

Paragon Asra Housing Limited

PA Housing FIRE SAFETY POLICY

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Policy Owner

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Approved by

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Paragon Asra Housing Limited PA Housing is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats, we will provide them.

1. Policy Statement

1.1 **Paragon Asra Housing Limited (PA Housing)** owns and manages a range of assets including single dwellings and non-domestic assets. The key objective of this Policy is to describe how PA Housing will manage Fire Safety Risk so far as is reasonably practicable. This includes:

- The identification of its specific responsibilities for each of its assets.
- The creation of a Fire Safety Management Plan (FSMP) and associated staff training to provide guidance on the implementation of the commitments contained in this policy.
- The key activities (e.g., risk assessment, testing, servicing) that PA Housing undertakes.
- Maintaining competent staff and contractors.
- Communication internally and with customers and other stakeholders
- How the PA Housing Board, as duty holder, will delegate responsibility for the implementation of policy, monitor its effectiveness and receive assurance of compliance.

1.2 The scope of this policy includes:

1.2.1 The undertaking of Fire Risk Assessments (FRA), and the remedial works and actions arising from the FRA.

1.2.2 Cyclical maintenance of fire safety systems and equipment including but not limited to 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; and

1.2.3 General repair, maintenance and management activity which could have an impact on fire safety within a building or individual property.

1.3 PA Housing will seek to comply with all current and relevant statutory obligations, primarily as detailed in the following.

- The Building Regulations 2010.
- The Housing Act 2004 and.
- The Regulatory Reform (Fire Safety) Order (RRFSO) 2005.

1.4 PA Housing takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985 will also be met.

- 1.5 In addition, PA Housing must meet the requirements of both the Regulator for Social Housing's (RSH) Homes Standard and the requirements of the Care Quality Commission (CQC).
- 1.6 Our primary objective is to ensure that customers, contractors, staff, and visitors remain safe in our premises (both domestic and non-domestic). Failure to properly discharge our legal responsibilities may also result in:
- Prosecution under the Regulatory Fire Safety Order 2005, Health and Safety at Work Act 1974, or Corporate Manslaughter and Corporate Homicide Act 2007.
 - Regulatory intervention by the RSH or CQC.
 - Reputational damage.
 - Loss of confidence by stakeholders in the organisation.
- 1.7 This Policy statement establishes the broad framework for compliance with the key statutory and regulatory obligations.

2. Roles and Responsibilities

- 2.1 Detailed roles and responsibilities will be documented within the FSMP and associated Operational Guidance. The overarching roles and responsibilities are as follows:

The PA Housing **Board** has overall responsibility for approving this Policy, delegating responsibility for its implementation, monitoring its effectiveness at high level, and receiving assurance of compliance. The PA Housing 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.

The **Audit Committee** will be responsible for ensuring that the PA Housing Board receives the assurance it requires.

The **Chief Executive Officer (CEO)** will be responsible for the implementation of the Policy and will allocate responsibilities within the Executive Management 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 Executive Management Team (EMT).

The **Assistant Director of Asset Management & Compliance** will take overall responsibility for the delivery of the Policy commitments described in the Data, Key Activities to Manage Risk and Communications sections of this Policy. The **Assistant Director of Asset Management & Compliance** will attend the Audit committee meetings and ensure that areas of non-performance are reported and escalated where required. All potential, material non-compliance will be reported to the CEO/ EMT irrespective of whether this relates to a KPI scrutinised by the EMT or other groups.

The **Assistant Director of Asset Management & Compliance** will take overall responsibility for planning and implementing the assurance activities described in this

Policy and for the effective upward reporting of performance.

All **Directors** will take responsibility for ensuring that staff and contractors they employ have the skills, knowledge, and expertise necessary to deliver the commitments outlined in the Policy. Directors will identify Competent Person(s) (internal or external) suitable for the delivery of specific tasks.

Competent Person(s) will have a responsibility to identify any concerns about their own competency for the task that they are being asked to undertake and recommend additional competency is procured where required.

3. Management Plan

3.1 PA Housing will maintain an FSMP and associated Operational Guidance which shall:

- Provide additional guidance on how the commitments outlined within this policy will be implemented.
- Provide clear lines of responsibility for the management of Fire safety.
- Set out key operational processes.
- Ensure that a clear and consistent process is in place to obtain access to properties where this is required. This will include proactive assessment of available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement action will be used where required.
- Maintain a process for dealing with unsafe situations or incidents.

