

Fire Safety Policy and Procedure

| Version Control | | | | | | |
|-----------------|--------------|---------------|-------------|---------------|------------------|-----------------------------|
| Version | Date drafted | Date approved | Approved by | Date reviewed | Next review date | Owner |
| Final | 05/01/2023 | 23/01/2023 | Board | N/A | 23/01/2025 | Head of Property and Assets |
| 2024 update | | | Board | 28/10/2024 | 28/10/2026 | Head of Property and Assets |

1. Introduction

- 1.1. Westmoreland Supported Housing Limited (WSHL) recognises, accepts and promotes its duties to provide a healthy and safe environment, as far as reasonably practicable, for our residents, contractors, and visitors to the properties.
- 1.2. The policies and procedures put in place by WSHL can have a significant impact upon the safety of its residents, officers and contractors. WSHL is committed to reducing the risk of fire in its housing stock to the lowest reasonably practicable levels.
- 1.3. This policy and procedure aims to clarify WSHL’s approach to fire safety management. This policy will not address fire safety in all scenarios and in all property types but will set a decision framework for addressing fire safety requirements at individual properties.
- 1.4. Fire safety in individual properties will ultimately be dictated by the Fire Risk Assessment, and application of the relevant guidance current at the time of the assessment.

2. Purpose

- 2.1. The purpose of this policy is to demonstrate how WSHL will fulfil its obligations under the fire safety statutory regulations.
- 2.2. This policy and procedure will ensure WSHL continues to keep all stakeholders, including residents, staff, stakeholders (including care providers) and contractors, safe and informed of their responsibilities.

3. Scope

- 3.1. The scope of this policy focuses on WSHL’s entire property portfolio and describes WSHL’s arrangements for satisfying its fire safety compliance under relevant legislation. WSHL understands its obligations as “the Responsible Person” as defined by the Regulatory Reform (Fire Safety) Order 2005.

3.2. WSHL's portfolio includes the following property types:

- Houses
- HMO type shared housing.
- Low-rise flat blocks not exceeding 11m
- Bungalows
- Bedsits
- Office premises

3.3. WSHL aims to take any fire precautions as described by the fire risk assessments within its stock that will, so far as is reasonably practicable, preserve and protect life in the event of a fire and take reasonable measures to prevent fires from occurring.

3.4. It is to be noted that under the definitions set under The Fire Safety (England) Regulations 2022, and based on the measurement method outlined in Building Regulations Approved Document B-2 (Volume 2 Fire safety in dwellings) Appendix D, none of the WSHL's properties are classified as exceeding 11m in height and therefore by extension none exceed 18m.

4. Legal and Regulatory Responsibilities

4.1. WSHL's responsibility in respect of fire safety is governed by the following statutory requirements:

- Health & Safety at Work Act 1974 (HASAW)
- Management of Health & Safety at Work Regulations 1999
- Regulatory Reform (Fire Safety) Order 2005 – applicable to commercial properties and the communal parts of housing stock
- Fire Safety Act 2021
- Building Safety Act 2022
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Specialised Housing Guidance - National Fire Chiefs Council
- Housing Act 2004 – fire safety
- Regulator of Social Housing's Home Standard
- PAS 79-1:2020 Fire risk assessment. Premises other than housing. Code of practice
- PAS 79-2:2020 Fire risk assessment. Housing. Code of practice
- Workplace (Health, Safety and Welfare) Regulations 1992
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Smoke-free (Premises and Enforcement) Regulations 2006
- Control of Substances Hazardous to Health Regulations (COSHH) 2002

4.2. WSHL will ensure that consultants and staff members adhere to the relevant guidance documents and that these are given consideration in the fire risk assessment of its purpose-built and converted housing stock, and any office premises within its portfolio.

