



POLICY DOCUMENT

Group Member: Progress Housing Group

Service Area: Property Services

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Subject Title: Fire Safety Management

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1. INTRODUCTION

- 1.1 Those responsible for buildings can avoid fires by taking responsibility for fire risk management and maintenance and by ensuring occupants adopt the right behaviours and procedures. The Regulatory Reform (Fire Safety) Order 2005 (FSO), the Fire Safety Act 2021 (England and Wales) the Building Safety Act 2022, the Fire Safety (England) Regulations 2022, the Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022 and the Fire (Scotland) Act 2005 (FSA) place a duty on persons responsible for buildings in England, Wales and Scotland to carry out risk assessments and implement adequate fire prevention measures within the premises that they own and/or manage.
- 1.2 From the 1st October 2023 new fire safety guidelines have been implemented for all buildings regulated by the Regulatory Reform (Fire Safety) Order 2005 (FSO). The new regulations aim to enhance collaboration and coordination between responsible persons (RPs), impose stricter requirements for recording and sharing of fire safety information, simplify the process for enforcement authorities to take action against non-compliance, and provide residents with comprehensive information regarding fire safety in their buildings.
- 1.3 Section 156 of the Building Safety Act 2022 (BSA) has made a number of amendments to the FSO to improve fire safety in regulated buildings non-domestic parts of blocks with two or more storeys. These improvements form Phase 3 of the Home Office fire safety reform programme, building on Phase 1 (the Fire Safety Act 2021) and Phase 2 (the Fire Safety (England) regulations 2022).

2. SCOPE OF THE POLICY

- 2.1 The Group has established a policy which meets the requirements of the current fire safety legislation, codes of practice and good practice guidance. This provides assurance that arrangements are in place to identify, manage and/or mitigate the risks associated with fire.
- 2.2 The Group will also ensure that compliance with fire safety legislation is formally reported at Senior Leadership Team (SLT) and Parent Board level, including the details of any non-compliance, and planned corrective actions.
- 2.3 The policy applies to all companies within the Group and therefore is relevant to all Group employees, tenants, contractors and other

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persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.

- 2.4 It should be used by all to ensure they understand the obligations placed upon the Group to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties owned and managed by the Group (offices, commercial shops, depots, etc.).

3. RESPONSIBILITY

3.1 Key Roles and Responsibilities

- 3.1.1 In order to ensure that this Fire Safety Management Policy, and the supporting procedure is adhered to, the Group will appoint suitably competent personnel to act as the 'Responsible Person' on behalf of the individual Duty Holder and oversee the implementation and review of these documents.

- 3.1.2 **Responsible Person (England) and Duty Holder (Scotland)** – The Director (Property Services) will fulfil the role of the appointed Responsible Person/Duty Holder on behalf of the Group to ensure the appropriate management of the risks associated with fire safety. As a result, the Director (Property Services) will hold responsibility for the implementation of this document, and supporting procedure, as well as ensuring fire safety compliance is achieved and maintained.

The changes to the Regulatory Reform (Fire Safety) Order 2005 include the following new requirements placed on the Responsible Person:

- All Responsible Persons must record their completed Fire Risk assessment, and in full (where previously only specific information was required to be recorded)
- All Responsible Persons must record the identity of the individual (their name), and/or if applicable. Their organisation (name) engaged by them to undertake/review any or all of the fire risk assessment.
- All Responsible Persons must record their fire safety arrangements (demonstrate how fire safety is managed in premises)

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- All Responsible Persons must record (and as necessary update) their contact information, including a UK based address, and share this with other Responsible Persons and residents of multi-occupied residential buildings where applicable,
- All Responsible Persons must take reasonably practicable steps to ascertain the existence of other Responsible Persons who share or have duties in respect of the same premises, and of Accountable Persons (which are a new legal entity made under the Building Safety Act in the case of higher-risk residential buildings) in relation to the premises – they must identify themselves to said persons.
- Departing Responsible Persons must share all 'relevant fire safety information' with incoming Responsible Persons.
- Responsible Persons of a building containing two or more sets of domestic premises to provide residents with relevant fire safety information in a format that is easily understood by the resident.

