

Fire Safety Policy

Summary	This policy sets out the controls that we have in place regarding fire safety and our commitments to help ensure that we keep our residents and employees safe.
Who to Contact	Head of Customer Safety/ Head of Building Safety
Effective from	12 July 2020
Planned review date	Annually (or more frequently if legislation changes)
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1. Introduction

- 1.1 At Southern Housing Group we are committed to ensuring that our residents' homes, our offices and commercial properties are safe and secure places in which to live and work.
- 1.2 This policy supports us to ensure that we meet our obligations as a landlord and employer, and seeks to provide assurance that fire safety is appropriately managed. We aim to ensure so far as reasonably practicable that our residents, employees and the general public, are not exposed to any risks to their health or safety and wellbeing from fire.
- 1.3 This policy applies to all residential and commercial properties owned and managed by Southern Housing Group.
- 1.4 When we use the terms 'we', 'our' and 'us' we mean Southern Housing Group.

2. Policy Statement

- 2.1 We will take all reasonably practicable steps to prevent and control the risk from fire in the properties that we own or manage on behalf of a third party including residential properties, offices and commercial properties.
- 2.2 We will provide employees, contractors and residents with clear advice on fire safety, including evacuation policies and fire signage within buildings. We will also provide a clear and transparent process for undertaking fire risk assessments (FRA's) and any works that arise out of those assessments.
- 2.3 Our obligations regarding fire safety are mainly set out in the Regulatory Reform (Fire Safety) Order 2005, the Health and Safety at Work etc Act 1974 and Building Regulations. A more detailed list of relevant legislation and guidance is set out in Appendix 1 below. We are committed to keeping residents, employees and visitors to our properties safe from fire risk and meeting our obligations as a Responsible Person under all current and relevant legislation as well as following best practice (see Appendix 1 for details of relevant legislation).
- 2.4 We are aware that the Fire Safety Bill is currently (at the time of writing) going through Parliament and we believe it is expected to come into force in the Autumn of this year (2020). This policy will undergo a thorough review when the Bill is enacted to ensure our full compliance with the new Act.

3. Our commitments

- 3.1 We will comply with all relevant legislation. See appendix 1 for a comprehensive list of relevant legislation and guidance.
- 3.2 We will meet our fire safety obligations and protect our residents, staff and visitors from risks to health and safety from fire by:
 - Understanding and complying with legislative requirements and best practice

- Using competent, skilled and well-trained staff
- Providing staff with training at a level appropriate to their role
- Briefing residents, staff and contractors about emergency evacuation procedures
- Knowing our properties and our activities and maintaining accurate asset information
- Maintaining an operational risk management approach
- Providing suitable, sufficient and risk-appropriate precautions
- Conducting ongoing and continuous risk assessment activities
- Undertaking tasks and actions noted in FRAs within the appropriate timescales, and having an action plan in place to ensure such works are completed
- Maintaining and servicing our fire safety assets
- Delivering remedial works and supplementary testing as required by the competent person
- Where others manage and operate our properties, checking their level of compliance and requesting evidence of the same (i.e. copies of FRAs)
- Maintaining accurate records and data
- Regularly reporting on our compliance performance to our Customer Safety Committee and Board
- Monitoring and challenging our own performance, seeking independent assurance and challenge through our internal and external audit procedures.
- Engaging openly and proactively with the Regulator of Social Housing and other stakeholders
- For multi-storey and multi-occupied residential buildings owned by Southern Housing Group, undertake investigations into the external wall systems and fire doors, in order to determine whether they represent a risk to the health and safety of residents.
- We will respond appropriately to meet the needs of residents who inform us they have a disability such as a hearing impairment, and install appropriate equipment to ensure they are alerted in the event of a fire and can evacuate safely.
- All residential properties will receive appropriate gas and electrical safety checks
- Where furniture is provided, 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.

