

**1 Policy Statement**

- 1.1 Rooftop Housing Group (RHG) is committed to ensuring that people living or working within our homes, offices, and other buildings are safe and recognise the importance of implementing efficient safety checks and maintenance programmes to comply with relevant legislation and regulation.
- 1.2 We will take all reasonable steps to manage fire safety to ensure that fires are unlikely to occur and that, if they do, they are able to be controlled or contained quickly, effectively, and safely, or that, if a fire does occur and grow, that everyone can escape to a place of safety easily and quickly.

**2 Background**

- 2.1 The key objective of this Fire Safety Policy and supporting Management Plan and Decision Making Framework is to ensure that our Board, colleagues, customers, and partners are clear on our legal and regulatory obligations in respect of fire safety and what we will do to meet them.
- 2.2 We will meet the requirements of key legislation and codes of practice. In addition, this Policy will provide assurance that measures are in place to comply with these regulations and to identify, manage and/or mitigate risk associated with fire.
- 2.3 It is RHG's responsibility to:
  - Minimise the risk of fire to all colleagues, customers, contractors, and visitors, and ensure appropriate procedures/processes are in place to do this.
  - Carry out fire risk assessments (FRAs) and identify, implement, and maintain appropriate control measures.
  - Ensure that all properties comply with statutory requirements.
  - Provide colleagues, customers, contractors and visitors with sufficient and appropriate fire awareness instruction and training.

**3 Legislative and Regulatory Requirements**

- 3.1 The Regulatory Reform (Fire Safety) Order 2005 (FSO 2005), as amended by the Fire Safety Act 2021, is the principal legislation related to this Policy. These regulations place a duty on RHG to take general fire precaution measures to ensure, as far as is reasonably practicable, the safety of people on our premises and in the immediate vicinity.
- 3.2 Under the FSO 2005, as an employer (and building owner or occupier), RHG is responsible for carrying out fire safety risk assessments and keeping them up to date and reviewed as required.

<sup>1</sup> Fire Safety Management Plan is attached as a separate document (Appendix 2)

Based on the findings of the assessment, RHG (as an employer) must ensure that adequate and appropriate fire safety measures are in place to minimise the risk of injury or loss of life in the event of a fire.

- 3.3 The Fire Safety Act 2021 also extends the areas to which the FSO 2005 applies to include the building's structure and external walls (including doors, windows and anything attached to the exterior of those walls, such as balconies, cladding, insulation and fixings) and any common parts. In addition to this, all doors between domestic premises and common parts, such as flat entrance doors.

- 3.4 In January 2023, new regulations were introduced under article 24 of the Regulatory Reform (Fire Safety) Order 2005 (Fire Safety Act). The Fire Safety (England) Regulations 2022 sit alongside the Building Safety Act amendments to the Fire Safety Act, and the government's update of supporting guidance issued under the FSO 2005 aim to improve fire safety outcomes designed to protect the public from the risk of fire by better supporting compliance and effective enforcement in all regulated premises. The application of this Policy will ensure compliance with this Act for all properties that meet the relevant criteria.
- 3.5 The Policy will take into account the requirements introduced within the Building Safety Act 2022, in particular those provisions as outlines in Part 5 of the Act.
- 3.4 The application of this Policy will ensure compliance with the regulatory and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH) in April 2012.
- 3.5 The publication of the Government's White Paper on Social Housing: The Charter for Social Housing Residents, also provides a clear step change for Registered Providers and this Policy and management plan seek to support the national commitment made within the social housing sector to ensure customers remain safe in their homes.
- 3.6 Other relevant legislation are the Health and Safety at Work Act 1974 and the Furniture and Furnishings (Fire Safety) Regulations 1988.
- 3.7 All new housing, including conversions and "material alterations", needs to comply with the fire safety requirements of the Building Regulations (Part B).
- 3.8 The relevant guidance documents applicable to this Policy include:
- 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.
  - Ministry of Housing, Communities & Local Government (MHCLG): Building safety advice for building owners, including fire doors (January 2020).
  - Ministry of Housing, Communities & Local Government (MHCLG): Advice for Building Owners of Multi-storey, Multi-occupied Residential Buildings (January 2020).
  - National Fire Chief Council's Guidance (NFCC) - Fire Safety in Specialist Housing – May 2017, covers sheltered schemes, supported schemes and extra care schemes.
  - Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018).
  - Fire Safety in Purpose Built Blocks of Flats – Gov.uk guidance document.
  - Home Office - A guide to making your small blocks of flats safe from fire (March 2023)
- 3.9 Additional legislation in which this Policy and management plan operates is included under **Appendix 1**.

## **4 Scope of the Policy**

- 4.1 This Policy is relevant to all our colleagues, customers, contractors, and others who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. It provides assurance that measures are in place to identify, manage and/or mitigate risks associated with fire.

- 4.2 It applies to all RHG premises that fall under the Fire Safety Order amended through the Fire Safety Act 2021, which applies to all residential buildings with two or more sets of domestic premises, in addition to offices, communal (stairwells and corridors) or shared (common) areas.
- 4.3 RHG will ensure that compliance with fire safety legislation is formally reported at Executive Team (ET), Audit and Risk Committee (ARC) and Board level, including the details of any non-compliance and planned corrective actions.
- 4.4 This Policy applies to all colleagues, customers, tenants, leaseholders, contractors and other persons or stakeholders who may work on, occupy, visit, or use RHG premises/property or who may be affected by our activities or services. It also applies to all assets RHG are responsible for even if we are not the owner (i.e., those where we are the managing agent unless expressly excluded in the lease/management agreement).

## **5. Obligations**

- 5.1 The Duty Holder must carry out an FRA for the purpose of identifying the general fire precautions and other measures needed to comply with the Fire Safety Order.
- 5.2 The Duty Holder must implement all necessary general fire precautions and any other measures identified by an FRA. They must put in place a suitable system of maintenance and appoint responsible/competent persons to implement any procedures that have been adopted.
- 5.3 The Duty Holder must 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.

## **6. Policy Statement**

- 6.1 RHG acknowledges and accepts its responsibilities under the Fire Safety Order and will ensure compliance with the Fire Safety Order, as well as other relevant legislation and regulations.
- 6.2 The Executive Director – Operations acts as RHG's responsible person and ensure that competent persons and contractors are employed by RHG to ensure that the day-to-day tasks of managing fire safety are adhered to, so that:
- General fire precautions are taken to ensure the safety of colleagues, customers, contractors, visitors and other stakeholders.
  - Suitable and sufficient risk assessments are carried out and regularly reviewed.
  - Arrangements are put in place for the effective planning, organisation, control, monitoring and review of preventative and protective measures.
- 6.3 RHG will carry out FRAs to identify and remove as far as reasonably practicable any fire risks and hazards, making and implementing fire safety arrangements. RHG will review premises and frequency of FRAs based upon expert FRA assessors' recommendations.
- 6.4 All FRAs will be reviewed no later than the date set within the FRA and that the review is carried out by a competent fire risk assessor..
- 6.5 An FRA will be carried out in the following situations, irrespective of the inspection cycle as follows:
- New build.
  - New property acquisitions.
  - Major property refurbishment.
  - Following a fire or incident.

We will manage all remedial actions for preventative measures identified via FRAs in line with the Fire Safety Policy, Management Plan and Decision Making Framework.