3.1.3 Although the organisation has an appointed Duty Holder, the Group's Chief Executive will be ultimately responsible for ensuring compliance with current legislation and to ensure that the organisation fulfils its duties and responsibilities as outlined in this policy document and the supporting procedure.

3.1.4 **Competent Persons** – The Head of Compliance, and the Compliance Manager (Fire) shall ensure that there are suitable arrangements in place for the implementation of the Fire Safety Management Policy and related procedures, as well as overseeing the delivery of the agreed risk assessment programmes and the prioritisation and implementation of any works arising from the assessments. The Compliance Team are also responsible for overseeing the delivery of service, maintenance and repair programmes for all fire detection, alarms and fire-fighting equipment within property assets owned or managed by the Group.

3.1.5 The Parent Board has overall governance responsibility for ensuring the Fire Safety Management Policy is fully

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implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice.

3.1.6 This policy is formally approved by the Executive Board on behalf of the Parent Board. The policy will be reviewed every three years thereafter (or sooner if there is a change in regulation, legislation or codes of practice).

3.1.7

3.1.8 The Board and SLT receive reports, at least quarterly, in respect of fire safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.

3.1.9 The housing teams will provide key support in gaining access to properties where access is proving difficult and use standard methods to do so. They will also facilitate the legal process to gain access as necessary.

3.1.10 All staff who have responsibility for or visit properties (housing officers, scheme managers, caretakers, operatives etc.) have a responsibility to notify the compliance team where circumstances have changed within a scheme/block/property, which may result in a new fire risk assessment being required.

3.1.11 The Development Team will have responsibility for ensuring that any new build or acquired properties are handed over in line with the policy requirements and that all relevant compliance information is accurate and updated on the housing management system.

3.1.12 **Third Party Landlords** - In properties where the landlord is responsible for compliance with all statutory legislation, the Group has a duty of care to tenants in these properties to ensure appropriate safety standards are met. the Group will monitor compliance of these parties to ensure that they meet all relevant statutory obligations. To do this we will use the process set out in the Procedure for Managing 3rd Party Landlords' Compliance Activities.

3.2 Competent Persons

3.2.1 The Group will ensure that the Compliance Manager (Fire) with lead responsibility for operational delivery is appropriately qualified holding a recognised fire safety

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qualification such as NEBOSH National Certificate in Fire Safety and Risk Management or equivalent. The Group will fund training as necessary so they gain this qualification and membership. If the Competent Person does not have appropriate qualifications already these should be obtained as soon as reasonably practicable.

- 3.2.2 The Compliance Manager (Fire) will ensure that only suitably competent fire risk assessors; for example certified by BAFE and on an appropriately accredited certification scheme that meets the competency criteria established by the Fire Risk Assessment Competency Council, are procured and appointed to undertake fire risk assessments.
- 3.2.3 The Compliance Manager (Fire) will check the relevant qualifications of those carrying out this work to ensure that all persons are appropriately qualified and accredited for all the work they are carrying out. These checks will be undertaken as part of the procurement process and/or on an annual basis thereafter and evidenced appropriately.

4. POLICY

4.1 Obligations

- 4.1.1 The Compliance Manager (Fire) will ensure that only suitably competent fire risk assessors are employed to carry out, for the purpose of identifying the general fire precautions and other measures needed to comply with the Regulatory Reform (Fire Safety) Order 2005 (FSO). Although under the FSO this requirement only applies to the common parts of non-domestic premises, in practice the responsible person will need to consider the entire premises - including, to some extent, the units of residential accommodation (known as a Type 3 FRA).
- 4.1.2 The responsible person (the Group) implements all necessary general fire precautions and any other measures identified by an FRA.
- 4.1.3 The responsible person (the Group) puts in place a suitable system of maintenance and appoints competent persons to complete any actions arising from the FRAs.
- 4.1.4 The responsible person (the Group) periodically reviews its FRAs in a timescale appropriate to the premises and/or the

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occupational fire risk level. This timescale is determined by the fire risk assessor who carries out the FRA.

