

# Fire Safety Management Policy

## Scope of Policy

This policy sets out the principles that Platform Housing Group (the Group) applies to ensure the risk of fire is mitigated and that it complies with all relevant legal and regulatory requirements.

Within the scope of this policy are the risk assessment of hazards and control measures used to:

- prevent potential fires from starting.
- provide adequate precautions and resources to minimise the risk of fire.
- carry out fire risk assessments.
- ensure evacuation strategies are in place and followed.
- provide training, instruction and information to employees and relevant persons, and
- engage with, and provide adequate information to customers, employees, visitors, and contractors on the risk of fire.

## Applicability

The policy applies to all members of the Group.

### 1. Policy Statement

- 1.1 The Group recognises its legal and moral duty to ensure the health and safety of employees, customers, visitors and members of the public it comes into contact with, and the devastating impact fire can have on lives. The Group will therefore ensure fire risks associated with our activities, and the properties we provide are minimised as far as reasonably practicable.
- 1.2 The Group follows a systematic approach to the management of fire safety to meet the above requirements and to ensure the safety of customers, employees, contractors, visitors, and members of the public.
- 1.3 In particular, the Group:
  - Ensures that adequate resources are provided to maintain acceptable standards in fire safety across all owned or managed asset groups.
  - Carries out fire risk assessments where they are required.
  - Ensures actions identified from fire risk assessments are actioned and completed in accordance with recommendations made by competent persons.
  - Ensures fire safety performance is reported to board and committees with a responsibility for fire safety.
  - Provides training, instruction, and information to employees for them to perform their duties safely and efficiently.

- Sets minimum standards of fire safety performance expected from contractors and other service providers.
- Implements strategies to reduce the risk of fire and unwanted alarm signals (false alarms) in our properties, and
- Actively reinforces employees' responsibility to:
  - work safely and take reasonable care of themselves and others by adhering to the Group's fire safety policy and procedures.
  - report any incidents that have led or could lead to a fire.
  - not to interfere with anything that is provided in the interest of fire safety.
  - inform and educate customers of fire safety in their property, where applicable.

## **2. Context**

- 2.1 This policy is set within the context of The Regulatory Reform (Fire Safety) Order 2005 (FSO) and other relevant legal and regulatory requirements. The policy forms part of a suite of building safety policies and is underpinned by operational procedures.

## **3. Aims and Objectives**

- 3.1 The aims of this policy are to:

- Comply with FSO, Housing Act 2004 and supporting regulations and applicable guidance.
- Comply with the Fire Safety Act 2021, Fire Safety (England) Regulations 2022, the Building Safety Act 2022 and applicable guidance.
- Ensure the risk of fires starting and spreading is minimised.
- Ensure employees, customers, contractors and visitors are safe when occupying or visiting the Group properties.
- Ensure contractors are competent and certified to carry out fire safety works.
- Ensure employees and customers are aware of their roles and responsibilities regarding fire safety.
- Ensure adequate resources and financial expenditure is provided to maintain fire safety.
- Ensure all machinery, plant and equipment is maintained in a safe condition.
- Ensure maintenance, test, and inspection records etc. for the various systems, plant and equipment are held securely by the Group to provide evidence of compliance.
- Ensure the Group carry out suitable and sufficient fire risk assessments and actions identified are reviewed and prioritised for completion with agreed time scales relative to the level of risk.
- Ensure that in the event of a fire or fire safety incident, an investigation is undertaken, procedures reviewed/amended as necessary and control measures are implemented which minimise any potential reoccurrence to foster a system of continuous improvement.

- Provide training, instruction, information, and supervision to enable employees to perform their duties safely, competently, and efficiently.
- Ensure the Group's Executive Team (ET) and Board have adequate oversight of the compliance status of fire safety across the Group.

#### 4. Policy Outline

4.1 This policy applies to all premises that fall within the remit of The Regulatory Reform (Fire Safety) Order 2005 that the Group own or have a defined responsibility to manage/control.

4.2 Responsibilities for fire safety are allocated across the Group in accordance with the '*PHG Fire Safety Responsibilities*' matrix and as follows:

See **Appendix 1** for details of our Roles and Responsibilities.

4.3 All employees play a valuable role in fire safety and are responsible for:

- Undertaking their role safely to ensure fire safety arrangements are maintained.
- Reporting any fire incidents and remove or report any fire hazards identified in a timely manner.
- Co-operating fully with any control measures that are implemented to ensure fire safety and legal compliance.
- Highlighting any concerns to the management team in relation to fire safety.
- Attending fire safety training as and when required.
- Promoting and encouraging colleagues, customers, contractors and visitors to be fire aware.

