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Fire Safety Management Plan

**Section**

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Safety and Compliance

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## **Fire Safety Management Plan**

March 2024

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## Appendix 1: Fire Safety Protocols

## 1. Introduction

- 1.1 The purpose of this Fire Safety Management Plan (FSMP) is to provide key information to ensure that Rooftop Housing Group (RHG) as a landlord meet their legal obligations for fire safety.
- 1.2 To ensure properties remain safe for those who occupy, visit, reside within close proximity and / or work within them, we will:
  - Provide all RHG colleagues involved in the management and administration of the service with detailed operating processes.
  - Detail the key requirements and provide relevant information to all contractor/consultants responsible for delivering the service.
  - Provide customers receiving the service with clear guidance on their roles and responsibilities.
  - Demonstrate that RHG complies with the requirements of the Regulations providing additional assurance.
- 1.3 Contractors and/or consultants will be provided with a copy of this FSMP to provide clarity as to how services must be delivered. All parties involved in the Policy and review process will be provided with a copy.

## 2. Responsibilities

### 2.1 Rooftop Housing Group (RHG)

- 2.1.1 The RHG **Board** has overall responsibility for approving the Fire Safety Policy, delegating responsibility for its implementation, monitoring its effectiveness at high level, and receiving assurance of compliance.
- 2.1.2 The **Group Chief Executive (GCE)** will be responsible for the implementation of the Fire Safety Policy and will retain overall responsibility for consistent monitoring of the management plan, to effectively comply with the regulatory standard and report to the Regulator of Social Housing (RSH).
- 2.1.3 The **Executive Director - Investment** will take overall responsibility for the delivery of the Policy commitments and for planning and implementing the assurance activities described in Fire Safety Policy and for the effective upward reporting of performance.
- 2.1.4 The **Head of Asset Investment** and **Safety and Compliance Manager** will ensure that there are suitable arrangements in place for the implementation of the Fire Safety Policy as well as overseeing the delivery of the agreed FRA programmes and the prioritisation and implementation of any works arising from the assessments. They are also responsible for overseeing the delivery of service, maintenance and repair programmes for all fire detection, alarms, fire-fighting equipment and fire safety related apparatus within property assets owned or managed by RHG. They are the Responsible Person(s) who will lead on the delivery and revision of all key fire safety documentation across the business and ensure compliance with the RHG Policy, FSMP and therefore ensuring compliance with regulations.
- 2.1.5 All **Executive Directors** will take responsibility for ensuring that the staff and contractors they employ or engage with have the skills, knowledge, and expertise necessary to deliver the commitments outlined in the Policy.
- 2.1.6 RHG has the following key responsibilities:
  - Ensure that sufficient competent resources and capability are in place to comply with the Fire Safety Policy and FSMP.

- Agree and set resource requirements for the management of fire safety ensuring sufficiency to meet compliance with the Policy.
- Discuss and seek Executive Team/Board approval (as per Scheme of Delegations) the procurement of fire safety contracts and any subsequent amendments.
- Ensure that fire safety contracts are being always adhered to by all contractors and or consultants through proactive management and monitoring.
- Ensure that all colleagues, contractors, and consultants with responsibility for managing and delivering fire safety-related services are competent.
- Ensure the safety of customers, residents, colleagues, contractors, consultants, and other stakeholders.
- Review performance of contractors and/or consultants and service delivery through agreed Key Performance Indicators (KPIs) and Operational Key Risk Indicators (KRIs).

## 2.2 **Contractors / Consultants**

### 2.2.1 Contractors and/or consultants are required to:

- Fully comply with the terms of a works order and contractor or service agreement (where available).
- Comply with RHG's Health and Safety Policy and all relevant health and safety legislation.
- Provide information and data as required within defined timescales as set out in the works order, contract and/or service agreement (where available).
- Work in partnership with RHG customers and/or colleagues.

## 2.3 **Customers**

### 2.3.1 Customers (incl. leaseholders) are expected to:

- Allow access upon reasonable notice to enable the surveying, servicing and routine repairs or inspections to be undertaken in accordance with the tenancy agreement and/or lease.
- Allow access for servicing and repair without delay.
- Report repairs/defects within a reasonable timescale dependent upon the nature and urgency of the repair.

2.3.2 Customers will be asked to provide feedback where appropriate to assist in the collection of performance data regarding their experience of fire safety inspections and remedial works.

2.3.3 Homeowners, such as leaseholders and shared owners, are responsible for fire safety within their homes. For commercial properties, there are additional statutory duties they must adhere to. We will ensure that homeowners and commercial property owners are informed about their responsibilities for fire safety at the time of them moving into one of RHG's properties.

2.3.4 We will ensure that leaseholders co-operate with RHG to discharge our duties under relevant legislation and regulations, to enable RHG to meet landlord covenants detailed in the Lease and as set out in the Fire Safety Act 2021.

## 2.4 **Information to Residents**

2.4.1 In blocks which contains two or more sets of domestic premises; and which contain common parts through which residents would need to evacuate in the case of an emergency, RHG will (as per Fire Safety Policy):

- Display fire safety instructions in a conspicuous part of the building in a comprehensible form that residents can reasonably be expected to understand (as required by Fire Safety (England) Regulations 2022).
- Provide fire safety instructions directly to new residents as soon as reasonably practicable after they move into their accommodation and on an annual basis thereafter including (as required by Section 156 of the Building Safety Act 2022):
  - Any risks to residents identified in the FRA.
  - The fire safety measures provided for the safety of any or all occupants (such as the means of escape, the measures to restrict the spread of fire and what people should do in the event of a fire).
  - The name and UK address of the Responsible Person.
  - The identity of any person appointed to assist with making or reviewing the FRA.
  - The identity of any competent person nominated by the Responsible Person to implement firefighting measures.
  - Any risks to relevant persons throughout the building that have been identified by other Responsible Persons in the building.
- Inform residents of the importance of Fire Safety on a regular basis including the importance of fire doors, through the provision of information via website, newsletters, social medias, leaflets, letters and information at New Tenancy Sign-Up.
- Maintain a clear approach to gaining access to carry out surveys and undertake works and be clear that enforcement action may be taken when it is necessary to do so.
- Maintain a clear Complaints Process and monitor and record complaints that indicate a risk to a Fire Safety.
- Communicate with Leaseholders and Shared Owners to remind them of the importance of undertaking Periodic Electrical and Gas Safety Checks.

