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**Author****Title of Policy**

Head of Asset  
Investment

Fire Safety

**Section**

Safety and Compliance

Updated: March 2025

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**1 Policy statement**

- 1.1 Rooftop Housing Group (RHG) is committed to ensuring that people living or working within our homes, offices, and other buildings are safe and recognise the importance of implementing efficient safety checks and maintenance programmes to comply with relevant legislation and regulation.
- 1.2 The key objective of this Fire Safety Policy is to ensure that our Board, colleagues, customers, and partners are clear on our legal and regulatory obligations in respect of fire safety and what we will do to meet them.

**2 Statutory and Regulatory context**

- 2.1 RHG will seek to comply with all current and relevant statutory obligations, primarily as detailed in the following;
  - The Building Regulations 2010
  - The Housing Act 2004
  - The Regulatory Reform (Fire Safety) Order 2005
  - The Fire Safety Act 2021
  - Fire Safety (England) Regulations 2022
  - The Building Safety Act 2022
  - The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- 2.2 Delivery of the commitments within this Policy will ensure that the requirements of other legislation, such as the Health and Safety at Work Act 1974; Furniture and Furnishings (Fire Safety) Regulations 1988; and Landlord Tenant Act 1985, will also be met.
- 2.3 In addition, RHG must meet the requirements of both the Regulator of Social Housing's (RSH) Safety and Quality Standard and the requirements of the Care Quality Commission (CQC) and new Building Safety Regulator (within the HSE (Health and Safety Executive)).
- 2.4 The relevant guidance documents applicable to this Policy include:
  - LACORS - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing.
  - Housing Health and Safety Rating System (HHSRS) Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9.
  - National Fire Chief Council's Guidance (NFCC) - Fire Safety in Specialist Housing – May 2017, covers sheltered schemes, supported schemes and extra care schemes.
  - Fire Safety in Purpose Built Blocks of Flats – Gov.uk guidance document.
  - Home Office - A guide to making your small blocks of flats safe from fire (March 2023).

### **3 Policy outline**

- 3.1 This Policy explains how RHG's commitments to Fire Safety will be met. It will be supported by a Fire Safety Management Plan (FSMP) providing more detailed Guidance and Procedures.
- 3.2 This Policy is relevant to all our colleagues, customers, contractors, and others who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. It provides assurance that measures are in place to identify, manage and/or mitigate risks associated with fire.
- 3.3 It applies to all RHG premises that fall under the Fire Safety Order amended through the Fire Safety Act 2021, which applies to all residential buildings with two or more sets of domestic premises, in addition to offices, communal (stairwells and corridors) or shared (common) areas. It also applies to all assets RHG are responsible for even if we are not the owner (i.e., those where we are the managing agent unless expressly excluded in the lease/management agreement).
- 3.4 Where Rooftop owns properties in a block owned and managed by a third party or management company, Rooftop will work with the Responsible Person for that block to ensure the safety of customers residing within it and in accordance with the lease or other agreement.
- 3.5 The scope of this Policy includes:
- The undertaking of Fire Risk Assessments (FRA), and the Remedial Works and Actions arising from the FRA.
  - Cyclical Maintenance of Fire Safety Systems and Equipment including but not limited to: Automatic Fire Detection and Alarm Systems; Emergency Lighting; Automatically Opening Smoke Vents or Smoke Control Systems; Portable Fire-Fighting Equipment; Dry or Wet Risers; Sprinkler/Mist Systems; Fire-Fighting Lifts.
  - General repair, maintenance and management activity which could have an impact on Fire Safety within a building or individual property.
  - A commitment to resident engagement on fire safety matters, including ensuring access to customer's homes to address fire risks.
- 3.6 RHG will maintain a FSMP and associated Operational Guidance which shall:
- Provide additional guidance on how the commitments outlined within this Policy will be implemented.
  - Provide clear lines of responsibility for the management of Fire Risk.
  - Set out key Operational Processes.
  - Ensure that a clear and consistent process is in place to obtain access to Properties where this is required. This will include pro-active assessment of available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement action will be used where required.

### **4 Equality, Diversity and Inclusion: Principles**

- 4.1 At Rooftop we are committed to creating and sustaining a diverse and inclusive environment achieving positive outcomes for potential and existing customers, our colleagues and the wider community. Our commitments to our customers, colleagues and communities are detailed in our Equality, Diversity and Inclusion (EDI) Strategy. We are an organisation that values diversity, champions equality and inclusion. We demonstrate this through the activities and the services we provide. This means living by, working to and acting on our Values.