5. Our Approach

5.1. Prevention

- 5.1.1. WSHL will complete and maintain suitable and sufficient Type 3 Fire Risk Assessments in line with PAS 79 (Fire Risk Assessment - Guidance and a recommended methodology).
- 5.1.2. WSHL will ensure that only suitably competent fire risk assessors or fire safety engineers undertake fire safety assessments or works for WSHL.
- 5.1.3. WSHL will ensure that all fire risk assessments are reviewed no later than the review date set by the fire risk assessment and that this review is carried out by a competent fire risk assessor.
- 5.1.4. WSHL will ensure that the fire risk assessment to a building is reviewed following a fire, change in building use, change in working practices that may affect fire safety, following refurbishment works to the building or if required following an independent fire safety audit and that this review is carried out by a competent fire risk assessor.
- 5.1.5. WSHL will ensure that all fire risk assessments are undertaken every 12, 24 or 36 months dependant on the level of risk set out in the NFCC Specialist Housing Guidance.
- 5.1.6. WSHL will maintain accurate building records in relation to fire safety, setting out the requirements for servicing, maintenance and repair of fire prevention, detection and firefighting equipment. These include but are not limited to: 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.
- 5.1.7. WSHL will provide relevant fire safety information and ensure adequate training has been given to persons occupying or working in WSHL locations.
- 5.1.8. WSHL will ensure all fire safety, electrical and mechanical equipment within WSHL's properties are regularly maintained, and records kept in line with relevant legislation and HSE guidance. This includes cyclical servicing and inspections of gas and electrical installations within flats.
- 5.1.9. WSHL will ensure that all private landlords provide a current gas safety servicing certificate, taking enforcement action where necessary under the terms of their lease.
- 5.1.10. WSHL will ensure that private landlords responsible for the maintenance of the properties provide a copy of a valid satisfactory electrical installation condition report (EICR) without C1 or C2 works being required. An EICR is an inspection undertaken by a competent electrician, to assess an electrical installations condition and safety, listing deficiencies to be addressed. C1 deficiencies pose an immediate threat to health and safety, typically being addressed before electrician leaves site; C2 deficiencies pose a potential risk to health and safety and are typically addressed within 30 days.

- 5.1.11. WSHL will ensure that where any hot works, such as soldering, take place in WSHL's properties, the necessary Risk Assessment Method Statement (RAMS) and hot work permits are completed and provided by contractors. Where work has commenced without necessary documentation being provided, operatives will be told to stop work.
- 5.1.12. WSHL will prohibit smoking within its properties or near any entrances, ensuring signage is clear, and will work with tenants to ensure all restrictions are adhered to.
- 5.1.13. WSHL will prohibit the storage of belongings in common areas, including but not limited to furniture, rubbish, flammable liquids, bicycles and scooters.

5.2. Protection

- 5.2.1. WSHL will provide and maintain a fully automatic fire alarm system, where appropriate, to detect fire.
- 5.2.2. WSHL will ensure that robust processes are in place to implement all mandatory fire precaution measures identified by fire risk assessments. Actions will be classified as high, medium or low risk. These recommendations will be reflected in an annual programme of works to be completed within a reasonable time scale (high risk 0-3 months, medium risk 0-6 months and low risk 0-12 months). WSHL will also give due consideration to all non-mandatory recommendations.
- 5.2.3. WSHL will delegate any statutory compliance inspections to Care Providers (CPs) where they are competent to complete them. These may include but are not limited to emergency lighting flick tests, function checks to manual call points, release checks for any hold open devices, fire alarm panel function checks and fire door assemblies.
- 5.2.4. WSHL will provide and maintain emergency lighting, where appropriate, which will operate in the event of a circuit or sub-circuit failure, to facilitate safe evacuation and effective fire response.
- 5.2.5. WSHL will provide and maintain primary compartmentation to limit the spread of fire through buildings and secondary compartmentation to protect escape routes, and ensure that this is adequately maintained in line with the fire risk assessment.
- 5.2.6. WSHL will provide firefighting equipment in higher-risk areas, where appropriate, to enable trained staff and contractors to secure their means of escape if required.
- 5.2.7. Where firefighting equipment is provided, WSHL will ensure its staff and the CP will ensure that their staff on site have received appropriate training in its use, and that communication is clear to ensure that untrained people do not attempt to use the equipment.

- 5.2.8. WSHL will implement a programme of regular property inspections to all of its properties with a fire risk assessment in place, to verify that all required management procedures (evacuation plans, Personal Emergency Evacuation Plans [PEEPs] etc.) and statutory compliance inspections (fire doors, emergency lighting etc) are in place and taking place.
- 5.2.9. These inspections will be undertaken at regular intervals by WSHL's Housing Officers and records will be kept against each property. A full list of the roles and responsibilities can be found under the Key Roles and Responsibilities section.
- 5.2.10. Any repairs or rectification works arising from the locally completed checks will be reported by the CP to WSHL's principal repairs contractor and remediation will be delivered in line with the repairs policy.
- 5.2.11. WSHL will take action alongside the CP to remove items left along escape routes and by fire exits.
- 5.2.12. Where appropriate, CPs will maintain a signing in/out process for all visitors to WSHL's premises.

