

PA Housing FIRE SAFETY POLICY

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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 The key objective of this Policy is to describe how PA Housing (PA) will manage Fire Safety Risk as 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, safety cases for HRB's, testing, servicing) that PA undertakes.
 - Using competent staff and contractors.
 - Communication internally and with residents and other stakeholders
 - How the PA 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 associated remedial actions.
- 1.2.2 The undertaking of Building Safety Cases for High-Risk Buildings, and the implementation of the relevant management plans through the life of the building.
- 1.2.3 Cyclical maintenance of fire safety systems and equipment including automatic fire detection and alarm systems; emergency lighting; automatically opening smoke vents or smoke control systems; dry or wet risers; sprinkler/mist systems; fire-fighting lifts; and
- 1.2.4 General repair, maintenance and management activity which could have an impact on fire and structural safety within a building or individual property.
- 1.3 PA 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.
 - Safety) Order (RRFSO) 2005.
 - The Fire Safety Act 2021.
 - Fire Safety Regulations 2022.
 - The Building Safety Act 2022.
 - Health and Safety at Work etc. Act 1974
 - Landlord Tenant Act 1985
- 1.4 PA must meet the requirements of both the Regulator for Social Housing's (RSH)

Homes Standard and the requirements of the Care Quality Commission (CQC).

- 1.5 Our primary objective is to ensure that residents, contractors, staff, and visitors remain safe in our property. 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.
- 1.6 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 **Finance Risk and Audit Committee** will be responsible for ensuring that the PA Board receives the assurance it requires.

The **Director of 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 **Executive Director of Asset Management** will take overall responsibility for planning and implementing the assurance activities described in this Policy and for the effective upward reporting of performance. The **Executive Director of Asset Management** will attend the Finance Risk & Audit committee meeting and ensure that any issues arising from assurance activities are discussed, and that areas of non-performance are reported and escalated where required.

All **Directors within the Asset Directorate** 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 will maintain an FSMP 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 residents to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement actions 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 acknowledges that to meet its obligations it must maintain a robust approach to identifying the Assets and components for which it has responsibility. PA will:
- 4.1.1 Maintain an up-to-date 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 has no responsibility but has an interest (e.g., a block managed by others, but PA 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 Maintain a schedule of fire safety equipment in PA's asset management system. This will include UPRN; type of equipment; 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 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 all remedial actions arising from FRAs or other fire safety inspections and 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 evidence of completed tasks.
 - 4.1.5 Maintain an up-to-date database of all registered properties where a property falls under the high-risk building regime i.e., currently seven stories or above or 18m in height. Maintain a building safety case report and golden thread of information where PA is the Principal Accountable Person (PAP), or assist the PAP where PA is the Accountable Person (AP).
 - 4.1.6 Where PA 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 will write to the responsible person on an annual basis asking for written confirmation that:

- They hold a suitable and sufficient Fire Risk Assessment.
- All relevant activities including but not limited risk assessment, inspection, testing, remedial works, and maintenance have been undertaken.
- They are in full compliance with all relevant legislation.
- PA has been informed of any material issues affecting resident health and safety.

Where PA 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.

- 4.1.7 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 PA will conduct 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' is set out in the Government Guide Fire Safety in Purpose Built Blocks of Flats. The Guide can be found here: [Fire safety in purpose-built blocks of flats](#).
- 5.1.3 Undertake new FRAs in line with PA Fire Safety Standards review cycle or as recommended in the FRA by the Competent person, if recommended outside of normal review periods. PA's standard approach is to review the FRA for higher risk buildings annually and all other buildings on a two-year cycle.
- 5.1.4 PA will review the 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 a Person-Centered Risk Assessment which

would be relevant to the building. For example, a resident who is unable to self-evacuate where their building's escape strategy is simultaneous evacuation.

5.2 Evacuation

Ensure each building has an evacuation strategy stated clearly within the FRA and communicated regularly to residents in the form of essential fire safety information. 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 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 have a 'total evacuation' policy. All occupants will need to self-evacuate in the event of fire or when the fire alarm sounds.

