

PURPOSE

Adullam Homes Housing Association Ltd is committed to providing high quality services. Fire Safety Management is essential to ensure that we fully comply with the statutory obligations. Adullam Homes Housing Association to adhere to the enforcing Fire Service Authority for the Fire Safety Regulations.

This document is a statement of the Association's policy and procedure for Fire Safety Management; to implement and maintain a fire safety programme, for assessing and controlling the risks from an outbreak of fire and for the provision of fire warnings, firefighting equipment, emergency lighting, emergency signs, adequate means of escape and evacuation procedures.

Adullam have put in place arrangements to meet these responsibilities and to identify and reduce the risks associated with fire and emergency situations.

1.0 Introduction

1.1 Adullam Homes Strategic objective is to take its responsibility to manage the risk from fires within its managed housing stock very seriously and strive to reduce this risk through:

- Defined roles and responsibilities for fire safety, including individual responsibilities.
- Compliance with the Regulatory Reform (Fire Safety) Order 2005, Fire Safety Act 2021 and any other relevant legislation.
- Ensuring fire safety is included when designing and constructing new and/or refurbishment projects.
- Ensuring that appropriate funding is allocated where deficiencies in fire safety measures are identified and for significant issues Adullam Homes SLT and Board are consulted.
- A comprehensive programme of fire risk assessments, undertaken by competent person(s).
- Ensuring suitable and sufficient fire precautions and management systems are in place.
- A programme of regular fire safety inspections based on building risk.
- Providing regular fire safety awareness updates to residents, employees and others every three years, unless significant changes to fire safety have occurred sooner.
- Making information on the specific fire safety arrangements in each residential building of two or more domestic properties readily available to:
 - Residents to ensure they are assured that the risk of injury or damage to their homes caused by fire is minimised.
 - Employees, contractors, visitors.
- Fostering and maintaining good working relationships with partner services and relevant stakeholders, including Fire & Rescue Service in which our services are located.

1.2 Specific Fire Safety Objectives is to ensure tenants feel safe in their homes and the risk from fires is effectively managed, Adullam Homes have identified a number of objectives for all its managed housing stock of domestic properties with two or more flats:

- Fire Risk Assessments have been undertaken by competent persons in accordance with the Regulatory Reform (Fire Safety) Order 2005 and current standards.

- Fire Safety measures are included in all new construction projects, existing building renovations and improvement programs undertaken on its building portfolio.
- Fire Safety risks posed by the structure and external walls (including cladding, balconies and windows and front doors) are assessed in line with current standards.
- The ongoing suitability and effectiveness of current fire safety measures in buildings classed as 'High Risk' are reviewed at least annually or after a fire incident, as part of the overall fire risk assessment process.
- The ongoing suitability and effectiveness of current fire safety measures in buildings classed as 'Low Risk' are reviewed at least every three years or after a fire incident, as part of the overall fire risk assessment process.
- Fire safety priorities, improvement areas and areas of non-compliance are identified and actioned.
- All relevant residential buildings under Adullam Homes control will, where appropriate, have adequate fire warning systems, signs, means of escape and fire-fighting equipment.
- All fire safety precautions are inspected, maintained, serviced, and tested to ensure they are always fully operational, in accordance with statutory requirements and manufacturer's instructions.
- Regular inspections are undertaken of communal areas to ensure good house-keeping practices are in place to minimise the risk and spread of fire.
- Gas and electrical safety inspections are undertaken in each residential property where Adullam Homes is the landlord to ensure that these do not present a fire risk to the tenant or building.
- All fire incidents are reported, logged, investigated and discussed at the bimonthly Health & Safety Champions Forum meetings.
- Relevant employees are provided with the necessary skills and training to undertake their duties defined in this policy in relation to Fire Safety.
- Suitable and sufficient records are kept and available to be audited at appropriate intervals.
- Adullam Homes keeps up to date with changing legislation and fire mitigation measures.