## 5 Vulnerability: Reasonable Adjustments

- 5.1 There are occasionally circumstances where we need to consider working outside of the parameters of this Policy. This may be where there are several complexities present, or where customers have vulnerabilities that may lead us to make reasonable adjustments to the way we apply this Policy. In such cases, a referral should be made to the Complex Cases Review Group via the Head of Housing, where any approach outside of this Policy (and potentially other policies) will be considered and recorded, if agreed. This will always be considered in the context of the Assessing and Supporting Vulnerability Policy.

## 6 Data Protection: Principles

- 6.1 Rooftop recognises the importance of protecting the personal data of our customers, colleagues, contractors and other stakeholders and our commitment to compliance with data protection laws and managing personal data responsibly. As an organisation, we are committed to ensuring everything we do with personal data follows the principles of lawfulness, transparency, fairness and accuracy whilst minimising the amount of data we collect and only using it for specific, explicit and legitimate purposes until we no longer need it.

## 7 Roles and Responsibilities

- 7.1 The Regulatory Reform (Fire Safety) Order 2005 (FSO) provides a framework for regulating, in England and Wales, fire safety in all non-domestic premises including workplaces but also the common parts of multi-occupied residential buildings.
- 7.2 In the case of residential buildings, the “Responsible Person” on who the duties under the FSO fall will be the person (usually an organisation rather than an individual) who has control of the premises in connection with carrying on a business. This will typically be the freeholder or the managing agents, or, for example, a residents’ management company.
- 7.3 Detailed roles and responsibilities will be documented within the FSMP. The overarching roles and responsibilities are as follows.
- 7.4 The **RHG Board** has overall responsibility for approving this Policy, delegating responsibility for its implementation, monitoring its effectiveness at high level, and receiving assurance of compliance.
- 7.5 The **Audit and Risk Committee** will be responsible for ensuring that the RHG Board receives the assurance it requires.
- 7.6 The **Group Chief Executive (GCE)** will be responsible for the implementation of the Policy.
- 7.7 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 this Policy and for the effective upward reporting of performance.
- 7.8 The **Head of Asset Investment** and **Safety and Compliance Manager** will ensure that there are suitable arrangements in place for the implementation of this 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.

- 7.9 All **Executive Directors** will take responsibility for ensuring that the colleagues and contractors they employ or engage with have the skills, knowledge, and expertise necessary to deliver the commitments outlined in the Policy.
- 7.10 All **RHG colleagues** play a valuable role in fire safety and are responsible for:
- Undertaking their role safely to ensure fire safety arrangements are maintained.
  - Reporting any fire incidents and remove or report any fire hazards identified in a timely manner.
  - Co-operating fully with any control measures that are implemented to ensure fire safety and legal compliance.
  - Highlighting any concerns to the management team in relation to fire safety.
  - Attending fire safety training as and when required.
  - Promoting and encouraging colleagues, customers, contractors and visitors to be fire aware.
- 7.11 RHG acknowledges that robust professional and competent advice is essential to ensure we are assessing risk adequately and implementing adequate mitigation measures. RHG will therefore employ suitably qualified and experienced **Competent Persons** in all matters relating to FRAs, fire mitigation measures or fire safety related works.
- 7.12 All colleagues who have roles identified in the FSMP will receive associated training appropriate to their role.
- 7.13 The **Head of Asset Investment** will regularly report to Executive Team, Audit and Risk Committee and the Group Board on the status of fire safety using the following key performance indicators:
- FRAs overdue to include forward looking position.
  - Number of overdue FRA recommendations to include forward looking position.

## 8 Fire Risk Assessment

- 8.1 RHG will undertake suitable and sufficient FRAs in accordance with the FSO which applies to all non-domestic premises in England and Wales. This includes multi-occupied residential buildings, such as blocks of flats, although individual flats are excluded (unless undertaking Type 4 FRAs). The updated legislation confirms that where “a building contains 2 or more sets of domestic premises”, the FSO applies to:
- the building’s structure and external walls (including windows, balconies, cladding, insulation, and fixings) and any common parts
  - all doors between domestic premises and common parts such as flat entrance doors (or any other relevant door).
- 8.2 RHG will record the findings identified in each FRA and aims to undertake recommended Remedial Work within the timescales set by the Assessor or as per the protocols detailed in the FSMP.
- 8.3 All fire safety remedial work will be carried out in accordance with the relevant British Standard, approved code of practice or associated good practice guidance. Any contractors undertaking specialist fire safety remedial works should be third party accredited.

