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FIRE SAFETY POLICY

1. Introduction

Black Country Housing Group (BCHG) is committed to minimising the risk of fire and promoting fire safety in all premises under its control. The Group has a responsibility towards all Relevant Persons under the Regulatory Reform (Fire Safety) Order 2005. This is shortly to be amended under the proposed Fire Safety Bill and the proposed Building Safety Bill, which are undergoing Royal Assent to become law following being passed by Parliament.

A new Building Safety Regulatory body is to be established, which will have new powers to ensure that BCHG adhere to the new rules, and the means to enforce.

The building safety regulator will:

- Implement a new, more stringent regulatory regime for high risk residential buildings.
- Promote competence among industry professionals and regulators to raise standards in design, construction and the management of buildings.
- Oversee performance systems of all buildings, so one regulator can provide guidance on building performance as well as building safety, ensuring that factors like countering climate change are factored into regulatory decisions.

2. Scope

This policy sets out how the Group addresses fire safety in its offices, communal areas (including roof voids), care homes, retirement living schemes and supported housing schemes. The policy is to be read in conjunction with the fire risk assessment procedure.

3. Definition

A new Duty holder system is to be implemented which will require new roles for BCHG in an 'Accountable Person', in BCHG's case will be the Deputy CEO and a 'Building Safety Manager', in BCHG's case will be the Assets & Safety Manager (Currently Asset Manager) whose role will be to support the accountable person in the day-to-day management of the building to ensure safety standards are adhered to. **See section 9 for written summary of responsibilities.**

The full details of new requirements and the responsibilities of BCHG have yet to be formally defined and disseminated, therefore this policy document will require a further review and update once the new requirements are finalised.

The Building Safety Bill is intended to put measures in place to make people safer in their homes. The draft Bill will ensure that there will always be someone responsible for keeping residents safe in high rise buildings – those 18 metres and above. It will ensure that high rise buildings and the people who live in them are being kept safe and there will be new powers to raise and enforce higher standards of safety and performance across all buildings.

Whilst none of BCHG buildings currently fall within the High Rise Building classification, New Bradley Hall and Gower Gardens care homes are the only buildings that fall under the new legislation, with all other blocks outside the scope of the draft legislation, although this may get extended for example to retirement living in future. Despite this, and in the interests of provision of safer homes, BCHG seek to adopt the principles and demonstrate Best Practice

It is understood currently that BCHG buildings will require 'Building Safety Assurance Certification' registered with the new Building Safety Regulator, which will require a 'Building Safety Case to be developed, maintained and managed to ensure that risks are proactively identified, and mitigating measures put in place and maintained.

All properties under the Group's control must therefore have one or more Responsible Persons with clearly defined responsibilities including carrying out and reviewing fire risk assessments and ensuring best practice and legal requirements are followed at all times.

A **Responsible Person** is anyone who has control of premises or a degree of control over certain areas or systems. Although the Responsible Person in the Group for overseeing health and safety is the Deputy Chief Executive, responsibilities are shared with other Responsible Persons in Leaders, Managers and Supervisors and are responsible for:

1. Ensuring that staff reporting to them understand their health & safety responsibilities. Monitoring the health & safety performance of staff and volunteers.
2. Ensuring special care is taken for new employees, agency staff and visitors ensuring their welfare is maintained at all times. Ensuring that risk assessments cover all employee activities, that any actions arising from them are implemented and that the findings are shared with employees.
3. Consulting employees on health and safety matters during team meetings and via the Health and Safety Panel.
4. Providing appropriate training for employees, including induction training and training in job skills, general health and safety matters and other specific safety issues, as required.
5. Ensuring that work equipment is suitable for purpose.
6. Providing suitable personal protective equipment and ensuring it is properly maintained. Reporting to the Director responsible for Health and Safety any concerns which they are not able to resolve.
7. Ensuring all incidents and near misses are reported to the Health and Safety Panel.
8. Plus the written summary of fire safety duties identified within section 9.