2. Scope

- 2.1 This policy applies to all who use Adullam services including Tenants, Residents, Service Users, Staff, Contractors, Neighbours and anyone affected by the way the Association carries out its business.
- 2.2 This policy relates to all buildings where the Regulatory Reform (Fire Safety) Order 2005 (RRFSO) and Fire Safety Act 2021 applies, and Adullam Homes is the appointed "Responsible Person" for fire safety. This includes commercial buildings such as offices, houses of multiple occupation, the common areas of blocks of flats or maisonettes and supported housing.
- 2.3 It does not apply to single family dwellings, which includes the habitable parts of a building such as a flat.
- 2.4 Where properties are managed by third parties (e.g., a Management Tenant under a Lease/ Management Agreement) the management of Fire Safety will fall under the scope of this

policy so far as Adullam Homes responsibilities detailed in the terms of the management agreement.

3. Definitions

- 3.1 Regulatory Reform (Fire Safety) Order 2005 (RRFSO) – a statutory instrument applicable in England and Wales. The Order places the responsibility on individuals within an organisation to carry out risk assessments to identify, manage and reduce the risk of fire.
- 3.2 Fire Safety Act 2021 (FSA) – arose out of the 2017 Grenfell Tower fire and relates to fire safety in buildings in England and Wales with two or more domestic residences and is designed to supplement the RRFSO.
- 3.3 Responsible Person - a person (or organisation) that has control of a building, or a degree of control. In reference to fire, they are who is responsible for ensuring measures are in place to identify, manage, and mitigate risks associated with fire.
- 3.4 Fire Risk Assessment (FRA) - A building assessment that identifies any fire hazards, evaluates the risk of those hazards, and recommends action that should be taken to remove, reduce or manage the risk.
- 3.5 Regulator of Social Housing's Consumer Standards (RSHCS) - Under the Regulator of Social Housing's consumer standards, all registered providers of social housing have an obligation for their tenants' safety, which includes fire safety. The objectives of the Regulator are set out in the Housing and Regeneration Act 2008. Adullam Homes is accountable to manage tenant fire safety and to ensure tenants feel safe in their homes and the requirement of the Home Standard duty is discharged/met.

4. Roles and responsibilities

- 4.1 Adullam Homes Board has overall responsibility for approving this Policy, delegating responsibility for its implementation, monitoring its effectiveness at high level, and receiving assurance of compliance. Adullam Homes Board will also ensure that there is a system in place that provides adequate protection from detrimental treatment or victimisation for anyone making disclosures that they genuinely believe to be necessary in the interests of Fire Safety.
- 4.2 The Chief Executive Officer (CEO) will be responsible for the implementation of the Policy and will allocate responsibilities within the Senior Leadership Team and ensure that there is adequate management, monitoring and visibility of performance. The CEO will recommend this Policy to the Board on behalf of the Senior Leadership Team (SLT).
- 4.3 The Executive Director of Housing and Support, Assistant Director of Quality & Assurance, Head of Departments, Locality Managers, Asset Management, and Operational Managers have additional responsibilities to develop, implement, and maintain documented procedures to ensure this policy statement is adhered to.
- 4.4 The Health and Safety Manager has responsibility for setting the minimum standards for compliance, ensuring these are embedded in the fire risk management procedures, and monitoring that they are implemented and maintained.