4.4 The Group acknowledges that robust professional and competent advice is essential to ensure the Group are assessing risk adequately and implementing adequate mitigation measures. The Group will therefore employ suitably qualified and experienced competent advisors and partners in all matters relating to fire risk assessments, fire mitigation measures or fire safety related works.

4.5 The Group will regularly report to Board on the status of fire safety using the following key performance indicators:

- % of valid FRAs (Fire Risk Assessments) held
- number of overdue high-risk actions

#### 5. Contractors and Visitors

5.1 Whenever contractors are on site it will be the duty of the appointed person with the responsibility for the works undertaken by them, to ensure the appropriate level of fire safety provision is incorporated within any work schedule, contract agreement or

risk assessment. Where such works are likely to impact on the existing fire safety provision, notification must be communicated to the relevant senior personnel for consideration.

- 5.2 Contractors will also require to be made aware of the fire management plan relevant to the area they are working in or are likely to attend. Where any work is likely to involve the application of a naked flame or mechanically induced heat source a 'Hot Work Permit' must be acquired and agreed prior to the commencement of such works.
- 5.3 Members of the public or other visitors are required to be advised of the evacuation plans for any relevant premises they access.

## **6. Common Areas**

- 6.1 Common areas are defined as Internal Communal or Decked Access areas that are used to access dwelling units.
- 6.2 To reduce 'fire loading' in common areas and to ensure emergency exit routes for access and egress are kept clear and free of hazards at all times the Group will operate a 'zero tolerance' approach, although The Group recognises the need and benefits of a 'managed use' approach in some of its properties, such as in its specialist housing schemes where a more flexible approach can be effectively managed.
- 6.3 Both approaches are explained in our '*Fire Safety in Communal Areas*' document.
- 6.4 No unauthorised use of electrical supplies in common areas is permitted.
- 6.5 To reduce the spread of fire, fire doors (including flat front doors) are not to be replaced, tampered with, or altered in any way by unauthorised persons.
- 6.6 Where applicable, emergency evacuation procedures will be tested in accordance with the building's fire risk assessment. All fire safety briefings and practice fire drills must be recorded.
- 6.7 Where appropriate, each workplace building will have a nominated Fire Marshal to support safe and efficient evacuation.

## **7. Customers' Information and Advice**

- 7.1 The Group will endeavour to house customers in appropriate buildings by matching the building fire safety strategy to the customer's capabilities when initially offering accommodation.
- 7.2 Customers are advised to contact us if they feel at risk and need assistance to complete a Personal Emergency Evacuation Plan (PEEP). In schemes with more vulnerable customers, such as specialist housing, the Group will ensure a PEEP is

created for all customers at the beginning of their tenancy and will be regularly reviewed with the co-operation of the customer.

- 7.3 Those identified at risk will have a person-centred fire risk assessment (PCFRA) carried out to produce an action plan and confirm that all fire safety provisions are suitable. We will endeavour to provide support measures that are reasonable and proportional.
- 7.4 We appreciate that, with time, customer capabilities and needs may also change. If these changes or capabilities are to the extent that the customer will be unable to meet the requirements of the fire safety strategy, and if the customer informs us of their change in circumstances, we will re-assess the suitability of the accommodation and if required help customers seek more appropriate accommodation or mitigate the risk where practical to do so.
- 7.5 We will ensure that appropriate fire signage is posted in communal areas. In addition to the initial fire safety advice given to customers at the start of their tenancies, we will update customers on fire safety matters and information to comply with the latest fire safety requirements through a variety of means.
- 7.6 Customers can also request a scheme or personal visit should they have any queries or concerns about fire safety in their home.

## **8. Fire Prevention and Control**

- 8.1 To protect the safety of our employees, customers and the integrity of our buildings, we will implement and maintain appropriate fire prevention and control measures.
- 8.2 We will ensure that buildings fire safety equipment and systems are serviced and maintained to recognised standards.

## **9. Building Design Considerations**

- 9.1 We will ensure buildings are designed and maintained in a manner that prevents and reduces the risk of fires by following our 'New Builds with Communal Areas – Fire Safety Procedure' which, in general terms, ensures:
- Fire safety is considered at the design stage of all new builds and the client group and the proposed fire strategy upon occupation of the new buildings are explicitly understood by the building designers.
  - There are procedures in place to effectively manage work during construction to ensure the integrity of compartment walls, floors, ceilings, fire doors and fire protection systems.
  - There is documented certified evidence and Regulation 38 (of The Building Regulations 2010 (as amended)) information at the handover of new buildings.

