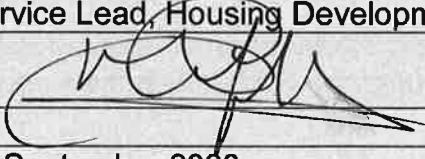


# HOUSING DEVELOPMENT & CONTRACTS

## Fire Safety Policy

<b>Date of Review:</b>	September 2019
<b>Reviewed By:</b>	Ian Finlay, Project Manager
<b>Approved By:</b>	R John Griffiths Service Lead, Housing Development & Contracts
<b>Signature:</b>	
<b>Date:</b>	06.09.19
<b>Date of Next Review:</b>	1 <sup>st</sup> September 2020

## **1. Introduction**

At the time of Policy approval Slough Borough Council owns and manages in the region of 6,000 tenanted properties. Some 3600 of these properties are flats, a majority of which have communal/ common areas which fall within the remit of the Regulatory Reform (Fire Safety) Order 2005 (RRFSO).

This policy explains how Slough Borough Council's commitments to fire safety will be met. It will be supported by a Fire Safety Management Plan providing more detailed guidance and procedures.

## **2. Statement of Intent**

A key objective of this Policy is to describe how Slough Borough Council will meet the required statutory, contractual and regulatory requirements in relation to fire safety. It will also cover how Slough Borough Council/Cabinet, as Duty Holder, will receive assurance of compliance.

The scope of this policy includes:

- all properties that fall within the remit of the Regulatory Reform (Fire Safety) Order 2005
- the undertaking of Fire Risk Assessments (FRA), and the remedial works and actions arising from the FRA
- cyclical maintenance of fire safety systems and equipment; automatic fire detection and alarm systems, emergency lighting, automatically opening smoke vents or smoke control systems, portable fire-fighting equipment, dry or wet risers, sprinkler/mist systems, fire-fighting lifts (or fireman lifts).
- general repair and maintenance activity which could have an impact on fire safety within a building or individual property.

Slough Borough Council will comply with all current and relevant legislation and specifically as detailed in the following:

- the Building Regulations
- the Housing Act 2004 and
- the Regulatory Reform (Fire Safety) Order (RRFSO) 2005

Slough Borough Council also acknowledges its obligations under the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985.

In addition, as a Landlord and provider of Social Housing Slough Borough Council must meet the requirements of the Regulator for Social Housing's (RSH) Homes Standard. (The economic standards do not apply to Local Authorities).

It is essential to ensure that customers, residents, employees and visitors remain safe in its premises (both individual homes and offices). Failure to properly discharge its legal responsibilities may also result in:

- Prosecution by the Fire and Rescue Service under the Regulatory Fire Safety Order 2005,
- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.
- RSH scrutiny.
- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

### **3. Policy**

In order to comply with regulatory standards and legal obligations, and to manage the risk to customers, staff, and other visitors to its properties, Slough Borough Council will:

#### **Process**

- Provide clear lines of responsibility for all properties within the scope of this policy supported by written guidance in the Fire Safety Management Plan.
- Ensure that a clear and consistent process including front-line engagement and enforcement, is in place to obtain access to properties to conduct the safety checks and works, including legal action when required.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).
- Maintain a process for dealing with unsafe situations in accordance with the regulations.

#### **Fire Risk Assessment and Evacuation**

##### **Fire Risk Assessment**

- Undertake suitable and sufficient FRAs in accordance with the Regulatory Reform (Fire Safety) Order 2005 (as per the table below), record the significant findings and undertake necessary remedial work within the timescales recommended by the competent person who completed the FRA.
- Review all FRAs, no matter what the risk category, following any of the events below:
  - a fire, near miss or threat of arson;
  - the introduction of new work practices;

- any works affecting the means of escape or alarm systems; and
- structural or material changes to the building or its use.

The above circumstances may prompt a new FRA not just a review. This decision is made by the Responsible Person. Outside of these circumstances, FRAs will be renewed on or before the date recommended by the competent person undertaking the previous assessment. In any event renewals of FRAs will be undertaken at frequencies not greater than those in the table below:

Risk Profile of the Premises	Example of Property Type	New FRA
<b>Low Risk</b>	Purpose built, general needs residential blocks of no more than 2 storeys above ground.	Every 3 years
<b>Medium Risk</b>	Purpose built, general needs residential blocks of between 3 and 5 storeys (inclusive) above ground.	Every 2 years
<b>High Risk</b>	Premises with vulnerable occupants (e.g. sheltered and supported housing), HMO's, converted premises, high rise blocks (greater than 5 storeys), assembly buildings, offices etc.	Annual

## Evacuation

- Ensure each building has an evacuation strategy stated clearly in the FRA. The evacuation strategy will be agreed with the competent person undertaking the FRA, however as a general principle:

### Residential accommodation (with common parts):

- Purpose built accommodation will generally have a 'stay put' policy. Occupants have the option to stay in the building provided they feel it is safe to do so. The 'stay put' policy may change based on the instructions of the Fire and Rescue Service during an emergency situation.
- Converted accommodation will have a 'total evacuation' policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds
- Residential buildings which are managed 24 hours or which house vulnerable residents may require bespoke evacuation strategies specific to the premises (outlined below in 'Assisted Evacuation').