- 4.5 The Health and Safety Manager shall liaise with the Fire Risk Assessors to provide assistance in the development of fire risk management procedures. The Health and Safety Manager shall conduct inspections to confirm procedures are being implemented and maintained.
- 4.6 Fire Risk Assessors are responsible for providing appropriate technical advice on the application and interpretation of fire legislation and fire safety guidance.
- 4.7 Local Responsible Person/Duty Holders are those who have delegated responsibility for completing the annual Fire Procedures – Review and ensuring compliance with this policy and Fire Safety Management Procedure in relation to any premises they manage.
- 4.8 Fire Wardens are in place in any staffed residential accommodation, they will attend the Fire Warden training. This training should be repeated in line with the Fire Risk Assessment, as a minimum every three years. Although the specific duties can be agreed at local level having considered the findings of the relevant fire risk assessment, typically these duties will include:
- Act as a focal point on fire safety issues for local staff.
 - Organise and assist in the fire safety routine within local areas.
 - Raise issues regarding local area fire safety with the relevant management.
 - Assist with coordination of the response to an incident within the immediate vicinity.
 - Participate in regular Fire Warden training and apply the information and duties to the workplace.
 - Following any evacuation situation, Fire Wardens will provide feedback to the Site Manager and include the Fire Safety Responsible Person on problems encountered, so that appropriate action can be taken.
 - As appointed by the Responsible Person, may be required to act as immediate liaison with the Fire Service during an incident.
- 4.9 Employees - All employees have a duty to take care for their own and others' health and safety and must:
- Familiarise themselves with the fire evacuation procedures that may be in place where they are working, including residential settings, even temporarily.
 - Undertake fire safety training as and when required.
 - Comply with fire safety procedures, safe systems of work information, instruction and training provided.
 - Not do anything that will put themselves or other people at risk from fire.
 - Report any problems relating to fire safety and ensure tenant safety is a number one priority.
 - Not interfere with or misuse any fire safety equipment e.g. wedging open fire doors, misuse of fire-fighting equipment or similar acts.
 - Co-operate in undertaking fire drills and evacuation.
 - Follow the instructions given by appointed Fire Wardens and leave the building in the event of a fire or other emergency.
 - Inform their immediate manager of any disability that may impact their ability to self-rescue from the premises in the event of a fire or emergency situation.

NOTE: Any person who refuses to comply with such instructions and remains in the building without proper authority, will do so at his/her own risk and may be subject to disciplinary action, without

prejudice to any action that might be taken by other appropriate authorities, for example, the HSE or Fire Service.

4.10 Health and Safety Team are responsible for providing health and safety support and guidance to Adullam Homes to help ensure that the requirements of this Policy can be implemented. The Health & Safety Manager will:

- Provide advice and assistance as the competent person for health and safety matters.
- Review any reported fire safety related incidents to ensure appropriate action is taken and that they are monitored and reviewed.
- Advise on suitable fire safety training for employees.
- Provide SLT & Board with any updates relating to fire safety legislation and any associated best practice.
- Report to SLT with any concerns of non-compliance or policy failures and any recommendations for improvement.

4.11 Responsibilities to Tenants - To provide a level of assurance and confidence to tenants, fire safety information on the specific fire safety arrangements for a particular residential building will be provided in an easy to understand format both electronically and physically inside each relevant building. This will also include tenant responsibilities to help ensure everyone's safety. All tenants will be briefed on fire safety measures specific to their new home at sign up. They are to be advised that Fire & Rescue Services offer a home safety check and urged to accept the offer, which is free of charge.

4.12 Tenant Responsibilities As part of their tenancy agreement, new and existing tenants must be made aware of their own obligations to reduce the risk of fire within their homes and not create a fire risk, both within their home and in any communal areas that may affect the safety of others.

A detailed list of specific responsibilities is attached as an Appendix to this policy. This is issued to tenants as part of their tenancy agreement.

4.13 Capital Projects Any capital programmes and extensive renovation work undertaken will include fire safety measures in any design or proposed changes to an existing building. The fire risk assessment will need to be reviewed and revised.

4.13.1 Specific requirements have been introduced for high rise residential buildings that are yet to be built requiring fire statements as part of the planning process. Fire safety and high-rise residential buildings (from 1 August 2021) - GOV.UK (www.gov.uk)

4.14 Asset Management Team Any repair work will need consider fire safety measures and not compromise escape routes or fire detection and alarm systems, either when being undertaken in-house or by contractors. Certain repair work will need to meet fire safety standards where fire integrity may be affected.

4.15 Fire Risk Assessors Regardless of who carries out the fire risk assessment, Adullam Homes retains the responsibility for ensuring the adequacy of that assessment and will take all reasonable steps to appoint a specialist who is competent to do the job properly. This will be done by ensuring:

- Those providing the service have independent registration with, or certification from, a professional or certification body.
- They meet the competency criteria established by the Fire Sector Federation.
- They are working towards Level 4 Regulated Qualifications Framework (RQF) higher education award.
- They have experience of undertaking fire risk assessments for the type of residential property.