## 10. Fire Risk Assessment

- 10.1 The Group acknowledge the Regulatory Reform (Fire Safety) Order 2005 (FSO) requires those who oversee or manage buildings should undertake a suitable and sufficient assessment of fire risk and implement appropriate safety measures to minimise the risk of fire.
- 10.2 We will undertake Fire Risk Assessments (FRAs) of all properties required by the FSO. Only competent and British Approvals of Fire Excellence (BAFE) accredited organisations will be instructed to act on behalf of the Group to undertake FRAs.
- 10.3 FRAs will assess the fire risk of the required buildings and will provide the Group with:
- (i) a risk rating for each assessed building in line with the following risk rating definitions:
    - Substantial – resources might have to be allocated to reduce the risk; urgent action should be taken.
    - Moderate – look at risk reduction measures, which should take cost into account and should be implemented within a defined period. Priority for improving control measures should be given to risks with greater consequences than those with greater likelihood.
    - Tolerable – no major additional precautions required. However, there might be a need for reasonably practicable improvements that involve minor or limited cost.
    - Trivial – no action is required, and no detailed records need to be kept.
  - (ii) a mitigation plan of prioritised and costed recommendations for each FRA to ensure each property can achieve the lowest practical risk rating.
- 10.4 FRA frequencies are determined by the Property Classification level of the building (high, medium, or low) which is determined by the Property Designation, number of storeys and number of flats in the block:

Property Designation	Number of Storeys	Number of Flats	Property Classification	Frequency
Specialist Housing	Any	Any	Level 1 (High risk)	Annually
Office	1 to 2	N/A	Level 2 (Medium risk)	2 Years
General Needs	6 and over	Any	Level 1 (High risk)	Annually
General Needs	3 to 5	11 and over	Level 2 (Medium risk)	2 Years

General Needs	3 to 5	1 to 10	Level 3 (Low risk)	3 Years
General Needs	1 to 2	Any	Level 3 (Low risk)	3 Years

10.5 If the proposed FRA frequency is longer than 1 year, a mid-term Fire Risk Review will be carried out if:

- There have been any structural alterations to the building since the last FRA was carried out.
- There have been any layout alterations to the building since the last FRA was carried out.
- There have been any significant changes to how the property is being used or managed since the last FRA was carried out (i.e., a change in the type of residents that occupy the property).
- A fire has occurred in, or spread to, the common parts of the premises since the last FRA was carried out, and/or a new FRA will be undertaken when any of the above is confirmed to have taken place.
- The correct servicing/testing has not been undertaken since the last FRA.

## 11. Emergency Arrangements

11.1 The Group operates a 'Stay Put' strategy in the majority of its buildings. However, an 'Evacuation' strategy will be implemented where a building's construction, design, or recommendation from the fire risk assessment dictate.

## 12. Record Keeping

12.1 The Group will ensure that all records (electronic or paper) are kept in relation to fire safety arrangements. These include:

- Fire Risk Assessments
- remedial actions (including evidence)
- repairs records
- certification
- inspection records
- logbooks – (to include fire drills & briefings and false alarms)
- PEEPs (Personal Emergency Evacuation Plans) and PCFRAs (Person Centred Fire Risk Assessment) where applicable
- action plans
- performance records
- training records
- fire service audit letters
- Regulation 38 documents



### **13. Guidance and Training**

13.1 The Group will ensure employees have the competency to undertake their activities and understand the principles of fire safety and prevention. The training will include but is not limited to:

- at the induction stage for new employees
- on an employee being exposed to new or increased risks as a result of being transferred or given a change of responsibilities
- the introduction of innovative technology or fire safety equipment
- the introduction of a new or revised system of work
- periodic refresher training
- if employees are issued with firefighting equipment, we will ensure training in the safe use firefighting equipment is provided
- Fire Wardens will receive appropriate training

### **14. Equality and Diversity**

14.1 We are committed to fairness and equality for all regardless of their colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

14.2 An equality impact assessment has been undertaken in respect of this policy and which identified no negative impacts on any person/group with a protected characteristic as a result of this policy.

### **15. Complaints**

15.1 The Group aims to meet the needs of its customers by providing an excellent service. However, it is acknowledged that occasionally things go wrong and customers may wish to complain. Should the need arise to make a complaint, please refer to the Group's Complaints, Comments and Compliments Policy.

