

Policy Statement & Purpose

Bromford Housing Group (BHG) are fully committed to meeting all relevant statutory and regulatory requirements, in fire safety management and ensuring continual improvement in compliance performance, adopting a zero-tolerance approach to any deviation from this policy.

The purpose of this policy is to demonstrate BHG's commitment to ensuring that the fire risk to people, buildings and the wider business are reduced as far as reasonably practicable, whilst ensuring that all legislative requirements are met. This policy will be supported by a detailed operating procedure to ensure the policy is fully embedded into routine working practice.

1.0 Scope

1.1 The Fire Safety Policy details how BHG meets the requirements of the Regulatory Reform (Fire Safety) Order 2005 (FSO). In addition to this, the policy provides assurance to BHG that measures are in place to identify, manage and/or mitigate risks associated with fire. As part of the policy BHG will ensure compliance with any additional fire safety legislation and formally report at Executive and Board level, 'the details of material concerns and overdue actions relating to fire safety compliance and planned corrective actions.

1.2 The policy is relevant to all BHG employees, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services including subsidiary companies. It should be used by all to ensure they understand the obligations placed upon BHG to maintain a safe environment for customers, contractors, and employees within the home of each customer and within all communal areas of buildings.

1.3 BHG will follow a systematic approach to the management of fire safety to ensure it meets the requirements set out in the Regulatory Reform (Fire Safety) Order 2005 and all other applicable fire safety legislation. This is to ensure the safety of customers, leaseholders, employees, and members of the public.

1.4 This policy applies to all BHG offices and buildings under its control or occupation and where Bromford is deemed as either the 'responsible' or 'accountable' person. It also applies to any of our blocks and schemes where the building is under our management. Where the building is controlled or managed by a third party the responsibility for fire safety in their designated areas lie with the management company or commercial tenant unless this is otherwise stated in the management contract. BHG will write to remind Management companies they should properly comply with its H&S obligations such as carrying out FRAs (Fire Risk Assessment) and follow up actions. This will be achieved by asking the third party for a copy of the fire risk assessment which will be reviewed by the Fire Safety Team to ensure any serious risk that have been identified have been actioned appropriately.

1.5 BHG will co-operate and coordinate fully with all responsible parties, informing them of any significant risks that have been identified as part of a FRA (Fire Risk Assessment). BHG will co-ordinate its resources to ensure its actions and working practises do not place others at risk and will create a co-ordinated emergency plan that operates effectively. This plan is the 'Crisis management and business continuity management policy and framework.'

2.0 Reference Documents

2.1 Fire Safety Procedures

2.2 A fire safety procedure will support the delivery of the policy and ensure, in line with our risk appetite, customers are kept safe in their homes.

2.3 A building safety procedure will support the delivery of fire safety in our high rise blocks and to meet the requirements of the Building Safety Act 2022 and secondary legislation.

3.0 Policy Principles

3.1 BHG are committed to providing a robust, safe, and cost-effective service to our customers in relation to fire safety. In respect of our responsibilities for fire safety BHG will:

- Ensure a Fire Safety Procedure is in place and adhered to by all colleagues.
 - Ensure a Safety Case regime is in place for our high-rise blocks, supported by the safety management system and mandatory reporting processes
 - Hold accurate data and records for all relevant properties and communal areas of each property BHG owns or manages, ensuring fire risk actions and remedial works are reported, recorded, and monitored.
 - Ensure preventative planned maintenance programmes are in place that comply with British Standards and manufacturer's recommendations for all fire detection, prevention and firefighting systems and equipment.
 - Ensure that each property that includes a communal shared access area or facility and to which the FSO applies, has, as a minimum, a Type 1 fire risk assessment including assessment of the external wall and attachments, but will make best endeavours to carry out a Type 3 fire risk assessment in place which is PAS79 compliant from the British Standards Institute (BSI), or the *Home Office - A guide to making your small block of flats safe from fire*, and has been undertaken by a competent Fire Risk Assessor.
 - Ensure that the fire risk assessment of a building is reviewed following a fire, change in building use, changes to working practices that may affect fire safety, following significant refurbishment works to a building, or as and when required following an independent fire safety audit.
 - For multi-storey and multi-occupied residential buildings owned by BHG, undertake investigations into the external wall systems and fire doors, to determine whether they represent a risk to the health and safety of residents. Flat entrance doors will be inspected annually and communal fire doors quarterly in blocks over 11m or 5 storeys and over.
 - Ensure that robust processes are in place to address all significant findings identified by fire risk assessments.
 - Ensure contractors and consultants employed by BHG to carry out works in our homes has the relevant licenses, registrations, accreditations, and qualifications as specified by the relevant regulations and BHG procedures.
 - Implement a programme of block inspections to all premises with a fire risk assessment in place to audit that all required management actions are taking place.
 - Install smoke and carbon monoxide alarms as required by The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
 - Test smoke alarms and carbon monoxide detectors in domestic dwellings as part of the annual heating check, or the 5-yearly electrical inspection and testing programme.
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- Install sprinklers in new homes in accordance with Building Regulation requirements.
 - Ensure that Bromford customers with any form of disability, or who have mobility issues or physical and mental wellbeing needs, within buildings requiring a fire risk assessment, will have either a Person-Centred Fire Risk Assessment (PCFRA) or a Personal Emergency Evacuation Plan (PEEP) as required. A copy of the PEEP/PCFRA (as and when produced and updated) shall be retained on ILS (Independent Living Schemes) or Supported sites. A PEEP summary for the building will be kept in the secure information box in line with GDPR (General Data Protection Regulation) procedures for use by the emergency services in the event of a fire and be provided to the relevant customer for their own reference. In General Needs housing blocks a referral will be made to the local fire service for a Safe & Well visit when relevant information may be gathered. Any leaseholders or their tenants would have to self-declare to Bromford for a PCFRA or referral to the fire service to take place.
 - Have a robust process in place to gain access to homes and property for the undertaking of essential fire safety inspection and works.
 - Commit to working with the Fire & Rescue Service (FRS) to create safer places to live and work. Provide the FRS with plans and information about the external wall for all buildings over 18m or 7 storeys and over. Notify the FRS of any life safety equipment that will not be repaired within 24 hours.
 - Fulfil our commitment to equality and diversity while delivering the fire safety services to our customers and colleagues.
 - Ensure that all buildings managed by BHG have adequate emergency arrangements clearly explained to the customers of each building.
 - Introduce procedures through Scheme Improvement applications and Disabled Facilities Grants for the safe storage of mobility scooters to ensure the communal areas of our buildings remain sterile and safe.
 - Engage with customers and leaseholders in a participative and empowering manner so that they can contribute to service provision in relation to fire safety, including building specific resident engagement strategies for our high-rise blocks.

4.0 Responsibilities

4.1 The Board is responsible for:

- Ensuring Bromford complies with legislation
- Ensuring effective controls are in place to maintain fire safety compliance
- Reviewing compliance reports and scrutinising areas of non-compliance

4.2 The Executive Team is responsible for:

- Approving this document and notifying Board of key changes to this document.
- Reviewing, endorsing, and achieving this policy's aims
- Ensuring the appropriate resources and performance management frameworks are in place to ensure compliance with applicable laws and regulations
- Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance.

4.3 The Audit and Risk Committee are responsible for:

- Reviewing Compliance reports and control frameworks and make recommendations to Board.

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- Providing assurance to Board on compliance with the law

4.4 All colleagues are responsible for:

- Carrying out their work in line with this policy and associated procedures and processes
 - Applying Bromford's DNA in everything they do
 - Reporting non-compliance to line management as soon as possible
 - Considering fire safety in all activities and notifying compliance leads of any activity which puts compliance at risk.
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5.0 Legislative Requirements

5.1 Our policy is to comply with all applicable legislation and regulatory requirements, including the following:

5.2 Regulatory Standards

5.3 The application of this policy will ensure compliance with the regulatory framework and consumer standards laid out by the Regulator of Social Housing and Homes England.