4.14.1 Accredited third party certification and professional body membership is deemed essential for fire risk assessors. Competence of fire risk assessors can be assured by either certification of the individual fire risk assessor or through a company providing fire risk assessments under a third party certification scheme accredited by the UK Accreditation Service (UKAS), or by registration of the fire risk assessor by a Professional Engineering Institution (PEI) that is licensed by the Engineering Council (EngC).

4.14.2 In the event that major change occurs within the building, be it either structural, change of processes or substantial increase of population, the Responsible Person must ensure that any proposed work meets fire safety legislative requirements and that any fire risk assessment is reviewed by a competent person who meets the criteria detailed above.

4.15 Managing Contractors - if contractors are used to undertake any work (including fire safety) in residential properties, including communal areas, they must be:

- Competent, suitably qualified and can demonstrate their ability to meet all statutory requirements.
- All works relating to fire safety are adequately monitored, controlled and post inspected.
- Fire safety works are completed in a timely manner and prioritised based on risk.
- Records are kept with details of the fire safety works completed and any fire risk assessment and associated building documentation is updated with relevant details.
- Capital programmes must include fire safety requirements and be designed with fire safety in mind. Contractors are required to:
- Co-operate with SCH and follow any instructions relating to fire safety given.
- Ensure that they and all staff falling under their control have received appropriate information, instruction, and training (including induction training) to enable them to comply with this policy and any emergency arrangements.

4.15.1 Contractors are required to:

- Co-operate with Adullam Homes and follow any instructions relating to fire safety given.
- Ensure that they and all staff falling under their control have received appropriate information, instruction, and training (including induction training) to enable them to comply with this policy and any emergency arrangements.

5. Organisational Arrangements

5.1 The following section explains the day-to-day arrangements that Adullam Homes have in place to minimise the risk of fire. Adullam Homes have a duty, under fire safety legislation to carry out fire risk assessments of all residential properties comprising of two or more domestic flats.

The day-to-day arrangements to managing the risks of fire is underpinned by:

- A programme of comprehensive fire risk assessments, including
 - Assessing the risk from fire, including a building's structure, the external walls (including doors or windows in those walls, anything attached to the exterior of those walls such as balconies) and any common parts, plus all doors between the domestic premises and common parts.
 - Evaluating the adequacy of existing fire protection measures and identifying additional measures that minimise the risk of fires starting and spreading.
 - Assessing compliance with all relevant legislation and relevant standards.
- The provision and maintenance of appropriate fire detection, alarm systems, emergency lighting, fire-fighting equipment (where in place), evacuation signage, appropriate means of escape and protected escape routes in communal areas of residential properties.
- The provision of essential training and fire safety information for all employees and more specifically residents.
- Appropriate instruction for contractors and other visitors on the action to be taken in the event of a fire in any property they may be working in.
- Reporting, reviewing and investigation of all fire related incidents and measures put in place to prevent a recurrence, where possible.
- Zero-tolerance relating to the storing of items by residents in communal areas.
- Strict enforcement of no-smoking in communal areas.

5.2 Fire Risk Assessments

5.2.1 Adullam has a responsibility for ensuring that 'suitable and sufficient' FRAs are conducted in all workplaces and common parts of other premises, owned or managed by Adullam, and to co-operate with other occupiers and agencies, in accordance with the requirements of the FSO and Fire Safety Act.

5.2.2 This requirement does not extend to people's private homes. Except in communal parts of a building, for example, in a block of flats, those parts such as the doors and walls making up the means of escape and common areas and where services penetrate compartment floors/walls.

5.2.3 The objective of the FRA is to ensure all occupants can safely exit, or safely remain within the premises, as appropriate to the fire evacuation strategy for the premises. The PR and the Compliance and Cyclical Maintenance Manager must ensure that the FRA is conducted and reviewed in accordance with the Fire Safety Management procedure.

5.2.4 The FRA will look at the following areas:

- life risk within the building and how it's affected (occupancy);
- use of the building;
- the building structure/design/protection;
- impact of fire on the environment; and
- fire safety management of the building.

