

Asset and Compliance Policies & Procedures



Fire Safety Policy & Procedure

1.0	Purpose of Policy
1.1	The aim of this Policy is to provide a framework for fire safety and risk assessment in our blocks, community hubs and offices.
1.2	<p>The Policy objectives are to:</p> <ul style="list-style-type: none"> • Provide well maintained properties and contribute to being a “Superbrand”; • Reduce the risk of fire occurring in our properties; • Provide sufficient measures of risk assessment, protection and remedial action regarding our common areas within blocks of flats; • Meet our legal obligations as a Social Landlord.
2.0	Legislative & Regulatory Requirements
2.1	Landlords are responsible for ensuring fire safety, with the main duty being to carry out and act upon fire risk assessments.
2.1.2	<ul style="list-style-type: none"> • The Housing Act 2004 covers England and Wales and applies to individual homes, including the licensing of houses in multiple-occupation (HMO) and other residential accommodation. The Act introduced the Housing Health and Safety Rating System (HHSRS) for use in England and Wales. The Regulatory Reform (Fire Safety) Order 2005 (“the FSO”) applies to common parts of blocks of flats.
2.1.3	<ul style="list-style-type: none"> • Fire risks to individual homes are assessed through the HHSRS. Both the Housing Act and the FSO apply to purpose-built blocks of flats, with the FSO bringing common parts of blocks of flats within the scope of mainstream fire safety legislation for the first time. The FSO requires fire risk assessments to be carried out and acted upon rather than meeting a set of prescribed measures. In addition to the FSO, other guidance such as the Government’s Fire safety risk assessment: sleeping accommodation can be useful. All new housing, including conversions and "material alterations" needs to comply with the fire safety requirements of the Building Regulations (Part B) but these do not apply retrospectively to existing properties.
2.2	<p>Enforcement</p> <ul style="list-style-type: none"> • The HHSRS under the Housing Act is enforced by local authorities; for

	<p>Category 1 hazards an improvement notice will be served or, in more extreme cases, a prohibition order may be served. The Act gives local authorities powers of access for the purposes of inspecting to see if a category 1 or 2 hazard exists.</p> <ul style="list-style-type: none"> • The Fire Safety Order 2005 is enforced by the local fire and rescue authority. Building Regulations are enforced by the Building Control Body (either local authority building control or a private-sector approved Inspector). • The final report following the independent review of Building Regulations and Fire Safety led by Dame Judith Hackitt recommends a step-change in the regulatory framework from the current position, introducing a Joint Competent Authority (JCA) to oversee enforcements. The “to be created” JCA will be made up of the Health and Safety Executive (“HSE”), the fire and rescue authorities and Local Authority Building Standards and it is “intended to provide a framework for those bodies to work together to more rigorously assess building safety”. • The changes will initially apply to High Rise Residential Buildings (HRRBs), which are defined as residential buildings of 10 storeys or more. This will include mixed-use buildings of that height if part of the building is residential. When these recommendations will be implemented is currently unclear but we will prepare for their implementation. • The report also lays out clear roles of responsibility and accountability for duty holders, taking inspiration from the structure of the Construction (Design and Management) Regulations 2015 (CDM). During the construction phase, the Duty Holder for WCH will be the Director of Partnerships. Once in the occupation phase, the Duty Holder will be the Head of Asset and Compliance. During the planning, construction and design phase, it is recommended that the duty holder(s) should be required to consult with the JCA, at three separate ‘Gateway Points’ <ul style="list-style-type: none"> ○ Planning Permission; ○ Full Plans Approval, and ○ Completion stage. • There will be continuing duties extending right through the occupation phase, requiring the duty holder to submit a safety-case file to the JCA every 5 years and a fire risk assessment review at a frequency to be agreed with the JCA based on risk. • The report also proposes rights for residents, which place further obligations on the duty holder, for example, to proactively provide residents with information to help them understand the protection in place to keep the building safe. Residents will also have a right to have access to the fire risk assessments, safety case documentation and other information. It will also be mandatory for duty holders to provide UK-based contact information to both the residents and the JCA.
2.3	<p>Regulatory</p> <ul style="list-style-type: none"> • The Regulator of Social Housing (RSH) requires registered providers to comply with its Regulatory Standards. Fire safety is covered by the Home

