



# The Havebury Housing Partnership

## FIRE SAFETY POLICY

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1. Statement of commitment.....	3
2. Linked documents.....	3
3. Fire safety strategy.....	4
4. Purpose-built, general needs, residential premises.....	4
5. Converted, general needs, residential premises .....	5
6. Sheltered accommodation .....	6
7. Supported living schemes.....	7
8. Commercial premises.....	7
9. Approach to fire risk assessment .....	7
10. Testing of active fire precautions .....	8
11. Investigating false alarms.....	8
12. Storage in common parts .....	9
13. Use of personal electrical items in common parts .....	9
14. Mobility scooters .....	9
15. Safe use of a balcony.....	10
16. Fire Safety Training.....	10
17. Fire Rescue Service .....	10
18. General .....	10

## **1. Statement of commitment**

- 1.1. We are committed to protecting all relevant persons from the risk of harm from fire in all the premises we own, manage, or maintain. In this policy, the phrase 'relevant persons' has the meaning assigned to it in the Regulatory Reform (Fire Safety) Order 2005, which is 'any person who is or may be lawfully on the premises', and 'any person in the immediate vicinity of the premises who is at risk from a fire on the premises'.
- 1.2. We acknowledge our moral obligation and the legal requirement to provide working conditions for our employees, and homes for our tenants, leaseholders, and residents that are safe from the risk of fire.
- 1.3. We shall put in place such processes and procedures as are necessary to reduce the likelihood and consequence of fire to a tolerable level, so that the impact of fire on life safety, the environment, our business, and property is minimised.
- 1.4. Overall responsibility for fire safety sits with our Board, delegated to the Executive Team. All members of staff have a responsibility for fire safety within their areas of activity.
- 1.5. The Director of Operations and delegated staff are responsible for delivery of this commitment and for the arrangements necessary to ensure its successful application.
- 1.6. We will review this policy every second year to ensure that it is current, appropriate to our needs, suitable for the activities we undertake, and applicable to the organisation and arrangements we have in place to manage fire safety.
- 1.7. We will monitor for legislative changes and make updates and amendments to this policy as required by changing legislation.

## **2. Linked documents**

- 2.1. The following documents contain the processes and procedures referred to in this policy document.

HS 008	Development & Home Ownership Policy
HS 016	Repairs and Maintenance Policy
HS 024	Periodic Electrical Inspections Policy
HS 032	Gas Safety
HS 044	Mobility Scooter Policy
HSF 005	Fire Safety Procedures
HSF 012	Storage in common parts
HSF 013	Testing of active fire precautions
HSF 014	Safe use of a balcony
PO 49	Investigating False Alarms
PO 50	Electrical Items in Common Parts

### **3. Fire safety strategy**

- 3.1. This document outlines our strategic approach to fire safety in premises under our control. It is not intended to be a detailed account of our fire arrangements, but is intended to provide a reference point against which our fire arrangements can be checked to ensure that the implemented precautions properly support this strategy.
- 3.2. Details of the fire safety arrangements can be found in our various policy and procedure documents as detailed in section 2 above.
- 3.3. Where reference is made in this document to our new build process, detailed guidance on our requirements can be found in our client brief document.