- 6.6 We will establish and manage programmes to deliver servicing and maintenance in accordance with all relevant recommendations for all fire detection, prevention and firefighting systems and equipment within buildings owned or managed by RHG.
- 6.7 Accurate and up-to-date records against each property RHG owns and manages will be held, setting out the requirements for having an FRA in place and for servicing, maintenance and repair of fire prevention, detection, and fire-fighting equipment. This includes 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.
- 6.8 Fire safety issues that pose a significant risk to health and safety will be identified and we will either remove or, where appropriate, put in place measures to manage the risk as a priority.
- 6.9 We will put measures in place to ensure that work on fire safety is carried out by competent contractors and consultants in accordance with current legal and regulatory standards and code of practices.
- 6.10 We will implement this Fire Safety Policy, Management Plan and Decision Making Framework by empowering designated operational colleagues with appropriate training, skills and resources needed to safely manage fire risk. Colleagues will be trained at the level required to manage their areas of responsibility competently.

## **7. Key Roles and Responsibilities**

- 7.1 In order to ensure that this Policy is adhered to, RHG will appoint suitably competent people to act as the 'Responsible Person' on behalf of the individual Duty Holder and oversee the implementation and review of these documents.

### **7.2 Duty Holder**

- 7.2.1 The Group Chief Executive will fulfil the role of the appointed 'Duty Holder' on behalf of RHG to ensure the appropriate management of the risks associated with fire safety. The Executive Director - Operations will hold the role of 'Responsible Person' and therefore have responsibility for the implementation of the Fire Safety Policy, as well as ensuring fire safety compliance is achieved and maintained.
- 7.2.2 The Group 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.

### **7.3 Responsible and Competent Person(s)**

- 7.3.1 The Head of Property and the Safety and Compliance Manager will ensure that there are suitable arrangements in place for the implementation of this Policy, as well as overseeing the delivery of the agreed FRA programmes and the prioritisation and implementation of any works arising from the assessments.
- 7.3.2 They are also responsible for overseeing the delivery of service, maintenance and repair programmes for all fire detection, alarms and fire-fighting equipment within property assets owned or managed by RHG.
- 7.3.3 The Board will have overall governance responsibility for ensuring this Policy and Management Plan is fully implemented to ensure full compliance with the regulatory standards, legislation, and approved codes of practice.
- 7.3.4 The ARC will receive regular updates at each meeting, on the implementation of this Policy and management plan, with an update on performance with notification of any non-compliance issues to the Board. This is so the Board has assurance that the Policy and management plan is operating effectively in practice.

- 7.3.5 The Executive Team will receive reports, at least quarterly, in respect of fire safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 7.3.6 Our Neighbourhood Housing teams, and Support Housing teams will provide key support in gaining access to properties where access is proving difficult and use standard methods to do so. They will also facilitate the legal process to gain access as necessary.
- 7.3.7 All colleagues and contractors who have responsibility for or visit properties (Neighbourhood Housing Officers, Supported Housing Officers, Handyperson team, Operatives etc.) have a responsibility to notify the Safety and Compliance team where circumstances have changed within a scheme/block/property, which may result in a new FRA being required.
- 7.3.8 The Development team will have responsibility for ensuring that any new built or acquired properties are handed over in line with the Safety and Compliance team requirements and that all relevant compliance information is accurate and updated on our ICT management system(s).

#### 7.4 **Competent Person(s)**

- 7.4.1 RHG will ensure that the Head of Property and the Safety and Compliance Manager with lead responsibility for operational delivery are appropriately qualified, holding a recognised qualification such as Level 4 VRQ Diploma in Assets and Building Safety, NEBOSH National Certificate in Fire Safety or equivalent.
- 7.4.2 RHG will fund training as necessary so that they gain this qualification and membership. If the Competent Person does not have appropriate qualifications already these should be obtained as soon as reasonably practicable.
- 7.4.3 The Safety and Compliance Manager will ensure that only suitably competent fire risk assessors; for example, certified by BAFE and on a UKAS accredited certification scheme that meets the competency criteria established by the Fire Risk Assessment Competency Council (FRACC), are procured, and appointed to undertake FRAs.
- 7.4.4 The Safety and Compliance Manager will check the qualifications of those carrying out this work. These checks will be undertaken as part of the procurement process and/or on an annual basis thereafter and evidenced appropriately.
- 7.4.5 The Head of Property will ensure that only suitably competent contractors and engineers, such as those certified by a UKAS accredited certification scheme, are procured and appointed to undertake works to fire safety equipment, systems and installations. They will check the qualifications of those carrying out this work. These checks will be undertaken as part of the procurement process and/or on an annual basis and evidenced appropriately.
- 7.5 Fire is a significant hazard to the safety of both buildings and their occupants. All buildings and human activity represent some form of fire hazard and risk. RHG aims to maintain an environment safe from fire by identifying the hazards and reducing the risk to a minimum within our general duties as follows:

<b>Role</b>	<b>General Duty</b>
As an employer	<ul style="list-style-type: none"> <li>Any workplace used by RHG colleagues.</li> </ul>
As a landlord	<ul style="list-style-type: none"> <li>Communal areas and supported housing accommodation.</li> <li>Communal areas and HMO (houses in multiple occupation) properties.</li> <li>High and low-rise communal areas of buildings.</li> </ul>

	<ul style="list-style-type: none"> <li>• Offer and provide advice for fire safety in the home.</li> <li>• Maintain a policy of installation and maintenance of smoke detection in the home.</li> <li>• Offer and provide fire safety advice to residents of commercially let properties.</li> </ul>
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## **8. The Fire Safety Management Plan and Decision Making Framework**

- 8.1 The Fire Safety Management Plan is available as a separate management document due to its content but is referred to as **Appendix 2** as it directly underpins implementation of this Policy.
- 8.2 The Decision Making Framework is available as a separate management document due to its content but is referred to as **Appendix 3** as it directly underpins implementation of this Policy.
- 8.3 The Management Plan and Decision Making Framework both support implementation of this Policy and relates to the management of fire safety to mitigate the risk of exposure of far, so far as is reasonably possible within the properties in the ownership of RHG or where a contractual responsibility exists for the management of all fire safety within the premises.
- 8.4 Both are 'live' working documents which will be used for operational delivery and monitoring. It will be held electronically and made available to all colleagues across the business. Contractors and consultants will be provided with a copy of the Management Plan to ensure clarity in how services must be delivered.

## **9. Promoting Fire Safety**

- 9.1 Annual safety and awareness campaigns will be proactively supported. These will include the distribution of media materials and initiatives as considered appropriate. They will be used to proactively promote and improve customer understanding of fire safety issues and the importance of fire safety inspections, servicing of equipment and reporting repairs promptly.

## **10. Training**

- 10.1 Only appropriately skilled and competent colleagues or contractors will carry out FRAs and work under this Policy and Management Plan. A person will be deemed skilled to carry out the appropriate inspection and testing only if they have sufficient qualification, knowledge, and experience.
- 10.2 All colleagues with premises management responsibility will receive detailed and specific fire marshal awareness training, including training on evacuation principles and fire-fighting techniques.
- 10.3 All colleagues will receive training on general fire safety awareness and basic fire warden training as part of new starter inductions and a refresher training programme.

## **11. Non-Compliance**

- 11.1 If non-compliance is identified, this will be formally reported and escalated within RHG. If significant failure has occurred, then formal notification to the RSH and the Health & Safety Executive (HSE) where required.

