to requests from customers about fire and building safety within their home, and be empathetic to any concerns. We will help our customers to understand how we keep them safe in their home.

Doing What We Say: We earn trust through honesty, integrity, caring and keeping our promises.

Working As One: We embrace our mutuality and work together to deliver great outcomes for the people living in our homes and communities.

Delivering Quality: We invest wisely in our people and make it easy for them to deliver services and create places that our customers are proud to call home.

Open & Transparent: We are curious, embrace diverse ways of thinking and seek feedback to help us improve.

4 Policy Statement

4.1 We acknowledge and accept our legal and regulatory responsibilities as outlined in Section 2.

4.2 We will maintain a core asset register of all properties and buildings we own and/or manage, with component/attribute data against each property to show fire and building safety requirements. The records will detail:

- The requirements for an FRA;
- All servicing, maintenance, inspections and repair of active and passive fire safety measures that are required to be in place i.e. fire alarm systems, emergency lighting and any other equipment relating to fire safety such as fire lifts;
- The requirements for any fire door checks;
- Details of any other Responsible Person duty holders;
- The requirements for any Secure Information Boxes; and
- The requirements for any Building Safety Cases, Resident Engagement Strategies and operation of Mandatory Occurrent Reporting Systems.

4.3 We will operate a robust process to manage all changes to our assets, including property acquisitions and disposals, to ensure that properties are not omitted from fire and building safety programmes and the programme remains up to date.

Fire safety programme

4.4 Each property requiring an FRA will have one in place, and the FRA will be carried out by a competent fire risk assessor. The FRAs for our non-residential buildings will be compliant with the British Standards Institution's PAS 79-1:2020 specification for non-residential buildings, and those for our residential buildings will be compliant with PAS 79-2:2020 specification for residential buildings.

4.5 We will maintain a programme of FRA reviews, in a timescale appropriate to the premises and/or occupation fire risk level. This timescale will be in accordance with the

maximum timescales we have set out in the fire safety procedure document, which details how we will deliver this policy and should be read in conjunction with it. The timescale for each individual FRA will also be determined by the fire risk assessor carrying out the FRA where they identify specific risks or other factors which mean the FRA is required sooner than our maximum timescale for the type of building, and will be between one and three years for the majority of our buildings. FRAs for our higher risk buildings will be reviewed annually. Low rise cottage flats, which were confirmed as requiring FRAs by the Fire Safety Act, will be reviewed every eight years due to the very low risk posed by these buildings; however we will start to transition these to a three year programme from 2026/27.

- 4.6 All FRAs will be reviewed 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/management practices that may affect fire safety;
 - Following refurbishment works;
 - Change in applicable legislation; or
 - If required following an independent fire safety audit.
- 4.7 We will operate robust processes to implement all general fire precaution measures and actions identified by FRAs:
- Intolerable risk – within 24 hours.
 - High risk – within one month.
 - Medium risk – within three months.
 - Low risk – within six months or delivered as part of a planned programme within 12 months
- 4.8 All buildings will have a suitable and sufficient FRA. As a minimum, these will be a Type 1 FRA (non-destructive assessment of common parts). However, we will undertake a more comprehensive FRA that covers dwellings as well as common parts and/or destructive sampling if we identify that there may have been works which may have compromised compartmentation. A more comprehensive FRA will also be commissioned if recommended by the Fire Risk Assessor or the Fire Service, or if there is any other reason to conclude that one is required to maintain assurance.
- 4.9 We will ensure that a pre-occupation FRA is carried out on all new acquisitions (both new build and existing buildings) where we have an obligation to do so. This will be followed by a post-occupation FRA, a maximum of three months after the first resident moves in.
- 4.10 **Servicing, maintenance and testing** - We will carry out a programme of servicing, maintenance and testing, in accordance with all relevant British Standards and manufacturer's recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings we own and manage.
- 4.11 **Fire door checks** – we will undertake quarterly checks of communal fire doors and annual checks of flat entrance doors to all relevant buildings over 11 metres in height. We will develop a risk-based approach to carrying out fire door checks in other buildings, and will implement this during 2025/26).
- 4.12 **Regular inspections** – We carry out a programme of inspections to all buildings with an FRA in place, to audit that all required management actions are taking place. The

frequency of the inspections will be determined by the overall risk associated with the building.

