

Fire Safety Policy

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# Introduction and Scope

* 1. Arches Housing acknowledges the risk from fire to both life and property. As a landlord, we are responsible for carrying out fire risk assessments, and taking action to identify, manage and mitigate risks associated with fire in respect of the common areas of buildings we own and manage.
  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. We have a duty of care to ensure that all residents and visitors can use our buildings and facilities safely and are not exposed to any undue fire risks.
  3. The key objective of this policy is to ensure that our Board, Executive Leadership Team, employees, partners and residents are clear on our legal and regulatory fire safety obligations. In addition, this policy provides the framework our staff and partners will operate within in order to meet these obligations, strengthen our approach to fire safety and encourage awareness and responsibility throughout the organisation.
  4. This policy forms part of our wider legal duty to ensure the health and safety of employees, tenants, leaseholders, stakeholders and visitors. Our wider organisational commitment to health and safety is set out in our Health and Safety Policy.
  5. This policy and the procedures that support it will be stored in Pentana and distributed across the organisation and subsequently adhered to.

# Legislation, Guidance and Regulatory Standards

* 1. **Legislation** – The principal legislation applicable to this policy is:
* The Regulatory Reform (Fire Safety) Order 2005 (amended by the Fire Safety Act 2021).
  1. **Guidance** - The principal guidance documents applicable to this policy are:
* LACORS - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing.
* Fire safety in purpose built flats (hosted by the Home Office and read alongside the Ministry of Housing, Communities and Local Government’s Consolidated Advice Note and the National Fire Chief Council’s guidance on simultaneous evacuation).
* HHSRS Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9.
* HHSRS Operating Guidance – Housing Act 2004: Addendum for the profile for the hazard of fire and in relation to cladding systems on high rise residential buildings.
* 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.
* HM Government Fire safety risk assessment: sleeping accommodation (June 2006)
  1. **Additional Policy Direction** – The following documents set out clear direction for landlords in respect of fire safety, and whilst not statutory guidance or approved legislation, there are certain recommendations or proposals which are applicable to this policy:
* Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018).
* Building a Safer Future - Proposals for reform of the building safety regulatory system: A consultation (June 2019).
* The Regulatory Reform (Fire Safety) Order 2005: Call for Evidence (July 2019).
* Grenfell Tower Inquiry: phase 1 report. Volumes 1 – 4 (October 2019).
* Building Safety Bill 2021.
  1. **Regulatory Standards** – Arches Housing must ensure compliance with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Home Standard is the primary standard applicable to this policy.
  2. We acknowledge that there is further legislation pending and where practical we will take account of anticipated alignment of the Building Safety Bill and the Fire Safety Act 2021.

# Obligations

* 1. **Regulatory Reform (Fire Safety) Order 2005 (the FSO):**
* Arches Housing is the ‘Responsible Person’ for the purposes of the legislation, by virtue of the fact that we own and manage homes and buildings where residents and leaseholders live.
* The Responsible Person (Arches Housing) must carry out a ﬁre risk assessment (FRA) for the purpose of identifying the general ﬁre precautions and other measures needed to comply with the FSO. Although under the FSO this requirement only applies to common parts of premises, in practice the Responsible Person will need to take into account the entire premises, including units of residential accommodation.
* The Responsible Person must implement all necessary general fire precautions and any other necessary measures identified by an FRA.
* The Responsible Person must put in place a suitable system of maintenance and appoint competent persons to implement any procedures that have been adopted (see Section 8 - Roles and Responsibilities for details).
* The Responsible Person 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.
  1. **Fire Safety Act 2021:**
* The Fire Safety Act 2021 (the Act) was approved by Parliament on 29 April 2021 and amends the FSO by clarifying the following:
  + In respect of any building containing two or more sets of domestic premises, the Responsible Person (Arches Housing) must apply the FSO to the building’s structure, external walls and any common parts, including flat entrance doors.
  + In respect of external walls, the Responsible Person must include consideration for ‘doors or windows in those walls’ and ‘anything attached to the exterior of those walls’ (including balconies).
* There is still further consultation and regulations to be made before the above provisions come into force, and therefore the Act is not likely to have legal effect until late 2021 or early 2022. As a result this may impact definitions and requirements and result in further changes to this policy.

