

Fire Safety policy

1. Introduction

- 1.1. The Wrekin Housing Group (the 'Group') is a Community Benefit Society registered with the Financial Conduct Authority under the Co-operative & Community Benefit Society Act 2014. Our main business is the provision of social housing, care and support, adding social value to the lives of the people who receive our services and live in our communities.
- 1.2. The Group is committed to ensuring that residents' homes, our offices and commercial premises are safe and secure places to live and work. The Fire Safety policy documents how we will achieve our objectives of keeping people safe, ensuring that fire safety is appropriately managed and that we meet our legal obligations as a landlord, care provider and employer.

2. Policy Statement

- 2.1. The Group accepts its responsibility under the Health and Safety at Work Act 1974, the Fire Safety Act 2021 and the Regulatory Reform (Fire Safety) Order (RRO) 2005, in providing residents, leaseholders, employees and others a safe place to live, work and visit with regards to fire safety. The Regulatory Reform (Fire Safety) Order 2005, places a duty on the 'Responsible Person' to take general fire precautions to ensure, so far as is reasonably practicable, the safety of these groups of people (Article 8).
- 2.2. The Group will:
 - 2.2.1. Ensure clear practices and procedures are in place for managing fire safety.
 - 2.2.2. Ensure that there is a clear management structure which outlines staff responsibilities for monitoring and managing fire safety.
 - 2.2.3. Ensure that suitable preventative and protective fire safety measures are in place for each property. We will ensure that such measures are tested, inspected and maintained appropriately, within the timescales defined in associated regulations and guidance.
 - 2.2.4. Ensure that accurate records are held for each building. This includes actions identified from Fire Risk Assessments (FRA's) where appropriate timescales will be set, and action plans put in place, to ensure that such works are completed.
 - 2.2.5. Implement a programme of providing additional fire safety preventive and protective measures to mitigate any identified hazards. In particular for existing buildings which do not meet the current requirements of the building regulations (as outlined with Approved Document B).
 - 2.2.6. Make and implement effective management control of the fire safety preventative and protective measures in buildings by:

- Preventing fires from occurring in the first place;
- Monitoring the fire risks on an ongoing basis;
- Taking appropriate action to eliminate or reduce the risk of a fire;
- Having an awareness of the number and type of building occupiers;
- Ensuring that all of the fire safety measures in the building are kept in working order;
- Training staff and organising/testing evacuation plans;
- Taking command in the event of a fire until the fire service arrives.

2.2.7. Ensure that suitable and sufficient FRA's are carried out at relevant buildings under its management and that these FRA's are reviewed:

- Annually where the Group is directly responsible for the building or periodically, as defined by the FRA, where the responsibility is via a third party (e.g. landlord, managing agent, leaseholder);
- When there is a change, or proposed change, in the use of all (or part of) the premises;
- When a material change is proposed or takes place in the premises;
- When there is a change in legislation;
- Following a fire, a fire safety incident, or a near miss;
- When there is a reason to suspect that the FRA is no longer valid.

2.2.8. Assess the specific risk posed by dangerous substances and reduce this by eliminating or reducing the presence within a building. Where it is not reasonable to eliminate the hazard, we will ensure that suitable measures are put in place to control the risk and additional emergency measures are in place to deal with an incident that may occur.

2.2.9. Ensure that premises are provided with firefighting, fire detection and warning systems that are appropriate for each location and the activities that take place within them. We will make sure that there are sufficient numbers of staff who are competent in operating the equipment, implementing emergency plans and carrying out fire drills to test their effectiveness.

2.2.10. Ensure that there are safe means of escape from buildings and have arrangements in place to ensure that these are maintained.

2.2.11. Ensure that there are emergency plans and procedures in place to safely evacuate buildings.

2.2.12. Ensure that staff, contractors and consultants appointed to assist in undertaking the FRA's and preventive and protective measures for fire safety (including service maintenance and repair) are competent to carry out their duties and that these competent persons cooperate with each other as part of the overall fire safety management system.