4.13 We will ensure there is a robust process in place for the management of any follow-up works required following the completion of any fire/building safety check (where the work cannot be completed at the time of the check).

4.14 To comply with the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, which came into force on 1 October 2022, we will install, test and replace (as required) battery operated and/or hard-wired smoke alarms and carbon monoxide alarms as part of the annual gas safety check visit (or at void stage). Where the property does not have a gas supply, we will still undertake an annual check of the smoke and carbon monoxide alarms.

4.15 If we become aware that a resident living in one of our buildings:

- has a physical, cognitive or mental impairment; or
- any other risk factors which may place them at greater risk in the event of a fire (including stored oxygen, such as for medical use) or at greater risk of causing a fire

we will complete a person-centred fire risk assessment for them, if they provide their consent, and will take steps to ensure that any requirements arising from it are implemented.

4.16 Personal Emergency Evacuation Plans (PEEPs) will be carried out by a competent person, reviewed at least annually, and made available to Greater Manchester Fire and Rescue Service for use in the event of an evacuation, as follows:

- For any disabled resident and/or employee within any building where we provide support services and are the employer (i.e. independent living schemes); and
- Where we identify, through a person-centred fire risk assessment, that any other resident requires one.

4.17 We will operate a robust process for the management of immediately dangerous situations identified from the fire and building safety programme, and in any other circumstances. In the case of properties where the Building Safety Act applies, this will be our Mandatory Occurrence Reporting System.

4.18 We will operate robust processes to gain access should any resident or leaseholder refuse access to carry out essential fire safety inspection and remediation works (as tested in the case Croydon Council v. Leaseholder 1st August 2014). We will also work with other statutory agencies to support our attempts to gain access.

4.19 We will operate robust processes to gain access to properties where resident vulnerability issues are known or identified (including hoarding) which could create or contribute to a fire and building safety risk, whilst ensuring we safeguard the wellbeing of the resident.

4.20 We will operate a risk-based post inspection process for works on or near to fire protection measures to ensure works have not impacted or compromised the fire protection measures for the building or unit of accommodation.

4.21 We will operate effective contract management arrangements with any contractors who support the delivery of the fire and building safety programmes. This will include ensuring contracts/service level agreements are in place, conducting client-led

performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.

- 4.22 **Properties managed by others** – Where our properties are managed by third parties, we will require them to provide copies of the FRAs to us, with evidence that any required follow up actions and works have been completed, to demonstrate that the buildings are safe. If the third party does not provide the FRA and the evidence, we will carry out the FRA, re-charge them for the cost of this, and require them to complete any actions identified.

Managing risk

- 4.23 We will establish and maintain a risk assessment for fire and building safety management and operations, setting out our key safety risks and appropriate mitigations.
- 4.24 Fire evacuation strategies will be determined on a building-by-building basis, in accordance with the recommendations of the competent fire risk assessor and with any guidance from Greater Manchester Fire and Rescue Service. Where we have buildings that are on a full evacuation strategy, we will implement plans to address the underlying risk factors which require the full evacuation, and will aim to move to an alternative evacuation strategy as soon as reasonably practicable.
- 4.25 We will operate a process for identifying and managing customers who are at risk and support our attempts to gain access, including mitigation plans to manage any specific risks identified.
- 4.26 We have a sterile environment approach in all internal common areas, requiring customers to remove combustible materials from corridors and fire escape routes. Where we have buildings with regular management presence i.e. sheltered accommodation, this requirement may be varied for low-risk items such as pictures, noticeboards and suitable doormats where there is suitable management oversight.
- 4.27 For any buildings which require FRAs, we will not permit the use of barbeques on balconies, within any internal common areas of the buildings, or within two metres of boundary fences or any flammable structures when within the external curtilage of a building. Where barbeques are used within external common areas, we will require them to be raised off the ground and not left unattended at any time.
- 4.28 We will not permit the storage of mobility scooters, eBikes and other battery powered equipment within internal common areas.
- 4.29 We are committed to working with Greater Manchester Fire and Rescue Service to create safer places to live and work. This joint working may include sharing information, review of FRAs, staff training, and providing access to our buildings to support training and development of their staff.
- 4.30 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be in place in respect of all repairs to void and tenanted properties (at the start of the contract and reviewed/updated annually thereafter), component replacement works and refurbishment projects. We will require pre-construction Health and Safety plans, risk assessments and method statements. Where appropriate, we will operate a permit to work system.