5.3. Intervention

- 5.3.1. WSHL will provide assistance and guidance to occupants and CPs to support adherence to this policy.
- 5.3.2. WSHL will assist CPs in developing PEEPs and keeping property information packs up to date, ensuring significant hazards such as oxygen cylinders have been clearly identified.
- 5.3.3. In line with WSHL's Disaster Recovery Plan, in the event of a fire WSHL will ensure information is cascaded to all relevant WSHL personnel involved with supporting residents or remediating fire, smoke or water damage, and will also ensure that any information collected by attending officers is shared with internal stakeholders and emergency services as appropriate.

6. Key Roles and Responsibilities

| Role | Responsibility |
|--------------------------------|---|
| WSHL Board | WSHL's Board will have overall governance responsibility for ensuring the fire safety policy is fully implemented to ensure full compliance with the regulatory standards, legislation and codes of practice. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in regulation, legislation or codes of practice). |
| Head of Property and Assets | The Head of Property and Assets (HoP) has strategic responsibility for the management of fire safety and ensuring compliance is achieved and maintained. The HoP will oversee the implementation of the fire safety policy with operational support from a suitably competent deputy. |
| Repairs and Compliance Manager | The Repairs and Compliance Manager will be responsible for overseeing the delivery of the agreed fire risk assessment and re-assessment programmes, and the prioritisation and implementation of any works arising from the fire risk assessments. They will also be responsible for overseeing the delivery of service, maintenance and repair programmes to all fire detection, alarms and firefighting equipment within property assets owned or managed by WSHL. |
| Head of Housing | The Head of Housing, via their team of Housing Officers, will provide key support in gaining access into properties where access is proving difficult. They will also facilitate the legal process to gain access as necessary. |
| WSHL Building Surveyors | Building Surveyors will undertake fire risk assessments and produce any necessary reports. |
| Housing Officers | Housing Officers will complete regular property visits, auditing the local management procedures and completion of statutory compliance inspections where delegated. |
| Care Provider. | <p>Care Providers will select a suitable responsible person for each location in charge of ensuring the completion of delegated statutory inspections as requested by WSHL. Inspections may include:</p> <ul style="list-style-type: none"> - Weekly Fire Alarm testing; - Monthly emergency lighting flick test; - Monthly visual check of firefighting equipment including fire blankets; - Monthly fire door inspections; - 6-monthly fire evacuation drills; - Creation of a fire logbook to store all pertinent information to be made available for review upon request. <p>CPs will also be responsible for:</p> <ul style="list-style-type: none"> - creating a suitable and sufficient fire evacuation plan, and for making this available for review by WSHL staff upon request; - Creating PEEPs where needed for any resident and ensuring that the evacuation plan is updated to reflect any changes; - Reporting any required repairs to WSHLs appointed principal contractor in timely manner; - Ensuring all CP staff are adequately trained to complete the statutory inspections delegated to them and that all training records are made available for inspection. |

7. Performance Monitoring and Reporting

- 7.1. Robust key performance indicator (KPI) measures will be established and maintained to ensure WSHL is able to report on performance in relation to fire safety.
- 7.2. KPIs will be produced and reported to the Executive Team and Board monthly. As a minimum, these KPIs will include:
 - The percentage of properties with a valid and in-date fire risk assessment (FRA) in place, for all buildings owned or managed by WSHL which require one. The number of properties accounting for any result less than 100% will also be disclosed, along with an explanation as to why the properties do not have a valid FRA at the time of reporting
 - The number of high, medium and low level actions outstanding (in time or overdue) from FRAs

8. Managing Non-Compliance

- 8.1. Any issues of non-compliance with this policy that are identified at an operational level will be formally reported to the Head of Property and Assets in the first instance.
- 8.2. The Head of Property and Assets will agree an appropriate course of corrective action with the operational team in order to address the non-compliance issue and report details of the same to the Executive Team.
- 8.3. The Executive Team will ensure the Board is made aware of any unresolved non-compliance issues so they can consider the implications and take action as appropriate.
- 8.4. In the event of a serious non-compliance issue, the Executive Team and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing (RSH) in the spirit of co-regulation as part of the Regulatory Framework.

9. Linked Policies

- 9.1. This policy is linked to the following documents and should be read in conjunction:
 - Electrical Safety Policy
 - Gas Safety Policy
 - Health and Safety Policy

10. Policy Review

- 10.1. This policy will be reviewed every two years.