### **4. Purpose-built, general needs, residential premises**

- 4.1. At development stage, we will design premises to meet the requirements for fire safety contained in Schedule 1, Part B of the Building Regulations.
- 4.2. Where design for fire safety is not as detailed in Approved Document B, we will obtain assurance from a competent person (who may be the designer) that the requirements of Part B are met by the design.
- 4.3. We will design to include comprehensive automatic fire detection and warning in each dwelling, with the life safety objective of detecting fire as early as possible, and sounding the alarm to trigger evacuation from that dwelling.
- 4.4. We will design blocks of flats with fire resisting compartmentation separating flats from each other, and from the common parts.
- 4.5. Where the premises includes common parts, we will design those common areas with minimal ignition sources and minimal combustibles.
- 4.6. We will design blocks of flats so that a stay put evacuation strategy is supported. A person discovering a fire in their flat will evacuate and call 999. A person in a flat other than the flat of origin can stay put in their flat protected by the fire resisting construction, and be defended in place by the fire and rescue service.
- 4.7. In blocks of flats, in support of that stay put policy, we will not provide automatic fire detection and warning in the common parts. Where the building is designed with automatically opening ventilation for smoke control in the common escape routes, provision will be made for smoke detection to activate the vent, but sounders will not be provided.
- 4.8. As part of our contract negotiations we will request that all approved details and construction drawings are supplied by the contractors and designers to be reviewed by our consultants, including our fire safety team, to confirm, as far as is practicable, compliance with the requirements contained in Approved Document B, and the British and European Standards referenced by the Approved Document, or where the design is not to the Approved Document, that it complies with all of the relevant standards that have been relied upon in designing the fire safety strategy.
- 4.9. During construction we will request that we be informed in reasonable time of all key gateways to allow time for our fire safety team to carry out on-site inspections where they deem it necessary. This is to provide assurance that construction matches the design, and that where compartmentation is required, it is complete with fire stopping to all breaches ensuring that the minimum required period of fire resistance is achieved throughout, that the installation of fire precautions complies with the relevant British Standards, the manufacturer's instructions, and where relevant, the configuration as tested for fire performance, and that all elements of the design for fire safety have been completed.

- 4.10. At handover of the newly built premises, we will ensure that the fire safety information specified in Building Regulation 38 is provided by the developer so that we are able to operate and maintain the premises with reasonable safety.
- 4.11. We will carry out a suitable and sufficient assessment of the risk from fire to relevant persons, paying particular attention to any occupiers who are or may be at particular risk from fire, to confirm that the fire precautions provided are those necessary to mitigate all of the identified risks. We will review that fire risk assessment periodically to ensure that it remains current.
- 4.12. At occupation, and annually thereafter, we will provide information to occupiers about fire safety in the premises, and the procedures to be followed in the event of a fire.
- 4.13. Throughout the lifespan of the building, we will inspect the premises regularly, so that we have documented evidence that the fire precautions are in good working order, and where they are found to be faulty, can quickly be restored to their original condition.
- 4.14. At intervals no greater than five years, we will inspect the electrical installations in all of our premises to ensure that they are in good condition. Where our premises have a gas installation, we will carry out safety checks no less often than each year.
- 4.15. Within 12 months of the date of this policy, we will ensure that we test the automatic fire detection in our homes at least once a year and will replace fire detectors within their lifespan as determined by the manufacturer. We already test the automatic fire detection annually in all homes with gas, oil, and renewable energy.
- 4.16. Where premises have automatic fire detection and warning in the common parts, we will test the system each week to ensure that it operates reliably.
- 4.17. We will ensure that occupiers can report faults, including those affecting the fire precautions, for prompt rectification.
- 4.18. Where we manage existing purpose-built premises for general needs residential occupancy, we will ensure that all of the strategic aims listed in paragraphs 4.11 to 4.16 above are adhered to, paying particular to the condition of any fire resisting compartmentation.
- 4.19. In existing purpose-built premises, we will assume that compartmentation is as intended and adequate, unless we find evidence that that is not the case. When we identify inadequacies in the compartmentation, we will remedy them quickly, implementing additional, temporary, mitigating control measures where we deem the risk to be unacceptably high.
- 4.20. For all purpose-built general needs premises, following occupation, we will adhere closely to the guidance contained in 'Fire safety in purpose-built blocks of flats' published by the Local Government Association in 2012.

## **5. Converted, general needs, residential premises**

- 5.1. Where we plan to convert premises to residential use from some other use, we will ensure that all of the strategic aims listed in paragraphs 4.1 to 4.17 above are adhered to.
- 5.2. Where we manage existing premises that were converted to residential use from some other use, we will assume that the compartmentation is not sufficient to support a stay put evacuation strategy, unless there is compelling evidence to conclude that there is adequate compartmentation.

- 5.3. In converted premises where we assume that the compartmentation is not sufficient to support a stay put evacuation strategy, we will install automatic fire detection and warning in the common parts, with a detector and sounder in each dwelling (in addition to the individual dwelling detection detailed in paragraph 4.3 above) connected to the common parts fire alarm system, with the life safety objective of detecting fire as early as possible, and triggering full evacuation from the premises (while minimising false alarms from, for example, cooking, and limiting those false alarms to the flat of origin).
- 5.4. We will adhere closely to the guidance contained in 'Housing - Fire Safety' published by LACoRS in 2008 for all converted general needs premises, following occupation, except for converted premises where we know the compartmentation is sufficient to support a stay put evacuation strategy, which we will treat as if they were purpose-built premises.