2.2.13. Ensure that the procurement and appointment of contractors, consultants and direct labour organisations (DLO) includes assessment criteria to evaluate their competency and performance as part of a quality based evaluation. This evaluation will be sufficiently weighted to ensure the best value option in the

selection process. Best value will be continually monitored throughout the delivery of the works / service through the implementation of Key Performance Indicators (KPI's).

2.2.14. Ensure that fire safety information is provided to all employees, tenants, service users and all other persons affected by the Group's activities. This information will include:

- The risks associated with the building they occupy (including where dangerous substances are present);
- The protective and preventative measures that are in place;
- The procedures to be followed in the event of an emergency and the people appointed to enact them (Fire Marshals).

2.2.15. Engage positively with residents, empowering them to play an effective role in ensuring their building is, and continues to be, safe. We will establish ways for residents to get involved with buildings safety matters, identify information residents need and want to be provided with and communicate this in various ways.

2.2.16. Ensure that fire safety awareness training is provided to all staff:

- When they join the organisation;
- When they change location or role;
- When there is a change in the risk exposure level or a change in the protective and preventative measures including emergency procedures.

2.2.17. Ensure that where third party individuals and organisations (such as leaseholders, landlords, managing agents) are responsible for fire safety obligations, as detailed within the RRO 2005, that they are fulfilling these duties and sharing relevant information with the Group (e.g. FRA's, service and maintenance records for fire safety systems).

2.3. In order to ensure compliance with the requirement of the legislation and this policy, performance reporting will be provided to the Executive Management Group (EMG) and the Audit and Assurance committee on a regular basis. Reporting will include information on FRA programmes, the fire precaution works programme, service and maintenance schedules for fire safety equipment (including repairs) and outcomes from internal and external audits.

2.4. The Group will undertake a process of continuous improvement, independent assurance and scrutiny for fire safety. This will be achieved through internal and external auditing, implementing actions and recommendations highlighted as part of audits and the use of a Primary Authority Scheme.

2.5. The Group acknowledges that failure to meet the requirements set out within the RRO 2005 could lead to prosecution by the Local Fire Authority as well as under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and a serious detriment judgement from the Regulator of Social Housing (RSH).

- 2.6. The Group is aware of the pending introduction of the Buildings Safety Bill and the responsibilities this will place on us with regards to the fire safety of our buildings. The Group is actively working towards, and adopting, the principles of the Bill (for example, in respect of a Resident Engagement Strategy, Building Safety Manager(s), the 'golden thread'). This policy will go through a comprehensive review when the bill is passed to ensure full compliance with the new act and any secondary legislation that is introduced.

3. Policy Scope

- 3.1. This policy applies to all staff, tenants, services users, visitors, contractors, third party providers and other people affected by the act and omissions of the Group in relation to fire safety.
- 3.2. This policy applies to all buildings (or parts) owned or managed by the Group including places of work, residents' homes, accommodation, commercial premises and communal areas within the scope of the Health and Safety at Work Act 1974, the Fire Safety Act 2021 and the Regulatory Reform (Fire Safety) Order (RRO) 2005.
- 3.3. The Group must also ensure that it complies with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England. The Home Standard is the primary one applicable to this policy.

4. Definitions

- 4.1. Primary Authority – the appointed Fire Service who provides reliable and consistent regulatory advice to the Group in relation to fire safety.
- 4.2. Competent / Competency – refers to staff with the required training, skills, knowledge and experience to undertake the role, action or task that has been delegated to them. The specific requirements to meet the level of being competent for a given role is detailed within the Fire Safety procedures.
- 4.3. Suitable and Sufficient - is not defined in the Fire Safety Order but the following is an established outline definition. This should include everything that the fire risk assessor has considered in making an assessment - for example the nature and size of the premises, the processes carried out, the hazards present, the people at risk, the fire protection measures and the management systems and procedures for fire safety. It is also a specific requirement that people, especially those at risk, are recorded. This will include disabled people, young people and possibly those who sleep on the premises. There is a requirement for the significant findings of the assessment to be documented.
- 4.4. Relevant Building – those within the scope of the RRO (2005).