# Statement of Intent

* 1. We acknowledge and accept our responsibilities under the Regulatory Reform (Fire Safety) Order 2005 (amended by the Fire Safety Act 2021) as outlined in Section 3. Although it does not yet have legal effect, we will start to apply the requirements of the Fire Safety Act 2021 to our blocks as we are committed to providing safe homes for our residents.
  2. Although we do not own or manage any buildings of at least seven storeys or over 18m in height (as currently in scope under the Building Safety Bill 2021), we will still adopt Building Safety Bill principles for our occupied communal buildings where appropriate (for example, development of a Resident Engagement Strategy and appointment of a Building Safety Manager).
  3. We will meet the regulatory requirements of the Regulator of Social Housing’s Home Standard, which includes meeting all applicable statutory requirements that provide for the health and safety of our customers in their homes in relation to fire.
  4. Each property requiring a fire risk assessment (FRA) will have one in place which has been carried out by a competent fire risk assessor, and which is compliant with the British Standards Institution’s PAS 79-1:2020 specification.
* The FRA will include consideration for a building’s structure, external walls and any common parts, including flat entrance doors (in line with 6.3 of this policy and the Fire Safety Act 2021).
* The FRA will inform the level of passive and active fire precautions required for each property assessed.
* The FRA will recommend a suitable evacuation strategy based on its findings and relevant to the risk factors as seen at the time of the visit.
  1. Where there is a managing agent for the common area, we will seek assurance that these are managed to meet statutory obligations, and follow a procedure to ensure that recommendations on any FRA Arches Housing undertakes at the block are implemented by the managing agent in a timely manner. This will be monitored in the same way as blocks we own and manage. Managing agents that fail to comply will be reported to the appropriate authority (for example, Building Safety Regulator or South Yorkshire Fire Service).
  2. A Fire Management Plan will be developed for each block:
* The plan will demonstrate the requirements of the Building Safety Bill’s Safety Case to ensure actions to mitigate and manage fire risk are being taken on an on- going basis.
* The plan will designate the Building Safety Manager for each block (this will usually, but may not always be, the Compliance Officer).
* The plan will be reviewed annually alongside the block FRA and an assessment to establish if the block meets the criteria of a high risk building. If so, when established, an application to obtain a Building Registration Certificate will be submitted to the Building Safety Regulator.
* Risk assessment principles for the plan will include:
* identifying the hazards;
* deciding who might be harmed and how;
* evaluating the risks associated with these hazards;
* deciding on the necessary control and mitigation measures;
* recording those findings and implementing them; and
* evaluating and monitoring on an ongoing basis.
  1. A premises information box will be installed at every block. This box will include the following information:
* Floor plan;
* Evacuation Strategy;
* PEEPS information (GDPR compliant) for location/identification; and
* Critical Incident contact details.
  1. Personal Emergency Evacuation Plans (PEEPs) will be carried out by a competent person, reviewed annually, and made available to the Fire and Rescue Service in the event of an evacuation, as follows:
* For any disabled resident and/or employee within any building where we provide care services and are the employer (i.e. supported housing schemes); and
* For any resident within a building where we have a responsibility for carrying out an FRA, where we have been notified that they are storing oxygen in their home for medical use.
  1. Fire evacuation strategies will be determined on a building by building basis, in accordance with the recommendations of the competent fire risk assessor, and will either be ‘stay put’ or ‘stay safe’.
  2. We are committed to working with South Yorkshire Fire and Rescue Service to create safer places to live and work. This joint working may include sharing information, FRA reviews and staff training.
  3. When letting properties we will consider the suitability of the accommodation for the prospective resident in respect of fire safety. We will refer new tenancies to South Yorkshire Fire and Rescue Service for a free home fire safety check where appropriate.
  4. Where we are the building owner we will keep fire safety log books securely on site (or electronically for our managed supported schemes) for all properties on the FRA programme.
  5. We will operate with robust processes to manage resident vulnerability issues or other key fire risks (such as hoarding) that are known or identified, whilst ensuring we safeguard the wellbeing of the resident.
  6. We will not permit the storage of mobility scooters within internal communal areas.
  7. The Complaints Policy will be amended to ensure that any complaint related to building or fire safety is immediately notified to the Head of Asset Operations and the Director of Operations who will monitor these monthly. This is to ensure that resident safety concerns are addressed, and any patterns and trends are quickly identified.
  8. We will undertake gas and electrical safety cyclical programmes (and re-let/mutual exchange safety checks), in line with the legislative requirements to reduce the risk of fire from gas or electrical faults.