4.2 Policy Statement

- 4.2.1 The Group acknowledges and accepts its responsibilities under the Regulatory Reform (Fire Safety) Order 2005 (FSO), the Fire (Scotland) Act 2005, the Fire Safety Act 2021 (England and Wales) the Building Safety Act 2022, the Fire Safety (England) Regulations 2022 and the Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022.
- 4.2.2 The evacuation strategies in place across the different Group property types will be implemented and followed as per the recommendations of the competent fire risk assessor and in consultation with relevant Group staff. Therefore, the future fire safety strategy to be adopted will be confirmed on a building-by-building basis in accordance with the fire risk assessor's recommendation.
- 4.2.3 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for having an FRA in place.
- 4.2.4 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for servicing, maintenance and repair of fire prevention, detection, and fire-fighting equipment. These include fire alarm systems, emergency lighting, smoke/heat detectors, hose reels, dry and wet risers, auto window/door openers, fire extinguishers, fire blankets, sprinkler systems and any other equipment relating to fire safety (where appropriate).
- 4.2.5 The Group will establish and manage programmes to deliver servicing and maintenance in accordance with all relevant recommendations for all fire detection, prevention and fire-fighting systems and equipment within buildings owned or managed by the organisation.
- 4.2.6 The Group will ensure that each property requiring a fire risk assessment has a fire risk assessment in place that is PAS79 compliant (Publicly Available Specification) from the British Standards Institute (BSI) BS 9792 and that has been carried out by a competent fire risk assessor.

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The Building Safety Act Section 156 amendment (4) to the Regulatory Reform (Fire Safety) Order 2005 Article 9, 9A (1) and 9A (2) requires the appointment of a competent person to undertake a Fire Risk Assessment. Competency is evidenced through company accreditation and assessor's qualifications, accreditation, experience and inclusion on a national Fire Risk Assessor register.

4.2.7 The Group will carry out an FRA programme, ensuring that all FRAs are completed, no later than the date stated in the current FRA (annually, 2 yearly, 3 yearly or 4 yearly, based on the risk profile of the property).

4.2.8 The Group will ensure that the FRA to a building is reviewed following a fire, a change in client need and/or building use, or a change in working practices that could affect fire safety, following refurbishment works to the building or if required following an independent fire safety audit and that this review is carried out by a competent fire risk assessor.

4.2.9 The Group will ensure that processes are in place to implement all mandatory fire precaution measures identified by FRAs.

4.2.10

Regular inspections will be carried out by caretakers and housing operations colleagues and be undertaken at regular intervals, with inspection records evidenced and kept against each property. In addition to this the Group will ensure regular testing of all fire alarms and emergency lighting systems.

4.2.11 The Group will ensure that processes are in place to record and action any 'near-miss reports with regard to fire safety. A 'near miss' is an unplanned event which does not result in an injury but had the potential to do so.

4.2.12 The Group will test hard-wired smoke alarms as part of the annual gas safety check visit (or at void stage). Any properties not included on the gas safety programme will have the smoke alarms tested annually on a separate programme.

4.2.13 The Group will ensure that all properties have a hard-wired smoke alarm system in accordance with BS5839-6. In some cases it may not be possible to install hard-wired detection in which case battery operated detection will be considered.

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- 4.2.14 The Group will liaise with property owners/landlords of accommodation leased or managed on their behalf to ensure that evidence of compliance is available.
- 4.2.15 The Group will ensure that all supported living scheme residents and any residents within independent living who are unable to self-evacuate a scheme/building, (regardless of the evacuation policy), will have a Person Centred Fire Risk Assessment (PCFRA).
- 4.2.16 Any employees who would be unable to self-evacuate a work premises would also require a Personal Emergency Evacuation Plan (PEEP). This will be identified, recorded and managed by the Health and Safety Team.
- 4.2.17 The PCFRA/PEEP will be reviewed annually by a competent person; this would usually be the Support provider for supported living schemes or an independent living scheme coordinator for independent living schemes.
- 4.2.18 Where the Group have been notified that a resident within a building is storing Oxygen in their home for medical use the organisation will ensure that they have a PCFRA in place and that this PCFRA will be reviewed annually by a competent person.
- 4.2.19 The Group will have processes and controls in place to ensure that consideration is given when letting properties to the suitability of the accommodation for the prospective tenant as regards to fire safety.
- 4.2.20 The Group will provide information to all new tenancies (general needs and independent living) and other tenants (via general information) within Lancashire, to self refer to Lancashire Fire and Rescue Service for a free home safety check (also known as 'Safe and well visits'). For as long as Lancashire Fire and Rescue offer this service. In our Supported properties that are spread geographically across the country, the Supported Living Housing Officer or Support Provider can refer to their local Fire and Rescue Service.
- 4.2.21 Where we have properties that are owned by a Third Party Landlord or Managing Agent where they have the responsibility to complete the Fire Risk Assessment, they will need to check the suitability and competence of the Fire Risk Assessor.