5. Roles and Responsibilities

- 5.1. The **Wrekin Housing Group Board** and **Group Chief Executive** has overall governance responsibility for the implementation of the policy, its effectiveness and overall compliance with statutory requirements. The Group Board will:

- Through the **Audit & Assurance Committee**, have oversight and scrutinise fire safety performance reporting information and fire safety management arrangements. This includes ensuring that there are suitable risk control measures in place;
- Formally approve this policy and review it every 3 years;
- Ensure that sufficient funds and other resources are provided for establishing, implementing and continual improving fire safety across the Group.

5.2. The **Executive Directors and Senior Managers** will oversee the implementation of this policy and will monitor and review its effectiveness by:

- Ensuring that this policy is applied consistently across the Group;
- Ensuring that sufficient resources are available to meet the requirements of preventative, protective and control measures;
- Ensuring that current fire legislation and associated regulatory guidance is complied with;
- Ensuring suitable reporting mechanisms are in place to monitor the fire safety risk of the organisation and reporting at Executive Management and Board levels;
- Ensuring that a positive culture surrounds the management of, and compliance with, fire safety prevention and protective measures. This includes in the workplace and to customers by delivering communications that positively promote fire safety;
- Being responsible for the effective management, monitoring and progression of fire safety issues within their service area;
- Ensuring that effective management systems are in place to achieve high standards of fire safety;
- Ensuring there is a regular review of the fire safety management structure with delegated organisational responsibilities for the implementation of this policy and local fire safety arrangement.

5.3. The **Director of Care and Support** is the responsible person for CQC prosecutions for failing to provide care and treatment in a safe way (including incidents relating to fire safety).

5.4. The **Resident Safety Manager** is responsible for the implementation and adherence to this policy across the Group and:

- Developing and reviewing the Fire Safety policy and procedures;
- Preparing reporting and performance monitoring information, including non-compliance relating to fire safety;
- Ensuring competent persons are appointed to assist in undertaking the preventative and protective measures with regard to fire safety;
- Monitoring best practice and innovation in order to ensure that fire safety arrangements remain current and up to date with developing technical standards;
- Ensuring systems and processes are set up to manage fire safety across the Group;
- Appropriately monitoring the work of the Fire Safety Team.

5.5. The **Fire Safety Category Manager** is responsible for the co-ordination of the delivery of fire safety precautions and the operational delivery of the fire safety objectives in line with the policy for the Group. This responsibility includes:

- Setting up practices, procedures and processes to ensure the policy is delivered;
- Monitoring the effectiveness of the practices, procedures and processes, reviewing and updating these accordingly;
- Ensuring the continued effectiveness of fire precautionary measures within Group premises and compliance with mandatory fire legislation and guidance;
- Procuring, managing and monitoring the fire safety related service contracts (e.g. fire alarm, emergency lighting, sprinklers);
- Providing monitoring information for compliance reporting to the Executive Directors and the Group Board;
- Ensuring FRA's are carried out to all Group premises that require one and that all assessments are carried out by a competent person;
- Ensuring that FRA actions are appropriately prioritised (low, medium, high) and that they are actioned within the timescales allocated;
- Annually undertaking an asset data review to ensure adequate assurance is provided and that fire safety data held against the Group's property assets is accurate and up to date.

5.6. **Delegated Organisational Responsibilities** - responsibility for the delivery of fire safety objectives is delegated to roles throughout the Group's Management structure. These roles and their responsibilities are detailed within the Fire Safety procedures.