	<p>Standard which requires meeting all statutory requirements for the health and safety of occupants.</p> <ul style="list-style-type: none"> • Landlord and Tenant Act 1985 • BS 7671: (2008) Requirements for Electrical Installations IET Wiring Regulations 17th Edition and any current amendments. This will be superseded by IET Wiring Regulations 18th Edition in 2019.
3.0	Scope & Definitions
3.1	This Policy and Procedure applies to all residential assets and common areas regardless of tenure or type. It also applies to all assets we are responsible for even if we are not the owner (such as WBC properties, properties held by joint ventures and assets where we are the managing agent unless expressly excluded in the lease / management agreement).
3.2	<p>Landlords have a legal duty to ensure the property is safe in relation to fire protection. We are required to adhere to the FSO, which to be compliant comprises the following provisions within common areas:</p> <ul style="list-style-type: none"> • Providing a means of escape from fire; • The measures necessary to assist people in the use of the escape routes, such as: emergency lighting, fire exit signs and measures for smoke control; • Where necessary, fire extinguishing appliances and fire alarm systems; • An emergency plan (in small blocks of flats, a fire action notice); • Maintenance of the above measures and record keeping; • Maintenance of measures required by legislation for the safety of, or use by, fire fighter, e.g. dry risers; • Appointing a “Duty Holder” on behalf of the Group. The Duty Holder can delegate the management of this policy to their staff from an operational perspective but remains responsible.
4.0	Policy Requirements
4.1	The Group wishes to adhere to best practice within the area of fire safety and will ensure this by the following:
4.2	<p>Training</p> <ul style="list-style-type: none"> • The Group will identify and provide staff managing this area of compliance suitable training to enable them to carry out their duties concerning fire safety. We ensure this by assessing those in-house roles across the Group which require fire safety training and procuring this via a suitably accredited training provider.
4.3	<p>Primary Authority Scheme</p> <ul style="list-style-type: none"> • The Group operates in four local authority areas, all in Hertfordshire; therefore, we use Hertfordshire Fire Service as our primary source for advice.
4.4	<p>Contractors & Assessors</p> <ul style="list-style-type: none"> • Risk assessments will be carried out by suitably competent persons with

<p>4.5 4.5.1 4.5.2 4.5.3</p>	<p>third party accreditation.</p> <ul style="list-style-type: none"> • Contractors carrying out works must be suitably competent and hold relevant United Kingdom Accreditation Service UKAS for works on fire doors. • Fire-related major works contractors will be members of a professional body such as BAFE. <p>Fire Risk Assessments</p> <p>A fire risk assessment has 3 objectives, these are:</p> <ul style="list-style-type: none"> • To identify all factors which could cause harm to people, property and / or the environment either during or as a result of fire; • To consider the likelihood of the event occurring; • To enable the “responsible person” and the delegated staff to plan, implement and monitor the preventative measures in place to ensure as low as reasonably practicable. <p>The Group carries out two types of Fire Risk Assessment:-</p> <ul style="list-style-type: none"> • Non-Intrusive cyclical assessments – these assessments review only the easy to reach and common areas; • Intrusive assessments – these assessments review hard to reach areas (behind panels etc.) and in residences. <p>Intrusive surveys are being completed as a “one off” exercise to ensure we have full knowledge of fire safety in all blocks.</p>										
<p>5.0 Fire Safety Procedure</p>											
<p>5.1</p>	<p>In line with current best practice, the Group will carry out cyclical fire risk assessments based on a risk-based approach to the building and its occupiers, as outlined below:</p> <table border="1" data-bbox="395 1301 1249 1816"> <thead> <tr> <th style="background-color: #d9e1f2;">Area</th> <th style="background-color: #d9e1f2;">Frequency</th> </tr> </thead> <tbody> <tr> <td>Low Rise Blocks (below 4 stories)</td> <td>Every 2 years</td> </tr> <tr> <td>High Rise (5 stories and above), 50+ schemes, and TA accommodation</td> <td>Every year</td> </tr> <tr> <td>Offices & Community Buildings</td> <td>Every 2 years</td> </tr> <tr> <td>New build or major refurbishment</td> <td>On completion of works and then as per above</td> </tr> </tbody> </table>	Area	Frequency	Low Rise Blocks (below 4 stories)	Every 2 years	High Rise (5 stories and above), 50+ schemes, and TA accommodation	Every year	Offices & Community Buildings	Every 2 years	New build or major refurbishment	On completion of works and then as per above
Area	Frequency										
Low Rise Blocks (below 4 stories)	Every 2 years										
High Rise (5 stories and above), 50+ schemes, and TA accommodation	Every year										
Offices & Community Buildings	Every 2 years										
New build or major refurbishment	On completion of works and then as per above										
<p>5.2</p>	<p>The Group will complete intrusive surveys on all higher risk building in 2019/2020 and will include our lower risk assets (medium rise blocks) in 2020/2021.</p>										