## **12. Monitoring**

- 12.1 The monitoring of a range of key performance indicators (KPIs) is crucial in achieving landlord compliance, ensuring the safety of others, protecting our assets/properties, and ensuring continuous improvement and value for money.
- 12.2 As a minimum, these KPI measures will include reporting on:

### **12.2.1 Data - The total number of:**

- Properties included (and not included) on the FRA programme.
- Properties with a valid 'in date' FRA, expressed as a number and a percentage (%).
- Properties where the FRA has expired and is 'out of date', expressed as a number and a percentage (%).
- Properties which are due for a new FRA within the next 90 days (early warning system).
- Follow-up works – number of actions (by priority and category) – 'completed or closed', number of actions live and length of time since identified in the FRA.

#### 12.2.2 Narrative – An explanation of the:

- Current position.
- Corrective action required.
- Anticipated impact of corrective action.
- Progress with completion of follow up works.
- Progress, position and timeframes of works which are 'Planned Asset Investment'

#### 12.2.3 In addition:

- Compliance with the fire safety equipment, systems and installations servicing and maintenance programme.
- Recording and reporting on property fire, where we are informed a fire has occurred within an RHG premise to identify trends and target awareness campaigns.

### 13. Review

- 13.1 This Policy will be reviewed annually, unless there are major changes in legislation, case law or good practice.

### 14. Consultation

- |      |                                     |                     |
|------|-------------------------------------|---------------------|
| 14.1 | Board Member – Building Safety Lead | April 2023          |
| 14.2 | Executive Team                      | April and June 2023 |

### 15. Responsibilities

#### Responsible body

- |      |  |                  |
|------|--|------------------|
| 15.1 | Formulation, amendment and approval of Policy  | Board of RHG     |
|      | Monitoring of Policy                           | Executive Team   |
|      | Operational management of Policy/Policy author | Head of Property |
| 15.2 | <b>Date of formulation of Policy</b>           | January 2022     |
| 15.3 | <b>Dates of Policy reviews</b>                 | July 2023        |
| 15.4 | <b>Date of next review</b>                     | July 2024        |

### Associated Documents

#### Internal

- Tenancy Agreement
- Lease Agreements
- Asset Investment Strategy
- Health and Safety Policy
- Electrical Safety Policy
- No Access Policy
- Insurance Policy
- Risk Management Policy
- Procurement Policy
- Value for Money Strategy

#### External

**In addition** to those identified under Section 3 of this Policy:

- Housing Act 2004
- Health and Safety at Work etc Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Gas Safety (Installation and Use) Regulations 1998
- The Furniture and Furnishings (Fire Safety) Regulations 1988
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Building Regulations 2000: Approved Document B Fire Safety
- Electrical Equipment (Safety) Regulations 2016
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
- Homes (Fitness for Human Habitation) Act 2018



## **Fire Safety Management Plan**

May 2023

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## **1. Introduction**

- 1.1 The purpose of this Fire Safety Management Plan is to provide key information to ensure that Rooftop Housing Group (RHG) as a landlord meet their legal obligations for fire safety.
- 1.2 To ensure properties remain safe for those who occupy, visit, reside within close proximity and / or work within them, we will:
  - Provide all RHG colleagues involved in the management and administration of the service with detailed operating processes.
  - Detail the key requirements and provide relevant information to all contractor/consultants responsible for delivering the service.
  - Provide customers receiving the service with clear guidance on their roles and responsibilities.
  - Demonstrate that RHG complies with the requirements of the Regulations providing additional assurance.
- 1.3 Contractors and/or consultants will be provided with a copy of this Management Plan to provide clarity as to how services must be delivered. All parties involved in the Policy and review process will be provided with a copy.

## **2. Responsibilities**

### **2.1 Rooftop Housing Group (RHG)**

- 2.1.1 The Group Chief Executive will retain overall responsibility for consistent monitoring of the management plan, to effectively comply with the regulatory standard and report to the Regulator of Social Housing (RSH).
- 2.1.2 The Executive Director - Operations is the Executive Team (ET) lead and Duty Holder (for the purposes of fire safety) and will lead on the delivery and revision of all key fire safety documentation across the business.
- 2.1.3 The Head of Property and the Safety and Compliance Manager, in collaboration with the Head of Asset Investment and Asset Investment Manager will ensure the operational delivery of fire safety/risk assessment and remedial work programmes and are the Responsible Person(s) who will ensure compliance with the RHG Policy, Management Plan and therefore ensuring compliance with regulations.
- 2.1.4 RHG has the following key responsibilities:
  - Ensure that sufficient competent resources and capability are in place to comply with the Fire Safety Policy and Management Plan.
  - Agree and set resource requirements for the management of fire safety ensuring sufficiency to meet compliance with the Policy.
  - Discuss and seek ET/Board approval (as per Scheme of Delegations) the procurement of fire safety contracts and any subsequent amendments.
  - Ensure that fire safety contracts are being always adhered to by all contractors and or consultants through proactive management and monitoring.
  - Ensure that all colleagues, contractors, and consultants with responsibility for managing and delivering fire safety-related services are competent.
  - Ensure the safety of customers, residents, colleagues, contractors, consultants, and other stakeholders.
  - Review performance of contractors and/or consultants and service delivery through agreed Key Performance Indicators (KPIs) and Operational Key Risk Indicators (KRIs).

## **2.2 Contractors / Consultants**

### **2.2.1 Contractors and/or consultants are required to:**

- Fully comply with the terms of a works order and contractor or service agreement (where available).
- Comply with RHG's Health and Safety Policy and all relevant health and safety legislation.
- Provide information and data as required within defined timescales as set out in the works order, contract and/or service agreement (where available).
- Work in partnership with RHG customers and/or colleagues.

## **2.3 Customers**

### **2.3.1 Customers (incl. leaseholders) are expected to:**

- Allow access upon reasonable notice to enable the surveying, servicing and routine repairs or inspections to be undertaken in accordance with the tenancy agreement and/or lease.
- Allow access for servicing and repair without delay.
- Report repairs/defects within a reasonable timescale dependent upon the nature and urgency of the repair.

### **2.3.2 Customers will be asked to provide feedback where appropriate to assist in the collection of performance data regarding their experience of fire safety inspections and remedial works.**

### **2.3.3 Homeowners, such as leaseholders and shared owners, are responsible for fire safety within their homes. For commercial properties, there are additional statutory duties they must adhere to. We will ensure that homeowners and commercial property owners are informed about their responsibilities for fire safety at the time of them moving into one of RHG's properties.**

### **2.3.4 We will ensure that leaseholders co-operate with RHG to discharge our duties under relevant legislation and regulations, to enable RHG to meet landlord covenants detailed in the Lease and as set out in the Fire Safety Act 2021.**

## **2.4 Information to Residents**

### **2.4.1 In blocks which contains two or more sets of domestic premises; and which contain common parts through which residents would need to evacuate in the case of an emergency, RHG will:**

- Display fire safety instructions; the fire safety instructions will:
  - be in a comprehensible form that the residents can be reasonably expected to understand.
  - instructions relating to the evacuation strategy for the building.
  - instructions as regards how to report a fire to the fire and rescue authority.
  - any other instruction that tells residents what they must do when a fire has occurred.
- Provide information about fire doors to the residents of the building, including:
  - fire doors should be kept shut when not in use.
  - residents or their guests should not tamper with the self-closing devices.
  - residents should report any faults or damages with doors immediately to the responsible person.

### **2.4.2 RHG will provide the required information to a new resident of domestic premises in the building as soon as reasonably practicable after that resident moves into the**

premises, and to all residents of domestic premises within the building, within each period of 12 months beginning from January 2023.