- 4.31 We will carry out a risk assessment under the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002 to any buildings which require them.
- 4.32 We will operate a robust process to investigate and manage any **RIDDOR notifications** submitted 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.
- 4.33 We will operate a robust process identify, manage and investigate any **Mandatory Occurrence Notifications** submitted to the Building Safety Regulator in relation to the fire and structural safety for buildings over 18 metres and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.
- 4.34 We will operate a robust process for **dealing with and escalating any significant non-compliance**. Our definition of significant non-compliance is: any incident which has the potential to result in a material breach of legislation or regulatory standard, or which causes a risk to health or safety.
- All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of an RBH employee becoming aware of it.
 - Any non-compliance issue identified at an operational level will be formally reported to either the relevant Service Manager or Head of Service in the first instance, who will agree an appropriate course of corrective action with the Director of Property Services. The Director of Property Services will report details of the same to the Executive Leadership Team.
 - In cases of serious non-compliance, the Executive Leadership Team will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive and the Building Safety Regulator. In such instances, the issue will also be reported to Board.

The issue will also be recorded and investigated in accordance with the RBH accident and near miss reporting process.

Training and competency

- 4.35 We will ensure that suitably competent and trained people will deliver our fire and building safety programme:
- Only suitably competent contractors, consultants and engineers, certified by a UKAS accredited certification scheme (or similarly recognised approved e.g. BAFE / IFSM) are procured, and appointed to undertake works to passive and active fire safety systems.
 - Those carrying out FRAs must have skills, knowledge, experience and behaviours as set out in the Fire Sector Federation's guidance on choosing a competent Fire Risk Assessor.
 - Only UKAS accredited third party technical auditors will undertake quality assurance checks of our FRAs.
- 4.36 We will annually review the job profiles, skills, knowledge and experience of those RBH colleagues involved in the delivery of this policy and, where necessary, provide training so they remain competent to deliver this policy.

- 4.37 We will check our contractors/consultants hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor/consultant's certification appropriately.
- 4.38 We will deliver training on this policy and the procedures that support it, through appropriate methods including: team briefings; basic fire safety awareness training; and on the job training for those delivering the programme of fire and building safety checks, planned maintenance and repair works as part of their daily job. All training undertaken by RBH colleagues will be formally recorded.

Customer communications

- 4.39 We consider good communication essential in the effective delivery of fire and building safety programmes, therefore we will establish a customer engagement strategy and communication programme to support customers in their understanding of fire and building safety. This will include writing and/or texting them in advance of safety checks, taking account of any specific customer communication requirements. This will assist us in maximising access to carry out safety checks, encourage and support customers to report any concerns about fire/building safety, and help us 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 via regular publications and information on our website via regular publications and information on our website via regular publications and information on our website. We will tailor our communications to meet any known needs of our customers.
- 4.40 We will maintain and periodically review the Resident Engagement Strategies for our high-rise residential buildings over 18 metres, and engage residents in these buildings in developing them. As they are updated, we will communicate the updates to residents.
- 4.41 We will provide residents with a copy of the FRA for their building upon request, anonymising any necessary information where an individual resident could be identified.
- 4.42 We will pro-actively promote fire safety awareness to and engage with residents to ensure they are aware of the fire safety management procedures for their home and building and so they understand how and when to report concerns to us.
- 4.43 We will advise all new customers of the opportunity to request a free home fire safety assessment, provided by Greater Manchester Fire and Rescue Service, and will proactively publicise these as part of joint initiatives.