3.2 All staff who have roles identified in the FSMP will receive associated training appropriate to their role.

4. Data

4.1 PA Housing acknowledges that to meet its obligations it must maintain a robust approach to identifying the Assets and components for which it has responsibility. PA Housing will:

- 4.1.1 Maintain an up-to-date master database of all properties that will indicate both where it does and does not have a responsibility to provide Fire Risk Assessments (FRAs) and/or maintain fire safety equipment. This will include the identification of properties where PA Housing has no responsibility but has an interest (e.g., a block managed by others but PA Housing owns a leasehold dwelling) or those where there is more than one responsible person.
- 4.1.2 Where a requirement for an FRA exists, hold full electronic copies of the current and previous FRAs along with key reportable and auditable information from the same including but not limited to the unique property reference (UPRN); property designation; construction type; building management; shared responsibilities; risk profile; evacuation strategy; date of last risk assessment; review frequency; and date of next risk assessment.

- 4.1.3 Where fire safety equipment exists, hold reportable and auditable information including but not limited to: UPRN; type of equipment; manufacturers' requirements and instructions (where available); associated testing/servicing frequencies; last date completed; and next date due. Records of at least the last two completions of each activity/equipment type will be held. These will generally be held electronically but there may be instances where a hard copy is kept on site and in this instance additional controls will be in place as detailed in the FSMP.
- 4.1.4 Maintain current and auditable records of remedial works arising from the FRAs or other fire safety related inspection or testing. The records will include address and risk profile of the property; detail of the work item required; priority and target completion date; person responsible; completion date and associated sign off; and evidence of completion.
- 4.1.5 Where PA Housing has no responsibility for a fire safety activity described in this policy but has one or more residents living within a block where one may be required, PA Housing will write to the responsible person on an annual basis asking for written confirmation that:
- They are fully aware of all relevant legislation and their obligations.
 - All relevant activity - including but not limited risk assessment, inspection, testing, remedial works, and maintenance - has been undertaken by a person competent to do so and is not overdue.
 - They are in full compliance with all relevant legislation.
 - PA Housing has been informed of any material issues relating to resident health and safety.

Where PA Housing does not receive an adequate response, it will take reasonable steps to follow this up. Further details will be contained within the Management Plan. Records will be kept for the current and previous year.

- 4.1.6 The approach to data control will be documented in the Data Management Protocol and FSMP.

5. Key Activities to Manage Risk

5.1 Fire Risk Assessment

- 5.1.1 Undertake suitable and sufficient FRAs in accordance with the Regulatory Reform (Fire Safety) Order 2005 and record the significant findings. Undertake recommended remedial work within the timescales set by the Competent Person who completed the FRA.
- 5.1.2 The basic FRA will be a Type 1 which will be escalated to a Type 2, 3 or 4 based on the recommendations of the Fire Risk Assessor. A full definition of

'Type 1-4' refer to the Government Guide Fire Safety in Purpose Built Blocks of Flats.

5.1.3 Undertake new FRAs in line with the recommendations in the FRA. FRAs will be renewed on or before the date recommended by the Competent Person undertaking the previous assessment.

5.1.4 Review 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.
- Works affecting the means of escape or alarm systems
- Structural or material changes to the building or its use.
- Changes in legislation (or significant changes to guidance).
- Changes to the building's fire strategy
- Resident issues identified in person centred RA which would be relevant to the building? E.g., resident who is unable to self-evacuate where the escape strategy is simultaneous evacuation.

5.2 Evacuation

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

5.2.1 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.

Converted accommodation will generally 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').

5.2.2 Commercial accommodation and community premises

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

5.2.3 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. PA Housing will be proactive in becoming aware of people who may need assistance to escape in the event of a fire.

In residential premises:

General Needs - where practicable and should assistance be requested; PA Housing 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.

Specialist Housing – assessment of individuals will be made by appropriate staff. This will involve detailed and up-to-date records of occupants; in some buildings they will require person centred fire risk assessments (PCFRAs). Assistance in evacuation provided by staff will be determined on a case-by-case basis. The Fire and Rescue Service will be included in the process and where required appropriate information will be held 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.