- 2.4.3 Further information on Building Safety will be provided to residents in line with our Building Safety Strategy.

### **3. Regulatory Reform (Fire Safety) Order 2005 (FSO)**

- 3.1 Responsibility for complying with the FSO 2005 rests with the 'Responsible Person' who can be either the 'landlord' of the customers living in a property, the 'owner' of a property or the 'employer' of colleagues working in a property.
- 3.2 The FSO 2005 requires fire precautions to be put in place 'where necessary' to the extent that it is reasonably practicable in the circumstances. Where RHG owns a property, has its own customers living in the property and colleagues working in the property, the 'Responsible Person' role rests solely with RHG.
- 3.3 In some cases a Managing Agent controls a workplace and will be the 'Responsible Person'. Where there is more than one Responsible Person, the responsibilities of each should be clearly set out in the Management Agreement, Lease or Service Level Agreement.
- 3.4 If there is more than one 'Responsible Person' in any type of premises (e.g., a multi-occupied supported housing scheme), all must take reasonable steps to co-operate and co-ordinate with each other. In this situation, the preferred option will be to agree that a single 'Joint FRA' is carried out on behalf of all the 'Responsible Persons' and that responsibility for completing any remedial actions is agreed by all parties.
- 3.5 The 'Responsible Person' or a 'Competent Person' (nominated by the 'Responsible Person') must carry out an FRA which must focus on the safety in case of fire of all 'relevant persons'. It should pay particular attention to those at special risk, such as persons who require assisted evacuation, those that are known to have special needs or are young persons and must include consideration of any dangerous substance liable to be on the premises.
- 3.6 The FRA will identify risks that can be removed or reduced to decide the nature/extent of general fire precautions the 'Responsible Person' needs to take.
- 3.7 The Fire Service has the power to inspect all premises to establish if a suitable and sufficient FRA has been carried out if significant findings have been recorded and the assessment has been acted upon. If dissatisfied with the outcome of the FRA or the action taken, an Enforcement Notice setting out specific improvements required may be issued.
- 3.8 In extreme cases, a Prohibition Notice may be issued to restrict the use of all or part of the premises until improvements are undertaken. If the premises are considered by the Fire Service to be high risk, they may issue an Alterations Notice that requires RHG to consult before any changes are made to the premises or the way it is used.
- 3.9 Failure to comply with any duty imposed by the FSO 2005 or any notice issued by the Fire Service is a criminal offence. The FSO 2005 does not place the enforcing authority (the Fire Service or Local Authority) under a specific express duty to issue alterations, enforcement, or prohibition notices. It provides the powers to do so where they deem necessary.

### **4. Fire Risk Assessment (FRA)**

- 4.1 Under the FSO 2005 as the 'Responsible Person(s)' the Head of Property and Safety and Compliance Manager are responsible for ensuring there are valid FRAs for all RHG communal areas and ensuring programmes of work are developed to address the building risks within a suitable timeframe.

- 4.2 Where the FRA identifies tenancy management issues, the Neighbourhood Officer will be responsible for addressing and monitoring these as the 'premise manager'. The Safety and Compliance team will be responsible for arranging an FRA to each qualifying communal area/flat as set out within the fire regulations.
- 4.3 We will carry out FRAs to identify and remove any fire risks and hazards, making and implementing fire safety arrangements. We will review premises based on the recommended timeframes as set out in the existing FRA. The approach is based on each blocks individual Fire Risk Assessment Matrix that takes into account the entire FRA (including asset information, tenancy type, previous risk ratings, previous recommendations and any changes since the last FRA), the current findings and recommendations, plus the level of fire hazard, the level of severity and the risk to life from a fire in the premise.
- 4.4 For the purpose of carrying out FRA and in line with the Fire Safety (England) Regulations 2022, from April 2023 'premises' will be categorised as follows:
- High Rise – a block/building at least 18 metres in height or at least seven storeys
  - Mid Rise (new) – a new build block/building that is 11m or over – usually (but not exclusively) with four or more storeys
  - Mid Rise – an existing block or building usually (but not exclusively) with four or more storeys
  - Low Rise – an existing or new build block/building below 11m in height usually (but not exclusively) with three or fewer storeys
- 4.5 Where recommended by a Fire Risk Assessor or other Fire Safety Specialist, an Intrusive fire safety inspection will be commissioned and carried out (either as part of the FRA process or alongside), to ensure that the structure and composition of external walls, doors etc can be considered as per the requirements of the revised FSO 2005 (as per Fire Safety Act 2021).
- 4.6 For new-build property blocks that are required to have an FRA, will always be undertaken within one month of handover of the home to RHG.
- 4.7 RHG will operate a robust process to gain access if any customer refuses access to carry out essential fire safety-related inspection and remediation works. We will follow our robust No Access Policy and use all legal remedies available within the terms of the Tenancy Agreement, Lease or License if any tenant or leaseholder refuses access to carry out essential fire safety checks, maintenance, and safety-related repair work.
- 4.8 We will support customers where vulnerability issues are known or identified and will work with partners, whilst maintaining a robust process to gain access to properties, by gaining timely access to the property to be compliant with this Management Plan and safeguard the wellbeing of the customer.

## 5. Type of Fire Risk Assessment (FRA)

- 5.1 Under current fire safety legislation there are four levels of FRA:
- **Type 1 – common parts only (non-destructive):** the inspection of the building is non-destructive and considers, as far as is reasonably practicable, the separating construction between the flats and the common parts. This is non-invasive.
  - **Type 2 – common parts only (destructive):** these assessments are similar to those outlined in Type 1, except there is a degree of destructive inspection carried out on a sampling basis.
  - **Type 3 – common parts and flats/bedrooms (non-destructive):** the assessment includes the work involved in a type 1 assessment but goes beyond

the scope of the FSO 2005 and considers fire safety within a sample number of flats.

- **Type 4 – common parts and flats (destructive):** these assessments are similar to those outlined in type 3, except there is a degree of destructive inspection in both the common parts and the flats, carried out on a sampling basis.

- 5.2 Unless otherwise advised, the Safety and Compliance team will ensure type 1 FRAs on its entire property portfolio with common areas are completed. Each FRA will be carried out to ascertain the level of fire protection, assess the possibility of a fire starting, and the potential risks to people in the event of a fire.
- 5.3 Each premise will have a rating of fire hazard and fire severity, in line with the matrix below:

### FIRE RISK ASSESSMENT MATRIX

		Fire Severity		
		SLIGHTLY HARMFUL	HARMFUL	EXTREMELY HARMFUL
Fire Hazard	LOW	No Action	Tolerable Risk	Moderate Risk
	MEDIUM	Tolerable Risk	Moderate Risk	Substantial Risk
	HIGH	Moderate Risk	Substantial Risk	Intolerable Risk

BS 8800: 1996 - Guide to occupational health and safety management systems.

Considering the fire prevention measures observed at the time of this assessment, it is considered that the hazard from the probability of ignition at the premises is:

Low  Medium  High

Taking into account the nature of the premises, occupancy, fire protection and procedural arrangements observed at the time of the risk assessment, it is considered that the consequences for life safety in the event of fire would be:

Slightly Harmful  Harmful  Extremely Harmful

In this context, the definition of the above terms is as follows:

<b>Slightly Harmful</b>	Outbreak of fire very unlikely to result in serious injury or death of any occupant.
<b>Harmful</b>	Outbreak of fire could result in harm to one or more occupants, but it is unlikely to result in serious injury or death of any occupant; any such injury or death is unlikely to involve multiples of people.
<b>Extremely Harmful</b>	Potential for serious injury or death of one or more occupants.

