

Fire Safety in Buildings Policy

1. What this policy is about

This policy outlines how we will meet our statutory obligation and commitment to fire and building safety. This policy will also provide guidance on our approach to a sterile environment within communal areas that form protected escape routes within communal blocks as well as details of the managed use approach adopted at our extra care schemes.

2. Our approach

Full detail on how we plan to fulfil our duty to manage risks associated with fire can be found in the Fire Safety Management Plan. In summary, there are eight key areas that we have considered when planning how best to mitigate risks relating to fire:

2.1 Fire Risk Assessment

A fire risk assessment (FRA) is a systematic evaluation of a building to identify potential fire hazards, assess the level of fire risk, and determine appropriate measures to mitigate those risks. It helps to ensure the safety of people, property, and the environment by identifying and implementing necessary fire safety measures.

There are four different types of fire risk assessment available:

- Type 1 – Common parts only (non-destructive)
- Type 2 – Common parts only (destructive)
- Type 3 – Common parts and flats/bedrooms (non-destructive)
- Type 4 – Common parts and flats (destructive)

All of our properties subject to The Regulatory Reform (Fire Safety) Order 2005 (RRFSO) will receive a type 1 FRA. Buildings over 18 metres in height will receive a type 3 FRA.

The review period for FRAs is building dependent. The review schedule for each building type is as follows:

Building Type		Review Schedule
Level 1	Premises with vulnerable occupants, HMO's, converted premises, mid- and high-rise blocks (greater than 3 storeys), communal halls, offices etc. that are subject to the RRFSO.	Annually
Level 2	Purpose built, general needs residential blocks of 3 storeys (Ground +2 upper floors) that are subject to the RRFSO.	Every 2 years
Level 3	Purpose built, general needs residential blocks of no more than 2 storeys (ground +1 upper floor) that are subject to the RRFSO.	Every 3 years

We will undertake new FRAs following any of the events below:

- a fire, near miss or threat of arson
- the introduction of new work practices
- any works affecting the means of escape or design of alarm systems
- structural or material changes to the building or its use
- widespread changes in the type of residents occupying the building
- a significant change in legislation or guidance
- if we have reason to believe the existing FRA is no longer valid
- if the annual Fire Risk Review identifies a need to.

Outside the circumstances outlined above, FRAs will be renewed on or before the date recommended by the schedule outlined above as a minimum, or in line with the Fire Risk assessor's recommendations.

If on completion of a type 1 FRA, the fire risk assessor recommends a more in depth survey is required, we will undertake either a type 2, 3 or 4 as they recommend and would aim to complete this at the earliest opportunity.

All completed FRA's are stored within our compliance management software. We also provide a summary FRA document which is stored on our website for our customers to view, along with our progress on completing any actions identified.

2.2 Management and Remedial Actions

Both management and remedial actions detailed in FRAs will be completed in a risk-based priority order. The different action types can be defined as follows:

Management Actions: actions to be taken in relation to the management of the building where further confirmation is required or further site checks needed.

Remedial Actions: works which generally involve the need for contractors to complete. Examples of remedial actions are replacement or repair of fire doors, compartmentation improvements, automatic fire detection, alarm works etc.



All actions will be allocated a target timescale in line with the risk matrix set out below:

Fig. 2.2.1 – FRA Action Risk Matrix

FRA Actions		Premises Risk Rating		
		Risk Type 1	Risk Type 2	Risk Type 3
Remedial Actions	U (Urgent)	1 day	1 day	1 day
	A (High)	3 months	3 months	3 months
	B (Medium)	12 months	12 months	12 months
	C (Low)	12 months	12 months	12 months
	R (Recommendation)	Unspecified	Unspecified	Unspecified
Management Actions	Man 1 (Urgent Management Action)	1 month	1 month	1 month
	Man2 (Management Action)	3 months	3 months	3 months

There are circumstances where it is appropriate to review and potentially extend the timeframes attached to actions. However, it is essential that any changes are appropriate, risk based, and the process is controlled and visible. Action timeframes will only be changed if the fire risk assessor agrees in writing that it is appropriate to do so. Evidence of the same will be held. Changes to timeframes will be signed off by the Executive Director of Property and shall be clearly explained.

In the event that a timescale cannot be met, mitigating measures will be considered to ensure risk is managed.