A **Relevant Person** is any person lawfully on the Group's premises or any person in the immediate vicinity of premises where a fire could occur.

A **Fire Risk Assessment** is an organised and methodical assessment at a premise, carried out by the Building Safety Manager (BSM) or another suitably qualified professional, the activities carried out there and the likelihood that a fire could start and cause harm to those in and around the premises. It takes account as far as is reasonable the needs of all Relevant Persons. Although these are normally completed when there has been a change in building use or change in design, BCHG take an enhanced approach and conduct an assessment every 12 months.

The Fire Risk Assessment should:

- a) Identify the fire hazards and actions required to ensure compliance

- b) Identify the people at risk
- c) Remove and reduce the risk as low as reasonably possible.
- d) Determine what physical precautions and management arrangements are necessary to ensure the safety of Relevant Persons if a fire does start.
- e) Provide a detailed list of Fire Risk Actions, categorisation of priority
- f) Distribution list of interested parties
- g) Review date

A **Fire Compartmentalisation Survey** is an organised and methodical intrusive assessment at a premise, carried out by a suitably qualified consultant in conjunction with the Building Safety Manager (BSM) that seeks to ensure that the structure of the building is suitably protected around openings (e.g. where services penetrate through the building) and fire-stopping within the structure in order to inhibit the spread of fire. This survey, is intended to be a 'one-off', however should be reviewed in line with the FRA, and when the building is altered, or there is a change of use.

The survey allows for destructive inspection and testing in both flats and common parts carried out in some sample areas and flats that are selected. It will require a contractor to be present to open up any construction for inspection, and then to make it good after the inspection and testing are completed. BCHG also keep and maintain a cladding register for its buildings. The key details, along other key compliance items are pulled together into the Building Safety Case for the block. The Building Safety Case for each block will have a health check annually alongside the FRA and will be used to monitor and record any changes to the building which may have affected compartmentalisation such as planned maintenance of wiring and pipework etc.

Due to the nature of this work, it is often necessary to carry out these tests and inspection in flats that are vacant.

The Fire Compartmentalisation Survey should:

- a) Identify the hazards within the structure and remedial action required to ensure compliance
- b) Identify the people at risk
- c) Remove and reduce the risk as low as reasonably possible.
- d) Determine what physical precautions and management arrangements are necessary to ensure the safety of Relevant Persons if a fire does start.

4. Related documents

- Fire Risk Assessment Procedure
- Health and Safety Policy
- Motorised Scooter Policy
- Smoke Free Policy
- Estate Management Policy
- Training and Development Policy
- Fire Evacuation Procedures

5. Fire Safety Principles

The Group will:

- Comply with all aspects of the building a safer future legislation and customer consultation.
- Ensure that all fire safety issues including incidents and near misses are raised at the Health and Safety Panel and any actions identified are followed through to completion.
- Ensure that Fire Risk Assessments are reviewed annually (within 1 month of anniversary) or where there is a significant change in risk by a competent trained person.
- Ensure that from Jan 2021, a Building Safety Case is produced for all existing blocks requiring an FRA as part of a planned programme.
- Ensure that all staff, customers and other Relevant Persons are aware of the evacuation procedures and escape routes, through training, meetings, newsletters, inductions, tenancy sign-ups, correct signage and evacuation drills.
- Ensure that all Responsible Persons receive appropriate training and are made aware of their individual responsibilities.
- Ensure that all relevant fire safety records are kept up to date.
- Ensure that all fire protection and firefighting equipment (Fire Alarms, Emergency Lighting, Dry Risers, Sprinklers, Smoke vents, Extinguishers, Blankets etc.) are regularly serviced, tested and maintained in accordance with legislation and best practice.
- Ensure as far as possible that the Group's employees work in a safe manner that minimises the risk of fire.
- Consult a fire safety expert / consultant where specialist advice is required.
- Work in partnership with the Fire Service to keep up to date with relevant legislation and best practice and seek specific advice from them relating to particular premises or issues of concern.
- Raise awareness of fire and gas safety through staff and customer meetings, SharePoint, BCHG Website, Customer Portal, training and other events.
- Promote fire home safety checks to all incoming tenants and ensure they are aware of basic fire safety arrangements in their new home including evacuation procedures.
- Complaints relating to fire and building safety are to be escalated immediately to the Accountable person and then investigated by the Building Safety Manager.
- Fire risk assessments and building safety cases will be displayed in communal areas for residents to read.
- Seek customer feedback on safety and security of their homes and communal areas through a programme of independent satisfaction surveys.