5.3 Shared Occupation/Lettings/Landlord Responsibilities

5.3.1 In the case of residential buildings where Adullam Homes remain the landlord, but other service providers are Management Tenants of the building a Lease/Management Agreement will clarify the fire safety arrangements in place. The Lease/Management Agreement for Fire Safety will defer to Management Tenants fire safety management

protocols as they are responsible for managing the day-to-day fire safety arrangements e.g. Management Tenants fire safety protocol to provide fire-fighting equipment throughout the property or specific fire-fighting equipment in high-risk areas only.

5.3.2 For the properties in which Adullam Homes is the Management Tenant the Lease/Management Agreement will determine if it is the landlords or Adullam Homes responsibility to ensure that a fire risk assessment is undertaken.

- i. Under Lease/Management Agreement Adullam Homes is Responsible for Fire Risk Assessments this Policy and Adullam Homes Fire Safety Management Procedure applies.
- ii. Under Lease/Management Agreement Landlord is Responsible for Fire Risk Assessments their Fire Safety Policies, Procedures and protocols will apply.

5.3.3 For properties in which Adullam Homes shares, either as the landlord or as a tenant Adullam Homes will endeavour to provide a means of communication and cooperation between all parties to ensure coordination of fire safety provisions, fire-fighting measures, evacuation procedures etc.

5.3.4 In the event that part of an Adullam Homes building may be let – the building manager has the responsibility to ensure that those hiring the site are aware of the fire risk assessment for the site, evacuation procedure, including contact names in the event of an emergency.

5.4 Fire Evacuation Strategy

5.4.1 As part of the FRA the risk assessor will review and confirm the appropriate fire evacuation strategy for the building, which in most cases will either be Stay Put or Full/Simultaneous. Adullam Homes will ensure that:

- Within each building a Fire Action Notice is displayed which details to residents what to do in the event of fire, should one occur in either their property or within the communal area.
- Every resident has been informed of the evacuation strategy for their building and had the opportunity to make Adullam Homes aware should they not understand the strategy or feel they would be unable to follow the guidance should a fire occur
- All new residents are informed of the evacuation strategy upon start of tenancy.
- All residents are appropriately informed should there be a permanent or temporary change to the evacuation strategy.

5.5 Tenant, Resident and Service User Friendly FRA

Adullam homes are committed to being open and transparent with its residents and to support them in gaining a fuller understanding of the issues surrounding fire safety. On request Adullam Homes will provide residents with a “face-to-face”, meeting to summarise in an easy-to understand language the FRA, the risks identified, and the subsequent action undertaken.

5.6 Certification & Documentation

Adullam Homes shall keep appropriate and up to date records and certification relating to the completion of FRAs and associated fire risk remedial actions. The records that are to be kept shall include (but are not limited to).

- An up-to-date list of properties and buildings that require an FRA including previous completion dates and next due dates.

- All fire hazards identified in the FRA including the category and risk rating along with the fire risk assessors recommended action and the timescale for completion.
- The action taken to address hazards- including completion date, details of who the action was completed by the action taken and photographic evidence.
- Relevant certification to evidence the work undertaken, e.g., fire door installation certificates, fire alarm, emergency lighting and Automatic Opening Vent commissioning certificates, electrical installation/minor works certificates.
- Written justification/reason for any decision to not fully execute the recommendation of the risk assessor or to execute a different course of action.
- Fire Action Plans and Evacuation strategies.

5.6.1 All FRAs and any relevant certification to evidence the work undertaken documentation will be saved against the property/building within Pyramid.

5.7 Asset Data & Reconciliation

Adullam homes will ensure an accurate record of the completion date, review period and due date of all FRAs, with processes in place to ensure FRA requests are issued to the risk assessors to allow sufficient time for completion before their due date.

5.7.1 Any new build developments that fall under the RRFSo will be subject to a pre-occupancy assessment followed by a full FRA upon occupation.

5.7.2 A reconciliation will be carried out at least every six months to ensure that all property divestments, acquisitions (including new builds) and any changes to management agreement responsibilities are appropriately reflected in the FRA schedule.