6. Relevant Legislation

6.1. The primary statutory legislation which applies to this policy is The Regulatory Reform (Fire Safety) Order 2005.

6.2. The Fire Safety Policy also operates in the context of the following legislation:

- Construction, Design and Management Regulations 2015;
- Data Protection Act 1998;
- Electrical Equipment (Safety) Regulations 1994;
- Gas Safety (Installation and Use) Regulations 1998;
- Health and Safety at Work Act 1974;
- Housing Act 2004;
- Licensing and Management of Houses in Multiple Occupation and Other Houses;
- Management of Houses in Multiple Occupation (England) Regulations 2006;
- RIDDOR 2013;
- The Building Regulations 2000: Approved Document B Fire Safety;
- The Furniture and Furnishings (Fire Safety) Regulations 1988;
- The Health and Safety (Safety Signs and Signals) Regulations 1996;

- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014;
- The Management of Health and Safety at Work Regulations 1999;
- (Miscellaneous Provisions) (England) Regulations 2006.

7. Monitoring

7.1. Compliance with this policy will be achieved through the delivery of its objectives by the operational and management teams. The effectiveness and performance of the policy will be monitored through regular reporting to the Group Board and the Executive Management Group (EMG).

7.2 Reporting to the Audit and Assurance Committee – Quarterly:

Fire Risk Assessment (FRA)	Fire Safety System Servicing (FSSS)
<ul style="list-style-type: none"> • Total number of locations requiring FRAs for all buildings owned or managed by the Group. • The number (and percentage) of properties with a valid 'in date' FRA. • The number of outstanding actions older than 28 days (with commentary where appropriate) as well as detail in the commentary of all outstanding fire safety actions. 	<ul style="list-style-type: none"> • The total number of locations requiring FSSS. • The number of 'in date' FSSS. • Compliance with the fire safety equipment, systems and installations servicing and maintenance programme. • The number of outstanding actions older than 28 days (with commentary where appropriate).
<ul style="list-style-type: none"> • The number of notice of deficiencies, improvement notices and RIDDOR's issued in the period. • High risk hazards and non-compliances identified from procedures that require Board approval to action. • Results of Audits and approval of action plans. • Updates and commentary on audit actions plans. • Policy reviews and approval. 	

7.3 Reporting to EMG – monthly: information report to Board plus:

Fire Risk Assessment (FRA)	Fire Safety System Servicing (FSSS)
<ul style="list-style-type: none"> • The total number of hazards (High, Medium, Low) and non-compliance that require action. Commentary on progress and issues with progress. • Hazards identified from procedures that require EMG approval to action. • Updates on industry changes to statutory and non-statutory requirements (e.g. wiring regulations). • Procedure changes and reviews. 	

8. Fire Safety Procedures

8.1. The Group's Fire Safety procedures detail the practices, procedures and wider delegated roles and responsibilities for achieving the objectives of this policy. The procedures are a separate document and they are regularly reviewed to ensure that they are reflective of any operational changes within the Group.

The Wrekin Housing Group	Policy control sheet Fire Safety policy Policy reference number - 2021/024
Policy Author	Nick Pike Resident Safety Manager
Direct Lead	David Hall Head of Property
Version	1. November 2021
Target audience	Staff, tenants, services users, visitors, contractors and third-party providers
Consultation	Tenants Panel Fire Safety Team Senior Managers Executive Management Group
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy.
Date of Data Privacy Impact Assessment	Not required.
Approving Body	Audit and Assurance Committee
Date of final approval	1 st November 2021
Implementation date	1 st November 2021
Monitoring arrangements	Executive Management Group – monthly Audit & Assurance Committee – quarterly Group Board – quarterly
Reporting	Executive Management Group – monthly Audit & Assurance Committee – quarterly Group Board – quarterly
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Expiry date	November 2024
Review cycle	Three year review cycle
Policy category	Health and Safety
Associated policies and procedures	Fire Safety procedures Health and Safety policy
Policy location	Intranet Wrekin Housing Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Nick Pike	Policy reviewed in line with review date	1.November 2021	Audit & Assurance Committee – 1 st November 2021