In addition, each building will be given a level of risk to life from fire at the premise; the ratings will be in line with the matrix below:

Accordingly, it is considered that the risk to life from fire at these premises is:

No Action ☐ Tolerable ☐ Moderate ☐ Substantial ☐ Intolerable ☐

<b>No Action</b>	No additional controls required.
<b>Tolerable Risk</b>	Consideration should be given to improvements that reduce risk. Risk reduction measures should be implemented within a defined time period.
<b>Moderate Risk</b>	Improvements should be made to reduce the risk at limited cost. Risk reduction measures should be implemented within a defined time period. Where moderate risk is associated with extremely harmful consequences, further assessment may be required as a basis for determining the need for additional control measures.
<b>Substantial Risk</b>	Considerable resources may have to be allocated to reduce the risk. If the building is unoccupied, it should not be occupied until the risk has been reduced. If the building is occupied, urgent action should be taken.
<b>Intolerable</b>	Building (or relevant area) should not be occupied until the risk is reduced.

## 6. Desktop Review

- 6.1 An annual review for all properties subject to the FSO 2005 will be carried out by the Safety and Compliance team, irrespective of risk ratings identified within FRAs. Copies of all FRA information will be held electronically, made easily available and audited regularly to provide assurance.

## 7. Recommendations Arising from an FRA

- 7.1 Recommendations arising from an FRA are categorised into four key areas:
- Management Actions.
  - Remedial Actions – Responsive
  - Remedial Actions – Planned Asset Investment
  - Best Practice – Advisory only
- 7.2 Management Actions are actions to be taken where the users of the property breach fire safety rules. RHG operates a zero-tolerance approach to anyone who prevents safe access/exit of communal shared areas within properties. We also operate a no smoking Policy in these areas.
- 7.3 Remedial actions - Responsive are defined as physical actions required to eliminate or reduce the risk of fire or spread of fire and smoke. Examples of remedial actions include fire resisting doors not closing correctly, fire exit doors not opening easily, minor compartmentation improvements, loft hatch missing.
- 7.4 Remedial actions – Asset Investment is defined as physical actions required to eliminate or reduce the risk of fire or spread of fire and smoke in a planned approach, either via inclusion on a current programme or planned for future upgrade works. Examples of remedial actions – Asset Investment would be the upgrading of fire panels and fire detection through the whole premise, installation of fire doors, major compartmentation upgrade works.
- 7.5 Best Practice (Advisory only) - These are recommendations that do not have an allocated timeframe for completion but are included in an FRA by the assessor as best practice and advisory for future consideration. Example of these are undertaken a lightning protection risk assessment, connect fire panel to alarm receiving centre.

- 7.6 We will manage all FRA recommendations in line with our decision making framework, taking into account the recommended priority and timeframes within the FRA. Recommended timescales can vary within each category as they are based on several factors including level of fire hazard, level of fire severity, and overall risk to life from fire at the premise. Appendix 3 provides further information on how RHG will manage all recommendations.

## **8. Communal Area Inspections**

- 8.1 All properties subject to FSO 2005 will receive regular inspection of communal areas. The management of the property type will determine who completes and the frequency of inspection below:

<b>Property Type</b>	<b>Frequency (Min)</b>	<b>Responsibility</b>
Head Office	Weekly	Property & Facilities Manager / Senior Handyperson
High Rise	Not Applicable	Currently no high-rise properties within RHG Management
Supported Housing Accommodation	Weekly	Handyperson or Scheme Manager (where agency managed)
Rented Blocks of Flats	Monthly	Handyperson or Neighbourhood Officer

## **9. Contractors and/or Consultants**

- 9.1 The Safety and Compliance Manager will keep a central register with the following fire safety contractor/consultant details:
- Contractor name, trading address, key contact details.
  - Copies of certification, financial information, insurance details etc.
  - Operatives' details, training received and qualifications.
  - Any other information as required by RHG or specific to contract.
- 9.2 The contractor/consultant will update the Safety and Compliance Manager if there is a change to list of operatives working on the contract or to their qualifications / training / refresher training prior to a new operative commencing or within one month of new qualifications/training.
- 9.3 Individual checks and verification of fire risk assessors and registered companies can be made via Institution of Fire Engineers (IFE) and Fire Industry Association (FIA). Unless RHG holds documentary proof that a company has the relevant and up to date qualifications, the company is not permitted to carry out any FRAs or remedial works.

## **10. Fire Protection Measures**

- 10.1 We visually inspect passive fire protection measures (for example, doors, walls, and pipework through walls) at the same time as carrying out an FRA. Regular servicing of active fire protection equipment is undertaken by our approved contractors.
- 10.2 We will install and maintain fire alarms, where necessary. All offices have a fully functioning fire detection and alarm system installed. Every office will hold and maintain a fire record. This will detail:
- Weekly fire alarm checks.
  - Alarm maintenance and servicing.
  - Emergency lighting tests.



- Evacuation drills.
  - Fire awareness training.
  - Fire extinguisher servicing.
  - Fire door checks.
  - Monthly inspection checks.
- 10.3 All Supported Housing accommodation with enclosed corridors, walkways, landings and exit routes have fire detection and alarm systems installed. These buildings will also hold and maintain a fire record log.
- 10.4 All offices and Supported Housing accommodation will be fitted with appropriate fire-fighting equipment if there is a competent person(s) able to use the equipment.
- 10.5 Fire-fighting equipment will not be supplied or fitted to communal areas (stairwells and corridors) unless this is specifically identified in an FRA.
- 10.6 Fire-fighting equipment will be inspected as part of routine inspection checks and any damage or fault will be reported immediately to the Safety and Compliance Team. Annual service maintenance will be carried out by a service engineer from our approved contractor.
- 10.7 Small-scale individual sprinklers/mist systems have been installed where appropriate as part of new-build developments.

## **11. Compartmentation and Fire Doors**

- 11.1 Communal areas and risers will be inspected in accordance with the FRA priority timescales: this will be done within the scope of a Type 1 FRA.
- 11.2 In relation to a building which contains two or more sets of domestic premises, and which is above 11 metres in height, RHG will use best endeavours to undertake checks of fire doors at the entrances of individual domestic premises in the building at least every 12 months. The check will include ensuring that the self-closing devices for the doors are working. All records will be held on our QL system.
- 11.3 RHG will keep a record of the steps taken to comply with the obligation in paragraph (4) of the Fire Safety (England Regulations 2022) including, in any case where access to the domestic premises was not granted during any 12-month period, the steps taken by the responsible person to try and gain access.
- 11.4 In relation to a building which contains two or more sets of domestic premises, and which is above 11 metres in height, RHG will undertake checks of any fire doors in communal areas of the building at least every three months. The check will include ensuring that the self-closing devices for the doors are working. All records will be held on our QL system.
- 11.2 All communal corridor fire doors will be marked with the appropriate fire safety signage.
- 11.3 Customers must not change the front door to a flat or alter the integrity of the door (for example, by the fitting of a cat flap or other opening in the door). This is to ensure that the fire resistance of doors and communal areas is maintained.
- 11.4 Any customer wishing to carry out improvement work to their home must, in the first instance, seek RHG's permission as landlord, as specified within their Tenancy Agreement or Lease.