5.2.4 Evacuation Drills

Evacuation drills will be carried out in all non-residential buildings. This will be determined by the FRA. In non-residential buildings PA Housing will endeavour to conduct drills twice annually. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.

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

5.3 Further Investigations

PA Housing will proactively undertake further investigations to the buildings for which it is responsible, where required. This may include but is not limited to investigations into external wall systems, balconies, compartmentation, and fire doors. Such further investigations will be recommended by the FRA, the fire and rescue service or initiated where PA Housing is not satisfied it has appropriate assurance around the design, installation, or maintenance of a building component. As a result of emerging guidance and the size of the PA Housing portfolio, there is likely to be numerous further investigations required. PA Housing will maintain a time-bound programme of these investigations prioritised by building risk profile.

5.4 Fire Door Inspections

Until further guidance or legislation is available, PA Housing will comply with the consolidated Government Advice Note (including Annex A) with reference to fire door inspections.

Fire doors will be sample inspected as part of the FRA process and at regular intervals as recommended within the FRA.

5.5 Remedial Actions

All remedial actions arising from the FRA or further investigations shall have clear completion targets agreed by the Competent Person undertaking the FRA. Any proposed changes to the agreed completion targets will be documented, agreed by a Competent Person, and proposed to the Fire Safety Committee for approval. The decision will be recorded and reported within the Key Performance Indicators (KPIs) to ensure clear visibility.

All fire safety remedial work should be carried out in accordance with the relevant British Standard, approved code of practice or associated good practice guidance. Any contractors undertaking specialist fire safety remedial works should be third party accredited.

The fire risk will be reviewed regularly from the time of FRA completion until remedial works have been completed.

Large remediation programmes following further investigations may be monitored as distinct projects outside of general remedial actions.

5.6 Testing and Maintenance of Fire Safety and Equipment, Gas Installations and Electrical Installations

All fire safety equipment within the scope of this policy will be tested and maintained in accordance with regulatory and statutory requirements and considering manufacturer's requirements. This will include the completion of all essential remedial works requirements identified during the testing/maintenance activity.

PA Housing shall ensure that all assets have a satisfactory Electrical Installation Condition Report (EICR) in accordance with the Electrical Safety Policy.

PA Housing shall ensure that gas installations are maintained in accordance with the Gas Safety Policy including the completion of Landlord Gas Safety Records (LGSR) where appropriate.

All repairs to fire safety equipment and gas and electrical installations will be undertaken in accordance with the relevant policy.

In some cases, electrical and gas safety inspections relating to the dwelling will be the responsibility of a Shared Owner or Leaseholder. PA Housing will not typically request evidence that these have been undertaken but will write to the residents periodically to remind them of the importance of them. This is detailed in the communication section of this policy. Where an FRA indicates that PA Housing should seek evidence, PA Housing will request this.

5.7 Domestic Smoke/Heat Detection

Ensure that all dwellings owned by PA Housing (excluding leasehold and shared ownership) will have working mains powered smoke/heat alarms installed (or battery-powered smoke alarms as an interim measure until mains powered can be installed).

Maintain a programme of upgrading to mains powered with standby battery systems across all properties over the next 5 years as part of the EICR programme.

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.

5.8 Repairs and Maintenance Activity

There is a risk that repairs and maintenance activity unwittingly impacts fire safety. Owing to the volume and nature of repairs works it is not practicable to undertake specific risk assessments of all jobs. PA Housing will manage this risk by ensuring that all contractors must obtain prior permission before working on any of its properties, and that R&M contractors (internal and external) have a general awareness of fire safety to inform dynamic risk assessment when undertaking responsive repairs that may have an impact on fire safety. Repairs will be carried out in accordance with the relevant British Standard, Approved Code of Practice or associated good practice guidance and by third party accredited contractors where required.

Any contractors (internal or external) undertaking hot works as part of repairs activity must have an approved hot works procedure. This should include avoidance of hot work unless no alternative method is feasible. The Contracts Register will identify if a contractor has such a procedure and is permitted to undertake such works.

Certain buildings may be assigned as permit to work areas to manage the work to a particular element, area, or of a certain type. PA Housing will review the need for the operation of a permit to work scheme for a specific property on a scheme-by-scheme basis.

