

# Fire Risk Assessment Policy

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| <b>1.0</b> | <b>SCOPE</b>   |
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|            | <b>Purpose</b>   |
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| 1.1        | This document sets out whg's Policy for keeping our customers and others safe, by ensuring we meet our legal and regulatory obligations to carry out appropriate Fire Risk Assessments (FRA).  |
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| 1.2        | These obligations apply to the common parts of flatted accommodation or other buildings where whg have a legal obligation as the landlord to ensure fire safety and keep our customers, colleagues, contractors and visitors safe.   |
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|            | <b>Legal and regulatory framework</b>  |
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| 1.3        | Our responsibilities in relation to fire risk assessments are set out in legislation. whg must comply with the Regulatory Reform Fire Safety Order 2005 (FSO) and the Housing Act 2004 for purpose-built blocks of flats. Under FSO it is a requirement for landlords to ensure that a suitable and sufficient fire risk assessment is undertaken to all common areas in blocks of flats, maisonettes and the common areas of Homes of Multiple Occupancy. These assessments must be undertaken by a competent person with the 'training and experience or knowledge and other qualities'. |
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| 1.4        | The Fire Safety (England) Regulations 2022 impose duties on you if you are the Responsible Person for any building which: <ul style="list-style-type: none"> <li>contains two or more sets of domestic premises</li> <li>contains common parts through which residents would need to evacuate in the case of an emergency</li> </ul>   |
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| 1.5        | The regulations are not intended to capture maisonettes, or where there are no "common parts" through which an individual would evacuate in the event of a fire.   |
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| 1.6        | The Corporate Director of Business Strategy and Assets is the 'responsible person' at whg for ensuring compliance with the FSO.  |
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| 1.7        | The Governance and Financial Viability Standard of the Regulator of Social Housing (RSH) states that Registered Providers, like whg, shall 'adhere to all relevant law'.   |
| 1.8        | The RSH's Home Standard requires Registered Providers to meet all applicable statutory requirements for the health and safety of the occupants in their homes, including fire safety.  |
| 1.9        | Registered Providers are subject to regulatory intervention and enforcement action if found to have caused 'harm or potential harm that may be caused to tenants by a breach of standards', known as 'serious detriment'.  |
| <b>2.0</b> | <b>POLICY STATEMENT</b>  |
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|            | <b>Systematic regime</b>   |
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| 2.1        | whg will undertake a systematic regime of carrying out fire risk assessments of common areas by suitably competent persons to all of our multi-storey (four storeys or more) and low rise blocks to ensure, as far as is reasonably practicable, they are free from fire risks and hazards.                                      |
| 2.2        | Fire risk assessments are compiled following the principles of a risk assessment priority grading that is considered to present a suitable level of fire safety taking in account the complexity of the building, proposed occupancy levels and local conditions.  |
| 2.3        | whg will take prompt remedial action to manage or remove any fire risks or hazards identified during a fire risk assessment. Actions are tracked to completion and evidenced where appropriate with a post completion certificate and photographs.   |
| 2.4        | Any issues that may compromise fire safety within whg blocks of flats identified by colleagues, customers, contractors and visitors will be reported, when noted, and acted upon in accordance with service area policy and procedures.  |
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|            | <b>whg's Responsibility</b>  |
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| 2.5        | Responsibility for ensuring compliance with the Regulatory Reform (Fire Safety) Order 2005 [the Order] rests with the accountable person and the Principal accountable person for Buildings over 18m. The accountable person and Principal accountable person for whg is the Corporate Director of Business Strategy and Assets. |
| 2.6        | In all multi-occupied residential buildings with two or more sets of domestic premises, responsible persons are required to:   |

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|      | <ul style="list-style-type: none"> <li>• Fire safety instructions: provide relevant fire safety instructions to our customers, which will include instructions on how to report a fire and any other instruction which sets out what a customer must do once a fire has occurred, based on the evacuation strategy for the building. This is to include a fire safety induction to all new customers of flatted accommodation.</li> <li>• Fire door information: provide customers with information relating to the importance of fire doors in fire safety</li> </ul>  |
| 2.7  | <p>In residential buildings with storeys over 11 metres in height, responsible persons are required to:</p> <ul style="list-style-type: none"> <li>• undertake quarterly checks of all fire doors (including self-closing devices) in the common parts</li> <li>• undertake annual checks of all flat entrance doors (including self-closing devices) that lead onto a building's common parts, to be captured as part of the annual fire risk assessment process</li> </ul>  |
| 2.8  | <p>In high-rise residential buildings (18 metres or at least seven storeys), responsible persons are required to:</p> <ul style="list-style-type: none"> <li>• Building plans: provide their local Fire and Rescue Service with up-to-date electronic building floor plans and to place a hard copy of these plans, alongside a single page building plan which identifies key firefighting equipment, in a secure information box on site</li> <li>• External wall systems: provide to their local Fire and Rescue Service information about the design and materials of a high-rise building's external wall system and to inform the Fire and Rescue Service of any material changes to these walls.</li> <li>• Lifts and other key firefighting equipment: undertake monthly checks on the operation of lifts intended for use by firefighters, and evacuation lifts in their building and check the functionality of other key pieces of firefighting equipment.</li> <li>• Information boxes: install and maintain a secure information box in their building. This box must contain the name and contact details of the Responsible Person and hard copies of the building floor plans.</li> <li>• Wayfinding signage: install signage visible in low light or smoky conditions that identifies flat and floor numbers in the stairwells of relevant buildings.</li> </ul> |
| 2.9  | <p>The Fire Risk Assessment will detail the composition of external walls and a visual inspection of the external walls will be undertaken, taking action to mitigate any risk where applicable.</p>  |
| 2.10 | <p>A more detailed fire risk appraisal of the external walls under PAS 9980 may be required if, for example, there is a known or suspected risk from the form of construction used for the external wall, such as the presence of combustible materials used for cladding or external wall insulation.</p>  |