2.4.2 Further information on Building Safety will be provided to residents in line the Building Safety Act and any changes in requirements.

### **3. Regulatory Reform (Fire Safety) Order 2005 (FSO)**

- 3.1 Responsibility for complying with the FSO 2005 rests with the 'Responsible Person' who can be either the 'landlord' of the customers living in a property, the 'owner' of a property or the 'employer' of colleagues working in a property.
- 3.2 The FSO 2005 requires fire precautions to be put in place 'where necessary' to the extent that it is reasonably practicable in the circumstances. Where RHG owns a property, has its own customers living in the property and colleagues working in the property, the 'Responsible Person' role rests solely with RHG.
- 3.3 In some cases a Managing Agent controls a workplace and will be the 'Responsible Person'. Where there is more than one Responsible Person, the responsibilities of each should be clearly set out in the Management Agreement, Lease or Service Level Agreement.

- 3.4 If there is more than one 'Responsible Person' in any type of premises (e.g., a multi-occupied supported housing scheme), all must take reasonable steps to co-operate and co-ordinate with each other. In this situation, the preferred option will be to agree that a single 'Joint FRA' is carried out on behalf of all the 'Responsible Persons' and that responsibility for completing any remedial actions is agreed by all parties.
- 3.5 The 'Responsible Person' or a 'Competent Person' (nominated by the 'Responsible Person') must carry out an FRA which must focus on the safety in case of fire of all 'relevant persons'. It should pay particular attention to those at special risk, such as persons who require assisted evacuation, those that are known to have special needs or are young persons and must include consideration of any dangerous substance liable to be on the premises.
- 3.6 The FRA will identify risks that can be removed or reduced to decide the nature/extent of general fire precautions the 'Responsible Person' needs to take.
- 3.7 The Fire Service has the power to inspect all premises to establish if a suitable and sufficient FRA has been carried out if significant findings have been recorded and the assessment has been acted upon. If dissatisfied with the outcome of the FRA or the action taken, an Enforcement Notice setting out specific improvements required may be issued.
- 3.8 In extreme cases, a Prohibition Notice may be issued to restrict the use of all or part of the premises until improvements are undertaken. If the premises are considered by the Fire Service to be high risk, they may issue an Alterations Notice that requires RHG to consult before any changes are made to the premises or the way it is used.
- 3.9 Failure to comply with any duty imposed by the FSO 2005 or any notice issued by the Fire Service is a criminal offence. The FSO 2005 does not place the enforcing authority (the Fire Service or Local Authority) under a specific express duty to issue alterations, enforcement, or prohibition notices. It provides the powers to do so where they deem necessary.

#### **4. Fire Risk Assessment (FRA)**

- 4.1 The Head of Asset Investment and Safety and Compliance Manager are responsible for ensuring there are valid FRAs for all RHG communal areas and ensuring programmes of work are developed to address the building risks within a suitable timeframe.
- 4.3 We will carry out FRAs to identify and remove any fire risks and hazards, making and implementing fire safety arrangements. We will review premises based on the recommended timeframes as set out in the existing FRA. The approach is based on each blocks individual Fire Risk Assessment Matrix that takes into account the entire FRA (including asset information, tenancy type, previous risk ratings, previous recommendations and any changes since the last FRA), the current findings and recommendations, plus the level of fire hazard, the level of severity and the risk to life from a fire in the premise.
- 4.4 For the purpose of carrying out FRA and in line with the Fire Safety (England) Regulations 2022, from April 2023 'premises' will be categorised as follows:
- High Rise – a block/building at least 18 metres in height or at least seven storeys (RHG does not own or manage any high rise buildings)
  - Mid Rise – a new build block/building that is 11 metres or over – usually (but not exclusively) with five or more storeys
  - Low Rise – an existing or new build block/building below 11 metres in height usually (but not exclusively) with four or fewer storeys

- 4.5 Where recommended by a Fire Risk Assessor or other Fire Safety Specialist, an Intrusive fire safety inspection will be commissioned and carried out (either as part of the FRA process or alongside), to ensure that the structure and composition of external walls, doors etc can be considered as per the requirements of the revised FSO 2005 (as per Fire Safety Act 2021).
- 4.6 For new-build property blocks that are required to have an FRA, will always be undertaken within one month of handover of the home to RHG.
- 4.7 RHG will operate a robust process to gain access if any customer refuses access to carry out essential fire safety-related inspection and remediation works. We will follow our robust No Access Policy and use all legal remedies available within the terms of the Tenancy Agreement, Lease or License if any tenant or leaseholder refuses access to carry out essential fire safety checks, maintenance, and safety-related repair work.
- 4.8 We will support customers where vulnerability issues are known or identified and will work with partners, whilst maintaining a robust process to gain access to properties, by gaining timely access to the property to be compliant with this Management Plan and safeguard the wellbeing of the customer.