Currently BCHG buildings have a variety of physical measures in place within flats and their respective blocks that include;

- Fire Resistant Structure (a defined level of fire resistance to comply with Building Regulations) which includes Compartmentalisation through walls/floors, Fire Doors etc.
- Where a building is clad, a survey has been undertaken to identify higher risk materials (ACM etc) and destructive testing carried out by specialist consultants to identify and record risk in the event of fire.

- Fire Protection and Firefighting Equipment including Fire Alarms, Smoke Detection, Emergency Lighting, Dry Risers, Sprinklers to new buildings (not retrofitted to existing stock), Smoke vents, Extinguishers, Blankets etc and a regular inspection and servicing regime to ensure effective operation.

6. New Developments

All new developments with communal areas irrespective of height will adopt the Building a Safer Future principles, also ensuring fire control systems (typically sprinklers) are installed in all new blocks of flats developed after March 2019.

For all new buildings BCHG will create a duty-holder regime with three key duty holders:

Design and Planning – Principle Designer

- Identify how core building safety requirements will be met in the pre-construction phase, controlling foreseeable risks and ensuring that the contractual relationships they enter into are appropriately funded to support core objectives;
- Ensure that all those involved in supporting the Principal Designer have suitable skills, knowledge and experience;
- Compile Full Plans documentation for the Building Safety Regulator demonstrating that they have considered and managed the key risks to building safety of the proposed construction so far as is reasonably practicable;
- Ensure that information management systems are properly updated, and change control mechanisms are utilised (for as long as they remain involved);
- Co-sign at completion of works stage (if still involved) that the work meets the Building Regulations requirements

Construction – Principle Contractor

- Make suitable arrangements for the planning, management and realisation of the core objectives in the construction phase of a project. This includes ensuring that the contractual relationships are appropriately funded to support core objectives. In addition it includes:
 - preparing a construction control plan
 - organising cooperation between contractors with suitable skills, knowledge and experience and coordinating their work;
 - updating information management systems and ensuring
 - change control mechanisms are properly utilised;
 - leading demonstration at the completion of works stage that the work meets the requirements of the Building Regulations and ensure the handover of the Fire and Emergency File and the digital record to the future building owner

Occupation – Accountable Person

- Make suitable arrangements for managing the building work so as to deliver against the core objectives on building safety (and other Building Regulations priorities).
- Establish procurement processes that allow sufficient time, resources and prioritisation to deliver the core objectives
- Appoint key duty holders who'll prioritise building safety and have the required skills, knowledge and experience;
- Establish the necessary information management systems to facilitate successful completion and handover of the work; (e.g. the Fire and Emergency File and digital record – see below);

- Co-sign at completion that the work, to the best of their knowledge, meets building safety requirements

At Handover four key information sources will be handed over for which all duty holders will have a joint responsibility:

- Digital record of the building as planned, then as built including, for example, products used. Intended to underpin an effective understanding of the constructed building across the life cycle.
- Fire and Emergency File setting out the key building safety information.
- Full Plans and specification of building works in respect of fire and structural safety as a minimum (alongside the necessary specification in all other aspects of the Building Regulations).
- Construction Control Plan, how building safety and Building Regulations compliance will be maintained during the construction phase and how change will be controlled and recorded.

