Fire Safety Management Policy

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Introduction
Empower Housing Association (EHA) is committed to ensuring that tenants, colleagues, contractors and others who may be affected by its activities are safe from the risk of fire.

Scope of the Policy
The policy applies to all properties owned or leased by EHA and to all circumstances where EHA has responsibility for fire safety management.

The policy is applicable to all EHA colleagues tenants, care providers, contractors, visitors, members of the public and any other persons who may work in, occupy, visit, use, or be affected by EHA's premises, properties, activities or services.

The policy should be used by all relevant persons to understand the obligations placed upon EHA to maintain a safe environment for tenants, colleagues and others within tenants' homes, communal areas and other premises owned or managed by the organisation.

The Policy
EHA understands that colleagues, tenants and visitors (including contractors and members of the public) need to be safe from the threat of fire or from injury in the event of a fire.

This policy sets out EHA's approach to managing fire safety across properties it owns or manages and confirms the organisation's commitment to complying with all relevant fire safety legislation, regulations and recognised codes of practice.

The policy provides a structure for identifying, managing, reducing and or mitigating fire risks and supports EHA in maintaining safe, well-managed homes and premises.
EHA acknowledges and accepts its responsibilities under the Regulatory Reform (Fire Safety) Order 2005 (FSO).

Fire Safety Management
This policy ensures that all colleagues and tenants are aware of how to react in the event of a fire.
Measures will be in place to identify, manage, reduce or mitigate fire safety risks through a structured and risk-based approach. This includes the assessment of fire risks, implementation of control measures, monitoring of compliance and review of effectiveness.

Where appropriate, fire safety compliance risks will be considered, mitigated or removed as part of any major refurbishment works or included within new development design briefs.

Fire Risk Assessments (FRA's)
EHA will carry out a programme of Fire Risk Assessments (FRAs) for all properties. FRAs will be reviewed no later than the stated review date and will be undertaken by a competent fire risk assessor.

FRAs will be reviewed at least every two years, or sooner where required, including where there are changes to tenant needs, property use, working practices, following refurbishment works or where a new tenant moves into a property. Any actions resulting in changes to the FRA will be picked up during EHA's annual compliance inspections or PRC's and logged within the housing management system

EHA will keep FRAs up to date and will require Care Providers to supply current Fire Evacuation Plans and Personal Emergency Evacuation Plans (PEEPs), including notification of any changes to tenant needs or disabilities.

Remedial Actions and Risk Prioritisation
EHA will ensure that all mandatory fire precaution measures and remedial works identified through FRAs or inspections are implemented within defined timescales, based on risk:

- High risk actions (A rated) – completed within 1 month
- Medium risk actions (B rated) – completed within 3 months
- Low risk actions (C rated) – included within a reasonable programme of works
- Recommendations or points for consideration (D rated) – considered, with an evidence trail of decisions and outcomes recorded

Where appropriate, interim mitigation measures may be implemented while higher-risk actions are being addressed (e.g. waking watch/alternative accommodation).

EHA will ensure that processes are in place to implement all fire precaution measures identified by the regular property inspections carried out by a competent person, whilst there is no strict definition of competent, this will include the necessary knowledge, training, skills and experience.

Servicing, Inspections & Maintenance
EHA will carry out a programme of servicing and maintenance in accordance with relevant legislation, standards and manufacturers recommendations for all fire detection and precaution systems within buildings owned or managed by the organisation.

This includes fire alarm systems, emergency lighting, smoke, heat and carbon monoxide detectors. Hard-wired smoke, heat and CO alarms will be tested as part of five-yearly electrical inspection visits.

Annual fire compliance inspections will be undertaken for all properties by a competent person, with inspection records evidenced and retained.

EHA will have processes in place to ensure that any follow-up works identified through servicing or inspections are recorded, monitored and completed.

EHA will check Care Providers are carrying out regular testing of all fire alarms, emergency lighting systems, reporting faults to EHA and that they are keeping records to evidence. EHA will review these records whilst carrying out annual compliance inspections at the property.

Personal Emergency Evacuation Plan (PEEP)
EHA will ensure that all tenants who are unable to self-evacuate a building will have a Personal Emergency Evacuation Plan (PEEP) in place, regardless of the evacuation strategy. PEEPs will be created and reviewed by a competent person, usually the Care Provider, and held securely on site. Any colleagues who would be unable to self-evacuate a work premises would also require a PEEPs.

The PEEPs will be made available to the Fire Service in the event of an evacuation.

Where EHA have been notified that a tenant within a building is storing oxygen in their home for medical use EHA will ensure that a Personal PEEP is in place and reviewed annually.

New Lets
EHA will have processes and controls in place to ensure that fire safety is considered when letting properties and assessing the suitability of accommodation for prospective tenants.

For new schemes, the Development Manager / Fire Risk Assessor will review tenant information and assess the suitability of the property.