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- 4.2.22 The Group has a process in place to gain legal access should any tenant or leaseholder refuse access to carry out essential fire safety related inspection and remediation works considering where tenant vulnerability issues are known or identified to ensure the wellbeing of the tenant.
- 4.2.23 The Group has a Primary Authority Agreement with Lancashire Fire and Rescue Service and is committed to working with all relevant Fire and Rescue Services to create safer places to live and work.
- 4.2.24 The aim of the Primary Authority Agreement is for Fire and Rescue Services to develop effective partnerships with businesses to achieve national consistency in delivering fire safety enforcement advice. Lancashire Fire and Rescue Service are the Groups single point of contact for fire safety regulation advice and they work with other authorities on behalf of the Group to resolve any inconsistencies in fire related compliance advice.
- 4.2.25 The Group considers good communication essential in the safe delivery of fire safety and will therefore ensure that information about fire safety and fire prevention measures is available to residents and building users via leaflets, letters and information on the group's website.
- 4.2.26 The Group will ensure that tenants (in shared houses or blocks) have access to a summarised, tenant-friendly FRA of the non-domestic parts of the property they occupy in line with section 156 of the Building Safety Act on request within 10 working days. A full version of the FRA will be made available to Responsible Persons (i.e. Support Providers).
- 4.2.27 To comply with the Fire Safety (England) Regulations 2022 the group will provide building specific fire safety information and information on the importance of fire doors. This information will be provided annually to all existing tenants and during the sign-up process for new tenants. This applies to tenants living in any residential building with two or more sets of domestic premises irrespective of height.
- 4.2.28 Where appropriate any compliance risks will be considered, mitigated or removed as part of any major refurbishment works or included in new development design briefs.

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4.2.29 The group will install in all its independent living schemes and general needs blocks of flats over 2 storeys in height, a Secure Information Box (SIB). The SIBs will be installed to aid local fire and rescue services in the event of a fire and will hold information such as building specific floor plans, details of stored oxygen and any PCFRA details of vulnerable tenants who would need assistance in the event of an evacuation.

4.3 Inspection Programmes

4.3.1 **Fire Risk Assessments (FRAs)** – the Group will complete a programme of fire risk assessments to all properties requiring an FRA in its management and ownership.

4.3.2 The Group will carry out a programme of FRAs in line with the next event date as per the assessment ,and this is carried out by a competent fire specialist (internally or externally as appropriate).

4.3.3 All FRAs will be Type 3 as a minimum, including an assessment of communal doors and a 10% sample of the resident's front doors unless it is deemed by the assessor that a Type 1 survey is sufficient. This sample will need to increase if issues are found on the initial sample. Type 2 and Type 4 risk assessments will only be commissioned where it is deemed appropriate for a particular property.

4.3.4 **Fire Risk Assessments (Supported Living)** - the Group will complete a programme of FRAs to all supported living properties in its management and ownership, except properties that have been reviewed and are deemed to be single occupancy with limited support provision.

4.3.5 The Group will carry out a programme of FRA reviews ensuring that all FRAs are reviewed on a risk-based cycle.

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4.4 Compliance Follow up Work.

4.4.1 The Group will ensure that processes are in place to implement all mandatory fire precaution measures identified by FRAs. This will be done on the following timescales:

- High risk actions (A rated) – As per FRA
- Medium risk actions (B rated) – 3 months
- Low level actions (C rated) – 6 months

4.4.2 In some circumstances it will be appropriate to consider interim mitigating actions whilst A rated actions are being completed (e.g. waking watch/alternative accommodation).

4.4.3 The Group will ensure that processes are in place to implement all fire precaution measures identified by the regular property inspections carried out by caretakers and housing operations colleagues.

4.4.4 The Group will ensure there is a process in place for the management of any follow-up works required following the completion of servicing and maintenance checks to fire detection, prevention and fire-fighting systems and equipment.