## 5. Type of Fire Risk Assessment (FRA)

- 5.1 Under current fire safety legislation there are four levels of FRA:
- **Type 1 – common parts only (non-destructive)**: the inspection of the building is non-destructive and considers, as far as is reasonably practicable, the separating construction between the flats and the common parts. This is non-invasive.
  - **Type 2 – common parts only (destructive)**: these assessments are similar to those outlined in Type 1, except there is a degree of destructive inspection carried out on a sampling basis.
  - **Type 3 – common parts and flats/bedrooms (non-destructive)**: the assessment includes the work involved in a type 1 assessment but goes beyond the scope of the FSO 2005 and considers fire safety within a sample number of flats.
  - **Type 4 – common parts and flats (destructive)**: these assessments are similar to those outlined in type 3, except there is a degree of destructive inspection in both the common parts and the flats, carried out on a sampling basis.
- 5.2 Unless otherwise advised, the Safety and Compliance team will ensure type 1 FRAs on its entire property portfolio with common areas are completed. Each FRA will be carried out to ascertain the level of fire protection, assess the possibility of a fire starting, and the potential risks to people in the event of a fire.
- 5.3 Each premise will have a rating of fire hazard and fire severity, in line with the matrix below:

## FIRE RISK ASSESSMENT MATRIX

		Fire Severity		
		SLIGHTLY HARMFUL	HARMFUL	EXTREMELY HARMFUL
Fire Hazard	LOW	No Action	Tolerable Risk	Moderate Risk
	MEDIUM	Tolerable Risk	Moderate Risk	Substantial Risk
	HIGH	Moderate Risk	Substantial Risk	Intolerable Risk

BS 8800: 1996 - Guide to occupational health and safety management systems.

Considering the fire prevention measures observed at the time of this assessment, it is considered that the hazard from the probability of ignition at the premises is:

**Low**      
 **Medium**      
 **High**

Taking into account the nature of the premises, occupancy, fire protection and procedural arrangements observed at the time of the risk assessment, it is considered that the consequences for life safety in the event of fire would be:

**Slightly Harmful**      
 **Harmful**      
 **Extremely Harmful**

**In this context, the definition of the above terms is as follows:**

<b>Slightly Harmful</b>	Outbreak of fire very unlikely to result in serious injury or death of any occupant.
<b>Harmful</b>	Outbreak of fire could result in harm to one or more occupants, but it is unlikely to result in serious injury or death of any occupant; any such injury or death is unlikely to involve multiples of people.
<b>Extremely Harmful</b>	Potential for serious injury or death of one or more occupants.

In addition, each building will be given a level of risk to life from fire at the premise; the ratings will be in line with the matrix below:

**Accordingly, it is considered that the risk to life from fire at these premises is:**

**No Action**      
 **Tolerable**      
 **Moderate**      
 **Substantial**      
 **Intolerable**

<b>No Action</b>	No additional controls required.
<b>Tolerable Risk</b>	Consideration should be given to improvements that reduce risk. Risk reduction measures should be implemented within a defined time period.
<b>Moderate Risk</b>	Improvements should be made to reduce the risk at limited cost. Risk reduction measures should be implemented within a defined time period. Where moderate risk is associated with extremely harmful consequences, further assessment may be required as a basis for determining the need for additional control measures.
<b>Substantial Risk</b>	Considerable resources may 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.
<b>Intolerable</b>	Building (or relevant area) should not be occupied until the risk is reduced.

## 6. Desktop Review

- 6.1 An annual review for all properties subject to the FSO 2005 will be carried out by the Safety and Compliance team, irrespective of risk ratings identified within FRAs. Copies of all FRA information will be held electronically, made easily available and audited regularly to provide assurance.

## 7. Recommendations Arising from an FRA

- 7.1 Recommendations arising from an FRA will be addressed in accordance with the Fire Safety Protocols outlined at Appendix 1.

## 8. Communal Area Inspections

- 8.1 All properties subject to FSO 2005 will receive regular inspection of communal areas. The management of the property type will determine who completes and the frequency of inspection below:

Property Type	Frequency (Min)	Responsibility
Head Office	Weekly	Property & Facilities Manager / Senior Handyperson
High Rise	Not Applicable	Currently no high-rise properties within RHG Management
Supported Housing Accommodation	Weekly	Handyperson or Scheme Manager (where agency managed)
Rented Blocks of Flats	Monthly	Handyperson or Neighbourhood Officer

## 9. Contractors and/or Consultants

- 9.1 The Safety and Compliance Manager will keep a central register with the following fire safety contractor/consultant details:
- Contractor name, trading address, key contact details.
  - Copies of certification, financial information, insurance details etc.
  - Operatives' details, training received and qualifications.
  - Any other information as required by RHG or specific to contract.
- 9.2 The contractor/consultant will update the Safety and Compliance Manager if there is a change to list of operatives working on the contract or to their qualifications / training / refresher training prior to a new operative commencing or within one month of new qualifications/training.
- 9.3 Individual checks and verification of fire risk assessors and registered companies can be made via Institution of Fire Engineers (IFE) and Fire Industry Association (FIA). Unless RHG holds documentary proof that a company has the relevant and up to date qualifications, the company is not permitted to carry out any FRAs or remedial works.
- ## 10. Fire Protection Measures
- 10.1 We visually inspect passive fire protection measures (for example, doors, walls, and pipework through walls) at the same time as carrying out an FRA. Regular servicing of active fire protection equipment is undertaken by our approved contractors.
- 10.2 We will install and maintain fire alarms, where necessary. All offices have a fully functioning fire detection and alarm system installed. Every office will hold and maintain a fire record. This will detail:

- Weekly fire alarm checks.
  - Alarm maintenance and servicing.
  - Emergency lighting tests.
  - Evacuation drills.
  - Fire awareness training.
  - Fire extinguisher servicing.
  - Fire door checks.
  - Monthly inspection checks.
- 10.3 All Supported Housing accommodation with enclosed corridors, walkways, landings and exit routes have fire detection and alarm systems installed. These buildings will also hold and maintain a fire record log.
- 10.4 All offices and Supported Housing accommodation will be fitted with appropriate fire-fighting equipment if there is a competent person(s) able to use the equipment.
- 10.5 Fire-fighting equipment will not be supplied or fitted to communal areas (stairwells and corridors) unless this is specifically identified in an FRA.
- 10.6 Fire-fighting equipment will be inspected as part of routine inspection checks and any damage or fault will be reported immediately to the Safety and Compliance Team. Annual service maintenance will be carried out by a service engineer from our approved contractor.
- 10.7 Small-scale individual sprinklers/mist systems have been installed where appropriate as part of new-build developments.

