

Fire Safety Policy

1.0 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 meeting our legal obligations as a landlord, care provider, and employer.

2.0 Policy Statement

2.1 The Group accepts its responsibility under the following relevant legislation in providing residents, leaseholders, employees and others a safe place to live, work and visit with regard to fire safety:

- Health and Safety at Work Act 1974,
- Building Safety Act 2022
- Regulatory Reform (Fire Safety) Order (RRO) 2005,
- Fire Safety Act 2021
- The Fire Safety (England) Regulations 2022 (FSR 2022)

2.2 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).

2.3 The Group will:

2.3.1 Ensure clear practices and procedures are in place for managing fire safety in accordance with the RRP 2005:

2.3.2 Ensure that suitable and sufficient Fire Risk Assessments (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 on 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- When there is a reason to suspect that the FRA is no longer valid.
- 2.3.3 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 that additional emergency measures are in place to deal with an incident that may occur.
- 2.3.4 Ensure that premises are provided with firefighting, fire detection, and warning systems appropriate for each location and the activities that take place within them. We will ensure that sufficient staff are competent in operating the equipment, implementing emergency plans, and carrying out fire drills to test their effectiveness.
- 2.3.5 Ensure that there are safe means of escape from buildings and have arrangements in place to maintain these.
- 2.3.6 Ensure emergency plans and procedures are in place to evacuate buildings safely.
- 2.3.7 Maintain a clear management structure that outlines staff responsibilities for monitoring and managing fire safety; develop and implement fire safety arrangements, ensuring effective planning, organisation, control, monitoring, and review of the necessary fire safety measures.
- 2.3.8 Ensure that suitable preventative and protective fire safety measures are in place for each property, including amendments made to the Fire Safety Order by Section 156 of the Building Safety Act 2022:
- Record and maintain comprehensive fire risk assessments, including all findings.
 - Document the names and, if applicable, the organisations of any individuals or entities engaged to conduct or review fire risk assessments. Share these details with residents and other Responsible Persons as applicable.
 - Record and regularly update fire safety management plans demonstrating how fire safety is managed on the premises.
 - Maintain and periodically update contact information for the Responsible Person, including a UK-based address, making this information available to residents and other Responsible Persons.
 - Identify and collaborate with other Responsible Persons who share or have duties regarding the same premises. Ensure a seamless transition of fire safety information to incoming Responsible Persons.
 - In higher-risk residential buildings, identify and cooperate with Accountable Persons to facilitate a comprehensive building safety strategy.
 - Provide residents with detailed information about identified risks, fire safety measures, the Responsible Person's contact details, and the credentials of any individuals involved in fire risk assessment or firefighting

measures. Update and communicate any changes to the fire safety protocols to residents.

2.3.9 Ensure FSR 2022 obligations for High-Rise Residential Building are implemented:

- Provide updated electronic building floor plans to local Fire and Rescue Services annually and maintain a secure on-site information box containing a hard copy of these plans and key firefighting equipment locations.
- Supply information about the design and materials of the building's external wall system to Fire and Rescue Services, report any material changes, assess risk levels, and outline mitigating measures.
- Conduct monthly operational checks on firefighter and evacuation lifts and other essential firefighting equipment. Report any defects that cannot be fixed within 24 hours to local Fire and Rescue Services and keep records accessible to residents.
- Install and upkeep a secure information box containing the responsible person's contact details and hard copies of building plans.
- Install wayfinding signage in stairwells to identify flat and floor numbers, ensuring visibility in low light or smoky conditions.

2.3.10 Ensure FSR 2022 obligations for Buildings over 11 Metres high are implemented:

- Fire Doors: Perform annual checks on flat entrance doors and quarterly checks on fire doors in common areas.

2.3.11 Ensure FSR 2022 General Obligations in Multi-Occupied Residential Buildings are implemented:

- Fire Safety Instructions: Distribute fire safety instructions to residents, including how to report a fire and actions to take during a fire based on the building's evacuation strategy.
- Fire Door Information: Inform residents about the critical role of fire doors in fire safety and maintenance.

2.3.12 Implement a programme of providing additional fire safety preventive and protective measures, especially for existing buildings, to comply with the updated requirements regarding building structure and external walls, including cladding and balconies.

2.3.13 Enhance management control of fire safety preventative and protective measures in buildings by incorporating the latest legislative requirements, including:

- The provision of information to residents on fire safety and the importance of fire doors;
- 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.
- 2.3.14 Ensure that staff, contractors, and consultants appointed for fire safety tasks are competent per the updated guidelines and that they cooperate as part of the overall fire safety management system, in line with the Building Safety Act 2022.
- 2.3.15 Ensure that the procurement and appointment of contractors, consultants and direct labour organisations (DLO) include 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 (KPIs).
- 2.3.16 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 building structures and external walls, in compliance with the Fire Safety Act 2021;
 - 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).
- 2.3.17 Engage positively with residents, providing comprehensive and accessible information about fire safety in their building, as required under the new regulations. This includes making every effort to ensure that all residents fully understand the information provided, regardless of language proficiency, literacy level or other potential barriers. The effectiveness of communication strategies will be periodically reviewed and improved as necessary.
- 2.3.18 Update fire safety awareness training for all staff to include information on new fire safety standards and legislative changes:
- 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.
- 2.3.19 Ensure that third-party individuals and organisations (such as leaseholders, landlords, and managing agents) are responsible for fire safety obligations, as detailed in the relevant legislation, that they are fulfilling these duties and sharing relevant information with the Group (e.g., FRAs, service and maintenance records for fire safety systems).