4.4.5 To comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all relevant works (see Health & Safety Policy).

4.5 Contract Management

4.5.1 Regular contract meetings will be held with all external contractors to review and monitor key performance indicators.

4.5.2 An item will be included on the agenda of contract meetings to review all qualifications and competencies of contractors' personnel (in line with those noted in section 3.2.3) for all areas of work they undertake on our behalf.

4.5.3 If requested by the contractor, we will provide up to date information relating to any relevant compliance areas.

4.6 Record Keeping

4.6.1 The Group maintains a compliance management system (C365) that identifies all communal blocks and 'other' properties that require an FRA. C365 also identifies all fire

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safety equipment, systems, and installations within each building.

- 4.6.2 The compliance management system (C365) shows the date of the previous and current FRA, along with the due date of the next FRA. C365 will also be used to record and track for the Group, all fire safety actions required as identified from the FRA.
- 4.6.3 FRA inspection and re-inspection dates, FRAs and FRA actions will be stored on C365
- 4.6.4 The Group will establish a record on C365 against each property asset of any smoke/heat detection equipment contained within domestic dwellings.
- 4.6.5 The Group will establish and maintain accurate and up to date records of all completed FRAs, FRA reviews and associated completed remedial works from these reports and keep these as per the organisation's Data Retention Policy.
- 4.6.6 The Group will establish and maintain accurate and up to date records of all completed servicing and maintenance checks on fire safety equipment, systems and installations and details of associated completed remedial works and keep these as per the organisation's Data Retention Policy.
- 4.6.7 The Group will maintain a record of appropriate Fire Safety information and keep securely on site or held electronically, where practical, for all communal blocks, independent living, supported living schemes and 'other' properties requiring an FRA.
- 4.6.8 The Group will establish and maintain records of all fire safety related training undertaken by staff.
- 4.6.9 The Group will ensure that processes and controls are in place to provide and maintain appropriate levels of security for all fire safety related data.

5. REGULATORY STANDARDS, LEGISLATION, AND APPROVED CODES OF PRACTICE

- 5.1 **Regulatory Standards** - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Quality & Safety Standard) for social housing in England, which were introduced by the Regulator of Social Housing (RSH).

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5.2 **Legislation** – the legislation applicable to this policy is the Regulatory Reform (Fire Safety) Order 2005 (FSO), Fire Safety Act 2021 (England and Wales), the Building Safety Act 2022, the Fire Safety (England) Regulations 2022, Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022 and for Group properties located in Scotland, the Fire (Scotland) Act 2005. These regulations place a duty on the Group to take general fire precaution measures to ensure, as far as is reasonably practicable, the safety of the people on its premises and in the immediate vicinity. The Group is the ‘responsible person’ for the purposes of the legislation by virtue of the fact that its own and manage Group homes and buildings housing tenants/leaseholders through its tenancy agreement and lease obligations. The principal applicable legislation for Group properties located in Scotland in the Fire (Scotland) Act 2005 which also places fire safety obligations on the duty holder and includes a requirement to produce an FRA.

5.3 **Codes of Practice** - the codes of practice applicable to this policy are:

- LACORS - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing.
- HHSRS Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9.
- Department for Communities and Local Government (DCLG) - Update on Interim Mitigation Measures Required Pending Remediation of Cladding (29.09.2017).
- Fire Safety in Purpose Built Blocks of Flats (LGA)
- Practical Fire Safety Guidance for Existing Specialised Housing (Scottish Government)
- Housing Health and Safety Rating System operating guidance: Housing Act 2004
- Fire Safety Risk Assessment: Sleeping Accommodation (HM Government)
- National Fire Chief Council’s Guidance (NFCC) - Fire Safety in Specialist Housing – April 2017, covers sheltered schemes, supported schemes and extra care schemes; and
- Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation 2018 – guidance for those with responsibility for ensuring fire safety in certain premises within sleeping accommodation in Scotland.

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5.4 Sanctions – the Group acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.

5.5 Tenants – the Group will use the legal remedies available within the terms of the tenancy agreement should any tenant refuse access to carry out essential fire safety related inspection and remediation works.

5.6 Leaseholders – the Group will use the legal remedies available within the terms of the lease agreement should any leaseholder or shared owner refuse permission and/or access to carry out essential fire safety related inspection and remediation works (as tested in the case Croydon Council v. Leaseholder 1st August 2014).