### **16. Monitoring and Review**

16.1 Members of the Group will monitor the effectiveness of this policy. Relevant performance information will be reported through the relevant Boards, Group Audit Committee, Group Executive Team, and appropriate Customer Panels.

16.2 This policy will be reviewed every three years or on the introduction of new legislation or best practice guidelines, whichever is the sooner.

16.3 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until a new version is available.

## 17. Associated Documents

17.1 This policy forms part of the Safety Management System Framework and supports the fire risk assessments and evacuation procedures.

17.2 This policy should be read in conjunction with:

- Group Health and Safety Policy
- Group Fire Safety Management Procedure
- The Regulatory Reform (Fire Safety) Order 2005
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022
- Building Safety Act 2022
- Health and Safety at Work etc. Act 1974
- Group policy and procedures for Estates Inspections and removal of unauthorised customers' effects
- Repairs and Maintenance Policy
- Mobility Vehicle Policy
- Group 'Fire Safety in Communal Areas'
- Group 'New Builds with Communal Areas – Fire Safety Procedure'
- Housing Act 2004

<b>Author:</b>	Linda Colburn
<b>Document type:</b>	Policy
<b>Version 2.1:</b>	Final
<b>Version 2.1</b> <b>Approved by:</b> <b>Approved date:</b> <b>Release date:</b>	Performance & Risk Forum 30/10/2023 31/10/2023
<b>Version 2</b> <b>Approved by:</b> <b>Approved date:</b> <b>Release date:</b>	Asset & Development Committee 06/05/2021 06/07/2021
<b>Customer Experience Panel:</b>	Yes (V2) 20/01/2021
<b>Next review date:</b>	10/2026
<b>DPIA completed:</b>	N/A
<b>EIA completed:</b>	Yes

## Appendix 1

### Fire Safety Roles and Responsibilities

Role	Responsibility
<b>Building Safety Team</b>	<p>Responsible for implementing and maintaining the Fire Safety Management Policy within the organisation.</p> <p>All employees, customers, contractors and visitors are to be made aware of the details contained within this policy at induction and via e-learning where appropriate.</p>
<b>All Employees</b>	<p>Our employees play a valuable role in fire safety and are responsible for:</p> <ul style="list-style-type: none"> <li>• undertaking their role safely to ensure fire safety arrangements are maintained</li> <li>• reporting any fire incidents and remove or report any fire hazards identified in a timely manner</li> <li>• co-operating fully with any control measures that are implemented to ensure fire safety and legal compliance</li> <li>• highlighting any concerns to the management team in relation to fire safety</li> <li>• attending fire safety training as and when required, and</li> <li>• promoting and encouraging colleagues, customers, contractors and visitors to be fire aware</li> </ul>
<b>Operational Leaders</b>	<p>Planning and organisation of adequate fire safety arrangements and are responsible for ensuring full implementation of the Fire Safety Management Policy. Operational Leaders are specifically responsible for:</p> <ul style="list-style-type: none"> <li>• leading by example and encouraging employees to be fire aware</li> </ul>

	<ul style="list-style-type: none"> <li>• take the lead on fire safety in their area of responsibility</li> <li>• ensuring all properties under their control have been adequately risk assessed for fire</li> <li>• ensuring there are adequate resources deployed that this policy and associated procedures are executed fully</li> <li>• escalating any significant safety issues to the relevant Director/Head of Service</li> <li>• ensuring fire safety training is provided and records are kept</li> <li>• ensuring all records relating to fire safety are recorded and kept up to date, and</li> <li>• reviewing and monitoring arrangements to ensure compliance with this policy</li> </ul>
<p><b>Executive and Functional Directors</b></p>	<p>Strategic responsibility is delegated to Executive Directors who will act as the named responsible person for their respective directorates and monitor compliance with this policy. Functional Directors will:</p> <ul style="list-style-type: none"> <li>• lead by example and encourage employees to be fire safety aware</li> <li>• ensure sufficient resources are available to support and deliver full implementation of this policy</li> <li>• ensure that operational leads are assigned within their directorates to assist with the implementation of fire risk management</li> <li>• ensure that the Group’s governing body receives regular reports on fire safety performance and risks, and</li> <li>• ensure that fire safety actions arising from fire risk assessments are completed in agreed timescales</li> </ul>
<p><b>Group Chief Executive (GCE)</b></p>	<p>Overall responsibility for the implementation of this policy and the provision of resources across the organisation sits with the GCE.</p>