2.3 Management of Buildings

We will manage our buildings in a way that mitigates fire risk where possible. The following measures will be in place:

- We will ensure each building has an evacuation strategy stated clearly in the FRA and this evacuation will be clearly displayed in each communal area or relevant property. The FRA will record the current and recommended evacuation strategy. Any exceptions, i.e. where the current and recommended strategy differ will be reported and referred to the Fire Safety Management Group. Information on the evacuation strategy will be shared with customers annually or when a new tenancy is taken.
- All planned and responsive works should be done so in line with current legislation and British Standards. All internal practices outlined in the Fire Safety Management Plan should be followed for any work type.
- All our homes will have detection installed to comply with the Smoke and Carbon Monoxide Alarm regulations 2022. All residents are responsible for their own fire



safety within their homes, including carrying out regular tests of their individual fire detection system. We will also carry out a test of the smoke detector annually when accessing the property to complete compliance activities.

- In all residential properties where furniture and furnishings are provided, whether in common areas or as part of a furnished tenancy, all will be in compliance with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended 1993).
- All properties subject to the RRFSo will receive regular inspection of communal areas. The frequency of inspections will be determined by the individual risk within each building.

2.4 Sterile Approach to Communal Areas of Blocks

Communal areas are those areas of a house or a block of flats in which individuals live and have a right to use in common with other occupants and for which we are responsible for. To ensure that all common areas are safe and free of hazards, we implement the following:

- The storage of possessions, waste or unwanted items in communal areas is strictly prohibited.
- Shared areas such as stairways, landings and hallways must be kept completely clear of all items such as prams, pushchairs, bicycles, children's toys, plant stands, furniture, door mats and rubbish or other such obstacles that may prevent clear access.
- We will immediately remove any prohibited items found in any communal areas and communicate with tenants reiterating the importance of fire safety within communal areas. Where a designated mobility scooter store is not available, scooters must be stored inside the flat or house. Storage and charging of mobility scooters, motorised wheelchairs, electric scooters or bikes in communal areas creates a significant fire hazard and is not permitted in any of our communal areas.
- Mobility scooters or motorised wheelchairs are the owner's responsibility. Any charging equipment should be subject to a portable appliance test (PAT); this will also be the tenant's responsibility.

Any items placed, stored or left in a shared communal area are a hazard that can prevent Fire Services entering the building as well as people leaving safely in the event of a fire. These items may also pose a source of ignition for a fire themselves.

We adopt a zero tolerance approach to any breach of this policy that may cause a risk or hazard in any part of our buildings.

2.5 Managed Use Approach to Extra Care Schemes

- Where extra care schemes are staffed 24/7, we will adopt a managed use approach in-line with NFCC Fire Safety In Specialist Housing guidance. Consideration of the tenure of these schemes along with the design would support such measures and will be agreed with our Fire Risk Assessors, the Building Safety Manager and local fire service.



- We will allow the storage of small non-flammable items to escape routes and will implement routine inspection and close monitoring of adherence to the policy to ensure full compliance. Failure to comply may result in the introduction of a sterile approach if necessary.
- Items on common escape routes that are considered permissible are set out within the Fire Safety Management plan.

2.6 Fire Safety Systems and Equipment

The testing of fire detection systems will be undertaken by competent engineers. Systems to be included in the fire safety equipment maintenance programme will include:

- Automatic Fire Detection (AFD) and alarm systems (and associated equipment such as hold open devices, door release mechanisms, fire curtains etc.)
- Smoke control systems (such as automatically opening smoke vents AOVs)
- Emergency lighting systems
- Portable firefighting equipment
- Rising (dry and wet) mains
- Firefighting lifts
- Fire suppression systems such as sprinklers / mist systems
- Lightning protection systems

We maintain a skills/training matrix to ensure that all colleagues undertaking key roles within the scope of this policy have appropriate training. Anyone appointed to carry out roles externally will be vetted to ensure they have the relevant skills, knowledge and experience to carry out their role.

We will also ensure that fire risk assessors undertaking assessments on its buildings are competent to do so. Fire risk assessors should be able to demonstrate competency individually via registration on a recognised national scheme such as the Institution of Fire Engineers Register of Fire Risk Assessors, Fire Protection Association, Institution of Fire Safety Managers or similar. Companies should also be 3rd party registered through schemes such as the BAFE SP205-1 or similar.

External companies should have experience in undertaking Fire Risk Assessments in the type of properties concerned.