## **12. Escape Routes**

- 12.1 All fire exits, doors, and emergency lighting will be checked during monthly inspection visits. All fire escape routes (internal and external) will be maintained free of all obstruction at all times and will be clearly signed.

- 12.2 Emergency lighting will be installed in all offices, Supported Housing accommodation and communal areas within enclosed corridors in blocks of flats. These will be checked monthly.
- 12.3 Final exit ground floor fire doors will be either fitted with a push bar device, push pad, or thumb twist lock device dependent upon their use and location. Regular checks will be undertaken by Neighbourhood Officers, Handypersons team, Supported Housing Officers and/or Managing Agents.

### **13. Fire Evacuation and Planning**

- 13.1 RHG will ensure a plan is developed for how occupants will evacuate a property in the event of a fire. For individual houses and commercial properties, the evacuation strategy will be simultaneous, immediate evacuation upon operation of the fire alarm.
- 13.2 In line with best practice, RHG normally adopts a 'Stay Put' Policy where, unless a fire is within a flat/room adjoining a communal escape area, people should be safe to remain in their flat/dwelling unless it also becomes affected by fire. If there is a need to evacuate, the Fire Service will co-ordinate this.
- 13.3 It is essential that RHG plans and trains relevant individuals on the site-specific procedures in place in the event of an emergency, including colleagues employed by Managing Agents covering as a minimum:
- How customers, colleagues and other stakeholders are warned in the event of a fire and what they should do if they discover fire.
  - How evacuation should be carried out, the needs/risks relating to individuals and where people should assemble and process for checking the premises has been evacuated safely.
  - Duties and identify of colleagues (RHG and/or Managing Agent colleagues) that have specific responsibilities if there is a fire e.g., Fire Marshalls.
  - Arrangements for the safe evacuation of people identified as being at risk, i.e., people with disabilities, children, lone workers etc., and any actions require to stop/isolate equipment, appliances, or power supplies.
  - How the Fire Service will be called, who will be responsible for calling them, and who will meet them on arrival and provide key information such as locations of people still in the building, any specific risks, access issues etc.

#### **13.4 Evacuation Plans**

- 13.4.1 All premises will have a fire escape notice prominently displayed on site. If customers and/or colleagues have disabilities, Personal Emergency Evacuation Plans (PEEPs) will include an agreed course of evacuation if applicable, such as in Supported Housing accommodation or offices.

#### **13.5 Evacuation Strategies**

- 13.5.1 The following evacuation strategies are in place across the housing stock:

- **General purpose blocks of flats (stay put evacuation strategy):** In the event of a fire within general purpose blocks of flats, residents will alert the fire service and, unless directly affected by the fire, have a 'stay put evacuation strategy' in place. If it is a major fire, the fire service will contact RHG to activate disaster recovery procedures.
- **Supported Housing schemes (stay put evacuation strategy):** In the event of a fire alarm sounding in a Supported Housing scheme, the fire panel alert goes to our fire servicing and maintenance contractor or remote monitoring centre (for a proportion of the supported housing schemes).

The contractor will alert the fire service and RHG. Customers who can self-evacuate who are in areas of immediate danger will gather at the scheme's assembly point. Those who cannot self-evacuate will adopt a stay put strategy by remaining in their homes. RHG and/or the Managing Agent will escalate the incident if required in accordance with disaster recovery procedures.

- **Personal Emergency Evacuation Plans:** If a colleagues or resident in a Supported Housing scheme is unable to respond to a fire alarm or will have difficulty in evacuating to the assembly point area unaided, a PEEP must be produced.

For all offices, a Generic Emergency Evacuation Plan (GEEP) will be in place, along with an appropriate system to aid visitors who need assistance in the event of an emergency who will have difficulty in evacuating. The Safety and Compliance Manager is responsible for ensuring measures are in place. Fire marshals are trained in evacuation chair use in offices, where required, to provide assistance.

- **Supported Housing scheme – vulnerable customers:** Due to the vulnerable nature of some customers within Supported Housing accommodation, RHG has adopted the following approaches:
  - **Customers who are mobile** can adopt a stay put strategy if the fire is known to be in a separate block or another part of the scheme. If their immediate area is at risk, they should adopt a simultaneous evacuation.

For customers who are partially mobile (unable to evacuate unaided on stairs) a stay put strategy will apply unless the fire is within the same compartment. In this instance, a phased evacuation strategy will apply by moving the person to another compartment on same floor level.
  - **Partially mobile/breathing difficulties** – A stay put strategy will apply unless the fire is within the same compartment. In this instance, a phased evacuation strategy will apply, by individuals moving to another compartment on same floor level. Oxygen notices will be located by the fire panel to warn about flats with occupants who have oxygen.
  - **Hard of hearing/deaf** – A stay put strategy will apply unless the fire is in the flat, in which case the customer should evacuate to a place of safety as per their PEEP instructions (assembly point). Where known, flats will be upgraded with flashing lights, a vibration pillow or cushion, according to individual needs.
  - **Vision impaired** – If a person is visually impaired, RHG will relocate the person to ground floor accommodation as a priority management move under the Allocations Policy. If a customer's consent is obtained, a defend in place (stay put) strategy will apply. If the fire is in the flat, they will evacuate to the next compartment on the same floor.
  - **English not first language** – PEEPs will be translated to a suitable language in line with a person's needs. We will arrange for a translator or relative to inform the occupants of personal evacuation arrangements.
  - **Occupant's health degenerates** – Neighbourhood Officers/Supported Housing Officers will recommend relocation of the occupant and their family to more suitable accommodation.
  - **Dementia** – A stay put strategy will generally be applied.
  - **Non-mobile (bed/chair-bound)** – A stay put strategy will generally be in place. We will consider additional measures to reduce the risk on an individual basis assessed on risk. Upgrade measures to the flat will be

followed to improve early warning measures based on risk rating if they are not already in place.

- **High risk (customer is a smoker/uses oxygen or there is cooking equipment provided within the home)** – An individual risk assessment will cover evacuation and early warning protection measures.

#### **14. Use and Storage of Mobility Scooters**

- 14.1 Mobility scooters can pose a significant fire risk. Storage and charging of mobility scooters in communal areas presents a risk of a fire which can spread to other parts of the building. Additionally, although they might not be directly involved in a fire, mobility scooters may prevent people from evacuating the building safely or restrict access for firefighters entering a building.
- 14.2 Mobility scooters are not currently regulated in the UK, we will therefore ensure our mobility scooter procedure aligns to the guidance within the National Fire Chief Council – Mobility Scooter Guidance for Residential Buildings to effectively manage the ownership of mobility scooters in our buildings to minimise fire safety risks.

#### **15. Contractors on Premises and Hot Work**

- 15.1 Contractors and subcontractors can present an additional fire risk, as they are likely to be unfamiliar with the premises or the associated fire risks and fire precautions. The risk at a property is increased when contractors and subcontractors are carrying out hazardous activities such as hot work (e.g., cutting or welding), or when they are using substances which emit flammable vapours (e.g., some adhesives).
- 15.2 To minimise this risk, colleagues will ensure either directly, or via robust contract management that the activities of external contractors will be strictly supervised and controlled. The supervision will include checks of any area where hot work is to be undertaken or where contractors have been engaged. There must be a hot work permit in use at all times where such work is being completed.
- 15.3 Arrangements will be put in place for the safety of the contractors' own colleagues and consider other users of the building.