## **11. Compartmentation and Fire Doors**

- 11.1 Communal areas and risers will be inspected in accordance with the FRA priority timescales: this will be done within the scope of a Type 1 FRA.
- 11.2 In relation to a building which contains two or more sets of domestic premises, and which is above 11 metres in height, RHG will use best endeavours to undertake checks of fire doors at the entrances of individual domestic premises in the building at least every 12 months. The check will include ensuring that the self-closing devices for the doors are working. All records will be held on our QL system.
- 11.3 RHG will keep a record of the steps taken to comply with the obligation in paragraph (4) of the Fire Safety (England Regulations 2022) including, in any case where access to the domestic premises was not granted during any 12-month period, the steps taken by the responsible person to try and gain access.
- 11.4 In relation to a building which contains two or more sets of domestic premises, and which is above 11 metres in height, RHG will undertake checks of any fire doors in communal areas of the building at least every three months. The check will include ensuring that the self-closing devices for the doors are working. All records will be held on our QL system.
- 11.2 All communal corridor fire doors will be marked with the appropriate fire safety signage.
- 11.3 Customers must not change the front door to a flat or alter the integrity of the door (for example, by the fitting of a cat flap or other opening in the door). This is to ensure that the fire resistance of doors and communal areas is maintained.
- 11.4 Any customer wishing to carry out improvement work to their home must, in the first instance, seek RHG's permission as landlord, as specified within their Tenancy Agreement or Lease.

## **12. Escape Routes**

- 12.1 All fire exits, doors, and emergency lighting will be checked during monthly inspection visits. All fire escape routes (internal and external) will be maintained free of all obstruction at all times and will be clearly signed.
- 12.2 Emergency lighting will be installed in all offices, Supported Housing accommodation and communal areas within enclosed corridors in blocks of flats. These will be checked monthly.
- 12.3 Final exit ground floor fire doors will be either fitted with a push bar device, push pad, or thumb twist lock device dependent upon their use and location. Regular checks will be undertaken by Neighbourhood Officers, Handypersons team, Supported Housing Officers and/or Managing Agents.

## **13. Fire Evacuation and Planning**

- 13.1 RHG will ensure a plan is developed for how occupants will evacuate a property in the event of a fire. For individual houses and commercial properties, the evacuation strategy will be simultaneous, immediate evacuation upon operation of the fire alarm.
- 13.2 In line with best practice, RHG normally adopts a 'Stay Put' Policy where, unless a fire is within a flat/room adjoining a communal escape area, people should be safe to remain in their flat/dwelling unless it also becomes affected by fire. If there is a need to evacuate, the Fire Service will co-ordinate this.
- 13.3 It is essential that RHG plans and trains relevant individuals on the site-specific procedures in place in the event of an emergency, including colleagues employed by Managing Agents covering as a minimum:
  - How customers, colleagues and other stakeholders are warned in the event of a fire and what they should do if they discover fire.
  - How evacuation should be carried out, the needs/risks relating to individuals and where people should assemble and process for checking the premises has been evacuated safely.
  - Duties and identify of colleagues (RHG and/or Managing Agent colleagues) that have specific responsibilities if there is a fire e.g., Fire Marshalls.
  - Arrangements for the safe evacuation of people identified as being at risk, i.e., people with disabilities, children, lone workers etc., and any actions require to stop/isolate equipment, appliances, or power supplies.
  - How the Fire Service will be called, who will be responsible for calling them, and who will meet them on arrival and provide key information such as locations of people still in the building, any specific risks, access issues etc.

### **13.4 Secure Information Boxes**

- 13.4.1 The Fire Safety (England) Regulations 2022 made it a legal requirement from 23 January 2023 for existing high-rise residential buildings in England to have a secure information box installed on the premises. The regulations define High Rise as a building at least 18 meters in height or at least seven storeys.
- 13.4.2 The regulations require responsible persons to install a suitably secure information box (SIB) in or on their high-rise building. They will also be required to provide in the box:
  - their UK contact details

- the UK contact details of any other person who has the facilities to and is permitted to access the building as the responsible person considers appropriate
- copies of the building's floor plans – which identify specified key fire-fighting equipment
- a single page block plan - which identifies specified key fire-fighting equipment.

Access should be given to the fire and rescue service. Boxes should be maintained, and their contents kept up to date in line with the duties imposed by the regulations and the Fire Safety Order

13.4.3 RHG do not have any buildings categorised at 'High Rise' but we will adopt a good practice approach by installing an SIB to all buildings we own that are:

- over 11 metres in height and: buildings
- buildings deem as 'complex' by Asset Investment (eg St Oswald's).

13.4.4 In line with the regulations, the box will be suitable for the purpose for which it is intended and be reasonably secure from vandalism and unauthorised access. The information in the boxes will be information only of use by and interest for the fire and rescue service. Access will be provided to the fire and rescue service

13.4.4 Although the regulations do not require a responsible person to include in the box any personal or sensitive information about customers, RHG will look at each building and Information within the SIB on a case-by-case basis. Where resident information (eg use of oxygen) is deemed to be relevant to the fire and rescue service, this will be included. As a minimum, all SIB's will be inspected annually to ensure its contents is up to date.