5.4 Legislation

5.5 The principal legislation applicable to this policy is the Regulatory Reform (Fire Safety) Order 2005 (FSO), which came into force in October 2006. These regulations place a duty on the 'responsible person' to take general fire precautions to ensure, as far as is reasonably practicable, the safety of the people on their premises and in the immediate vicinity.

5.6 Additional Legislation

5.7 The policy also operates in the context of the following additional legislation:

- The Building Safety Act 2022
 - The Fire Safety Act 2021
 - The Fire Safety (England) Regulations 2022
 - The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
 - Other Building/Fire Safety legislation <https://www.gov.uk/guidance/the-building-safety-act-secondary-legislation>
 - Housing Act 2004
 - Health and Safety at Work Act 1974
 - Fire & Rescue Services Act 2004
 - 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
 - The Furniture and Furnishings (Fire Safety) Regulations 1988
 - Building Regulations 2010
 - The Health and Safety (Safety Signs and Signals) Regulations 1996
 - Approved Document B (Fire Safety) Volume 1: Dwellings (2019 edition) and Volume 2: Buildings other than Dwellings (2019 edition)
 - Electrical Equipment (Safety) Regulations 2016
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- Gas Safety (Installation and Use) (Amendment) Regulations 2018
 - The Construction, Design and Management Regulations 2015
 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
 - Landlord & Tenant Act 1985

5.8 Code of Practice

5.9 The principal codes of practice applicable to this policy are:

- LACORS (Local Authority Coordinators of Regulatory Services) - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing
- HHSRS (Housing Health and Safety Rating System) Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9
- National Fire Chiefs Council (NFCC) - Fire Safety in Specialised Housing
- DCLG (Department for Communities and Local Government) Fire safety in purpose-built blocks of flats
- Home Office: A guide to making your small block of flats safe from fire

6.0 Assurance Framework

6.1 The Legal and Regulatory risk appetite of Bromford's Board is minimal, and it is risk averse with respect to landlord asset compliance. As such we always do everything reasonably practicable to ensure Legal and Regulatory compliance. Our compliance management comprises high-level oversight and assurance at Board and Executive level, mid-level oversight at Senior Leadership level and detailed scrutiny at management level.

6.2 This policy assists with mitigating the risks identified in our strategic and operational risk registers, namely 'We fail to ensure safety and asset compliance across our homes resulting in death or injury to customers, colleagues or a third party.'

6.3 A system of audits in line with our 3 lines of assurance will ensure that all aspects of this policy and any controls implemented, will be monitored to ensure its effectiveness.

7.0 Performance Monitoring

7.1 The following KPI's are measured across the Group and reported to the Executive:

- % properties with a valid Fire Risk Assessment
- Number of Fire Risk Assessments due in 30 days
- Number of Intolerable and Substantial (P1) actions overdue from completed FRAs
- Number of Intolerable and Substantial (P1) actions due in 30 days

Additional operational PIs are monitored by the Compliance and Service Delivery teams to ensure ongoing compliance and inform improvements.

8.0 Training

8.1 Training will be provided to colleagues which is relevant, suitable, and sufficient and meet the requirements of Article 21 of the Fire Safety Order

9.0 Communication and Review

9.1 This policy is published on the Hub intranet site and will be communicated and applied throughout the organisation.

9.2 This policy will be reviewed annually and in line with changes to government guidelines and will be made available to interested parties as appropriate.

Document Details

Owner: Director of Asset Management & Building Safety

Approved By: Risk and Compliance Forum

Date of Approval: December 2023

Next Review Due: Annually

Policy Version: V2