5.2.1	<p>Assessors (appointed contractors) and staff will adopt the British Standard PAS 79 which is the nine step approach to risk assessing:</p> <ul style="list-style-type: none"> • Obtain Information • Identify the fire hazards and control measures • Assess the likelihood of fire • Determine the fire protection measures • Obtain information about fire safety management • Assess the likely consequence to people in the event of a fire • Make an assessment of the fire risk • Formulate and document an action plan • Set a date for review 														
5.3	<p>Fire Protection</p> <p>5.3.1 The following fire protection measures will be inspected as follows and recorded in our ICT systems, currently Wisdom (EDM) and Keystone asset management.</p> <p>5.3.2</p> <table border="1" data-bbox="327 797 1390 2020"> <thead> <tr> <th data-bbox="327 797 876 887">Fire Protection</th> <th data-bbox="876 797 1390 887">Frequency</th> </tr> </thead> <tbody> <tr> <td data-bbox="327 887 876 1095">Fire Alarm</td> <td data-bbox="876 887 1390 1095"> Weekly Test of system Quarterly Maintenance Annual Test & Overhaul </td> </tr> <tr> <td data-bbox="327 1095 876 1256">Automatic Opening Vents</td> <td data-bbox="876 1095 1390 1256">Annually</td> </tr> <tr> <td data-bbox="327 1256 876 1420">Dry & Wet Risers</td> <td data-bbox="876 1256 1390 1420"> 6 monthly visual Yearly service & pressure test </td> </tr> <tr> <td data-bbox="327 1420 876 1659">Emergency Lighting</td> <td data-bbox="876 1420 1390 1659"> Monthly Test 6 monthly service Annual full service </td> </tr> <tr> <td data-bbox="327 1659 876 1823">Fire Fighting Equipment</td> <td data-bbox="876 1659 1390 1823"> Routine Inspection Monthly Annual maintenance service </td> </tr> <tr> <td data-bbox="327 1823 876 2020">Smoke & Heat Detection</td> <td data-bbox="876 1823 1390 2020"> Annually as part of landlords gas safety record (LGSR) Where smoke and heat detection are present in a non-gas or communal gas properties, the stock condition </td> </tr> </tbody> </table>	Fire Protection	Frequency	Fire Alarm	Weekly Test of system Quarterly Maintenance Annual Test & Overhaul	Automatic Opening Vents	Annually	Dry & Wet Risers	6 monthly visual Yearly service & pressure test	Emergency Lighting	Monthly Test 6 monthly service Annual full service	Fire Fighting Equipment	Routine Inspection Monthly Annual maintenance service	Smoke & Heat Detection	Annually as part of landlords gas safety record (LGSR) Where smoke and heat detection are present in a non-gas or communal gas properties, the stock condition
Fire Protection	Frequency														
Fire Alarm	Weekly Test of system Quarterly Maintenance Annual Test & Overhaul														
Automatic Opening Vents	Annually														
Dry & Wet Risers	6 monthly visual Yearly service & pressure test														
Emergency Lighting	Monthly Test 6 monthly service Annual full service														
Fire Fighting Equipment	Routine Inspection Monthly Annual maintenance service														
Smoke & Heat Detection	Annually as part of landlords gas safety record (LGSR) Where smoke and heat detection are present in a non-gas or communal gas properties, the stock condition														