5.9 Planned and Major Works

Planned maintenance or upgrade programmes commissioned by PA Housing to buildings that require a FRA will be subject to a risk assessment by a competent person to consider their impact on fire safety. Works programmes are likely to fall into one of three categories:

1. Works subject to planning permission and/or Building Regulations approval.
2. Works not subject to the Building Regulations (including those covered by the Building Regulations but delivered by under a Competent Person scheme) but where there is a foreseeable impact on fire safety.
3. Works not subject to the Building Regulations where there is no foreseeable impact on fire safety.

Works will only be in category 3 if a Competent Person has reviewed the proposed works and formally agreed that there is no foreseeable impact on fire safety.

For all other works PA Housing will ensure that prior to works commencing a competent person will:

- Review the proposed work against the fire risk assessment and any Building Safety Case.
- Ensure anyone appointed to undertake design or construction activities can demonstrate the necessary competence to discharge their responsibilities relating to fire safety. This will include duty holders identified in the Construction (Design and Management) Regulations 2015 (the Client, the Principal Designer, the Principal Contractor, designers, and contractors).
- Request reasonable assurance that duty holders have demonstrated that resident safety can be assured during the works or that a suitable decanting strategy is in place.
- Engage with residents on fire safety matters that affect them.
- Request reasonable assurance that duty holders have complied with the building regulations in relation to fire safety where required
- Request reasonable assurance that there is an appropriate site inspection and sign-off programme in place for the stages of the work.

During the project and at its conclusion, PA Housing will make any updates to the FRA, Building Safety Case, or other key fire safety information as required.

For certain projects on buildings there will be additional requirements in relation to notification and consent from Building Safety Regulator (once established). This is covered further below.

5.10 Resident Commissioned Works

PA Housing will maintain a consent process for any resident commissioned works. In buildings that are subject to a FRA, the proposed work will be evaluated by a Competent Person to consider if there is a foreseeable impact in relation to fire safety. Approval will not be unreasonably withheld although consent may be refused or conditions imposed where appropriate.

Where unauthorised work with the potential to impact fire safety is discovered, PA Housing will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident.

5.11 Management

PA Housing will:

- Prohibit the storage of any items in communal areas and escape routes without PA Housing 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 FSMP to enforce the above.
- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).
- Ask residents to alert PA Housing to the presence of stored oxygen so that it can alert the Fire and Rescue Service to its presence.
- Enforce resident responsibilities where required considering a balance of individual residents' rights with the need for effective, timely action where there is a risk to the safety of other residents.

5.12 Construction

There are detailed requirements on PA Housing as a Client during construction projects and these are considered elsewhere. However, in relation to fire safety PA Housing will ensure:

- It cooperates and shares information with stakeholders at key stages prior to and during construction.
- that the people it employs are competent to do the work they are undertaking.
- compliance with the building regulations and specific regulatory requirements imposed upon it.
- appropriate approvals are in place and that all information is handed over to Operations prior to any occupation.
- that a FRA is undertaken prior to occupation.

5.13 Building Safety System Reforms

This document is written at a time of change in relation building safety management. New requirements are emerging and PA Housing is committed to being proactive in implementing key aspects of the approach before legislation requires. The Building Safety Case is likely to be at the heart of the new approach to evidencing the safety of buildings that fall within the scope of the new regulations. PA Housing expects the Safety Case to require a demonstration of how it has identified the hazards, evaluated the risks, decided on and implemented control and mitigation measures and has an ongoing process in place for monitoring. This is consistent with the approach that should be undertaken for FRAs under the Fire Safety Order and other commitments made in this policy.

6. Communication with Stakeholders

6.1 Internal

Operate a HSC comprising of a cross organisation team of staff. Terms of Reference of the Group will be included in the FSMP.

6.2 Residents

PA Housing will encourage fire safety by the following actions:

- Provide a copy of an FRA or evidence of fire equipment servicing to a relevant resident within 28 days when reasonably requested to do so.
- Inform residents of the importance of fire safety on a regular basis, through the provision of information via website, newsletters, leaflets, and information at sign-up.
- Maintain a clear approach to gaining access to carry out surveys and undertake works and be clear that enforcement action may be taken when it is necessary to do so.
- Communicate with residents through appropriate 'Fire Action' signage.
- Maintain a clear complaints process and monitor and record complaints that indicate a risk to a fire safety.
- Communicate with Leaseholders and Shared Owners annually to remind them of the importance of undertaking periodic electrical and gas safety checks.