7. Inspection Procedures

In addition to fire risk assessments, all premises including communal areas should be subject to regular inspections by Customer Relations Managers/Scheme Managers to include the following:

- Checking that adequate signage is in place including fire exits, safety procedures, assembly points and warning notices, information for emergency services where required.
- Ensuring adequate internal and external lighting is in place and in working order including emergency lighting where required.
- Ensuring fire exits are free from obstruction and able to be opened easily in an emergency
- Checking that no inappropriate items are stored in communal areas, under stairwells etc. This includes items such as mobility scooters, bikes, prams and any flammable materials. A common-sense approach should be taken on items such as pictures and mats in corridors. For example, a small single non-slip mat would normally be acceptable but a loose piece of carpet that forms a tripping hazard would not be. Plants in ceramic pots may be acceptable provided they do not cause an obstruction. Artificial plants and flowers or plastic pots which are both flammable are not normally acceptable. Communicate this from time to time as required using social media or other methods.
- Ensure access to refuse stores is restricted to prevent the risk of arson. No gas bottles and other flammable items should be stored in refuse or other communal areas.
- Check for tripping hazards in communal areas.
- Check that service books for fire safety equipment are in place and kept up to date and information for emergency services is accessible and up to date.
- Check fire doors are fit for purpose.
- Regularly check for any concerns with electrical items and that meter doors are kept locked.
- Ensure 'No Smoking' signs are in place and No Smoking Policy is being adhered to.
- Keep inspection records and maintain for the appropriate period of time.
- Ensure actions required are recorded, highlighted and addressed in an appropriate manner, including escalation of high risk actions to AP & Exec Team.

8. Measuring Compliance

The Head of Assets and Investment will regularly report to the Executive Team and Group Audit Committee on the progress and performance of the Fire Risk Assessment programme and other compliance areas, in accordance with approved Key Performance Indicators (KPIs) which shall include:

- The Fire Risk Assessment Programme.
- Immediately raise to the accountable person and executive team, the discovery of high risk rated fire actions.
- 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.

9. Written Summary of responsibilities.

Accountable Person (AP) Main duties

- Identify those who have control over the management and maintenance of the building.
- Ensure BCHG comply with all items of law and legislation relating to fire safety.
- Ensure those who have this control are aware of their duties and responsibilities.
- Ensure that a BSM is appointed to the building as appropriate, (and as above that this information is logged as part of the Building Registration Certification process and record).
- Accountable Person to ensure appropriate resources (in time, personnel and financial terms) are always made available to ensure that their obligations to operate can be executed suitably and sufficiently.
- Delivery of a 'Management Summary' as part of the Resident Engagement Strategy.
- Monitor risks under building safety and apply appropriate risk frameworks.
- BCHG Board will receive an annual report on the fulfilment of main duties.

Building Safety Manager (BSM) Main duties

- Ensuring and assessing that those employed to maintain and manage the building have the necessary skills, knowledge and experience
- Maintaining and operating information management systems to facilitate safe management of the building
- Maintaining and managing the safety case for the building so that risks are proactively identified, and mitigating measures put in place and maintained
- Identifying and ensuring that necessary and appropriate building remediation is undertaken to ensure conditions set out in the building registration certificate are met
- Engaging residents in the safe management of their building through a Resident Engagement Strategy that includes routes of escalation for resident concerns
- Delivering the engagement plan on day-to-day basis, providing the engagement plan to all residents so that they can understand how to get involved in decision making and providing residents (and regulator) with updates to the plan to include;
 - Name/contact information of BSM, Accountable Persons (Owner, Landlord,

- managing agent, letting agent etc.)
- System/Process for logging complaints/defects in Fire Safety
- Process/contacts to escalate a complaint
- Rights and responsibilities of the occupier
- Availability of the last FRA
- Pictorial/symbol driven explanations of escape and fire risk obligations
- Overview of firefighting/detection equipment (e.g. fire alarm, smoke detection, emergency lighting, AOVs, Personal Fire Protection/ extinguishers, dry risers, sprinklers, etc.) that are installed in the building and overview as to their function in the building
- Location of emergency escape and exit routes including accessible/step free routes and refuges (and their internal signage)
- Fire Action Policy (Evacuate or Defend in place/Stay put) and related evacuation procedures
- Contact details for local Fire Authority
- Means/procedures for supporting the needs of vulnerable occupiers
- Means/procedures for supporting residents and occupants where a barrier to communication could exist
- Incident response communication including addressing any sensory needs such as hearing or sight impairment by having visual and audible alerting systems.
- Identification of vulnerable people, informing them what arrangements are in place including any PEEPs and GEEPs. (consideration about how this information can be accessed)
- Presentation/Training for occupiers to enhance awareness of occupiers' responsibilities to each other and to fire safety of all occupants
- Demonstrating that fire risk assessments for the whole building are undertaken and reviewed regularly and any recommendations are undertaken in a timely manner.
- Reporting mandatory occurrences to the building safety regulator.