## **6. Sheltered accommodation**

- 6.1. When we design and build new sheltered schemes, we will ensure that all of the strategic aims listed in paragraphs 4.1 - 4.4, 4.6, and 4.8 - 4.10 above are adhered to.
- 6.2. For all sheltered schemes we will ensure that all of the strategic aims listed in paragraphs 4.11 - 4.17 are adhered to.
- 6.3. In existing sheltered schemes, we will carry out survey to ensure that compartmentation is in good order and able to support a stay put evacuation strategy. Where it is found not to be, we will carry out remedial works to ensure that a stay put policy can be supported, and implement temporary, mitigating control measures where we deem the risk to be unacceptably high.
- 6.4. Within 2 - 4 years of the initial date of this policy, we will connect each sheltered dwelling individually to an alarm receiving centre to minimise unwanted fire signals reaching the fire rescue service and ensure the quickest possible summoning of the fire and rescue service if the alarm receiving centre cannot confirm a false alarm.
- 6.5. In those sheltered schemes with common parts that include shared facilities in excess of shared escape routes, we will provide automatic fire detection and warning in the common parts, with connection to an alarm receiving centre to ensure the earliest possible summoning of the fire and rescue service. The common parts fire alarm system will not, in isolation, trigger a full evacuation from the scheme.
- 6.6. For all sheltered schemes, we will adhere closely to the guidance contained in 'Fire Safety in Specialised Housing' published by the National Fire Chiefs Council (NFCC) in 2017.
- 6.7. We will use a person-centred approach to fire safety in our sheltered schemes using the NFCC Person-Centred-Fire Risk Assessment (PC-FRA) checklist to identify tenants who require a PC-FRA, using the PC-FRA to identify those tenants who additionally need a personal emergency evacuation plan (PEEP).
- 6.8. Where we have flats for sheltered occupation in blocks that are primarily intended for general needs occupation, we will, within 2 - 4 years of the initial date of this policy, provide connection to an alarm receiving centre from the flats with sheltered occupancy to ensure the quickest possible summoning of the fire and rescue service if the alarm receiving centre cannot confirm a false alarm.
- 6.9. Where our general needs premises have communal facilities similar to a sheltered scheme (e.g. communal lounge, communal kitchen, office, etc.), we will provide automatic fire detection and warning in the common parts, with connection to an

alarm receiving centre to ensure the earliest possible summoning of the fire and rescue service. The common parts fire alarm system will not, in isolation, trigger a full evacuation from the scheme.

## **7. Supported living schemes**

- 7.1. When we design and build new supported living schemes, we will ensure that all of the strategic aims listed in paragraphs 4.1, 4.2, and 4.8 - 4.10 above are adhered to.
- 7.2. For all supported living schemes we will ensure that all of the strategic aims listed in paragraphs 4.11 - 4.17 are adhered to.
- 7.3. We will use a person-centred approach to fire safety in our supported living schemes, using the Tayfen House Initial Assessment form to identify tenants who require a PC-FRA, using the PC-FRA to identify those tenants who additionally need a personal emergency evacuation plan (PEEP).
- 7.4. For all supported living schemes, we will adhere closely to the guidance contained in 'Fire safety in specialised housing' published by the National Fire Chiefs Council in 2017.
- 7.5. Our provision of automatic fire detection and warning in supported living schemes will be in line with the recommendations contained in Table 1 of BS 5839-6:2019 and specific to the type of premises.

## **8. Commercial premises**

- 8.1. In our commercial premises we will ensure that the strategic aims contained in paragraphs 4.11 to 4.16 above are adhered to.
- 8.2. We will provide automatic fire detection and warning where necessary, testing and maintaining it in line with the recommendations of BS 5839-1:2017.
- 8.3. Where we provide fire alarm systems in our commercial premises, we will ensure that the alarm achieves at least the recommended sound level throughout the premises, and ensure that we have a personal emergency evacuation plan in place for any person in the premises who may not be able to evacuate unaided.