6.3 Staff

Communicate with staff through induction training, fire drills, appropriate signage, and the intranet.

6.4 Other Responsible Persons

Comply fully with Article 22 of the RRFSo and ensure that where PA Housing are considered jointly responsible for a property or common area, it will share its FRA with other relevant parties, and co-operate with them so far as is practicable to ensure the safety of relevant persons.

6.5 Fire and Rescue Service

PA Housing will engage in a regime of regular and proactive communication with the Fire and Rescue Service to ensure good lines of communication and operational familiarity.

6.6 Building Safety Regulator

Once established, we will maintain communication with the Building Safety Regulator. This will include reporting of mandatory and voluntary occurrences where required once this scheme is established.

7. Monitoring and Assurance

7.1 Monitoring

7.1.1 The following Performance Indicators (PIs) and KPIs will be reported to the HSC, Executive Management Team or Board at the frequencies outlined in our Landlord H&S Compliance Strategy:

- Buildings with a valid FRA renewed within its due date as a percentage of total buildings requiring an FRA.
- Remedial actions that are overdue
 - Buildings with no outstanding and overdue remedial actions as a percentage of total buildings subject to an FRA.
 - Buildings with fire safety systems/equipment present where all systems/equipment has been tested/maintained in accordance with this policy as a percentage of total buildings with fire safety systems/equipment.
 - Number of notices received by the Fire and Rescue Services in the reporting period.
 - Number of notices from the Fire and Rescue Service that are overdue as a percentage of total outstanding notices.
 - Number of safety occurrences - including any reported fires and fire safety related occurrence reporting (e.g., to the HSE or Regulator) during the reporting period.

7.1.2 These PIs or KPIs will be reviewed periodically by the HSC and additional/amended measures may be recommended.

7.1.3 Where appropriate, KPIs will include the total number of actions or buildings required and the total number within target as well as percentage figure.

7.1.4 Commentary will be provided for any properties or actions out of date to include the date they became overdue, days overdue, and the action proposed 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.

7.1.5 A detailed PI suite will be defined within the Management Plans and monitored by Operations Teams.

7.2 Assurance

The following assurance activity will be undertaken:

- Internal checking independent of the Operational Teams to provide additional assurance around the accuracy of data and reporting. The approach will be documented within the Data Management Protocol and will include sample testing of the accuracy of data and the operation of controls. The outcomes will be reported to the HSC.
- Internal audit to provide independent assurance on the operation and effectiveness of controls. Frequency agreed as part of the **Internal Audit Programme** and reported to Audit and Risk Committee.
- Works based quality assurance to test the quality of work delivered. This will be at levels detailed within the FSMP and reported to HSC.

8. Competence

- 8.1 It is not possible to succinctly define competence requirements for all roles and activities outlined in this Policy. In many areas, competence will be assessed based on skills, knowledge and experience as opposed to a single qualification or standard. As defined above, PA Housing has a system of Directors evaluating competence within their areas of responsibility and Competent Person(s) are required to highlight the limits of the competence.
- 8.2 However, owing to the initial importance of the FRA in PA Housing's approach and the need to for PA Housing to have access to overarching fire safety advice, PA Housing will:
- Ensure that FRAs are undertaken by BAFE SP205-1 accredited organisations and all FRAs are subject to validation.
 - Appoint an external Competent Person to provide retained support and advice in relation to fire safety. This will be or include access to a Chartered Fire Engineer and experienced Fire Risk Assessor – with experience on complex residential properties – who is listed on an approved register.

Specific areas of competence relating to risk assessment, servicing and maintenance activity are listed within the FSMP along with a procedure outlining the reasonable steps PA Housing will take to ensure the competence of those carrying out work who are not under its direct control.

9. Consultation

- 9.1 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 PA Housing.

10 Equality Impact Assessment

10.1 An Equality Impact Assessment (EIA) will be undertaken on this Policy. See the full EIA document for further details.

11. Policy Review

11.1 The Policy will be reviewed upon any change to legislation or major guidance documentation, and at least every 36 months (or earlier if deemed necessary through the Monitoring and Assurance Process).

12. Amendment Log/Version Control

12.1 Revision Detail/Record:

Date of Revision:	Record of Amendments:	Reason for Revision:	By Whom: Name and Title