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| 2.11 | Where necessary an action plan(s) will be created following the fire risk assessment detailing what work is required, which service area is responsible and the timescales that any remedial works will be completed by.   |
| 2.12 | whg will work closely with all stakeholders affected by this Policy particularly the Fire Service who can offer advice and guidance on how to ensure compliance with current fire safety standards. whg will also accept and act up on any findings following inspections carried out by the Fire Service.   |
| 2.13 | <p>On completion of the fire risk assessment there will be a statement indicating what the overall risk to life is from a fire at the premises. The levels are classed along the following Fire Service guidelines:-</p> <p><b>Trivial</b> - no action required and no detailed records need to be kept.</p> <p><b>Tolerable</b> – No major additional controls required. However, there might be a need for improvements that involve minor or limited cost.</p> <p><b>Moderate</b> – It is essential that efforts are made to reduce the risk. Risk reduction measures should be implemented within a defined time period. Where moderate risk is associated with consequences that constitute extreme harm, further assessment might be required to establish more precisely the likelihood of harm as a basis for determining the priority for improved control measures</p> <p><b>Substantial</b> – Considerable resources might have to be allocated to reduce the risk. If the building is unoccupied, it should not be occupied until the risk has been reduced. If the building is occupied, urgent action should be taken.</p> <p><b>Intolerable</b> – Building (or relevant area) should not be occupied until the risk is reduced.</p> |
|      | <b>Customer engagement</b>   |
| 2.14 | whg will be proactive in providing general fire safety advice e.g. leaflets, sign up packs and website links to customers. This is to inform customers on what to do in the event of a fire in their block of flats and other fire safety issues including the importance of fire doors in fire safety .   |
| 2.15 | whg will provide a range of ways for customers to raise any fire or other safety concerns with us.   |
| 2.16 | whg will identify a responsible person (duty holder) who will have responsibility for the oversight of remedial actions that have been identified on fire risk assessments.  |

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| 2.17       | Customers are to take necessary fire precautions within their flat and keep up to date with whg's evacuation policy and fire safety guidance.   |
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|            | <b>Balconies</b>  |
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| 2.18       | whg will enforce a zero tolerance approach to the storage of all potential ignition sources and fuels on flat balcony areas (paper, wood, oils, gasoline, gas canisters, rubber, alcohol, acetone, methanol).   |
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|            | <b>Light Electric Vehicles (LEV's)</b>  |
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| 2.19       | Internal corridors, hallways, landings and stairwells must be kept free of any obstruction including light electric vehicles. A zero tolerance approach to fire safety is operated and any obstruction will be removed.   |
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| 2.20       | Where there is a potential breach of tenancy, we will work with customers to give them the opportunity to put the issue right before considering other responses. This will be in accordance with the Tenancy Management Policy.  |
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|            | <b>Asset Definition</b>   |
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| 2.21       | whg has categorised the types of flats, inclusive of community rooms against their associated level of fire risk. The two categories are: - <ul style="list-style-type: none"> <li>○ Category 1 – Multi storey blocks (four floors or more), Community Rooms and Wellbeing Schemes</li> <li>○ Category 2 – Low Rise blocks</li> </ul> |
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| <b>3.0</b> | <b>PERFORMANCE MEASURES</b>   |
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|            | <b>FRA's</b>  |
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| 3.1        | The categories of buildings identified in section 2.1 have been risk rated as follows, for the appropriate risk assessment criteria; <p style="margin-left: 40px;">Category 1 - Period not exceeding 12 months from previous assessment.<br/>Category 2 - Period not exceeding 24 months from previous assessment.</p>                |
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|            | <b>Remedial Works Action Plans</b>  |
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| 3.2        | Depending on the outcome of the fire risk assessment, where remedial actions are required, an action plan comprising the following business areas will be created; <ul style="list-style-type: none"> <li>• Home Maintenance Services</li> <li>• Community Housing</li> </ul>   |