# Policy Scope

* 1. This policy forms part of Arches Housing management framework for the management of fire risk. Additional information relating to our management framework includes:

1. Fire Risk Assessments and the implementation of an action plan of significant findings.
2. Fire Management Plans.
3. Provision of fire safety information for tenants.
4. Fire risk management procedures including weekly testing, monthly, six monthly and annual inspections.
5. Fire risk inspection reports.
6. Provision of training.
7. Liaison with the relevant fire safety and other enforcing authorities.
8. Servicing and maintenance of all fire protection equipment in line with applicable British Standards.

# Inspection Programmes

* 1. **FRAs**
* We will ensure all our communal blocks (including supported schemes) that we own or manage have an FRA in place where we have the legal obligation to do so.
* All FRAs will either be a Type 1 survey (common parts only and non-destructive) or a Type 3 survey (common parts, at least a sample of flats and non-destructive). The assessment type will be assigned to the block based on risk and will be stated within the Fire Management Plan for each block (and reviewed annually).
* FRAs will be undertaken on communal blocks annually.
* A pre-occupation FRA will be carried out on all new build schemes or new acquisitions before handover (with monthly inspections undertaken after the building is occupied).
* We will ensure robust processes are in place to implement all mandatory fire precaution measures identified within each FRA in accordance with the following priorities and timescales:
* High risk – immediate
* Medium risk – within three months
* Low risk – within six months
  1. **Compartmentation Surveys**
* We will undertake compartmentation surveys to all communal blocks over 5 years old.
* Surveys will be repeated every 5 years.
* All actions, recommendations and observations to be completed within the recommended time frame defined by the procedure.
  1. **Fire Door Inspections**
* We will undertake a fire door inspection every 6 months to all flat entrance doors within communal blocks (that are off the communal area)
* Remedial works will be completed within the recommended time frame defined by the procedure.
  1. **Fire Safety Testing**
* Fire safety testing will be carried out on all active fire protection in line with FRA recommendations, manufacturer instructions and British Standards. As a minimum we will undertake the following regimes;
* Emergency lighting - quarterly
* Fire alarms (including control panels) - quarterly
* Smoke control vents/ducts systems - quarterly
* Smoke detectors - quarterly
* Fire extinguishers - six monthly
* Portable appliance testing (PAT) - annually
* All testing will be monitored, managed and all testing certification will be reviewed and checked and any remedial works approved by the Compliance Officer (or a manager in the Asset Operations Team in their absence).
  1. **Regular Inspections**
* Monthly communal inspections will be carried out by suitably competent and trained staff and proactive action will be taken to ensure all common areas are kept free of hazards (for example, no blocked access or exit routes and no combustible materials).

# Competency and Training

* 1. Arches will ensure that adequate information, instruction and training to follow the requirements of this policy is given to relevant staff in the Operations Team.
  2. The Compliance Officer and/or Head of Asset Management will be qualified to IFSM-accredited Fire Risk Assessment for general needs, sheltered and extra care accommodation; where this is not held by the current post holder (during periods of staff turnover or whilst training being undertaken) a consultant will be engaged who is competent and qualified to offer independent advice to this level for staff at Arches to be able to access.
  3. Arches has in place a third party who provides advice on Fire Safety and Risk Management in respect of workplace safety so do not require a member of the team to hold any NEBOSH fire safety and risk management qualifications.
  4. Should stock profiles change and blocks of at least 7 storeys or 18m high be considered to be built, acquired or there are legislative changes that reduce or change the definition of complex buildings, this policy and specifically training needs for these staff and/or external consultant competency would be reviewed.
  5. In house surveyors who are qualified through the Fire Door Inspection Scheme (FDIS) will carry out 6 monthly fire door inspections; where this is not held by current post holders (during periods of staff turnover or whilst training being undertaken) a consultant will be engaged who is competent and qualified to undertake these surveys for staff at Arches to be able to access.
  6. All Operational Team members will undertake Fire Compliance Awareness in general needs and sheltered accommodation or similar accredited Level 1 training.
  7. All staff will be trained on the contents of this policy annually.
  8. For Arches’ office premises a sufficient number of fire marshals will be appointed and will be trained and given the necessary authority to carry out their tasks.
  9. Third party certificated contractors will carry out FRAs on behalf of Arches.
  10. Selection of the contractor to carry out FRAs will meet the requirements of the Fire Safety Act 2021 and be based around the Fire Sector Federation Guide to selection; as a minimum be able to demonstrate their competence through a professional body registration scheme and that body certification be UKAS accredited e.g. have British Approvals for Fire Excellence (BAFE) SP205 or similar Institute of Fire Safety Management (IFSM).
  11. All FRAs must be PAS 79-1:2020 compliant following a specific methodology making sure that all required information relating to the assessment and findings.