For existing schemes, tenant information will be forwarded by Housing Management to the Development Manager / Fire Risk Assessor, will assess suitability and advise accordingly.

Assurance and Continuous Improvement
EHA will monitor fire safety compliance through inspections, servicing programmes, KPIs and audits to provide assurance that risks are being effectively managed.

Where access to carry out inspections is difficult

- EHA will make every effort to gain access to carry out inspections/work in conjunction with tenants' availability
- Legal action may be taken if access is refused and all reasonable efforts have been made (in line with the Access/No Access Procedure) in exceptional circumstances.
- Consideration will be given to tenants' vulnerabilities and disabilities at all times

Record Keeping and Data Security
EHA will hold accurate and up-to-date records for each property it owns or manages, including records relating to:

- FRAs
- Servicing
- Inspections
- Maintenance
- Remedial works
- Fire safety equipment.
- All records are retained in accordance with the Data Retention Policy.
- Appropriate data protection and security controls are in place for tenant and contractor information
- EHA will also ensure that processes are in place to record and investigate any fire safety near misses. A near miss is an unplanned event that did not result in injury but had the potential to do so.

Communication
EHA colleagues will ensure that all communication with tenants, care providers, contractors and other stakeholders are logged on the housing management system ~~(SDM)~~ and that they continue to maintain an open line of communication throughout when dealing with reports of repairs, arranging works/inspections or dealing with enquiries.

Contractor Requirements

Only competent contractors with the required qualifications and knowledge may undertake works.

Contractors must provide:

- Risk Assessments and Method Statements (RAMS).
- Proof of qualifications.
- Up-to-date public liability insurance.
- Registrations are verified upon appointment and reviewed annually.

Responsibilities

The Chief Executive Officer (CEO) will have overall responsibility and retain oversight on performance.

The responsibility for the delivery of the service will be delegated to the Property & Compliance Manager who will provide oversight of Fire safety, risk management and ensure compliance of the legislation/regulation duties. The Property & Compliance Lead will retain operational responsibility

Related Legislation, Regulation and Codes of Practice

- Regulatory Reform (Fire Safety) Order 2005 (FSO)
- Fire Safety Act 2021 (England and Wales)
- Fire Safety (England) Regulations 2022Smoke & Carbon Monoxide Alarm (England) Regulations 2015 (Amended 2022)
- Health & Safety Executive under the Health & Safety at Work Act 1974 Housing Act 2004
- Social Housing (Regulation) Act 2023
- The Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Gas Safety (Installation and Use) Regulations 1998
- The Furniture and Furnishings (Fire Safety) Regulations 1988
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Building Regulations 2010: Approved Document B Fire Safety
- Building Safety Act 2022
- Electrical Equipment (Safety) Regulations 2016
- Construction, Design and Management Regulations 2015
- Data Protection Act 2018
- RSH ~~Consumer~~ Safety and Quality Standard (Revised April 2024)
- The Supported Housing (Regulatory Oversight) Act 2023

Codes of Practice

- LACORS – Housing – Fire Safety
- MHCLG – Update on Interim Mitigation Measures Required Pending Remediation of Cladding (29.09.2017)
- Fire Safety in Purpose Built Blocks of Flats (LGA)
- Practical Fire Safety Guidance for Existing Specialised Housing (Scottish Government)
- Housing Health and Safety Rating System operating guidance - Housing Act 2004
- Fire Safety Risk Assessment: Sleeping Accommodation (HM Government)

- NFCC – Fire Safety in Specialist Housing – April 2017
- Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation 2018

Related Policies, Procedures and Documents
Health and Safety Policy
Equality, Diversity and Inclusion Policy
Tenancy Agreement
Data Retention Policy
Fire Safety Management Procedure
Reasonable Adjustments Policy
Access/No Access Procedure

Reporting & Monitoring
Key Performance Indicators (KPIs) are reported to Senior Management monthly, quarterly to Board.
Compliance with Regulatory Standards reported annually to Board

EHA will carry out an independent audit of fire safety at least once every 3 years. This audit will specifically test for compliance with regulation, legislation, codes of practice and policies and processes and identify any non-compliance issues.

Non-Compliance / Escalation Process
Any non-compliance identified will be reported to the Property & Compliance Manager immediately, the Property and Compliance Lead and Property & Compliance Manager will agree a plan of action and notify the CEO within 24 hours.

The CEO will inform the Board and where appropriate the Regulator of Social Housing.

Consultation and Publicising Policy
Consultation of this policy has been undertaken with:
- Senior Management Team
- Management Team

Publicised on:
- EHA website.
- Communicated to all colleagues.

Review
The policy will be reviewed every two years (or sooner if there is a change in regulation, legislation or codes of practice).

Equality Impact Assessment
An Equality Impact Assessment has been completed.