### Commercial accommodation and community premises

- All premises to have a 'total evacuation' policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds.

### Assisted Evacuation

- For commercial, community and non-residential premises it is the responsibility of each employee to inform their line manager of any

physical or sensory impairment he/she may have, including temporary impairment, which may affect how they evacuate the premises. Slough Borough Council will be proactive in becoming aware of people who may need assistance to escape in the event of a fire.

- In residential premises, (1) General Needs - where practicable and should assistance be requested, the Council will provide advice and guidance to assist residents in developing their own means of escape plan in general needs premises. This will not involve the assistance of staff in the evacuation. (2) Sheltered Accommodation - Liaison will take place with the Fire and Rescue Service on how best to record and store information on disabled or vulnerable residents. This will not involve the assistance of staff in the evacuation. (3) Extra-care – Where a Personal Emergency Evacuation Plan (PEEP) is in place a copy will be kept in the Gerda Box on site.
- Where appropriate, provide equipment to aid evacuation which should only be used by appropriately qualified or trained persons e.g. the Fire and Rescue Service.
- Evacuation drills will be carried out in all non-residential buildings and a selected set of residential buildings. This will be determined by the FRA. There is a legal requirement to carry out an evacuation drill annually. In non-residential buildings Slough Borough Council will endeavour to conduct drills twice annually. Residential premises with alarms will be assessed as to the appropriateness of regular fire drills on an individual basis. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.

All new staff to the organisation will be instructed in the fire evacuation procedure on induction.

## **Delivery**

### **Remedial Works**

- Ensure that priorities and completion targets for remedial actions are defined by the competent person undertaking the FRA. Any changes will be agreed by the Fire Safety Group.
- All fire safety remedial work should be carried out in accordance with the relevant British Standard, approved code of practice or associated best practice guidance. The fire risk will be reviewed regularly from the time of FRA completion until remedial works have been completed. Upon completion of all remedial works an FRA review or renew will be undertaken to provide assurance that customers, residents, employees

and visitors remain safe in the premises and in line with the RRFSO 2005.

- Test and maintain all fire safety equipment within the scope of this policy in accordance with regulatory and statutory requirements and considering manufacturer's requirements.

#### Domestic Smoke Detection

- Ensure that all properties owned by Slough Borough Council (excluding leasehold and shared ownership) will have mains or battery-operated fire detection systems. Upgrading to mains operated systems across all properties will be part of ongoing investment work programmes.
- Check smoke detection annually as part of the heating servicing contract or, where properties are not part of heating contracts, through other cyclical maintenance contracts.
- Where works are refused by the customer, Slough Borough Council will treat the situation sensitively but will be clear that the work must be completed to ensure their health and safety and that of others in the property and will take legal action as appropriate and where necessary to undertake required works.
- Ensure that residential properties will receive further checks which contribute to reducing the risk of fire, including annual gas and other heating installation checks, electrical safety checks, and portable electrical appliance checks.

#### Responsive and Planned / Upgrade Works

- Ensure that contractors (internal and external) have a general awareness of fire safety and undertake a risk assessment considering fire safety when undertaking responsive repairs that may have an impact on fire safety. Repairs to be carried out in accordance with the relevant British Standard, approved code of practice or associated good practice guidance.
- Ensure contractors maintain suitable method statements relating to fire stopping and compartmentation. Carry out a sample of 'during' and 'post work' inspections to ensure compliance.
- Risk assess planned maintenance or upgrade programmes to consider any impact on fire safety. Current reports/examinations/FRAs should be provided together with any historic works records, both responsive and planned.
- Ensure that a post project fire safety check is completed by a competent person, independent to the contractor, where the risk

assessment indicates a likely impact on existing fire safety measures in a building.

### Management

- Comply with the requirements of the building regulations and other relevant fire safety legislation when carrying out any works.
- Prohibit the storage of any items in communal areas and escape routes without Slough Borough Council's express permission. Maintain a no smoking policy in all communal areas.
- Implement a risk-based approach to the periodic inspection of communal areas and escape routes in line with the Fire Safety Management Plan to enforce the above.
- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988.
- Ask residents to alert Slough Borough Council to the presence of stored oxygen so that it can alert the Fire and Rescue Service to its presence.
- Ask residents to remove any alterations that they have made if the FRA indicates that this is required. Slough Borough Council will take a reasonable approach according to the risk presented but will take enforcement where required.