#### **16. Equipment and Alarm Systems Servicing / Maintenance**

- 16.1 RHG, through the Safety and Compliance team, will maintain service contracts for the following:
  - Fire detection and alarm systems: a full check and service of the entire system on an annual service cycle.
  - All fire-fighting equipment maintained and serviced annually to conform to British Standards by a competent person.
  - Maintenance of escape routes' emergency lighting. This includes an annual (three hour) discharge battery service test by a service engineer.
  - Blocks of flats where dry risers are installed will be inspected by a competent service engineer annually. Wet tests are carried out on an annual basis, along with six monthly riser inspection checks.
  - Annual checks on smoke detectors and where relevant CO detectors as part of the heating servicing programme, with those properties not included are checked on a five-year cycle under the electrical inspection programme.
  - Communal smoke and heat detectors are checked annually.
  - Individual flats in Supported Housing schemes have smoke detectors checked every six months.

- Premises with automatic smoke vents and fail-safe door entry systems are serviced annually.

## **17. Fire Prevention Measures**

- 17.1 RHG undertakes monthly inspections of all blocks and sheltered schemes; blocks are inspected by our Handyperson team and Supported Housing schemes in conjunction with Neighbourhood Officers and Managing Agents.
- 17.2 We carry out and record maintenance and inspections of components on all fire doors to ensure they are in good working order.
- 17.3 RHG has a no smoking/no vaping Policy in all its premises.
- 17.4 We will provide all new customers with fire safety advice and instruction on fire safety measures as part of their resident sign up packs.
- 17.5 Fire notices and evacuation procedures are displayed in RHG premises.
- 17.6 We will undertake routine maintenance, inspection and testing of electrical installations and equipment in accordance with the guidance provided by the Institute of Electrical Engineers Wiring Regulations. NB: Refer to the RHG Electrical Safety Policy for further details.
- 17.7 We will carry out annual safety checks of gas appliances and flues provided for tenants in accordance with Gas Safety (Installation and Use) Regulations. NB: Refer to the RHG Gas Servicing Policy for further details.
- 17.8 The responsible person for a set schedule of works will control the activities of contractors to make sure safety is always maintained.
- 17.9 We will undertake upgrades, renewals and installation of major components relating to fire safety, fire prevention and fire detection (such as flat front doors, door entry systems, fire panels and emergency lighting) in accordance with our Asset Management Strategy. NB: Refer to the RHG Asset Management Strategy and Action Plan for further details.

## **18. Fire Drills**

- 18.1 RHG will display visual information regarding fire evacuation procedures on entry to premises for residents, visitors, and contractors to see. For offices, fire drills will be carried out at least annually.
- 18.2 For general purpose blocks of flats, residents will be informed of their evacuation strategy as part of their tenancy sign up packs, on block notice boards, and periodically through customer newsletters. Fire drills will not be undertaken for such accommodation.
- 18.3 Fire drill will be carried out in all 'manned' buildings / schemes. This covers all workplace/RHG offices and Supported Housing schemes. Fire drills will be carried out at sufficient intervals to ensure that all colleagues and customers located on site and others who may occupy the building take part in two drills per year. Fire drills will be carried out with lift contractors on site to ensure that the lift returns to ground floor and remains out of service when the fire alarm is sounding.
- 18.4 Records should be kept of fire evacuation drills and the length of time taken to completely evacuate the building to a place of ultimate or relative safety dependant on the type and use of the building.

## **19. Fire Investigation**

- 19.1 Following a fire at any RHG property, the Head of Property will arrange for an internal fire investigation to be completed. The investigation will assess the current FRA and management/remedial actions completed, as well as the effectiveness of any fire precautions present, how procedures works and any learning outcomes.

- 19.2 A fire investigation report will be requested from the appropriate Fire Service and will be reviewed as part of the investigation process. A fire within any RHG property will trigger a new FRA re-assessment to be carried out.

## **20. Gaining Access**

- 20.1 Contractors are responsible for three attempts to gain access and contract terms must reflect this. Once three attempts have been proved to be unsuccessful, the property is passed to the Safety and Compliance Manager along with evidence of access attempts for escalation. RHG's No Access Policy is to be followed for gaining access and the escalation process if access is not achieved.

## **21. Amendments to Property Portfolio**

- 21.1 The following circumstances will require an assessment/controlled amendment to the RHG asset register/database and the property attributes relating to fire components/categories will need to be updated:
- New build property development.
  - Acquisition and/or disposal of property.
  - Property refurbishment and/or change in tenure.
  - Any asset addition to the Aareon QL ICT System.

## **22. Audit and Validation**

- 22.1 RHG will ensure a minimum of 10% of completed fire safety works are audited per year via the use of an external auditor or contractors own independent external auditor. An external strategic review will be carried out every two years which will include all operating procedures.

## **23. Complaints and Compliments**

- 23.1 All customer compliments and complaints will be dealt with in accordance with the RHG Complaints Policy.

## **24. Training**

- 24.1 Training provided by RHG to ensure that colleagues involved in fire safety have the right combination of training, skills, experience, and knowledge to ensure that RHG can demonstrate competence.
- 24.2 All colleagues will receive training on the importance of remaining vigilant relating to fire safety issues and the signs that can alert others of a concern related to fire safety, through the Health and Safety Induction and regular refresher training.
- 24.3 Colleagues working in Supported Housing also receive Person-Centred Fire Risk Assessment (PCFRAs) training.

There may be circumstances where PCFRAs are required for higher risk residents within general needs blocks, therefore training on PCFRAs will also extend to Neighbourhood Officers.

## **25. Changes to Regulations and Legislation**

- 25.1 The Safety and Compliance Manager in conjunction with the LLHS Compliance Panel will proactively monitor legislative and regulatory developments and changes. This will ensure RHG effectively prepares for potential changes and consistently operates within the most up-to-date regulations/legislation at all times.
- 25.2 Potential changes in legislation will be identified where there is an impact upon Policy and changes will be disseminated to all relevant colleagues across RHG, contractors, consultants, and customers.

25.3 All colleagues have a responsibility to remain alert and share knowledge and best practice across all teams. This includes dissemination from the RSH, statutory agencies, professional bodies, fire management companies, and other trade media.

## **26. Review**

26.1 This Management Plan will be reviewed annually with the Fire Safety Policy and Decision Making Framework. Where there are major changes in legislation, case law, good practice or significant RHG changes – this plan may be reviewed sooner.

## Fire Safety Decision Making Framework

May 2023

This decision making framework details our approach for the management and reporting of evidence of RHG decision making and completion of FRA recommendations ensuring our customer's safety is maintained and our regulatory and legal duties are completed. It also aims to remove confusion around timescales and outline a practical approach to recommendations that may be of significant cost to RHG.

A Fire Risk Assessment is an assessment of the building on a given day and each building is considered in the following way:

Considering the fire prevention measure observed at the time of this assessment, it is considered that the hazard from the probability of ignition at the premises is either:

- Low
- Medium
- High

Taking into account the nature of the premises, occupancy, fire protection and procedural arrangements observed at the time of the risk assessment, it is considered that the consequences for life safety in the event of fire would be either:

- Slightly Harmful
- Harmful
- Extremely Harmful

Accordingly, it is considered therefore that the risk to life from fire at these premises would be result in the rating of either:

- No Action
- Tolerable
- Moderate
- Substantial
- Intolerable

Example of recommendations within a FRA can include a range of items such as:

- The removal of combustible items from communal areas
- Checking individual flat doors
- Additional fire safety signage
- Upgrading fire alarm systems
- Checking compartmentation



Each recommendation comes with a suggested time frame based on the assessor's opinion.