Contractors undertaking work on our behalf are competent and have the appropriate skills, knowledge, training and experience to undertake any fire related work.

2.7 Implementation

A framework of documents have been set up to outline how this policy will be implemented. They are as follows:

- Landlord Compliance Policy
- Fire Safety Management Plan
- Fire Safety Standard



There is also a suite of key performance measures that outline the clear expectations of the group and what is expected of the people responsible for delivering Fire Safety Compliance.

2.8 Consultation

Internal consultation has been carried out with the relevant departments in order to ensure that it is fit for purpose.

3. Building Safety

The Building Safety Act 2022 introduces several key requirements to ensure the safety of our buildings over 18 metres in height. Full details on how we plan to fulfil our duty to manage risks associated with Building Safety will be supported by the development of a Building Safety Management Plan.

In summary, we are taking the 12 following steps to ensure compliance of our “in-scope” buildings:

3.1 Customer Engagement

We will ensure our customers have a voice to challenge building safety matters by engaging in discussion of how to keep their building safe, including their own responsibilities.

We will regularly share building safety information with our customers through suitable means of communication and have a suitable and sufficient customer engagement strategy in place which clearly outlines our customer engagement plan.

3.2 Mandatory Occurrence Reporting

We will operate a mandatory occurrence reporting system during:

- construction of a new higher-risk building;
- work on an existing higher risk building unless the work consists only of exempt work or emergency repairs;
- work on an existing higher-risk building that causes it to stop being a higher- risk building;
- work on an existing building that will make it a higher-risk building.

A higher-risk building has at least:

- 7 storeys or is at least 18 metres high.
- 2 residential units or is a hospital or a care home.

Our reporting system will ensure building safety incidents and risks that have caused, or if not remedied are likely to cause:

- the death of a significant number of people.
- serious injury to a significant number of people.



3.3 Building Safety Case

We will continuously review, monitor and document the safety of our high-rise buildings within a suitable and sufficient safety case report, ensuring risks are appropriately controlled.

We will share our building safety case reports with the Building Safety Regulator when required and work collaboratively and openly to support inspections.

3.4 Building Safety Risk Assessment

To ensure the safety of our high-rise buildings, we will carry out regular, ongoing building safety assessments, ensuring that any defects are remedied as soon as practicably possible.

The Building Safety Manager will record our assessments within our compliance monitoring software solution, C365, ensuring oversight that all reasonable steps have been taken to mitigate risk.

3.5 Golden Thread of Information

We will keep a golden thread of key building safety information and use this to support understanding of the building and the steps needed to keep our customers safe.

3.6 Compliance and monitoring of high-rise buildings

We will monitor the compliance of our high-rise buildings through our building safety dashboard, ensuring that further mitigation measures are implemented where required.

3.7 Building Safety Manager

We will provide our customers in high-rise buildings with a Building Safety Manager for all building safety matters.

The Building Safety Manager fulfills an assurance function for our higher risk buildings through:

- Ensuring compliance with the Group's statutory duties as set out in the Building Safety Act and Fire Safety Act.
- Development and monitoring of our Building Safety Dashboard to provide assurance and oversight of our compliance requirements within higher risk buildings.

3.8 Building Safety Gateway Regime

We will take all reasonable steps to comply with our requirements for the submission and approval under the gateway regime.

We will establish three gateways at key stages in design and construction, and introduce new requirements during construction, that will apply to higher-risk buildings:



- Planning Gateway one – at the planning application stage.
- Gateway two – before building work starts.
- Gateway three – when building work is completed

3.9 Building Safety Competence

We will maintain a competency matrix across the business to ensure colleagues and subcontractors hold the relevant skills, knowledge, experience and qualifications to evidence competence within our Building Safety case.

3.10 In-Scope Registration

We will register all our existing and future development high-rise buildings with the Building Safety Regulator.

3.11 Building Safety Complaints

We will have robust processes in place to swiftly investigate, address and respond to complaints relating to Building Safety.

Our Building Safety Manager will triage complaints received from within our high-rise properties and investigate those which are in relation to:

- structural failure and the spread of fire in the building (building safety risks).
- the performance of an accountable person (AP).

3.12 Building Assessment Certificate

When available to do so and to assure the safety of our customers in high-rise buildings, we will obtain a valid building assessment certificate and clearly display it in the communal areas.