3.3 When fire safety works are being carried out (for example, remedial works, actions resulting from a fire risk assessment or from primary authority visits) there may be additional fire safety regulations that employees, residents, contractors and other parties may need to comply with. Southern Housing Group, as the Responsible Person under the Regulatory Reform (Fire Safety) Order 2005 will:

- Carry out a fire risk assessment of the premises and review it regularly, in accordance with the recommendations in the fire risk assessment for each property.
- Tell residents and employees or their representatives about the risks identified and carry out remedial action to remove those risks so far as reasonably practicable.
- Put in place, and maintain, appropriate fire safety and mitigation measures.
- Plan for an emergency.
- Provide employees and residents with information and fire safety instructions, where required.

- Carry out more in-depth assessments of all blocks in a risk-based plan for high risk blocks, extra care schemes, sheltered schemes, homes in multiple occupation and other buildings where a greater risk is identified.

4. Measuring compliance

- 4.1 The Head of **Building Safety** will regularly report to the Executive Management Team and Customer Safety Committee on the progress and performance of the Fire Risk Assessment programme, in accordance with approved Key Performance Indicators (KPIs) which shall include:
- The Fire Risk Assessment Programme.
 - Completion of fire risk assessment identified remedial actions against an action plan for completion.
 - Fire risk assessment actions that are overdue against an action plan for completion.

5. Roles and Responsibilities

- 5.1 The Chief Executive retains the overall responsibility for the implementation of this policy.
- 5.2 The Executive Director Customer Services is responsible for ensuring that adequate resources are made available to enable the objectives of the policy to be met.
- 5.3 The Building Safety Director is responsible for the operational delivery of the policy and ensuring this policy is reviewed and kept up to date.
- 5.4 The Head of Customer Safety is responsible for ensuring that any associated procedures are up to date and that the policy and associated procedures are implemented, as well as responsibility for monitoring and review, staff awareness and training and policy development.
- 5.5 The Customer Safety Team organises, manages and monitors the maintenance and servicing contracts which includes the servicing programme.
- 5.6 There are numerous operational roles with responsibility for property and tenancy management, whose titles vary. These teams support resident liaison and manage the response or completion as appropriate of fire risk assessments actions relevant to the management of our properties or tenancies. This includes managing issues relating to inappropriate storage and hoarding.

6. Related Documents

- Fire Safety Procedure
- Upkeep of Common Parts Policy
- Gas Servicing and Access Policy
- Electrical Safety Policy
- Lift and Lifting Equipment Policy

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Approved by	Customer Safety Committee
Policy Owner	Building Safety Director

Appendix 1 - Legislation, Regulation and Guidance

Scenario	Legal Requirement	Regulatory Guidance
Single Domestic Property – Social – Landlord	<p><u>Health and Safety at Work etc. Act 1974 – Section 3.</u></p> <p>This provides a broad duty for employers to ensure the safety of non-employees.</p>	The Act requires employers do everything reasonably practicable to reduce health and safety risks to non-employees.
Single Domestic Property – Non Social – Landlord	<p><u>The Management of Health and Safety at Work Regulations 1999 Regulation 3</u></p> <p>This requires employers to complete a suitable and sufficient assessment of the risk to employees, and those not in their employment but who may be affected by their activities.</p>	The requirement for a fire risk assessment under the Regulatory Reform (Fire Safety) Order 2005 would be more than sufficient to comply with the requirements of the Management Regs in relation to fire safety.
It is considered that the same standards will apply to all single domestic properties.	<p><u>Landlord and Tenant Act 1985 – Section 11</u> “...keep in repair and proper working order the installations in the dwelling house for water, gas and electricity...”</p>	Faulty electrics and heating appliances are very common sources of fires. Therefore, Southern Housing Group need to ensure that any gas appliances and electrical equipment they provide and circuitry are safe. This will require regular safety checks.
	<p><u>The Housing Act 2004 – Part 1 - Housing, Health and Safety Rating System (HHSRS).</u></p>	There is a broad requirement to ensure that premises are safe. The Act refers to Category 1 and Category 2 hazards – “ <i>If a local housing authority considers that a category 1 hazard exists on any residential premises, they must take the appropriate enforcement action in relation to the hazard.</i> ”
	<p>Building Regulations 2010 – Schedule 1, Part B</p> <p>“The building shall be designed and constructed so that there are appropriate provisions for the early warning of fire and appropriate means of escape”</p> <p>“To inhibit the spread of fire within the building, the internal lining shall adequately resist the spread of flame over their surfaces”</p> <p>“the building shall be designed and constructed so that in the event of fire its stability will be maintained for a reasonable period”</p> <p>“The external wall of the building shall adequately resist the spread of fire over the walls and from one building to another!”</p>	All properties should comply with the building regulations applicable at the time.
	<p>Building Regulations 2010 – <u>Schedule 1, Part P</u></p> <p>“reasonable provision shall be made in the design and installation of electrical installations in order to protect persons operating, maintaining or altering the installations from fire or injury”.</p>	All premises built or modified since 2010 must comply with the latest building regulations.