## **9. Approach to fire risk assessment**

- 9.1. Our approach to fire risk assessment (FRA) in our residential buildings is based on guidance given in 'Fire Safety in Purpose-Built Blocks of Flats' (published by the Local Government Association in May 2012), and repeated in 'Fire Safety in Specialised Housing' (NFCC, 2017). Those documents define four types of FRA: types 1, 2, 3, and 4. Our approach combines elements of all four types.
- 9.2. In blocks of flats providing general needs and sheltered accommodation, we will risk assess the common parts, including service areas, plant rooms, bin stores, and other ancillary areas, and investigate a sample of dwellings to check flat entrance doors, provision of fire detection and warning (within the dwelling), and where it is necessary, fire resisting construction creating an internal lobby protecting the common areas from fire in the flat.
- 9.3. In general needs premises, we will carry out compartmentation surveys only where the FRA identifies specific concerns about compartmentation that only a formal survey can address. In our sheltered schemes, we will complete a compartmentation survey to give us confidence that the building will support a stay-put strategy, which is our preferred strategy for our more vulnerable tenants in those schemes.

- 9.4. In supported living premises, we will risk assess all areas of the building, and may carry out compartmentation survey where the FRA identifies concerns about the fire resisting construction protecting escape routes.
- 9.5. In all of our residential premises, we will use the methodology for FRA contained in PAS 79-2:2020, and the template in annex A as the template for our FRA report.
- 9.6. In our commercial premises, we will use the methodology described in PAS 79-1:2020 as the basis for fire risk assessment, and will use the template contained in annex A as the template for our FRA report.
- 9.7. Where our fire risk assessments make recommendations for action, we will create a record of that action in HSRA, assign the action to an action owner, periodically check for progress and update the action, escalate where resolution is delayed, and store evidence on completion of the action.

## **10. Testing of active fire precautions**

- 10.1. In determining what testing regimes for active fire precautions are necessary in our premises, we have considered risk, both in regard to the likelihood of a fire starting, and the potential severity of the consequences of that fire, and in regard to the likelihood and consequence of the failure of any of the active fire precautions in the event of a fire. That consideration has been applied to the testing regimes detailed in our procedure document HSF 013.
- 10.2. In comparison with many other undertakings (e.g. petrochemicals, large public arenas, large scale manufacturing, etc.), the provision and management of fire safety in residential premises is typically less complex, and that has been taken into account when we considered the extent to which we must comply with the recommendations for testing in various British Standards and other guidance documents.
- 10.3. The legal requirement to test active fire precautions is contained within article 17 of the Regulatory Reform (Fire Safety) Order 2005, which requires that 'where necessary', fire precautions 'are subject to a suitable system of maintenance, and are maintained in an efficient state, in efficient working order, and in good repair'. It is Havebury's judgment that the procedures detailed in document HSF 013 meet the requirements of article 17 to the extent that it requires testing.

## **11. Investigating false alarms**

- 11.1. False alarms are the unwanted activation of an automatic fire detection and warning system when there is no fire. Unwanted fire signals are false alarms that reach the Fire and Rescue Service (FRS) and cause a response.
- 11.2. Minimising false alarms is an essential part of the duty to maintain our fire precautions in effective working order imposed on us by article 17 of the Regulatory Reform (Fire Safety) Order 2005 (RRO). Unacceptable levels of unwanted fire signals can be subject to enforcement by the FRS under the RRO.
- 11.3. False alarms can habituate people to ignore signals from the alarm system as 'just another false alarm', and prevent them from reacting appropriately when a real fire is detected.
- 11.4. When unwanted fire signals summon the FRS, they divert the FRS from attending genuine emergencies, can disrupt community fire prevention activities and firefighter training, expose the public and firefighters to increased risk on the roads when incidents are responded to on blue lights, and they cause unnecessary financial cost to the FRS.



- 11.5. For the reasons stated above, Havebury will record and investigate false alarms so that we learn the lessons from each false alarm, and, wherever possible, apply those lessons to minimise future false alarms.
- 11.6. Our procedure for investigating false alarms is contained in procedure document PO 49.