		surveyor will perform the testing.
	Fire Sprinklers	As per the manufacturers' recommendations and annually as a minimum
5.4	Means of Escape & Evacuation (Emergency Plan) <ul style="list-style-type: none"> • Tenants are not permitted to store personal effects in common areas, examples of which are scooters, bikes, flammable items etc. • Neighbourhoods & Communities are responsible for management of the common areas and means of escape i.e. if bikes or flammables are left in these areas. This will involve taking tenancy action as required. WCH staff are able to remove and destroy these goods once a Tort Notice has been served (again by WCH staff) and expired after 7 days. • As advised by Hertfordshire Fire Brigade (HFB), the Group will normally operate a "stay put policy" when a fire break out. However, a "stay put" or "evacuate" policy will be determined by asset type and risk assessment on a block by block basis. • Where requested by HFB, supplementary evacuation plans will be drawn up, in consultation with the Fire Brigade on a block by block basis. • Appropriate signage will be used in common areas regarding our Policy and the individual blocks specific policy will be included in the handover pack of a new tenant where relevant. 	
5.5	On-Site Information & Notices	
5.5.1	The following will be held on-site: <ul style="list-style-type: none"> • Emergency Plans will be displayed alongside appropriate signage. • Fire proof boxes will be held on site at Watford 50+ facilities, our high rise blocks, Offices and Community hubs, which will hold relevant information pertaining to cyclical servicing and records of fire alarm testing and emergency lighting. • Details of the most recent Fire Risk Assessments, what works are required and the plan and timescales for the completions of the works will be displayed on our website. To ensure transparency, these details are also to be publically displayed in the blocks affected. • Residents who have specific mobility issues at Watford 50+ schemes and our high rise blocks. • Site plan of the fire escape routes to be displayed in complex blocks. • General needs block, records such as emergency lighting and fire alarm testing will be held at Gateway House. • It is the responsibility of scheme managers (for Watford 50+) and Neighbourhood officers (for non-Watford 50+) to ensure details are up to date and data should be updated as soon as the information is available i.e. at sign up. 	

5.6	<p>Smoke Alarms</p> <ul style="list-style-type: none"> On letting a property or change of tenancy, a hard-wired smoke alarm will be fitted as part of our void specification. This includes fitting a smoke detector in an additional habitable room (living room). During major internal planned works, a hard-wired smoke and fire alarm will be fitted as part of the standard specification. This includes fitting a smoke detector in an additional habitable room (living room). 												
5.7	<p>Maintenance Works</p> <ul style="list-style-type: none"> Fire safety must be considered as part of planned maintenance works. Works must comply with Part B of the Building Regulations to ensure compartmentation and safe means of escape. All contractors and staff are required to have the relevant and up to date qualifications to work on our assets. During mobilisation of a contract, Contractors are required to confirm that all staff have the relevant skills and qualifications and we will seek to have this confirmed on an annual basis. 												
5.8	<p>Audit & Recording</p> <p>5.8.1 Auditing will be undertaken across our properties:</p> <ul style="list-style-type: none"> The Group will audit the work of assessor and contractors. This will include a 10% annual check on-site against the risk assessment and any remedial works completed; A 100% check of all risk assessments and fire protection documentation, as a desktop exercise; Remedial actions will be dealt with on a risk-based approach with timescales listed below: <table border="1" data-bbox="336 1227 1378 1514"> <thead> <tr> <th>Risk Level</th> <th>Timescale for completion</th> <th>Budget constraints</th> </tr> </thead> <tbody> <tr> <td>High</td> <td>3 months</td> <td>None - HofS to apply for contingency if required</td> </tr> <tr> <td>Medium</td> <td>12 months</td> <td>To be programmed in current FY where funding available or form part of next FY budget request</td> </tr> <tr> <td>Low</td> <td>18 month</td> <td>To be programmed as budgets allow</td> </tr> </tbody> </table>	Risk Level	Timescale for completion	Budget constraints	High	3 months	None - HofS to apply for contingency if required	Medium	12 months	To be programmed in current FY where funding available or form part of next FY budget request	Low	18 month	To be programmed as budgets allow
Risk Level	Timescale for completion	Budget constraints											
High	3 months	None - HofS to apply for contingency if required											
Medium	12 months	To be programmed in current FY where funding available or form part of next FY budget request											
Low	18 month	To be programmed as budgets allow											
5.9	<p>Record Keeping</p> <p>5.9.1 In line with the proposed requirements for record keeping/document management for works related to fire risk assessments, we are committed to the creation of a digital database where, to ensure the “golden thread” of information is maintained through the life of a building we will create:-</p> <ul style="list-style-type: none"> A digital record of where FRA’s has been completed All remedial or management actions relating to fire risk assessments must be captured in our ICT solutions to provide a clear audit trail; FRA records are held for a minimum of 3 years and it is the responsibility of the relevant contractor coordinator to ensure full details and documentation are uploaded onto our ICT solution. 												