- 2.4 In order to ensure compliance with the requirements 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.
- 2.5 The Group will undertake a process of continuous improvement, independent assurance and scrutiny, and alignment with the Building Safety Act 2022 principles. This will be achieved through internal and external auditing, implementing actions and recommendations highlighted in audits, and using a Primary Authority Scheme.
- 2.6 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, Fire Safety (England) Regulations 2022, the Fire Safety Act 2021, and the Building Safety Act 2022, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and a serious detriment judgement from the Regulator of Social Housing (RSH).
- 2.7 Prepare for the full implementation of the Buildings Safety Act 2022, adopting its principles and ensuring compliance with its requirements upon enactment. The Group is actively working towards and adopting the principles of the Act. This policy will go through a comprehensive review when the bill is passed to ensure full compliance with the new act and any introduced secondary legislation.

3.0 Policy Scope

- 3.1 This policy applies to all staff, tenants, service users, visitors, contractors, third-party providers, and other individuals affected by the Group's actions and omissions regarding fire safety. This includes adherence to new standards and requirements as outlined in the latest legislation.
- 3.2 Integral to a comprehensive safety framework, this Fire Safety Policy works with other critical Group policies, ensuring a cohesive approach to safety. Essential companions include:
 - The Fire Safety Procedures, which detail operational practices;
 - The Mandatory Occurrence Report Policy, guiding incident documentation;
 - The Health and Safety Policy,
 - Overarching Employee Welfare Measures;
 - The Building Safety Policy, focusing on safety requirements for relevant buildings as part of the Building Safety Act 2022; and
 - The Resident Engagement Strategy, ensuring active participation in safety matters.
- 3.3 These policies embody our commitment to a safe, informed, and engaged community that addresses all facets of safety and well-being.

3.4 This policy is applicable to all buildings (or parts thereof) owned or managed by the Group, including workplaces, residential homes, accommodation, commercial premises, and communal areas. Compliance with the Health and Safety at Work Act 1974, the Fire Safety Act 2021, the Regulatory Reform (Fire Safety) Order (RRO) 2005, the Fire Safety (England) Regulations 2022 and the Building Safety Act 2022 is essential. This policy also encompasses the new responsibilities and requirements introduced by these acts, especially in relation to the building's structure and external walls, including cladding, balconies and individual flat entrance doors.

- The Group is committed to ensuring compliance with the Regulator of Social Housing's Regulatory Framework and Consumer Standards for social housing in England. The Home Standard pertains to fire safety and will include the considerations and compliance requirements stemming from the recent legislative changes. The Group will also anticipate and prepare for the implementation of any further fire safety regulations and standards that may arise in the future.
- In addition to these legislative requirements, the Group will proactively engage in monitoring emerging trends and best practices in fire safety to ensure the highest standards of safety for all stakeholders.

4.0 Definitions

4.1 Primary Authority—the appointed Fire Service that provides reliable and consistent regulatory advice to the Group regarding 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 competence for a given role are 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).

4.5 Responsible Person - Defined under the Regulatory Reform (Fire Safety) Order 2005, this term refers to the individual responsible for fire safety in a building, typically the employer, owner, or occupier.

4.6 Fire Risk Assessment (FRA) - A 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.

- 4.7 External Wall Systems—This includes a building's exterior walls, cladding, balconies, and windows.
- 4.8 Preventive and Protective Measures - Actions and equipment designed to prevent fire or protect occupants and property in the event of a fire.

5.0 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**, oversee and scrutinise fire safety performance, ensuring appropriate risk control measures align with all relevant legislation;
- Ensure that sufficient funds and other resources are provided for establishing, implementing and continually 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:

- Formally approve and review the policy at least every 3 years, or sooner if significant legislative changes occur;
- 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 are 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 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 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 **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 in alignment with all relevant legislation.;

- 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 practices 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;

5.4 The **Property Compliance and Delivery Managers** are responsible for the coordination 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:

- Developing and documenting comprehensive fire safety practices, procedures, and processes, which include external walls and flat entrance doors;
- Integrating procedures for regular inspection and maintenance of external walls, cladding, balconies, and fire doors;
- Establishing processes for ongoing risk assessments and safety checks in high-rise buildings as mandated by the Building Safety Act 2022;
- Continuously monitoring and updating fire precautionary measures to ensure they meet the current standards set out in all relevant legislation;
- Organising periodic training sessions for staff to keep them informed about the latest fire safety standards and practices;
- Procuring and managing all service contracts for fire safety equipment (like fire alarms, emergency lighting, sprinklers), ensuring they are up-to-date and meet the standards of the new legislation;
- Regularly reviewing and auditing these contracts for compliance and effectiveness;
- Developing, maintaining and providing a reporting system that captures all relevant fire safety information and compliance data;
- Regularly reporting this information to the Executive Directors and the Group Board, including updates on legislative compliance and any areas of concern;
- Ensuring Comprehensive Fire Risk Assessments (FRAs) are conducted for all Group premises, ensuring they are thorough and include assessments of the building's structure, external walls, and fire doors;
- Verifying that all FRAs are conducted by individuals with the appropriate level of competence and expertise, as required by the new regulations;
- Developing a system for prioritising FRA actions based on risk level;
- Ensuring timely implementation of required actions, tracking progress and completion within allocated timescales;
- Performing annual fire safety-related asset data reviews to ensure accuracy and relevance;
- Updating the asset data to reflect any changes in the properties' fire safety features or compliance requirements.

5.5 **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.

6.0 Relevant Legislation

6.1 The primary statutory legislation which applies to this policy is **The Regulatory Reform (Fire Safety) Order 2005**. This Order continues to form the backbone of fire safety regulation, focusing on reducing risks and preventing fire in commercial premises, including multi-occupied residential buildings.

6.2 In addition to the RRO, the Fire Safety Policy operates within the context of several other pieces of legislation, including recent updates. These are:

- **Fire Safety Act 2021:** Clarifies the scope of the Fire Safety Order, emphasising the fire safety responsibilities relating to the structure and external walls of buildings, including cladding, balconies, windows, and individual flat entrance doors.
- **Fire Safety (England) Regulations 2022:** Introduces additional duties for building owners or managers in multi-occupied residential buildings, particularly for high-rise buildings.
- **Building Safety Act 2022:** This act aims to enhance the safety of high-rise residential buildings, including new measures for resident engagement and the 'golden thread' of building information.

6.3 The policy also aligns with other relevant legislation, including:

- 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.

6.4 Under the policy, the following guidance is also applicable:

- Fire Sector Federation ACOP - A National Framework for Fire Risk Assessor Competency
- Fire Sector Federation - A Guide to Choosing a Competent Fire Risk Assessor
- [Fire prevention and rescue - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [HSE Fire Safety Webpages](#)
- PAS 79-2:2020 Housing – British Standards BSI
- PAS 9980:2022, Fire risk appraisal of external wall construction and cladding of existing blocks of flats – Code of practice
- BS9991:2015 Fire safety in the design, management and use of residential buildings. Code of practice (under review)
- [PIBS Guide 06-21 V2.pdf \(nationalfirechiefs.org.uk\)](http://nationalfirechiefs.org.uk)

7.0 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)

- 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) and details in the commentary of all outstanding fire safety actions.

Fire Safety System Servicing (FSSS)

- 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).

Fires & Fire Signal Notifications

- Total number of Fires and fire signal notifications which result in fire service attendance, including false alarms
- Breakdown of fires and fire notifications; cause and consequence and action being taken.

Fire Door Checks

- Total number of locations (building 11 meters plus in height) requiring fire door inspection (3 monthly for communal doors, 12 monthly for flat entrance doors.
- Percentage compliance of locations with in-date fire door inspections.
- Commentary on non-compliance for inspection and action being carried out to resolve.
- Commentary on actions resulting from fire door inspection.

Fire Display Information and Fire Door Safety Information

- Percentage compliance with the requirement to provide the information.

- Commentary on non-compliance with the requirement and action being carried out to resolve.

Secure Information boxes

- Percentage compliance with the requirement to review and update the information and make it available to the Fire Service.
- Commentary on non-compliance with the requirement and action being carried out to resolve.

Other relevant reporting

- The number of notices of deficiencies, improvement notices and RIDDORs 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 action plans.
- Policy reviews and approval.

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

- 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.

8.0 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 <u>Housing Group</u>	Policy Control Sheet Fire Safety Policy Policy reference number – 2024/028
Policy Author	Nick Pike Resident Safety Manager
Direct Lead	David Hall Head of Property
Version	2.0 – November 2024
Target audience	Staff, tenants, services users, visitors, contractors and third-party providers
Consultation	Wrekin Voices Fire Safety Team Senior Managers Customer Committee Executive Management Group
Date of Equality Impact Assessment	An Equality Impact Assessment was completed on the 17 th July 2024.
Date of Data Privacy Impact Assessment	Not required.
Approving Body	Audit & Assurance Committee
Date of final approval	6 th November 2024
Implementation date	November 2024
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
Review date	May 2027
Expiry date	November 2027
Review cycle	Three year review cycle
Policy category	Health and Safety
Associated policies and procedures	Fire Safety Procedures Mandatory Occurrence Report Policy Health and Safety Policy Building Safety Policy Resident Engagement Strategy Asset Management Strategy
Policy location	Sharepoint The 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	1.0	Audit & Assurance Committee –

Nick Pike	Policy reviewed in line with review dates – including recommendations from Pennington Choices Audit	2.0 – November 2024	Audit & Assurance Committee – 6 th November 2024
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