Additional Legislation – This fire safety policy also operates in the context of the following additional legislation:

- Housing Act 2004
- Social Housing (Regulations) Act 2023
- Fire (Scotland) Act 2005 and the associated Fire Safety (Scotland) Regulations 2006
- Housing Scotland Act 2006
- Building (Procedures) (Scotland) Regulations 2004 and the Building (Scotland) Act 2003
- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Gas Safety (Installation and Use) Regulations 1998
- The Furniture and Furnishings (Fire Safety) Regulations 1988
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Building Regulations 2010: Approved Document B Fire Safety

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- Electrical Equipment (Safety) Regulations 2016
- Construction, Design and Management Regulations 2015
- Data Protection Act 2018
- RIDDOR 2013

5.7 A process is in place to identify changes to regulation and legislation through the Group's compliance reporting framework. Any changes relating to this policy will be highlighted and implemented, including a review of policy and procedural documents.

This policy also links to the following Group Policies:

- Health and Safety Policy
- Data Archival, Retention and Disposal Policy
- Reasonable Adjustment Policy
- Business Continuity Plan (Dealing with Emergencies)

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6. IMPLEMENTATION

6.1 Training

- 6.1.1 The Group will ensure that all employees working for, or on behalf of the organisation have the relevant training required for their role.
- 6.1.2 Group employees will undertake periodic assessments of training needs and resulting programmes of internal and/or external training will be implemented via the Health & Safety team.
- 6.1.3 All relevant employees, involved in the process, will have an understanding of fire safety management and their roles and responsibilities in ensuring that full compliance is maintained
- 6.1.4 In order for all employees to fully understand the regulations and obligations placed upon the Group, they will undertake mandatory compliance awareness training and this will be refreshed every 3 years.

6.2 Performance Reporting

- 6.2.1 Key performance indicator (KPI) measures are established and maintained to ensure the Group is able to report on performance in relation to fire safety.
- 6.2.2 KPI measures are provided to SLT on a monthly basis. They are also provided to Executive Board and the Health & Safety Steering Group on a quarterly basis. As a minimum these KPI measures include reporting on:

Data – the total number of:

- Properties – split by communal blocks and ‘other’ properties.
- Properties on the FRA programme.
- Properties not on the FRA programme.
- Compliant properties with a valid ‘in date’ FRA; and
- Non-compliant properties where the FRA has expired and is ‘out of date’;
- Compliant & non-compliant 3rd party properties with or without a valid FRA

Narrative - an explanation of the:

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- Current position.
- Corrective action, if any, required.
- Completion of any follow-up works – number of high, medium and low risk actions – ‘completed’, ‘in time’ and ‘overdue’.
- Properties which are due for a new FRA within the next 90 days. This is the early warning system.

In addition:

- Compliance with the fire safety equipment, systems and installations servicing and maintenance programme
- Parent Board receives a condensed version of the report provided to SLT and Executive Board on a quarterly basis.
- The fire team report on the scorecard, convene monthly meetings with RWP and Housing Management. All management actions follow an escalation process to Head of Compliance and Head of Operations (RWP), if not resolved by this process any actions not completed are reported to Executive Board

6.2.3 Tenant Satisfaction Measures (TSMs) are part of the new Consumer Standards and provide a valuable insight as to how the Group is performing from a tenant perspective. Compliance performance is part of the TSMs and the Group reports the number of properties with a compliant FRA annually to the Regulator of Social Housing. 6.2.3 The Group carries out independent third-party quality assurance audits on a monthly basis of completed Fire Risk Assessments. This is a 5% sample of the total number of assessments carried out during the year. In addition 100% of all certificated actions are checked upon receipt by the fire team

6.2.4 The Group commissions an independent audit encompassing all areas of compliance, including fire safety at least once every three years. This audit specifically test for compliance with regulation, legislation and approved codes of practice and identify any non-compliance issues for correction.

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6.2.5 The audit also looks at and will test processes to ensure that they are being adhered to and they are still fit for purpose.