# Roles and Responsibilities

* 1. **Board and Chief Executive**

The Board has overall responsibility for ensuring that Arches Housing complies with all fire safety regulation, legislation, and approved codes of practice.

The Chief Executive has responsibility for the Fire Safety Policy but will delegate actions to the Duty Holder (Director of Operations) and other responsible staff. These actions also relate to contractors acting on behalf of Arches Housing. Key actions are set out below:

* Ensuring that regular externally commissioned FRAs are carried out and completed by a BAFE or equivalent professional body register for accredited fire safety consultancy.
* Ensuring adequate resources are allocated to managing the risks associated to fire safety.
* Ensuring adequate processes and procedures are in place to manage the risks relating to fire.
* Ensuring sufficient information, instruction and training is carried out.
* Monitoring the performance of staff and contractors.
* Reporting any material breach of non-compliance of the Home Standard to the Board and the Regulator of Social Housing.
* Ensure Arches Housing takes account of the requirements of the Fire Safety Act 2021 which amends the Regulatory Reform (Fire Safety) Order 2005 in its non-domestic (communal) areas.
* Ensure the alignment of the Building Safety Bill (and any subsequent legislation) and the Fire Safety Act are reflected in this policy and the organisation approach to fire safety for customers and homes.
* Ensure enforcement action is not taken by the Fire and Rescue Service against the association and is not on the Prosecution Register in relation to breaches of The Regulatory Reform (Fire Safety) Order 2005.
* Ensuring that members of the public, staff and contractors are not unnecessarily exposed to risks associated to fire risk.
* Ensuring appropriate inspections are made to common areas.
* Ensuring that Arches Housing complies with its overall legal duties in relation to fire safety.
  1. **Director of Operations – ‘Accountable Person (Duty Holder)’**

The Director of Operations shall serve as the Fire Safety ‘Accountable Person’ and be responsible for the strategic management of fire safety within Arches Housing, reporting directly to the Chief Executive and the Board and shall:

* Formulate and revise Arches Housing Policy.
* Formulate and revise Fire Management Plans.
* Ensure that actions arising from Compartmentation Surveys and Fire Risk Assessments are completed.
* Ensure fire related accidents and incidents are reviewed, reported, investigated and controls introduced to reduce the risk of such accidents recurring.
* Serious incident fires must be investigated and notified to the Chief Executive. An incident report to be completed.
* Report to the Chief Executive and the Executive Leadership Team any material breach of the Regulator of Social Housing’ Home Standard.
* Report to the Chief Executive and the Executive Leadership Team any breaches of the Fire Safety Act 2021 which may result in enforcement or prosecution by Building Safety Regulator and/or the Fire and Rescue Services.
* Appoint a designated deputy (Head of Asset Operations – Appointed Responsible Person) to provide cover in their absence.
* Maintain an up to date knowledge of legislative requirements and best practice.
  1. **Head Asset Operations ‘Appointed Responsible Person’**

The ‘Appointed Responsible Person’ is the Head of Asset Operations who with the support of the Compliance Officer (the Building Safety Manager unless stated as someone else in the Fire Management Plan) is responsible for the day-to-day running and implementation of the Fire Management Plans, and they will promote openness, trust and collaboration with residents fundamental to keeping buildings safe:

* Provide advice on the application of this policy on an individual case by case basis.
* Ensure that the required information from fire risk related assessments, inspections or work is fed back to the Building Safety Manager.
* Ensure that a regime of inspections and checks in common areas within the stock are monitored in accordance with legislative requirements.
* Ensure that weekly and monthly inspection and testing regimes in addition to the cyclical contractor servicing programme are maintained to the common areas
* Provide fire safety related information to staff, contractors, tenants and members of the public as required.
* Carry out PEEPS in line with code of practice from the Fire Safety Act 2021 for residents expected later this year; in the meantime, all tenants in a block will have a pro-forma PEEPS assessment at point of letting and an annual review. Details of PEEPS assessment will be managed and monitored on the integrated housing management system (ActiveH) and GDPR compliant information provided in premises information box in blocks where residents require assistance for evacuation.
* Appoint a designated deputy as appropriate to provide cover in their absence.
* Ensure information regarding fire safety is made readily available to contractors and that they are aware of the actions they should take to prevent fires and how to respond to fire if it occurs. Implement where required a permit to work system to control all hot works or any works undertaken in areas deemed high risk.
* Carry out a review of any fire incidents within blocks in 3 working days of the incident taking place or if there is a significant change such as a change of processes, occupants, or the layout of the building.
* Ensure on occupancy any new development with a communal area is registered if required with the Building Safety Regulator and has a Fire Management Plan including a Fire Risk Assessment and at handover the appropriate documentation is in place to support correct specification relating to fire doors, fire stopping and compartmentation.
* Ensure Resident Engagement Strategies are developed for each block in line with the Building Safety Bill 2021 and the Fire Safety Act 2021
* Ensure Fire Risk Assessments for common areas are published and available to tenants.
* Report to the Operations Director any non-compliance of less than 100% of Fire Risk Assessments for all properties and common areas in line with the timescales of this policy that require one which would be a breach of the Regulator of Social Housing’ Home Standard.
* Ensure any remedial work is undertaken identified as non-compliance of the Regulatory Standard of the Regulator of Social housing’ Home Standard.
  1. **Supported Housing Managing Agents**

Where we own properties that are not managed directly by Arches Housing, we remain responsible for fire safety. However all supported housing managing agents are expected to undertake periodic checks of properties managed on our behalf and specifically this must include:

* Weekly inspection of any fire-fighting equipment; to include fire extinguishers, fire blankets etc.
* Weekly testing of any fire alarms.
* Weekly testing of smoke alarms to communal areas.
* Weekly testing of carbon monoxide detectors to communal areas where these are fitted.
* Weekly visual check of all common areas to ensure that there are no items hindering exit from the premises.
* Six monthly evacuation test where there is an evacuation strategy in operation.

Documentary evidence that the above checks have been completed will be submitted by the managing agent to the Building Safety Manager or the Responsible Person in their absence on a monthly basis.

As part of the pre-tenancy process, the support agency must ensure that the resident is made aware of their responsibilities as set out in (10.6 to 10.12).

Where furniture is provided by a managing agent whether in common areas or as part of a furnished tenancy, furniture will be fire retardant in compliance with the Furniture and Furnishings (Fire Safety) Regulations 1988.

# Employees

* 1. All employees, irrespective of their position shall:
* Take reasonable care for their own health and safety and that of other persons who may be adversely affected by fire risk, including members of the public, tenants, visitors and contractors.
* Co-operate as appropriate with other staff and agencies to ensure compliance with this policy and all other legal requirements.
* All staff should look out for danger signs and fire hazards, such as damaged fire protection equipment and blocked exits and report these for remedial work or action to be taken to the Building Safety Manager.
* All staff should report any concerns that they may have in relation to the management of fire risk to the Operations Director or Chief Executive.