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|            | <ul style="list-style-type: none"> <li>• Neighbourhood Services</li> <li>• Energy and Programme Management</li> </ul>   |
| 3.3        | whg will regularly monitor, audit and report to the Building Safety group and the Health and Safety Committee, with our performance and risk management frameworks.   |
| 3.4        | FRA actions are captured and monitored through current Power BI reporting. All High Priority actions are part of the Group Executive customer safety KPI suite. FRA Surveyors also carry out a secondary visit on all Category 1 blocks and escalate any outstanding actions as required if incomplete to service area managers.          |
| <b>4.0</b> | <b>EQUALITY AND DIVERSITY</b>   |
| 4.1        | Fire risk assessments consider the needs of all occupants and passive and active fire safety measures are designed to ensure people are not treated differently or discriminated against because of their characteristics.  |
| <b>5.0</b> | <b>TRAINING AND DISSEMINATION</b>   |
| 5.1        | Article 21 of the Regulatory Reform (Fire Safety) Order 2005, requires an employer to ensure that his or her employees are provided with adequate fire safety training.   |
| 5.2        | Fire risk assessments will be undertaken by a competent person with the 'training and experience or knowledge and other qualities'.   |
| 5.3        | All colleagues are required to complete an e-learning module on fire safety. Colleagues with responsibility for specifying and carrying out remedial works associated with fire risk assessments will receive additional bespoke training as necessary to ensure competence.  |
| <b>6.0</b> | <b>MONITOR AND REVIEW</b>   |
| 6.1        | This Policy will be monitored by the Director of Home Maintenance Service and be reviewed annually, by the Policy Group; to ensure we capture any fundamental changes to the Regulatory Reform Fire Safety Order 2005 (FSO), the Building Safety Act 2022 or Government guidance document - Fire safety in purpose-built blocks of flats. |
| 6.2        | FRA inspections programmes and programmed works identified, are reported to the Building Safety Group on a quarterly basis to ensure whg are compliant providing assurance to the Health and Safety Committee and other Boards.   |

| 7.0 | ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES   |
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| 7.1 | <p>Documents, policies and procedures associated with this Policy are:</p> <ul style="list-style-type: none"> <li>• The Regulatory Reform (Fire Safety) Order 2005</li> <li>• Building Safety Act 2022</li> <li>• The Fire Safety (England) Regulations 2022</li> <li>• Fire safety in purpose-built blocks of flats</li> <li>• whg Repairs Policy</li> <li>• Housing Act 2004</li> <li>• The Furniture and Furnishings (Fire) (Safety) Regulations 1988</li> <li>• The Building Regulations 2000 (as amended) - Approved Document B (Fire Safety) Volume 2 – Buildings other than dwelling houses (2019 edition)</li> <li>• Local Authorities Co-coordinators of Regulatory Services (LACORS) – Housing fire Safety</li> <li>• FRA Procedure</li> <li>• Housing Health and Safety Rating System (HHSRS)</li> <li>• whg Tenancy Agreement</li> <li>• Tenancy Management Policy</li> <li>• whg Health and Safety Policy</li> </ul> |

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| <b>Document author</b>    | Stephen Walters, Home Maintenance Project Manager   |
| <b>Document owner</b>     | Nigel Harris, Director of Home Maintenance Services   |
| <b>Legal advice</b>       | None  |
| <b>Consultation</b>       | Not required  |
| <b>Approved by</b>        | Policy Group 21 June 2023   |
| <b>Review Date</b>        | 21 June 2024  |
| <b>Corporate Plan aim</b> | <ul style="list-style-type: none"> <li>• Deliver high quality homes and services for our customers</li> </ul>   |
| <b>Equality analysis</b>  | Not required  |
| <b>Key changes made</b>   | <p>Updates made to:-</p> <ul style="list-style-type: none"> <li>• Added sections 1.4 and 1.5 – duties imposed by the Fire Safety (England) Regulations 2022</li> <li>• Added sections 2.6, 2.7, 2.8 to provide clarity for requirements for buildings over 11 and 18 metres in height and general requirements for all multi-occupied buildings.</li> <li>• Added sections 2.9 and 2.10 to include external wall requirements</li> <li>• Updated section 2.14 – customer information</li> </ul> |

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|  | <ul style="list-style-type: none"><li>• Revised 2.19 to capture all electric mobility devices as Light Electric Vehicles</li><li>• Updated section 3.2 to reflect current service team names</li><li>• Updated section 6.1 to include the Building Safety Act 2022</li><li>• Updated 7.1 to reflect current policies and regulatory procedures</li></ul> |
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