5.7.3 There may be instances where the responsibility under the RRFSo for the completion of the FRA and/or subsequent remedial actions does not sit with Adullam Homes however, Adullam Homes retains some Landlord obligations, e.g., Tenancy managed properties. In these instances, Adullam Homes will ensure processes and procedures are in place to ensure the third party is fully aware of their responsibilities under the RRFSo e.g., under the lease or management agreement, and the action they are required to take in relation to these responsibilities e.g., completion of an FRA, or the completion of remedial actions relating to an FRA carried out by Adullam Homes.

5.8 Reporting of Fire Incidents, regardless of how minor, must be reported on Pyramid. Incidents must be investigated, and lessons learnt to prevent a recurrence. Adullam Homes will liaise with external emergency services, where required, to minimise the potential risks that could arise from activities where there is a reportable incident related to fire within properties that they manage.

5.9 Training and Instruction

5.9.1 Adullam Homes will provide fire safety awareness training to all employees. This is currently via eLearning. Tenants and relevant persons will receive information on the fire safety arrangements in the building where they live or work and the action they need to take in the case of a fire.

5.9.2 Employees working in staffed residential properties will be instructed by their line manager in the following:

- What to do if there is a fire.
- What to do if the fire alarm sounds.
- The location of the nearest fire alarm.
- The location of the nearest fire exit, as well as a secondary route.
- The location and route to the designated assembly point(s).

5.9.3 All employees are required to complete regular refresh training every three years.

5.9.4 Training table

Who	Training
All new starters	Fire Awareness (e-Learning)
Fire Wardens	Fire Warden Training
Fire Risk Assessors Competent (internal)	British safety Council Certificate in Fire Risk Assessment eLearning
Fire Risk Assessors Professional (internal)	NEBOSH Fire Safety Certificate or Equivalent
Fire Risk Assessors Professional (external)	Level 5 Regulated Qualifications Framework (RQF) or equivalent higher education award (as a minimum) Accredited third-party certification Professional body membership

6. Resident consultation

6.1 Adullam Homes recognises the importance of working in partnership with our Tenants Residents & Service Users (TRS'S) to develop and continuously improve our services and raise standards.

6.2 Adullam Homes actively involves all TRS's at the beginning of decision-making processes and ensures TRS's are empowered to play a part in wider consultation and involvement structures, as detailed in the Adullam's National Coproduction, Involvement & Engagement Plan.

6.3 To demonstrate this commitment, where appropriate, this policy:

- Will be reviewed in consultation with TRS's.
- Involves TRS's in the monitoring and testing of service delivery standards laid out in this policy and relevant procedures.
- Will be developed and reviewed considering any TRS's feedback received relating to this policy.

7. Monitoring and compliance

7.1 The implementation of this policy will be monitored and audited in line with the targets set for the maintenance of Certification to ROSPA Gold Award (Occupational Health and Safety Management Systems - Requirements).

7.2 The completion of FRAs in line with their due date forms part of the Assets Team "Compliance" KPI, which is reported monthly to SLT.

7.3 Progress on the completion of FRA actions is monitored at a team level by the Compliance

Team. A weekly update is provided to the Assets Manager, and subsequently to the Health & Safety Manager on the number of FRA actions that have gone past their policy timescale for completion.

7.4 A quarterly update is also provided within the H&S Report provided to the SLT and Operations Committee.

8. Review

8.1 This Policy shall be reviewed and updated every three years or if there are any significant changes to current fire Legislation, HSE approved codes of practice or guidance, as the result of the outcome of an incident review or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations.

At which point the lead officer will initiate an immediate review.

8.2 In any event this policy will be reviewed no later than three years from the effective date of this version.

9. Reference Documents *(both legal and practical, also good practice sources)*

- Fire Safety Management Procedure
- Regulatory Reform (Fire Safety) Order 2005
- Fire Safety Act 2021
- Construction (Design and Management) Regulations 2015
- National Fire Chiefs Council Fire Safety in Specialised Housing
- Local Authorities Coordinators of Regulatory Services (LACoRS) Housing Fire Safety Guidance
- The Building Regulations 2010.
- Housing and Regeneration Act 2008
- Policy Hub Fire Safety documents
- Peninsula Safety Arrangement 2-1 Fire Safety – Arrangements and Procedures
- Peninsula Guidance Notes 2-1 to 2-3