# Resident Engagement - Tenants and Leaseholders

* 1. This policy is to be read in conjunction with current Tenancy Agreement and Lease Agreement conditions.
  2. We will publicise the importance of fire safety to all residents, regardless of tenure, but generally, the responsibility for safety in all individual private domestic properties falls on the individual rather than on us including carrying out regular tests of their individual fire detection system.
  3. A Resident Engagement Strategy will be developed for each block in line with the Building Safety Bill 2021 and the Fire Safety Act 2021; the Building Safety Manager will proactively engage and communicate with all residents making sure they are kept informed and able to participate in decision making regarding the safety of their building.
  4. The Resident Engagement Strategy will be implemented to support residents in the safe management of their building, including being proactive and sharing details of the Fire Management Plan to provide and enable residents to:
* Understand how core information about building safety will be shared;
* Make information about building safety available to residents on request;
* Communicate with Arches through different channels and forums (which will also be used for information to be shared);
* Know how they can be involved in decisions about their building’s safety, particularly during any major works or refurbishment;
* Be aware of how complaints about safety will be handled effectively and efficiently including timescales for initial response, investigation and final resolution;
* Be informed about their own safety responsibilities, and how these will be managed;
* Awareness that they have a statutory duty to co-operate with the Fire Management Plan of the building which if not met could result in legal action if it is determined that their actions that could pose a risk to the fire and structural safety of the building for example :-
* making structural alterations to their flats, such as removing supporting walls, that undermine the structural integrity or compartmentation of the building, or failing to put right dangerous alterations that they are liable for;
* removing and replacing compliant fire doors or windows;
* damaging or removing fire safety features in the common parts of a building, such as fire extinguishers, sprinklers or alarm systems;
* hindering or frustrating the “Building Safety Manager” in the performance of their duty to maintain the fire and structural integrity of the building and keep residents safe.
* See what steps will be taken to ensure the engagement takes account of the diverse needs of residents; and
* Know how implementation of the strategy will be measured.
  1. The Fire Safety Act 2021 includes a statutory duty for tenants and leaseholders to co-operate with the Fire Management Plan of the building which if not met could result in legal action if it is determined that their actions that could pose a risk to the fire and structural safety of the building; residents must ensure they understand their safety responsibilities and behave responsibly.
  2. Storage of goods in communal areas is strictly prohibited and we will take action to remove items that are left in them. Arches Housing adopt a managed approach in relation to items deemed acceptable in relation to fire loading – this may be items such as doormats etc. In blocks where Arches Housing is not the property owner and does not manage the block storage in communal areas will be reported to the managing agent and Arches Housing will check, monitor and review.
  3. Residents should not fit metal security gates to their homes. As gates of this type can often hinder entry to and exit from the premises for purposes of evacuation and firefighting, permission will not be given for these to be fitted.
  4. Where residents have already fitted metal security gates and these have been identified as an unacceptable fire risk in the fire risk assessment Arches Housing will request for them to be removed. If necessary, Arches Housing will remove the gates.
  5. Tenants are not permitted to make any material alterations to their homes without the express formal written permission of Arches Housing and have legal responsibilities to avoid actions that could pose a risk to the fire and structural safety of the building, for example: making structural alterations which undermine compartmentation, removing and replacing compliant fire doors or windows, damaging or removing fire safety features, hindering or frustrating the Building Safety Manager in the performance of their duty etc.
  6. Residents are responsible for their own actions in relation to fire safety.
  7. Immediately report any concerns with fire safety or faults to fire protection or fire safety equipment.
  8. Not to cause damage to any fire protection or fire safety equipment in their property or communal areas.
  9. Leaseholders and shared owners at point of sale of shared ownership and shared equity products and new tenants at letting or mutual exchange will be given a copy of the Resident Engagement Strategy, Fire Management Plan and Fire Risk Assessment will be provided to the purchaser. These documents will also be available on the website.

# Contractors

* 1. Contractors are required to immediately report any fire related risks or concerns to the Appointed Responsible Person or their deputy.
  2. Contractors must have and follow procedures in place where Hot Works Permits are required that have been approved by Arches Housing.
  3. Contractors must complete works in a block that do not undermine the compartmentation of the building; incidents which may result in this being at risk or compromised must be reported to the Building Safety Manager or Head of Asset Operations or another manager in the Asset Team to ensure appropriate remedial works by a competent contractor are put in place.
  4. This policy will be shared with all contractors so they understand their responsibilities while working on behalf of Arches Housing.

# Communication

* 1. Where an FRA is commissioned, Arches Housing will notify residents in the affected block or scheme when this will be taking place.
  2. Where an FRA is commissioned, affected residents will be advised of the findings and recommendations as part of the Resident Engagement Strategy.
  3. Communication methods on building fire safety will be included in the Fire Management Plan for the block as part of the Resident Engagement Strategy and be published on our website and given to all new residents.

# Review

* 1. This Policy shall be reviewed and updated by the Duty Holder on a triennial basis, or if there are any significant changes to current legislation, regulations, codes of practice or guidance. It will also be reviewed after any serious fire related incident or if any reason becomes known to suggest that the Plan or Policy is inadequate.