Residential buildings which have on-site staff 24/7 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 have a 'total evacuation' policy. All occupants must evacuate in the event of fire or once the fire alarm sounds.

5.2.3 Assisted Evacuation

PA will assess individuals to identify residents who may require assistance to evacuate their building. For independent living accommodation and residents in higher-risk buildings, PA will undertake a person-centered fire risk assessment (PCFRAs). Each case will be assessed based on its own circumstances. PA will involve the Fire and Rescue Service in the process and where required we will hold appropriate information on residents who required additional assistance in paper format on site. Where appropriate PA will provide equipment such as evacuation alert system to aid evacuation.

5.2.4 Evacuation Drills

Evacuation drills will be conducted in all non-Housing residential buildings. The FRA will determine this. In non-residential buildings PA will conduct drills twice annually. PA will induct all new and relevant staff to the organisation on the fire evacuation procedure.

5.3 Further Investigations

PA will proactively undertake assessments of our buildings in line with the Building Safety Regulations. This may include checks to external wall systems, balconies,

compartmentation, and fire doors, as recommended by the FRA or other experts. These will be Fire Risk Assessments of External Walls (FRAEW) and EWS1 assessments.

5.4 Fire Door Inspections

PA will comply with Regulation 10 of the Fire Safety (England) regulations 2022 for the expected use and size of properties. Fire doors in communal escape routes will be sample inspected as part of the FRA process and at regular intervals as recommended within the FRA. PA will undertake a programme of Flat Entrance Door inspections for dwellings in accordance with requirements.

5.5 Premises Information Boxes (PIBs)

PA will comply with the Code of practice that provides recommendations for Premises Information Boxes (PIBs) and Emergency Response Packs (ERPs) in high-rise residential buildings. The building safety team will ensure PIBs, and ERPs are provided within the required premises as set out in the Code of practice.

The building safety team will ensure that the PIBs are secure, properly maintained, and readily accessible to firefighters, containing critical information about the building layout, fire safety systems, and potential hazards to aid them during an emergency evacuation operation.

5.6 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 and PA Fire Safety Standards. Any proposed changes to the agreed completion targets will be documented, agreed by a Competent Person, and proposed to the Fire Safety Group for approval.

All fire safety remedial work will be conducted in accordance with the relevant British Standard, approved code of practice or associated good practice guidance. Any contractors undertaking specialist fire safety remedial work will hold third party accreditation.

5.7 Testing and Maintenance of Fire Safety and Equipment

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

Shared owners or homeowners are responsible for the electrical wiring and gas installation in their dwelling. PA will not request evidence that these systems have been checked.

5.8 Domestic Smoke/Heat Detection

Ensure that all dwellings owned by PA (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 battery operated fire detection to mains powered with standby battery systems across all properties as part of the EICR or planned programme.

Smoke detection will be checked annually as part of the annual gas safety inspection. or, where properties are not part of heating contracts, through other cyclical maintenance contracts.

5.9 Repairs and Maintenance Activity

There is a risk that repairs, and maintenance activity unwittingly impact fire safety. PA will manage this risk by ensuring that all contractors are approved.

Any contractors (internal or external) undertaking hot works as part of repairs activity must have an approved hot works procedure. Hot works should be avoided unless an alternative method is not feasible. (Hot work is any activity that uses heat, friction, or open flames to create sparks or ignition).

Properties of seven stories or more or above 18 metres will be designated as permit-to-work areas to appropriately manage work, i.e., where repairs may affect the core or structural safety of the property. PA will review the need for the operation of a permit-to-work scheme for other specific properties on a scheme-by-scheme basis.

5.10 Planned and Major Works

Where applicable, planned maintenance conducted by PA to buildings that require an FRA will be subject to a risk assessment by a competent person before works start to consider their impact on fire and structural safety. Works programs are likely to fall into one of three categories:

1. Works that require planning permission and/or Building Regulations approval.
2. Works not subject to the Building Regulations (including those covered by the Building Regulations but delivered 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 as confirmed by a Competent Person.