### 13.5 Evacuation Plans

13.5.1 All premises will have a fire escape notice prominently displayed on site. If customers and/or colleagues have disabilities, Personal Emergency Evacuation Plans (PEEPs) will include an agreed course of evacuation if applicable, such as in Supported Housing accommodation or offices.

### 13.6 Evacuation Strategies

13.6.1 The following evacuation strategies are in place across the housing stock:

- **General purpose blocks of flats (stay put evacuation strategy):** In the event of a fire within general purpose blocks of flats, residents will alert the fire service and, unless directly affected by the fire, have a 'stay put evacuation strategy' in place. If it is a major fire, the fire service will contact RHG to activate disaster recovery procedures.
- **Supported Housing schemes (stay put evacuation strategy):** In the event of a fire alarm sounding in a Supported Housing scheme, the fire panel alert goes to our fire servicing and maintenance contractor or remote monitoring centre (for a proportion of the supported housing schemes).

The contractor will alert the fire service and RHG. Customers who can self-evacuate who are in areas of immediate danger will gather at the scheme's assembly point. Those who cannot self-evacuate will adopt a stay put strategy by remaining in their homes. RHG and/or the Managing Agent will escalate the incident if required in accordance with disaster recovery procedures.

- **Personal Emergency Evacuation Plans:** If a colleagues or resident in a Supported Housing scheme is unable to respond to a fire alarm or will have difficulty in evacuating to the assembly point area unaided, a PEEP must be produced.

For all offices, a Generic Emergency Evacuation Plan (GEEP) will be in place, along with an appropriate system to aid visitors who need assistance in the event of an emergency who will have difficulty in evacuating. The Safety and Compliance Manager is responsible for ensuring measures are in place. Fire marshals are trained in evacuation chair use in offices, where required, to provide assistance.

- **Supported Housing scheme – vulnerable customers:** Due to the vulnerable nature of some customers within Supported Housing accommodation, RHG has adopted the following approaches:
  - **Customers who are mobile** can adopt a stay put strategy if the fire is known to be in a separate block or another part of the scheme. If their immediate area is at risk, they should adopt a simultaneous evacuation.  
  
For customers who are partially mobile (unable to evacuate unaided on stairs) a stay put strategy will apply unless the fire is within the same compartment. In this instance, a phased evacuation strategy will apply by moving the person to another compartment on same floor level.
  - **Partially mobile/breathing difficulties** – A stay put strategy will apply unless the fire is within the same compartment. In this instance, a phased evacuation strategy will apply, by individuals moving to another compartment on same floor level. Oxygen notices will be located by the fire panel to warn about flats with occupants who have oxygen.
  - **Hard of hearing/deaf** – A stay put strategy will apply unless the fire is in the flat, in which case the customer should evacuate to a place of safety as per their PEEP instructions (assembly point). Where known, flats will be upgraded with flashing lights, a vibration pillow or cushion, according to individual needs.
  - **Vision impaired** – If a person is visually impaired, RHG will relocate the person to ground floor accommodation as a priority management move under the Allocations Policy. If a customer’s consent is obtained, a defend in place (stay put) strategy will apply. If the fire is in the flat, they will evacuate to the next compartment on the same floor.
  - **English not first language** – PEEPs will be translated to a suitable language in line with a person’s needs. We will arrange for a translator or relative to inform the occupants of personal evacuation arrangements.
  - **Occupant’s health degenerates** – Neighbourhood Officers/Supported Housing Officers will recommend relocation of the occupant and their family to more suitable accommodation.
  - **Dementia** – A stay put strategy will generally be applied.
  - **Non-mobile (bed/chair-bound)** – A stay put strategy will generally be in place. We will consider additional measures to reduce the risk on an individual basis assessed on risk. Upgrade measures to the flat will be followed to improve early warning measures based on risk rating if they are not already in place.
  - **High risk (customer is a smoker/uses oxygen or there is cooking equipment provided within the home)** – An individual risk assessment will cover evacuation and early warning protection measures.

## 14. Use and Storage of Mobility Scooters

14.1 Mobility scooters can pose a significant fire risk. Storage and charging of mobility scooters in communal areas presents a risk of a fire which can spread to other parts

of the building. Additionally, although they might not be directly involved in a fire, mobility scooters may prevent people from evacuating the building safely or restrict access for firefighters entering a building.

- 14.2 Mobility scooters are not currently regulated in the UK, we will therefore ensure our mobility scooter procedure aligns to the guidance within the National Fire Chief Council – Mobility Scooter Guidance for Residential Buildings to effectively manage the ownership of mobility scooters in our buildings to minimise fire safety risks.

## **15. Contractors on Premises and Hot Work**

- 15.1 Contractors and subcontractors can present an additional fire risk, as they are likely to be unfamiliar with the premises or the associated fire risks and fire precautions. The risk at a property is increased when contractors and subcontractors are carrying out hazardous activities such as hot work (e.g., cutting or welding), or when they are using substances which emit flammable vapours (e.g., some adhesives).
- 15.2 To minimise this risk, colleagues will ensure either directly, or via robust contract management that the activities of external contractors will be strictly supervised and controlled. The supervision will include checks of any area where hot work is to be undertaken or where contractors have been engaged. There must be a hot work permit in use at all times where such work is being completed.
- 15.3 Arrangements will be put in place for the safety of the contractors' own colleagues and consider other users of the building.