# Governance, Assurance and External Validation

* 1. Compliance with Arches Housing’ legal responsibility in relation to Fire Risk Management will be reported to board quarterly.
  2. Compliance is monitored by the Head of Asset Operations and the Director of Operations. Where non-compliance is identified in the first instance there is an agreed appropriate course of corrective action put in place with the operational team in order to address the non-compliance issue. If this is not resolved to agreed timescales, details of the matter will be escalated to the Chief Executive.
  3. The Chief Executive or the Director of Operations will make the Board aware of any serious non-compliance issue so they can consider the implications and take action as appropriate which will include whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation, or any other relevant organisation such as the HSE, BSR, etc., as part of the Regulatory Framework.
  4. Key Performance Indicators on Fire Safety will be reported quarterly:

1. The number of properties that require a Fire Risk Assessment - all buildings with a communal area managed or owned by the organisation.
2. The number and percentage of properties with a valid Fire Risk Assessment for all buildings with a communal area managed or owned by the organisation.
3. The number of overdue, incomplete actions based on recommendations on a Fire Risk Assessment Action Plan (including the number of days the action is overdue).
   1. We will develop our health and safety accident and incident recording and reporting framework to also identify serious risks and ensure they are investigated and addressed (in line with the principal of Mandatory Occurrence reporting under the Building Safety Bill).
   2. We will undertake internal work in progress inspections and post inspections on an agreed sample of FRA remedial works, plus other repairs and maintenance works that have the potential to compromise building compartmentation, to provide internal quality assurance.
   3. Independent external assurance will be sought periodically, but no less than annually through FRA’s, to ensure compliance with Arches Housing’ legal responsibility in relation to Fire Risk.
   4. Contractors who carry out works to properties including fire door installations, maintenance, fire stopping etc. will be certified by an appropriate UKAS industry recognised accredited certification scheme for example FIRAS, BWF, BM TRADA.

# Additional Legislation

* 1. This policy also operates within the context of the following legislation:
* Housing Act 2004 specifically the Housing Health and Safety Rating System (HHSRS)
* Health and Safety at Work Act 1974
* The Management of Health and Safety at Work Regulations 1999
* Furniture and Furnishings (Fire Safety) Regulations 1988
* The Health and Safety (Safety Signs and Signals) Regulations 1996
* Building Regulations 2010 Approved Document B (Fire safety) 2019 edition incorporating 2020 amendments
* Construction (Design and Management) Regulations 2015
* Dangerous Substances and Explosive Atmospheres Regulations 2002
* Landlord and Tenant Act 1985
* 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
* Electrical Equipment (Safety) Regulations 2016
* Data Protection Act 2018
* Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
* Homes (Fitness for Human Habitation) Act 2018

# Equality and Diversity

* 1. All involved will recognise their ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of; age, sex, sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

# Publicising this Policy

* 1. This policy will be publicised on the Arches Housing’ Website.

# Glossary

* 1. This glossary defines key terms used throughout this policy:
* **BAFE -** Is the independent register of quality fire safety service providers, who are certified to ensure quality and competence to help meet fire safety obligations.
* **FRA** **-** A fire risk assessment is an assessment involving the systematic evaluation of the factors that determine the hazard from fire, the likelihood that there will be a fire and the consequences if one were to occur.
* **FRA survey -** The FSO states that an FRA is required, however, it does not prescribe how intrusive or destructive this should be. There are four types of FRA:
* Type 1 – common parts only (non-destructive), basic level to satisfy the FSO.
* Type 2 – common parts only (destructive), element of destruction on sample basis.
* Type 3 – common parts and flats (non-destructive), considers means of escape and fire detection within at least a sample of flats.
* Type 4 – common parts and flats (destructive).
* **IFSM -** The Institute of Fire Safety Managers.
* **PAS 79-1:2020 -** A publicly available specification published by the British Standards Institution which focuses on making sure that all the required information that pertains to both an FRA and its findings are recorded.
* **PEEP -** A personal emergency evacuation plan is a bespoke escape plan for individuals who may not be able to reach an ultimate place of safety unaided or within a satisfactory period of time in the event of any emergency.
* **UKAS -** The National Accreditation Body for the United Kingdom, appointed by government to assess and accredit organisations that provide services including certification, testing, inspection and calibration.