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	<p><u>The Furniture and Furnishings (Fire) (Safety) Regulations 1988.</u></p> <p>These regulations set levels of fire resistance for domestic upholstered furniture, furnishings and other products containing upholstery.</p>	<p>The regulations cover most items of furniture found in rented accommodation including beds, mattresses, pillows and cushions. They do not apply to carpets, curtains or duvets. The regulations apply to all persons who supply furniture and furnishings in connection with accommodation in the course of a business. In general, this includes landlords.</p>
	<p><u>The Gas Safety (Installation and Use) Regulations 1998</u></p> <p>The regulations deal with the installation, maintenance and use of gas appliances, fittings and flues in domestic and certain commercial premises. They place duties on certain landlords to ensure that gas appliances, fittings and flues provided for tenants' use are safe.</p>	<p>Landlords must ensure that gas fittings and flues are maintained in a safe condition. Gas appliances should be serviced by a competent person – registered with Gas Safe - in accordance with the manufacturer's instructions. If these are not available, then it is recommended that they are serviced annually.</p> <p>Any faults/improvements identified must clearly be rectified and the appliances made safe or replaced.</p>
	<p><u>The Regulatory Reform (Fire Safety) Order 2005</u></p> <p>This overarching piece of legislation deals with fire safety in commercial premises, including rented residential property.</p> <p>Other Guidance used:</p> <p>PAS 79:2012 - Fire Risk Assessment – Guidance and recommended methodology</p> <p>PAS 7:2013 – Fire Risk Management System Specification</p>	<p>The legislation is extensive, but in summary landlords are expected to identify the risk of fire (fire risk assessment), and suitably manage and control those risks – providing for example:</p> <ul style="list-style-type: none"> • measures to reduce the risk of fire occurring; • measures to reduce the spread of any fire through the premises; • measures in relation to the means of escape; • measures to ensure the means of escape can always be safely used; • firefighting measures; • means of fire detection and warning; Adequate training of staff • action to be taken in the event of fire; and • mitigating the effects of fire. <p>Once any issues have been identified, they should be swiftly rectified, and suitable controls implemented.</p> <p>Information should be provided to the tenant. This should be communicated to the tenant at the start of the tenancy. Other relevant information for example would be how to test the alarms.</p>
<p>All Tenures of Domestic Block – Landlord (Rented or Leased)</p>	<p>The regulations and good practice listed above applies, along with:</p> <p>Management of Houses in Multiple Occupation (England) Regulations 2006</p> <p>Fire Safety in purpose-built blocks of flats – LGA 2012</p> <p>Fire Safety risk assessment: Sleeping accommodation – Department for Communities and Local Government 2006</p>	<p>The regulations describe the duties of managers of HMOs and the corresponding duties of occupants.</p> <p>Regulation 4 places specific duties on managers of HMOs in respect of fire safety. The manager must ensure that:</p> <ul style="list-style-type: none"> • all means of escape from fire in the HMO are kept free from obstruction and maintained in good order and repair; • any firefighting equipment and fire alarms are maintained in good working order; and • all notices indicating the location of means of escape from fire are displayed in positions within the HMO that enable them to be clearly visible to the occupiers (unless the HMO has four or fewer occupiers).