	<ul style="list-style-type: none"> • Details of works completed following an FRA and the reasons for the works will be held in our systems indefinitely • This record will also contain details of valuations resulting from the works, a photographic record of works completed where possible and all 3rd party validation documentation.
5.10	<p>Leaseholder Responsibilities & Enforcement</p> <ul style="list-style-type: none"> • Leaseholders have a responsibility to seek permission from the Group via the Customer Relations Team when changing the layout of their property or changing their front door. • Injunctive action (through the courts) will be taken if the leaseholder changes their front door to a non-compliant fire door. If identified the door will be replaced at the leaseholder's cost, either through the Group's contractors or by the leaseholder. Where the former applies, the cost, including the legal costs will be recovered from the lessee. • Educational campaigns, in partnership with HFB will be run to raise awareness of fire safety in the home and to help prevent accidents.
6.0	The Escalation of Concerns
6.1	To strengthen our process around resident engagement we have added an escalation for concerns, along the lines of our whistleblowing policy. The process names a designated person outside of Operations or Partnerships to whom residents can send details of their concerns if they feel unable to express concerns to Asset and Compliance or who feel that their concerns have not received the attention they deserve. This process can be accessed at any time, and does not require the completion of our complaints process to be initiated.
6.2	The Assistant Company Secretary is Watford Community Housing's Designated person and concerns will be sent to FireSafety@WCHT.org.uk
7.0	Resident Involvement
7.1	We will produce an enhanced Resident Engagement approach for Building Safety. This approach would include details on:- <ul style="list-style-type: none"> • How to support residents to understand building safety • How we will involve residents in decision making • How we will share key information clearly and transparently • How we will engage vulnerable residents
7.2	The approach would guarantee that resident voices would be heard if they raise genuine concerns. If residents remained concerned, they would have a quick and clear route to an independent body, to escalate their concerns (see 6.0 above).
7.3	These core principles – transparency of information, involvement in decision making, opportunity for redress and support for good practice don't just apply to building safety, vital as it is, but more widely to all services provided for tenants and leaseholders.
8.0	Related Documents
	<ul style="list-style-type: none"> • Health Safety and Welfare Policy • Contract Management Policy & Procedure • Gateway House Emergency Evacuation Procedure • Building a Safer Future (Independent Review of Building Regulations and

	Fire Safety: Final Report)
9.0	Monitoring & reporting
9.1	Monitoring of performance against the outlined measures will be monitored through the Property Services' KPIs and reported to EMT on a quarterly basis. Auditing will be tracked to ensure that we are meeting our audit requirements and quota. Compliance will be monitored by the Senior Contracts and Compliance Officer via our asset management software.
10.0	Person responsible
10.1	The Head of Asset and Compliance is responsible for this Policy. Delivery and compliance is the responsibility of the Surveying Manager, Senior Contracts and Compliance Officer and the GRT Managers / Team Leaders where indicated in the Procedure.
11.	Approval
Approved :	EMT approval on 23 rd January 2019
Approval date :	January 2019
Review Date:	July 2019
Policy Owner	Head of Asset and Compliance