6.3 Non-Compliance/Escalation Process

- 6.3.1 Any significant non-compliance issue identified, will be formally reported to the Director (Property Services) as soon as this is identified.
- 6.3.2 The Director (Property Services) will agree an appropriate course of corrective action with the Head of Compliance in order to address the non-compliance issue and report details of the same to the Executive Director (Operations, Services and Support) (or Chief Executive in their absence) within 24 hours.
- 6.3.3 The Executive Director (Operations, Services and Support) or Chief Executive will ensure the Parent Board is made aware of any non-compliance issue raised in 7.3.1 so they can consider the implications and take action as appropriate, including notification to the Regulator of Social Housing, if necessary.

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7. CONSULTATION7.1 The Consumer Standards set out expectations for the Group to provide tenants with accessible information in respect of the legal obligations and relevant regulatory requirements that Registered Providers must meet in connection with their homes. The Group will:

7.1.1 Ensure that information is available to tenants at sign up, and on the website relevant to their homes and communal areas.

7.1.2 Compliance data is also available to tenants on request .

7.2 Colleagues within the organisation have been consulted on this policy.

8. REVIEW

8.1 This policy will be reviewed following the Group's standard three-year timeframe or following any legislative or regulatory changes.

9. EQUALITY IMPACT ASSESSMENT

9.1 An EIA has been completed for the overarching Property Compliance Policy statement which covers this policy..

10. ASSOCIATED POLICIES & PROCEDURES

Document reference	Name of document
EIA01	Equality Impact Assessment
GRPROPS20	Fire Safety Management Procedure
GRPROPS23	Procedure For Managing 3rd Party Landlords Compliance Activities (Final)
GRPOLPS03	

Progress Housing Group		Property Services			
Title:	Fire Safety Management				
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Appendix 1 – Glossary of terms

BAFE	British Approvals for Fire Equipment (UK)
BSI	British Standards Institute
CDM	Construction, Design and Management Regulations 2015
FSO	Regulatory Reform (Fire Safety) Order 2005
HHSRS	Housing, Health & Safety Rating System
LACORS	Local Authority Coordinators of Regulatory Services
PAS	Publicly Available Specifications
PEEP	Personal Emergency Evacuation Plan
UKAS	United Kingdom Accreditation Service
FRA	Fire Risk Assessment

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APPENDIX 2 - Types of Fire Risk Assessment (FRA)

Type 1 – Common parts only (non-destructive)

A Type 1 fire risk assessment is the basic fire risk assessment required for the purpose of satisfying the RRO. Unless there is reason to suspect deficiencies in structural fire protection –such as inadequate compartmentation, or poor fire stopping – a Type 1 FRA will normally be sufficient for most blocks of purpose-built flats. Where there is doubt, it may be necessary for another type of fire risk assessment to be carried out by a specialist company.

Type 2 – Common parts only (destructive)

The Type 2 fire risk assessment covers the same areas as the Type 1, except that there is a degree of destructive inspection, carried out on a sampling basis. It is usually necessary for a contractor to be present for gaining access to the elements to be examined and making good after the inspection.

A Type 2 fire risk assessment is usually a one-off exercise, carried out only where there is good reason to suspect deficiencies that could lead to spread of fire beyond the flat of fire origin.

Type 3 – Common parts and flats (non-destructive)

A Type 3 fire risk assessment includes the work involved in a Type 1 fire risk assessment but goes beyond the scope of the RRO (though not the scope of the Housing Act). This risk assessment considers the arrangements for means of escape and fire detection within at least a sample of the flats. The inspection of any flat is non-destructive, but the fire resistance of doors to rooms will be part of the survey.

A Type 3 fire risk assessment may be appropriate for rented flats if there is reason to suspect serious risk to residents in the event of a fire in their flats. This could be due to the age of the building or because of unauthorised alterations.

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Type 4 – Common parts and flats (destructive)

A Type 4 fire risk assessment covers the same areas as the Type 3 fire risk assessment, except that there will be some destructive inspection in the common parts and in a sample of the flats. This will normally require a contractor to gain access to the elements to be examined and for making good after the inspection. This form of inspection would normally only be carried out on properties that are unoccupied (void).

The type 4 fire risk assessment will only be required in a very limited set of circumstances, such as when a new landlord takes over a block of flats in which the history is unknown, or where there is reason to suspect serious risk to residents from both a fire in their own flats and a fire in neighbours' flats.