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	<p>Fire Safety in Specialised Housing: 2017 National Fire Chief Publication</p>	<p>Regulation 10 places specific duties on occupiers of HMOs. Every occupier of the HMO must:</p> <ul style="list-style-type: none"> • conduct themselves in a way that will not hinder or frustrate the manager in the performance of their duties; • allow the manager, for any purpose connected with the carrying out of any duty imposed on them by these regulations and at all reasonable times, to enter any living accommodation or other place occupied by that person; • provide the manager, at their request, with any such information as they may reasonably require for the purpose of carrying out their duties; • take reasonable care to avoid causing damage to anything that the manager is under a duty to supply, maintain or repair under these regulations; and • comply with the reasonable instructions of the manager in respect of any means of escape from fire, the prevention of fire and the use of fire equipment. <p>Regulation 6 places specific duties on managers of HMOs in respect of gas and electrical safety.</p>
	<p>British Standard 5839 Pt 1 & 6 Fire Alarms</p> <p>This is not a legal requirement but is considered as the expected standard.</p>	<p>The type of fire alarm system that is required will vary according to the type of building, its use and the type of person(s) using the building.</p> <p>The particular standard that applies to fire alarm systems in dwellings is BS 5839-6 Fire detection and fire alarm systems for buildings – Part 6 code of practice for the design, installation and maintenance of fire detection and fire alarm systems in dwellings.</p> <p>BS 5839-6 prescribes the requirements for fire alarm systems. Different Grades and the extent of coverage are specified depending upon the type of building, height, occupier, and use.</p>
<p>Commercial Property – Landlord</p>	<p>Broadly much of the regulation and guidance stated above is applicable here.</p> <p>A key defining factor is the terms of the lease, and the nature of the premises.</p> <p>There is a specific section of the Health and Safety at Work Act – <u>Section 4</u> that deals specifically with the duty to ensure that the premises being provided for someone else to work in (as in a rented commercial property) is safe and without risk to health. However, under the terms of a lease, this duty can be transferred to the tenant. Therefore, accurate and mindful wording of the lease is essential to limit the risk to a landlord.</p>	<p>The landlord is responsible for the general safety of the premises at the start of the tenancy, and then the ongoing safety of communal areas, and depending on the terms of the lease, the maintenance and testing of the fixed electrical installation, gas supply and fire alarm / emergency lighting systems – although often this is the tenants responsibility post-occupancy.</p>
<p>Commercial Property – Owner Occupier</p>	<p>Broadly much of the regulation and guidance stated above is applicable here as a minimum, however there are additional responsibilities placed on an Owner Occupier – for example under the The</p>	<p>In addition to the measures outlined in section 8 – under the RRO the employer must also:</p> <ul style="list-style-type: none"> • Appoint a responsible person; • Carry out a fire safety risk assessment; • Keep sources of ignition and flammable substances apart;

Scenario	Legal Requirement	Regulatory Guidance
	Regulatory Reform (Fire Safety) Order 2005 (“RRO”)	<ul style="list-style-type: none"> • Avoid accidental fires, e.g. make sure heaters cannot be knocked over; • Ensure good housekeeping at all times, e.g. avoid build-up of rubbish that could burn; • Consider how to detect fires and how to warn people quickly if they start, e.g. installing smoke alarms and fire alarms or bells; • Have the correct fire-fighting equipment for putting a fire out quickly; • Keep fire exits and escape routes clearly marked and unobstructed at all times; • Ensure workers receive appropriate training on procedures they need to follow, including fire drills; • Review and update the risk assessment regularly.
	Health and Safety at Work etc. Act 1974 – <u>Section 2</u> –	The employer has a duty to ensure as far as reasonably practicable that the safety of their staff and provide a safe place of work.