- 8.4 Larger remediation programmes following further investigations may be monitored as distinct projects outside of general remedial actions.
- 8.5 RHG will ensure that FRAs are reviewed no later than the review date set by the current FRA.
- 8.6 The FRA for a building will be reviewed by the Safety and Compliance Manager when they have been informed of any of the following: a fire, change in building use, change in working practices that may affect fire safety, following refurbishment works to the building or as and when required following an independent fire safety audit. Where deemed appropriate, a new FRA will be requested.

## **9 Fire Prevention and Control**

- 9.1 To ensure the safety of our colleagues, customers and the integrity of our buildings, RHG will implement and maintain appropriate fire prevention and control measures.
- 9.2 RHG will ensure that fire safety equipment and systems are tested, serviced and maintained in accordance with regulatory and statutory requirements and considering manufacturer's requirements. This will include the completion of all essential Remedial Works requirements identified during the testing/maintenance activity.
- 9.3 RHG shall ensure that all blocks and properties have a satisfactory Electrical Installation Condition Report (EICR) in accordance with the Electrical Safety Policy.
- 9.4 RHG shall ensure that Gas Installations are maintained in accordance with the Gas Safety Policy, including the completion of Landlord Gas Safety Records (LGSR) where appropriate.
- 9.5 All repairs to Fire Safety Equipment and Gas and Electrical Installations will be undertaken in accordance with the relevant Policy.
- 9.6 In some cases, Electrical and Gas Safety Inspections relating to the dwelling will be the responsibility of a Shared Owner or Leaseholder. RHG will not typically request evidence that these have been undertaken but may write to the residents periodically to remind them of the importance of them. Where an FRA indicates that RHG should seek evidence, RHG will request this.

## **10 Fire Doors**

- 10.1 RHG will comply with Regulation 10 of The Fire Safety (England) Regulations 2022, ensuring for all multi-occupied residential buildings, with two or more sets of domestic premises, over 11 meters in height, including:
- Quarterly fire door checks for communal area fire doors (including self-closing devices), and:
  - Annual checks of all flat entrance doors (including self-closing devices) that lead onto a building's common parts.
- 10.2 An electronic record of fire door checks and subsequent follow-on works will be maintained as an evidence base, and performance will be monitored against the above quarterly/ annual checking requirements.
- 10.3 In accordance with Regulation 10, RHG will provide residents with information on the importance of fire doors to a building's fire safety as soon as reasonably practicable after they move into their flat and at periods not exceeding 12 months thereafter.
- 10.4 In addition, fire door checks will be undertaken in multi-occupancy buildings under 11 metres in height with a door replacement programme established to upgrade doors as required with appropriate certification obtained.

## **11 Domestic Smoke/Heat Detection**

11.1 RHG will ensure that all dwellings owned by Rooftop (excluding leasehold and shared ownership) will have working mains powered smoke/heat alarms installed (or battery powered smoke alarms as an interim measure until mains powered can be installed).

11.2 RHG will:

- Ensure smoke/heat detectors comply with the requirements of The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022. Ensuring at least one Smoke Detector is equipped on each storey of homes where there is a room used as living accommodation.
- Maintain a programme of upgrading to mains powered smoke/heat detection with standby battery systems across all properties, where possible over the next five years as part of the EICR programme.
- Check smoke detection at the start of each tenancy and annually as part of the heating servicing contract or, where properties are not part of heating contracts, through other cyclical maintenance contracts, tenancy audits or stock condition survey.

## **12 Emergency Arrangements**

12.1 Each building has an evacuation strategy stated clearly within the FRA. The evacuation strategy will be agreed with the competent person undertaking the FRA, however as a general guide:

12.1.1 Residential accommodation (General Needs with common parts)

- Purpose built accommodation will generally have a 'stay put' policy. Occupants have the option to stay in the building provided they feel it is safe to do so. The 'stay put' policy may change based on the instructions of the Fire and Rescue Service during an emergency.
- Converted accommodation will generally have a 'total evacuation' policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds.