Training

Administering the Organisation's training matrix and ensuring that training is provided to responsible persons is the primary responsibility of the HR team, in co-operation with Heads of Service.

Fire Risk Assessments

The Building Safety Manager (BSM) is responsible for the completion of Fire Risk Assessments (FRA's) for BCHG buildings managed buildings. For agency managed schemes the responsibility is with the leaseholder, however the BSM is responsible for ensuring these have been carried out and a copy of the occupier's FRA is requested and reviewed annually to check for any landlord obligations and ensure procedures are in place to protect vulnerable occupiers.

Fire Compartmentalisation Surveys

Building Safety Manager (BSM) for all communal blocks/scheme buildings. Reports filed on

SharePoint against properties. All high risk actions to be immediately raised to the AP.

Servicing and maintenance of fire equipment

The responsibility lies with the Building Safety Manager (BSM) assisted by the Compliance Manager & Officer. - Certificates filed on SharePoint against properties for statutory servicing.

Fire Alarm Testing, Monthly Emergency Lighting function test. Visual Checks Including (estate inspection) of held open fire doors, visual check of extinguishers, fire doors.

For General needs this is the responsibility of the Building Safety Manager (BSM) with checks delivered under various compliance contracts. Customer Relations Managers undertake estate inspections and report defects to BSM (CRM).– Site Noticeboards', SharePoint for estate inspections

For Retirement Living/ Care Homes/Supported Living schemes this is the responsibility of Scheme Managers (SM's), Home Managers (HM's), Supported Living Manager (SLM). - Checklists kept in onsite folders

For Agency Managed sites this is the responsibility of the leaseholder, (where defined in the lease arrangement) however copies of reports are to be provided to BCHG.

For offices this is the responsibilities of Fire Marshalls, who are appointed by the Health and Safety Panel. For the Savoy Centre the responsibility lies with the Facilities Manager. - Fire logbooks.

Evacuation Drills / Evacuation Policy

For Retirement Living/ Care Homes/Supported Living schemes this is the responsibility of SM's, HM's, SLM.

For agency managed sites this is the responsibility of the leaseholder.

For offices this is the responsibilities of Fire Marshalls, who are appointed by the Health and Safety Panel. For the Savoy Centre the responsibility lies with the Senior Centre Technician.

Hazard Spotting, Behavioural issues, housekeeping, monitoring contractors, upkeep noticeboards

For general stock needs this is the CRM and for Retirement Living/Care Homes and Supported Living schemes this is the responsibility of SM's, HM's and SLM. For Agency Managed sites this is the responsibility of the leaseholder.

For offices this is the responsibilities of Fire Marshalls, who are appointed by the Health and Safety Panel, and the shared responsibility of all staff. – Health & safety Panel minutes, verbal and electronic communications

Promotion of Safety checks for vulnerable customers (general needs) and Personal Emergency Evacuation Plans (PEEPS), for our staff and residents of schemes and

homes with vulnerabilities/disabilities a Person-Centered Fire Risk Assessments (PCFRA) for those requiring additional assistance in the event of evacuation.

Offices/Staff – Line Managers, BSM supported by Fire Marshals.

General needs – CRM

Other sites – SM's supported by the RLM, SLM, HM's. PEEPS documents are to be provided in the Fire Service Document Boxes located by alarm panels at schemes for reference by the Fire Service in the event of an emergency.