### Contractors Competency

- Only engage with companies assessed and registered under BAFE SP205-1 in providing fire risk assessment services. External fire risk assessment providers (whether individuals or companies) should be able to demonstrate reasonable experience of undertaking fire risk assessments in housing stock.
- Only engage with contractors assessed as being suitably competent to undertake the work for which they are being considered. Contractors, where possible, should be third party accredited to a nationally recognised scheme, such as BAFE SP203 (relevant part) for fire alarm contractors, BAFE SP101 for fire-fighting equipment etc.
- Carry out an assessment of all contractor competencies annually or at change of contract/contractor, as detailed within the Fire Safety Management Plan.

## **Internal Competency**

- Maintain a skills/training matrix to ensure that all staff undertaking key roles within the scope of this policy have appropriate training.
- Will operate a detailed competence framework including regular appraisals as part of the Fire Safety Management Plan.

## **Data**

- Maintain an up to date Master Database of all properties where it has a responsibility to provide Fire Risk Assessments (FRAs) and/or maintain fire safety equipment as set out in the scope of this policy.
- Where a requirement exists, hold information including but not limited to: UPRN, property designation, construction type, building management, shared responsibilities, risk profile, evacuation strategy, type of equipment, manufactures requirements and associated testing/servicing frequency date of the last two FRAs and next FRA due date.
- Maintain current and up to date records of remedial works for the entire portfolio which will detail all recommendations from the FRAs. The records will include; address and risk profile of the property, detail of the work item required, priority and target completion, person responsible, when the work was completed and who it was signed off by, and evidence of completion.
- Hold fire safety maintenance records electronically in the Master Database by the Compliance Co-ordinator with other Landlord Compliance records. There may be instances where a hard copy is kept on site and these will be detailed in the Management Plan.
- Where required, and in agreement with the Fire and Rescue Service, provide specific site information within a Gerda Box on site.

## **Assurance**

- Ensure that all persons involved with the management of fire safety are properly trained and accredited in accordance with this policy.
- Where necessary, operate a permit to work system when safety critical work is being carried out.
  - Carry out works-based assurance activity including checks on certification and post-inspection of onsite works to the level stated within the Fire Safety Management Plan. A proportion of such checks will be carried out by an independent party.



- Set a timetable for the review of the Fire Safety Policy and the associated Management Plan.

### **Communication**

- Operate a Fire Safety Group comprising of a cross organisation team of staff. Terms of Reference of the Group will be included in the Fire Safety Management Plan.
- Communicate with staff through training, fire drills, appropriate signage and the intranet.
- Communicate with residents through appropriate 'Fire Action' signage in conjunction with other forms of communication provided on a regular basis such as web-site, newsletters, leaflets and home information packs.
- Comply fully with Article 22 of the RRFSO and ensure that where Slough Borough Council are considered jointly responsible for a property or common area, it will share its fire risk assessment with other relevant parties, and co-operate with them so far as is necessary to ensure the safety of relevant persons.
- Engage in a regime of regular communication with the Fire and Rescue Service to ensure good lines of communication and operational familiarity.

### **4. Implementation**

The policy will be effective from September 2019 following Corporate Management Team (CMT) approval.

Staff will be made aware of the policy at priority training and a copy will be available on the intranet. The policy will be uploaded to the Slough Borough Council web site.

This policy should also be read in conjunction with the Compliance Strategy and Fire Safety Management Plan

There will be training provided for all those staff involved with the delivering the Compliance functions.

### **5. Consultation**

This policy is based on legislative and regulatory requirements and as such consultation with customers has not taken place. There has been consultation with teams within Slough Borough Council.

## **6. Equality Impact Assessment (EIA)**

We believe all people should be treated with dignity and respect regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including, nationality, ethnic or national origins), religion, belief or non-belief, sex, or sexuality or by association with someone with any of these characteristics or perception of having any of these characteristics.

The EIA was undertaken on 6<sup>th</sup> September 2019 and no adverse discrimination was found. (See the full EIA document for further details)

## **7. Monitoring Performance**

The following Performance Indicators (PIs) will be reported:

- % of buildings with a valid FRA renewed within its due date
- Total no of outstanding and overdue remedial building works actions
- Total no of outstanding and overdue remedial management actions
- % buildings with outstanding and overdue remedial actions
- % of buildings with fire safety systems/equipment present where all systems/equipment has been tested/maintained in accordance with this policy
- Number of notices received by the Fire and Rescue Services in the reporting period
- Number of outstanding notices received by the Fire and Rescue Services

Commentary will be provided for any overdue requirements to include the date they became overdue, days overdue, and proposed action to bring them back into a compliant position. To provide additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

A detailed PI suite will be defined within the Management Plan.

The following assurance activity will be undertaken and reported in line with the Management Plan

- Internal audit
- Strategic review
- 3rd Party Assurance

## **8. Policy Review**

The policy will be reviewed every 12 months or earlier if deemed necessary through the performance monitoring process.

**9. Amendment Log**

Date of revision:	Record of amendments:	Reason for revision:
September 2019	Rewritten	Compliance Review