## **16. Equipment and Alarm Systems Servicing/Maintenance**

- 16.1 RHG, through the Safety and Compliance team, will maintain service contracts for the following:
- Fire detection and alarm systems: a full check and service of the entire system on an annual service cycle.
  - All fire-fighting equipment maintained and serviced annually to conform to British Standards by a competent person.
  - Maintenance of escape routes' emergency lighting. This includes an annual (three hour) discharge battery service test by a service engineer.
  - Blocks of flats where dry risers are installed will be inspected by a competent service engineer annually. Wet tests are carried out on an annual basis, along with six monthly riser inspection checks.
  - Annual checks on smoke detectors and where relevant CO detectors as part of the heating servicing programme, with those properties not included are checked on a five-year cycle under the electrical inspection programme.
  - Communal smoke and heat detectors are checked annually.
  - Individual flats in Supported Housing schemes have smoke detectors checked every six months.
  - Premises with automatic smoke vents and fail-safe door entry systems are serviced annually.

## **17. Fire Prevention Measures**

- 17.1 RHG undertakes monthly inspections of all blocks and sheltered schemes; blocks are inspected by our Handyperson team and Supported Housing schemes in conjunction with Neighbourhood Officers and Managing Agents.
- 17.2 We carry out and record maintenance and inspections of components on all fire doors to ensure they are in good working order.

- 17.3 RHG has a no smoking/no vaping Policy in all its premises.
- 17.4 We will provide all new customers with fire safety advice and instruction on fire safety measures as part of their resident sign up packs.
- 17.5 Fire notices and evacuation procedures are displayed in RHG premises.
- 17.6 We will undertake routine maintenance, inspection and testing of electrical installations and equipment in accordance with the guidance provided by the Institute of Electrical Engineers Wiring Regulations. NB: Refer to the RHG Electrical Safety Policy for further details.
- 17.7 We will carry out annual safety checks of gas appliances and flues provided for tenants in accordance with Gas Safety (Installation and Use) Regulations. NB: Refer to the RHG Gas Servicing Policy for further details.
- 17.8 The responsible person for a set schedule of works will control the activities of contractors to make sure safety is always maintained.
- 17.9 We will undertake upgrades, renewals and installation of major components relating to fire safety, fire prevention and fire detection (such as flat front doors, door entry systems, fire panels and emergency lighting) in accordance with our Asset Investment Strategy.

## **18. Fire Drills**

- 18.1 RHG will display visual information regarding fire evacuation procedures on entry to premises for residents, visitors, and contractors to see. For offices, fire drills will be carried out at least annually.
- 18.2 For general purpose blocks of flats, residents will be informed of their evacuation strategy as part of their tenancy sign up packs, on block notice boards, and periodically through customer newsletters. Fire drills will not be undertaken for such accommodation.
- 18.3 Fire drills will be carried out in all 'manned' buildings / schemes. This covers all workplace/RHG offices and Supported Housing schemes. Fire drills will be carried out at sufficient intervals to ensure that all colleagues and customers located on site and others who may occupy the building take part in two drills per year. Fire drills will be carried out with lift contractors on site to ensure that the lift returns to ground floor and remains out of service when the fire alarm is sounding.
- 18.4 Records should be kept of fire evacuation drills and the length of time taken to completely evacuate the building to a place of ultimate or relative safety dependant on the type and use of the building.

## **19. Fire Investigation**

- 19.1 Following the report of a fire at any RHG property, the Safety and Compliance Manager will carry out an investigation. The investigation will assess the current FRA and management/remedial actions completed, as well as the effectiveness of any fire precautions present, how procedures works and any learning outcomes.
- 19.2 A fire investigation report will be requested from the appropriate Fire Service and will be reviewed as part of the investigation process. A fire within any RHG property will trigger a new FRA re-assessment to be carried out.

## **20. Gaining Access**

- 20.1 Contractors are responsible for three attempts to gain access and contract terms must reflect this. Once three attempts have been proved to be unsuccessful, the property is passed to the Safety and Compliance Manager along with evidence of access attempts for escalation. RHG's No Access Policy is to be followed for gaining access and the escalation process if access is not achieved.

## **21. Amendments to Property Portfolio**

21.1 The following circumstances will require an assessment/controlled amendment to the RHG asset register/database and the property attributes relating to fire components/ categories will need to be updated:

- New build property development.
- Acquisition and/or disposal of property.
- Property refurbishment and/or change in tenure.
- Any asset addition to the Aareon QL ICT System.

## **22. Audit and Validation**

22.1 RHG will ensure a minimum of 10% of completed fire safety works are audited per year via the use of an external auditor or contractors own independent external auditor. An external strategic review will be carried out every two years which will include all operating procedures.

## **23. Complaints and Compliments**

23.1 All customer compliments and complaints will be dealt with in accordance with the RHG Complaints Policy.

## **24. Training**

24.1 Training provided by RHG to ensure that colleagues involved in fire safety have the right combination of training, skills, experience, and knowledge to ensure that RHG can demonstrate competence.

24.2 All colleagues will receive training on the importance of remaining vigilant relating to fire safety issues and the signs that can alert others of a concern related to fire safety, through the Health and Safety Induction and regular refresher training.

24.3 Colleagues working in Supported Housing also receive Person-Centred Fire Risk Assessment (PCFRAs) training.

There may be circumstances where PCFRAs are required for higher risk residents within general needs blocks, therefore training on PCFRAs will also extend to Neighbourhood Officers.

## **25. Changes to Regulations and Legislation**

25.1 The Safety and Compliance Manager will proactively monitor legislative and regulatory developments and changes and recommend adjustments to policy and procedures. This will ensure RHG effectively prepares for potential changes and consistently operates within the most up-to-date regulations/legislation at all times.

25.2 Potential changes in legislation will be identified where there is an impact upon Policy and changes will be disseminated to all relevant colleagues across RHG, contractors, consultants, and customers.

25.3 All colleagues have a responsibility to remain alert and share knowledge and best practice across all teams. This includes dissemination from the RSH, statutory agencies, professional bodies, fire management companies, and other trade media.

## **26. Review**

26.1 This FSMP will be reviewed annually with the Fire Safety Policy. Where there are major changes in legislation, case law, good practice or significant RHG changes – this plan may be reviewed sooner.