12.1.2 Residential buildings which are managed 24 hours

- Bespoke evacuation strategies specific to the premises may be required. Assessment of individuals will be made by appropriate staff. In some buildings, Personal Emergency Evacuation Plans (PEEPs) or Person Centred Fire Risk Assessments (PCFRAs) may be required.
- Where appropriate equipment may be provided to aid evacuation which should only be used by appropriately qualified or trained persons.

12.2 RHG will endeavour to house customers in appropriate buildings by matching the building fire safety strategy to the customer's capabilities when initially offering accommodation.

12.3 We appreciate that, with time, customer capabilities and needs may also change. If these changes or capabilities are to the extent that the customer will be unable to meet the requirements of the fire safety strategy, and if the customer informs us of their change in circumstances, we will re-assess the suitability of the accommodation and if required help customers seek more appropriate accommodation or mitigate the risk where practical to do so.

12.4 Evacuation drills will be carried out in all non-residential buildings. This will be determined by the FRA. In non-residential buildings RHG will conduct drills twice

annually. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.

12.5 All relevant new colleagues to the organisation will be instructed in the fire evacuation procedure on induction.

### **13 Customer Information and Advice**

13.1 RHG will encourage and promote fire safety through the following actions:

- Display fire safety instructions in a conspicuous part of the building in a comprehensible form that customers can reasonably be expected to understand (as required by Fire Safety (England) Regulations 2022).
- Provide fire safety instructions directly to new customers 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 customers 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 customers 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.

### **14 Housing Management**

14.1 RHG will:

- Prohibit the storage of any items in communal areas and escape routes without RHG express permission.
- Maintain a no smoking policy in all communal areas.
- Implement a risk-based approach to the periodic inspection of communal areas and escape routes in line with the FSMP to enforce the above.
- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).

- Ask customers to alert RHG to the presence of stored oxygen so that it can alert the Fire and Rescue Service to its presence.
- Enforce customer responsibilities where required considering a balance of individual customers' rights with the need for effective, timely action where there is a risk to the safety of other customers.

## 15 Record Keeping and Data

- 15.1 RHG acknowledges that to meet its obligations it must maintain a robust approach to identifying the Assets and components for which it has responsibility.
- 15.2 RHG will ensure that all records are kept in relation to fire safety arrangements and components including:
- FRAs
  - Remedial actions (including evidence)
  - Repairs records
  - Inspection records
  - Certification
  - Logbooks – including fire drills, briefings and false alarms
  - Personal Emergency Evacuation Plans (PEEPs) and Person Centred Fire Risk Assessment (PCFAs) where applicable
  - Action Plans
  - Performance records
  - Training records
  - Fire service audit letters
  - Customer communications.

## 16 Review

- 16.1 This Policy will be reviewed annually unless there are major changes in legislation or good practice.

## 17 Consultation

- |      |                                     |               |
|------|-------------------------------------|---------------|
| 17.1 | Board Member – Building Safety Lead | March 2025    |
| 17.2 | Executive Team                      | February 2025 |

## 18 Responsibilities

### Responsible body

- |      |  |                                |
|------|--|--------------------------------|
| 18.1 | Formulation, amendment and approval of Policy  | Board of Rooftop Housing Group |
|      | Monitoring of Policy                           | Executive Team                 |
|      | Operational management of Policy/Policy author | Head of Asset Investment       |
| 18.2 | <b>Date of formulation of Policy</b>           | January 2022                   |
| 18.3 | <b>Dates of Policy reviews</b>                 | March 2025                     |

March 2024

July 2023

18.4 **Date of next review**

March 2026

## Associated documents

### Internal

- Tenancy Agreement
- Lease Agreement
- Asset Investment Strategy
- Health and Safety Policy
- Electrical Safety Policy
- Gas Servicing Policy
- No Access Policy
- Insurance Policy
- Risk and Assurance Policy and Framework
- Procurement Policy
- Value for Money Strategy

### External

In addition to those identified under Section 2 of this Policy

- Housing Act 2004
- Health and Safety at Work etc 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: Approved Document B Fire Safety
- Electrical Equipment (Safety) Regulations 2016
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
- Homes (Fitness for Human Habitation) Act 2018