4. Policy outcomes

Where there is a duty to manage the risk associated with fire, we will ensure:

- a FRA is undertaken for every building we are responsible for that has common areas. These FRAs will be completed by a trained, experienced and competent person.
- that management actions and remedial works arising from FRA's are actioned and tracked to completion, including evidence of completion, photographs and relevant certification.
- the effective management of buildings
- fire safety systems and fire safety equipment, where fitted, are maintained to the recommended standards through programmes of cyclical maintenance.
- that all communal areas are kept free of any items that pose a risk from a fire safety perspective. This is to provide a sterile environment that may be used as a protected escape route in the event of a fire.
- that our employees with a specific fire safety responsibility have the correct skills, knowledge, training and experience to fulfil their duties.



- that all our employees are suitably trained to Identify fire risks that are present in their activities and areas of work and do all they can to reduce and manage these risks and escalate appropriately.

5. Responsibilities

All colleagues are responsible for carrying out their work in line with this policy and associated procedures. The Director of Assets is responsible for overall implementation of this policy.

The Policy Framework documents the approval routes for all Policies & Strategies, however under this policy the following teams/employees have the following responsibilities.

Role	Responsibility
Customer Committee	Responsible for final approval of the policy.
Executive Director's Team (EDT)	Responsible for initial approval of the policy.
Executive Director – Property	For ensuring that adequate resources are made available to enable the objectives of the policy to be met.
Director – Assets	Operational implementation of the policy.
Head of Compliance & Legal	Operational oversight for delivery of the policy.
Building Safety Manager	Has responsibility for ensuring compliance with the Group's statutory duties as set out in the Building Safety Act and Fire Safety Act. Responsible for monitoring compliance activities within all high-risk properties and recommending mitigating measures where required.
Compliance Officers	Will act as the competent persons for the effective management and operational delivery of property compliance in line with the management plans. Responsible for undertaking and management of quality assurance audits including reporting.
All employees	Responsible for the day-to-day operational delivery of the policy. They are directly accountable for ensuring this policy and supporting documentation is duly acted upon.
The implementation of this policy is a Group wide responsibility due to the nature and potential severity of the risks associated with fire.	



6. Monitoring and review

We will monitor the effectiveness of the policy on each inspection of communal areas and the policy will be reviewed on a biennial basis. All relevant Fire Risk Assessments will be reviewed annually.

*An unscheduled policy review will take place following any changes to Building Regulations Part B or any changes to legislation relating to Fire Safety



Control framework

Compliance

This policy supports compliance with the latest editions of the following Acts, Regulations and Codes of Practice:

- Regulatory Compliance, in particular the Safety and Quality Standard
- Regulatory Reform (Fire Safety) Order (RRFSO) 2005
- Fire Safety Act 2021 and Building Safety Act 2022
- Legislative Compliance, in particular the Building Regulations
- Housing Act 2004
- Health & Safety at Work etc. Act 1974
- Landlord and Tenant Act 1985
- The Fire Safety (England) Regulations 2022
- The Building Safety Act 2022

Document control	
Version	5
Policy applies from	May 2024
Policy applies to	Livv Housing Group; Livv Homes; Livv Maintenance
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Responsible Executive Director	Executive Director - Property
Policy author	Head of Compliance and Legal
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Version control		
Version	Date of Review	Summary of changes made
1	October 19	Amalgamation of the Fire Safety in Communal Areas Policy, Mobility Scooter and Motorised Wheelchair Policy as well as the sterile environment approach we have adopted.
2	February 21	Changes to category levels for 4 and 5 storey buildings. Covid19 Pandemic Impacts to Fire Safety measures
3	January 23	Inclusion of managed use approach to extra care schemes, reference to the Building Safety Act 2022 and Fire Safety Act 2021, inclusion of the Fire Safety Standard 2022. More detailed focus on non-communal homes. Sets out our commitment to meeting obligations under the Fire Safety (England) Regulations 2022.
4	February 23	Revision following input from Customer Committee to include reference as to when we would undertake a Type 2, 3 or 4 Fire Risk Assessment.
5	May 2024	Introduced new policy format. Inclusion of Type 3 FRA for high-rise buildings Introduced a new section (3) for Building Safety. Updated responsibilities to include the Head of Compliance and Legal, the Building Safety Manager and the Compliance Officer. Updated the compliance framework to include the Building Safety Act and the Fire Safety (England) Regulations.