## Fire Safety Protocols

March 2024

Fire Safety Protocols details our approach to the management, completion and reporting of FRA recommendations ensuring our customer's safety is maintained and our regulatory and legal duties are completed. It also aims to remove confusion around timescales and outline a practical approach to recommendations that may be of significant cost to RHG.

Rooftop recognises that whilst Fire Risk Assessments (FRA) have priority actions with timescales for completion, it is not always possible to have the works complete and closed in the timeframe suggested by the Assessor. The expectation is that the responsible person takes the necessary steps to begin remedials within that timescale.

If a specific recommendation is not reasonably practicable, because the cost far outweighs the risk or it provides limited benefit in reducing the risk further, the organisation can make a decision not to implement it but they would need to justify that decision.

When keeping track of all of the FRA actions, the key thing is transparency. Whether it is actions that remains open but are overdue by a significant amount of time, or if it is actions that have been closed but there on-going related works, this information needs to be clear and understood by all those responsible and accountable.

Rooftop has established the following approach to assist in addressing FRA recommendations:

- A consistent application of a Priority Code for completion of recommendations based on the Assessor's initial timescale for review.
- A series of practical protocols to be applied to re-occurring recommendations to aid decision making

### FRA Recommendations

A Fire Risk Assessment is an assessment of the building on a given day and each building is considered in the following way:

Considering the fire prevention measure observed at the time of this assessment, it is considered that the hazard from the probability of ignition at the premises is either:

- Low
- Medium
- High

Taking into account the nature of the premises, occupancy, fire protection and procedural arrangements observed at the time of the risk assessment, it is considered that the consequences for life safety in the event of fire would be either:

- Slightly Harmful
- Harmful
- Extremely Harmful

Accordingly, it is considered therefore that the risk to life from fire at these premises would be result in the rating of either:

- No Action
- Tolerable
- Moderate
- Substantial
- Intolerable

Example of recommendations within a FRA can include a range of items such as:

- The removal of combustible items from communal areas
- Checking individual flat doors
- Additional fire safety signage
- Upgrading fire alarm systems
- Checking compartmentation

Each recommendation comes with a suggested time frame based on the assessor's opinion.

RHG has a responsibility to review the recommendations and decide how and if they will be implemented. There is no requirement in legislation that recommendations have to be implemented, however the approach of RHG is that all recommendations will be considered paying due attention to building and customer safety and balancing cost, future planned investment and value for money.

### Key Principles

- FRA's that result in **substantial or intolerable risk** rating will be escalated immediately to the Head of Asset Investment (HoAI) for a suitable and measured review, a response and plan of action within 2 working days. Where required, or where the Head of Service is unavailable, the matter must be escalated to Executive Director - Investment (EDI). The Head of Risk and Assurance (HoRA), Safety and Compliance Manager (SCM) and Compliance Officer (CO) must be kept informed at all stages of decisions and works.
- FRA's that result in ratings of '**moderate risk** to life from fire' and the 'Potential for **extremely harmful** consequences' will be escalated within a day of receipt to our SCM and Asset Investment Manager (AIM) to review and determine together the priority actions that will have the biggest impact on reducing the risk, decisions to be made within three working days. Where required, or where either Manager is unavailable, the matter must be escalated to the Head of Asset Investment (HoAI) and/or Head of Repairs and Maintenance (HoRM). Our Fire Risk Assessors may be consulted with in terms of prioritisation of actions where required.
- FRAs that result in a rating of '**moderate risk**' with **harmful** consequences, or where rated as '**Tolerable risk or below**' will be considered on a case by case basis and the priority codes and protocols outlined below will be applied.

### Priority Codes

A rule will be applied on Rooftop's FRA Tracker to determine a Priority Code for completion of a recommendation based on the timescale indicated by the Assessor.

<b>Remedial Item Priority (incl. remedial works and management action)</b>	<b>Standard FRA recommended delivery timescale for one off actions</b>	<b>RHA Target Delivery Timescale for a programme of remedial actions</b>
<b>Urgent- hazard</b>	Immediately	5 working days (management or works)
<b>High Priority Item P1</b>	7 days	30 working days (management or works)
<b>Medium Priority Item P2</b>	30 to 60 calendar days	90 days (management or works)
<b>Low Priority Item P3</b>	3 months (some items recommendations only)	180 days (management or works)
<b>Recommendation P4</b>	6 months Recommendation only	220 days to complete or if added to planned works programme 3 years (if agreed required)
<b>Recommendation P5</b>	Recommendation only on going	Noted and considered at review of all workstreams management, policy or renewal

## Fire Safety Protocols

A series of practical protocols have been established and will be applied to re-occurring recommendations to aid decision making as follows:

<b>Typical Fire Risk Assessment Recommendation</b>	<b>Proposed Rooftop Protocol</b>
<b>Fire Doors</b>	
Check and Confirm Fire Doors Buildings less than 6 storey or 11 metres to floor level of highest living space.	RHA will carry out an inspection of flat front doors using internal resources  If the door was inspected within the previous 12 months and is on the door inspection schedule, an interim check is not required unless specific concerns are raised by the Fire Risk Assessor.  RHA will follow current Government Guidance and to aid decision making reference will be made to the LGA Fire Door Decision Tree shown at Appendix 1.
Notional FD30 Fire door – replacement PI Inadequate – following inspection	Where RHA concludes that a flat entrance door at the time of inspection is inadequate RHA will undertake a full FD30 replacement no later than six months from the time of identification.
Notional FD30 Fire door – replacement Adequate – following inspection	Where RHA concludes that the flat entrance door at the time of inspection is adequate RHA will undertake a full FD30