## **12. Storage in common parts**

- 12.1. We have a legal obligation to manage fire safety in the common parts of our buildings, and a responsibility to make certain that unhindered escape is possible in case of an emergency. Misuse of the common parts for storage can increase the likelihood and the consequence of a fire.
- 12.2. Items stored in the stairways, corridors, and lobbies create a tripping hazard, which in the event of a fire, especially if those areas become smoke logged, can impede escape, and hinder access for firefighters.
- 12.3. In other areas, combustible storage adds to the fire load so that a fire would develop more rapidly than it might have without that extra fuel, and be more difficult to extinguish. The presence of combustible items can also make it more likely that a fire starts as the consequence of an electrical fault.
- 12.4. Document HSF 012 contains details of our approach to storage in common parts, and the situations where exceptions might apply.

## **13. Use of personal electrical items in common parts**

- 13.1. The most common cause of fire is the misuse of, or faults in, electrical appliances. PO 50 defines our procedures for ensuring reasonable safety with regard to electrical appliances in our common parts.
- 13.2. Our intent is to ensure that our premises with limited common parts continue to have limited sources of ignition and minimal combustibles. In premises with ancillary accommodation in common parts our intent is to ensure that all electrical appliances used in the common parts are in good condition and used safely.
- 13.3. Our procedure is based on guidance issued by the Health & Safety Executive (INDG236 - 'Maintaining Portable Electric Equipment in Low-Risk Environments'), and includes periodic visual inspections recorded in HSRA, and where necessary, portable appliance testing.

## **14. Mobility scooters**

- 14.1. Havebury is committed to maximising choice and independence, and we recognise the value of mobility aids such as mobility scooters to tenants in maintaining their independence.
- 14.2. At the same time, Havebury has a duty to ensure high standards of health and safety in blocks of flats, maisonettes and sheltered schemes for tenants, leaseholders, visitors, and staff.
- 14.3. Havebury will accommodate all requests for permission to keep a mobility scooter where it is reasonable and practical, and we will not refuse permission unreasonably.
- 14.4. We reserve the right to withdraw permission if the relevant regulations or law change.
- 14.5. Where permission is refused or withdrawn, a clear explanation in writing will be provided to the resident who shall have right of appeal through Havebury's complaints process.

- 14.6. This policy extends to all Havebury tenants, leaseholders, residents, and visitors, including those in our sheltered schemes, who use mobility scooters in our premises.
- 14.7. Any person who wishes to store a mobility scooter in any of Havebury's schemes, including inside the dwelling, must apply using the process detailed in 'Applying to store a mobility scooter' in document HS 044.

## **15. Safe use of a balcony**

- 15.1. We will do whatever we reasonably can to ensure that balconies are used safely and do not create unnecessary risk for our tenants.
- 15.2. Document HSF 014 applies to all of our dwellings with a balcony, addresses the fire safety risks that arise from the use of a balcony, and defines steps for the safe use of a balcony.
- 15.3. Our tenancy agreements make tenants responsible for the safe use of their home, and where that home has a balcony, it is included in that requirement for safe use.
- 15.4. At the start of a tenancy that includes a balcony, we will give the tenant sufficient information that they understand the risk from fire on their balcony and the steps outlined in HSF 014 to ensure their safety and that of others. Periodically, we will repeat that advice by direct communication with tenants who have a balcony, and through other less specific media.

## **16. Fire Safety Training**

- 16.1. We will provide fire safety awareness training for all of our staff working in positions that include any aspect of fire safety. Additionally, we will provide specific training for staff members expected to install, inspect, test, or maintain any of our fire precautions.
- 16.2. We will provide specific fire safety instruction, including what action to take in the event of a fire for all staff members who work at our commercial premises.
- 16.3. Relevant fire safety training will be given to new staff as part of their induction process, and we will provide relevant refresher training for all staff at intervals not greater than two years.

## **17. Fire Rescue Service**

- 17.1. We will work closely with the local Fire and Rescue Service to ensure that we demonstrate our compliance with the Regulatory Reform (Fire Safety) Order 2005, and to benefit from their expertise, especially in our higher risk premises, including our sheltered schemes.

## **18. General**

- 18.1. We will carefully monitor legislation, regulations, authoritative guidance, British Standards, and best practice to identify changes that affect how we manage fire safety in our premises. Changes that are mandatory will be implemented within the time frames given in the applicable legislation, or as quickly as reasonably practicable. In the case of changes that are not retrospectively mandated, we will review fire safety in any of our premises that the changes might apply to, and decide whether there are improvements in fire safety we would like to make, and over what time period we will make them.