For all other works PA will ensure that before works start in high rise (18m+) buildings, 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 work 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 in its conclusion, PA will make 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 the Building Safety Regulator. This is covered further below.

5.11 Resident Commissioned Works

PA will maintain a consent process for any resident commissioned work. In buildings that are subject to an 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 unauthorized work with the potential to impact fire safety is discovered, PA will take the appropriate action to remove or remedy. The cost of doing so will be recharged to the residents in line with PA's Recharge Policy.

Management

PA Housing will:

- Prohibit the storage of any items in communal areas and escape routes without our 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.
- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).
- Ask residents to alert PA to the presence of stored oxygen to alert the Fire and Rescue Service of its presence.

5.12 Building Safety System Reforms

PA will be proactive in implementing key aspects of the building safety management regime and legislative requirements for higher-risk buildings under the Building Safety Act 2022 and subsequent legislation. The Building Safety Case is at the heart of evidencing the safety of our buildings that fall within the scope of the new regulations. The Safety Case report and golden thread of information is a demonstration of how hazards are identified, evaluated, and how control and mitigation measures are implemented and have an ongoing process in place for monitoring all aspects of

building safety. This is consistent with the approach undertaken for FRAs under the Fire Safety Order and other commitments made in this policy.

6. Communication with Stakeholders

6.1 Internal

Operate a Fire Safety Group comprising of a cross-organization team of staff. The Fire Safety Group feeds into the Health and Safety Committee.

6.2 Residents

PA will encourage fire safety by conducting the following actions:

- Provide a copy of an FRA or evidence of fire equipment servicing a relevant resident within 28 days when requested.
- Inform residents of the importance of fire safety on a regular basis, through the provision of information via the PA website and newsletters.
- Maintain a clear approach to gaining access to conduct surveys and work and be clear that enforcement action may be taken when it is necessary.
- Communicate with residents through appropriate 'Fire Action' signage.
- Maintain a clear complaints process and monitor and record complaints that indicate a risk to fire safety. Individual routes will be available for properties falling under the new HRB regime.
- Implement resident engagement plans and mandatory reporting process for all properties falling under the new HRB regime.

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 are considered jointly responsible for a property or communal area, it will share its FRA with other relevant parties and co-operate with them as far as it is practicable to ensure the safety of relevant people.

6.5 Fire and Rescue Service

PA 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

PA will maintain regular and proactive communication with the Building Safety Regulator. This will include reporting of mandatory and voluntary occurrences where required for properties under the HRB regime.

7. Monitoring and Assurance

7.1 Monitoring

7.2 The following KPIs will be reported to the Investment Committee and the PA Board at each meeting cycle:

- Buildings with a valid FRA renewed within its due date as a percentage of total buildings requiring an FRA.
- Remedial actions that are overdue.
- 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.

7.3 Assurance

The following assurance activity will be undertaken:

- 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 Finance Risk and Audit Committee.

8. Competence

8.1 PA will:

- Ensure that FRAs are undertaken by BAFE SP205-1 accredited organisations and all FRAs are subject to validation.
- Ensure Individual fire risk assessors are accredited to relevant external bodies via membership/registration of appropriate risk registers.
- 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 will take to ensure the competence of those conducting 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 residents has not taken place. There has been consultation with Teams within PA.

10. Policy Review

10.1 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).

10.2 **Monitoring and reporting**

- The Director of Compliance has overall responsibility for monitoring and reviewing the operation of this policy to ensure it meets legal requirements, is fit for purpose and reflects best practice.
- All managers have a specific responsibility for operating within the boundaries of this policy and procedure, ensuring that colleagues understand what is expected of them.
- All colleagues are responsible for reading, understanding, and adhering to the policy and any questions regarding its content or application should be directed to their line manager or the HR team.

10.3 **Advice and Guidance**

Advice, guidance, and support will be provided by the Building Services Team to all colleagues on the Electrical Safety Policy. The policy will also be made available to all colleagues via the company SharePoint site to ensure that they are aware of its existence.