	replacement no later than 36 months from the time of identification.
<b>Other recommendations</b>	
Door Entry System – Existing	Where FRA recommendations suggest improvements to an operating/functional Door Entry System, RHA will consider and or apply recommendations at the point of the cyclical Door Entry Replacement programme.
Door Entry System – New	Where FRA recommendations suggest a new system is installed in a block where a door entry system is not currently present, RHA will consider the suitability of the building for a door entry system and carry out consultation if appropriate. In all instances, signage and letters to remind customers to keep main door locked will be implemented.
Communal Fire Alarm/Heat detection systems including emergency lighting	Where FRA recommendations suggest improvements to an operating Communal Fire Alarm System, RHA will consider and or apply recommendations at the point of the cyclical communal Fire Alarm Replacement programme unless it is deemed appropriate to remove the system in line with current best practice.
Lightning Conductors	11 metre+ (5 x storey and over) buildings: Lightning protection risk assessment to be carried out within 6 months. Lightning Conductor to be installed where risk assessment demonstrates there is a requirement and added to inspection programme.  Buildings of four storey: Risk assessment to be carried out where lightning conductor is not present. Lightning Conductor to be installed where risk assessment demonstrates there is a requirement. No defined period of time will be introduced for risk assessment/ installation.  Buildings of three storeys or less: Risk assessments will not be carried out.
Electrical meter cupboard doors	Existing meter cupboard doors that are not of flame-resistant material will be replaced during cyclical communal redecorating of major works programmes. Works will be undertaken during a period no greater than five years from the point of identification. Subject to Energy Supplier Approval.
Hard Wired Fire Alarm/Detection within confines of flat	Upgrade to Fire Alarm/Detection system will be undertaken at point of EICR or major works/renewals programme e.g. kitchen Replacement/Bathroom Replacement, Electrical Fuse Board upgrade, Electrical re wire. To form part of standard specification for these works

Link fire alarm to a remote monitoring centre	<p>Retirement Living / Extra Care schemes – to be actioned within 6 months if not already in place</p> <p>Buildings of five storeys or higher and converted blocks of flats – to be discussed with fire service on a case by case basis if not already in place.</p> <p>Purpose built blocks below five storeys – not required.</p>
Relocation of Waste Bins	No further action unless Waste Bins location forms an immediate threat to life.

## Method of application

All recommendations from FRAs are recorded on a spreadsheet monitored by the CO responsible for fire safety. In the short term this will continue to be the approach until a suitable process in QL (or alternative software) is implemented.

The CO and Safety and Compliance Manager will be responsible for driving delivery of the fire risk assessment recommendations including seeking updates on works required and where necessary arranging follow up surveys, implementing training, signage or resident communication.

Upon receipt of a FRA the following steps will be taken.

- The CO will review the overall rating of the building as detailed above and take the appropriate action regarding any escalation that may be required.
- Any recommendation received will be recorded with the time frame proposed by the Assessor.
- The Priority Codes and Protocols above will be applied.
- Recommendations will be categorised into one of the following four disciplines to determine route to delivery.
  - **Management Actions:** These are all actions to be taken where the users of the property breach fire safety rules. RHG operates a zero-tolerance approach to anyone who prevents safe access/exit of communal shared areas within properties. We also operate a no smoking Policy in these areas. These will generally related to the Compliance team; Neighbourhoods Team or the Estates and Facilities team.
  - **Remedial Actions - Asset Investment:** These are defined as physical actions required to eliminate or reduce the risk of fire or spread of fire and smoke in a planned approach, either via inclusion on a current programme or planned for future upgrade works. Examples of remedial actions – Asset Investment would include the upgrading of fire panels and fire detection through the whole premise, installation of fire doors, major compartmentation upgrade works.
  - **Remedial Actions – Responsive**

These are defined as physical actions required to eliminate or reduce the risk of fire or spread of fire and smoke on a reactive and responsive approach. Examples of remedial actions include fire doors not closing correctly, fire exit doors not opening easily, minor compartmentation improvements and loft hatch missing.
  - **Best Practice (Advisory only)**

These are recommendations that do not have an allocated timeframe for completion but are included in an FRA by the assessor as best practice and advisory for future consideration. Best Practice recommendations will be grouped together and taken to the quarterly decision making group for review and agreement of action.

- Details of the recommendations and the timeframe for completion will be sent to the relevant colleague or contractor for the recommendation to be completed this could be Neighbourhoods, Handy Men Service, Asset Investment, Repairs or direct to a contractor.
- The relevant colleague or contractor is then responsible for providing confirmation of the recommendation being completed and evidence of the completion. This will then be noted on the spreadsheet and the evidence filed accessible via a link from the spreadsheet. The recommendation will then be marked as completed on the spreadsheet.
- The CO will review the tracker on a daily basis and provide regular updates to the relevant colleagues on delivery of actions to ensure that they do not go overdue when protocol is applied.
- Where recommendations are not completed within the specified timeframe this will be escalated by the CO to either the colleague's line manager or the colleague responsible for managing the contractor for an urgent clarification or completion of the recommendation, it will also be escalated to the Compliance Team Leader (CTL) for support and monitoring.

### **Reporting and Monitoring**

Reporting of FRAs and FRA recommendations will be in line with 5.13 of the Fire Safety Policy based on the priority codes. This will include a forward looking position.

Recommendations relating to planned programme of works will be reported separately via the Asset Investment team including fire door replacement programme.

In addition, the Landlord Compliance Panel will be the operational forum to monitor FRA recommendations on a monthly basis, this will include the monitoring of recommendations by team:

The Landlord Compliance Panel will be used to capture information and data for inclusion in the HoRA's monthly Compliance, Health and Safety report.

### **Review**

This Fire Safety Protocols document will be reviewed annually with the Fire Safety Policy and Fire Safety Management Plan and where there are major changes in legislation, case law, good practice or significant RHG changes.