5 Monitoring

- 5.1 We will hold fire safety check dates and safety check records against each property we own or manage, to include the dates of the current and next due, including:
- Fire risk assessment;
 - Servicing and inspection of fire detection and prevention equipment;
 - Fire door checks.

- 5.2 We will hold dates of the most recent review of the Building Safety Cases, Building Safety Case Reports and Resident Engagement Strategies for buildings over 18 metres, and the date on which they are next due for review.
- 5.3 We will ensure there is a programme of third-party quality assurance audits of fire safety checks. The minimum sample size will be 5%.
- 5.4 Internally we will undertake 100 per cent validation and checks of all FRAs, records/certificates of servicing and maintenance to fire protection systems, and person centred fire risk assessments and personal emergency evacuation plans.
- 5.5 We will keep all completed safety check records, warning notices and remedial work records for at least ten years, and in accordance with our document retention policy, and will have robust processes and controls in place to maintain appropriate levels of security for all fire safety related data and records.

- 5.6 We will hold data and monitor performance against the following:

Data – the total number of:

- Properties – communal blocks and other properties);
- Properties on the FRA programme;
- Properties not on the FRA programme;
- Properties with a valid and in date FRA;
- Properties without a valid and in date FRA;
- Properties due to have the FRA reviewed within the next 30 days; and
- Completed, in-time and overdue follow-up works/actions arising from the FRA programme.

Narrative - an explanation of the:

- Current position;
- Corrective action required;
- Anticipated impact of corrective actions; and
- Progress with completion of follow-up works.

- 5.7 We will also monitor compliance with:

- The fire safety equipment, systems and installations servicing and maintenance programme;
- The fire door inspection programme
- The review of Building Safety Cases and Resident Engagement Strategies.

- 5.8 We will also monitor:

- Any enforcement notices from the Fire and Rescue Service, Building Safety Regulator or other enforcement bodies;
- RIDDOR notifications to the HSE about fire safety; and
- Mandatory Occurrence Reports to the Building Safety Regulator for buildings over 18 metres.

These will be monitored through our Health and Safety Committee and reported to Board, and will include details of the action taken to prevent a recurrence.

- 5.9 We will record and report on property fires to identify trends and target awareness campaigns or other root cause actions.

- 5.10 We will report key performance indicator (KPI) data for fire safety to our Executive Leadership Team (ELT) on a monthly basis, and to the Customer Service Committee on a quarterly basis. We will also report any non-compliance to Board on an exception basis, in accordance with our performance monitoring and KPI framework. We will report our performance to customers in our annual report, and through our website and other communication channels throughout the year.
- 5.11 We will carry out an internal or independent audit of fire and building safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

6 Review

- 6.1 All RBH strategies, policies, service standards and procedures are reviewed on a regular basis to ensure that they are 'fit for purpose' and comply with all relevant legislation and statutory regulations.
- 6.2 This policy will go through the full policy approval process every 3 years and will undergo a desktop review annually. This is to ensure that it is fit for purpose and complies with all relevant and statutory regulations.

7 Links with Other RBH Documents

- 7.1 This policy links to the following policies and strategies:
- Homes and Communities Strategy
 - Gas and Heating Safety Policy
 - Electrical Safety Policy
 - Asbestos Safety Policy
 - Construction Design and Management (CDM) Policy
 - Disrepair Policy
 - Responsive Repairs Policy
 - Building Safety Mandatory Occurrence Reporting System

8 Inclusivity statement

- 8.1 We are dedicated to fostering an inclusive and equitable environment for all. We ensure that everyone is valued and respected. Our policies aim to be inclusive, and will comply with UK laws, including the Equality Act 2010, to create a diverse and supportive environment for people to thrive.
- 8.2 We understand not everyone absorbs information the same way. If you have any difficulty understanding or interpreting this document please email people@rbh.org.uk or call Freephone 0800 027 7769. We will work with you to ensure your individual needs are met.