RHG has a responsibility to review the recommendations and decide how and if they will be implemented. There is no requirement in legislation that recommendations have to be implemented, however the approach of RHG is that all recommendations will be considered paying due attention to building and customer safety and balancing cost, future planned investment and value for money.

## Key Principles

- FRA's that result in **substantial or intolerable risk** rating will be escalated immediately to Head of Property (HoProp) and Head of Asset Investment (HoAI) for a suitable and measured review, a response and plan of action within 2 working days. Where required, or where either Head of Service are unavailable, the matter must be escalated to Executive Director - Operations (EDO) and/or Executive Director - Investment (EDI). The Head of Risk and Assurance (HoRA), Safety and Compliance Manager (SCM) and Compliance Officer (CO) must be kept informed at all stages of decisions and works.
- FRA's that result in ratings of '**moderate risk** to life from fire' and the '**Potential for extremely harmful** consequences' will be escalated within a day of receipt to our SCM and Asset Investment Manager (AIM) to review and determine together the priority actions that will have the biggest impact on reducing the risk, decisions to be made within three working days. Where required, or where either Manager is unavailable, the matter must be escalated to the HoProp and/or HoAI. Our Fire Risk Assessors may be consulted with in terms of prioritisation of actions where required.
- FRA's that result in a rating of '**moderate risk**' with **harmful** consequences, or where rated as '**Tolerable risk or below**' will be considered on a case by case basis with the appropriate balance to minimising risk of fire and risk to life with a measured approach to costs of implementing recommendations. An example of this would be the change to an external door on a building where the risk is already low. It would be more practicable to put this on a planned programme of works. – The advice from our Fire Risk Assessor is that this would be perfectly acceptable.
- The below provides guidance for most scenarios within these rating, but is not exhaustive (there will be items that need to be reviewed on a case by case basis):
  - Where a recommendation relates to 'Management/Tenancy' these will be referred to the relevant Neighbourhood, Supporting Housing or Handyperson colleague by the CO within two working days. Progress updated must be logged and updated by the relevant colleague in QL.  
Where a recommendation relates to a repair, these will be referred to the Repairs Team by the CO within two working days. The Repairs team must then action and provide job number and appointment to CO within one working day.
  - Where a recommendation involves the 'Upgrade or Replacement' of a component – these will be referred to our AIM for review, decision and action (and feedback to CO) with five working days.
  - Where a recommendation relates to 'review or confirm compartmentation' – these will be referred to our AIM for review, decision and action (and feedback to CO) with five working days. Where required, advice should be sought from HoAI and HoProp on a case by case basis.

## How will this work in practice and how will we evidence decisions

- All recommendations from Fire Risk Assessments are recorded on a spreadsheet monitored by the CO responsible for fire safety. In the short term this will continue to be the approach until a suitable process in QL (or alternative software) is implemented.
- When the Fire Risk Assessment is returned the CO will review the overall rating of the building as detailed above and take the appropriate action regarding an escalation that may be required.
- Any recommendation received will be recorded with their suggested time frame.
- Recommendations will be categorised into one of the following four disciplines:
  - **Management Actions**

These are all actions to be taken where the users of the property breach fire safety rules. RHG operates a zero-tolerance approach to anyone who prevents safe access/exit of communal shared areas within properties. We also operate a no smoking Policy in these areas. These will generally related to the Neighbourhoods Team or the Estates and Facilities Team.
  - **Remedial Actions - Asset Investment**

These are defined as physical actions required to eliminate or reduce the risk of fire or spread of fire and smoke in a planned approach, either via inclusion on a current programme or planned for future upgrade works. Examples of remedial actions – Asset Investment would include the upgrading of fire panels and fire detection through the whole premise, installation of fire doors, major compartmentation upgrade works.
  - **Remedial Actions – Responsive**

These are defined as physical actions required to eliminate or reduce the risk of fire or spread of fire and smoke on a reactive and responsive approach. Examples of remedial actions include fire doors not closing correctly, fire exit doors not opening easily, minor compartmentation improvements and loft hatch missing.
  - **Best Practice (Advisory only)**

These are recommendations that do not have an allocated timeframe for completion but are included in an FRA by the assessor as best practice and advisory for future consideration. Best Practice recommendations will be grouped together and taken to the quarterly decision making group for review and agreement of action.
- Details of the recommendations and the timeframe for completion will be sent to the relevant colleague or contractor for the recommendation to be completed this could be Neighbourhoods, Asset Investment, Repairs or direct to a contractor.
- The relevant colleague or contractor is then responsible for providing confirmation of the recommendation being completed and evidence of the completion. This will then be noted on the spreadsheet and the evidence filed accessible via a link from the spreadsheet. The recommendation will then be marked as completed on the

spreadsheet.

- Where recommendations are not completed within the specified timeframe this will be escalated by the CO to either the colleague's line manager or the colleague responsible for managing the contractor for an urgent clarification or completion of the recommendation, it will also be escalated to the Compliance Team Leader (CTL) for support and monitoring.

### **Recommendations that are best delivered in a different way and recommendations requiring escalation for decisions**

Where a recommendation is made by the assessor that could result in significant cost, where repeated recommendations would be better delivered on a programme of works, or where the recommendation for replacement/upgrade of a component are not due by the Asset Investment team within three years – The approach to dealing with those recommendation will be taken to one of the following groups:

- **Tier 1 DMF Group** - Made up of the SCM, AIM, Repairs Manager (RM) and Property and Facilities Manager (PFM). Where required, a Fire Risk Assessor will be in attendance to support decisions. The group will meeting monthly, or more frequently where recommendations require a faster decision.
- **Tier 2 DMF Group** - Made up of the SCM, AIM, PFM, RM, HoProp, HoAI and HoRA. A member of Executive Team or the Board Health and Safety Representative can attend any meetings of this group if desired. Where available, a Fire Risk Assessor will be in attendance to support decisions. The group will meeting Quarterly, or more frequently where recommendations require a faster decision
  - Meetings of both groups will be minuted with a clear audit trail of agreed decisions and actions, these will be sent to the CO and CTL for records and updates.
  - Each FRA has a section for comments alongside each recommendation – the outcome of each discussion for these recommendations will be noted on the FRA by the CO in the comments along with the date agreed.
  - This provides a full and auditable trail of information which would be available to anyone who has cause to review the FRA and understand why, when and by who decisions were made.
- Where a recommendation is placed on a planned programme of works this will then be monitored through the delivery of that programme within the Asset Investment Team, progress against programme must be reported via AIM as requested.

### **Reporting and Monitoring**

Reporting of FRA's and FRA recommendations will be in line with section 12 of the Fire Safety Policy.

In addition, the Landlord Compliance Panel will be the operational forum to monitor FRA recommendations on a monthly basis, this will include the monitoring of recommendations by team:

	Total no of recommendations referred	No of recommendations Completed / Closed	No of recommendations in Progress
Asset Investment			

Neighbourhoods/Support Housing team			
Repairs Team			
Handyperson Team			
Contractors			
Other			

On a quarterly basis the Landlord Compliance Panel will be updated on all matters discussed, agreed or escalated to Executive Team from the Quarterly Escalation and FRA Review Group.

The Landlord Compliance Panel will be used to capture information and data for inclusion in the HoRA monthly compliance report.

### **Review**

This Decision Making Framework will be reviewed annually with the Fire Safety Policy and Management Plan. Where there are major changes in legislation, case law, good practice or significant RHG changes – this Decision Making Framework may be reviewed sooner.