



**EASTSUFFOLK**  
C O U N C I L

## Fire Safety Strategy

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**Review:** May 2024 (or sooner if policy or legislation changes require)

## 1. Introduction

- 1.1 This Strategy outlines the way East Suffolk Council's (the Council) Landlord Services will minimise the risk of fires starting and spreading in Housing Revenue Account owned and managed properties and how the service will safeguard residents, staff, contractors and visitors in the event of fire.
- 1.2 The Council will ensure that it manages fire safety in accordance with best practice, legislation and other relevant internal policies relating to the safe management of properties.

## 2 Purpose

- 2.1 The purpose of this strategy is to:
  - 2.1.1 Ensure the Council's primary focus is on the life, safety and welfare of our residents and staff
  - 2.1.2 Ensure the council's assets are protected from the spread of fire and interruption of business and protect the general public
  - 2.1.3 Ensure we meet our legislative duties as landlord and 'responsible person'
  - 2.1.4 Ensure suitable resources are in place to prevent the cause and spread of fire and if/when they occur to minimise their impact within communal areas and individual properties.

## 3 Scope

- 3.1 This strategy applies to all residential properties under the management of East Suffolk Council's Housing Revenue Account (HRA), this includes Leasehold, General Needs and Retired Living Scheme properties and some properties used as Temporary Accommodation as defined under the s188 and s193(2) Housing Act 1996 for those owed a duty under Homelessness legislation.
- 3.2 East Suffolk Council shall ensure, so far as is reasonably practicable, that fire safety management arrangements comply with The Management of Health and Safety at Work Regulations 1999, The Regulatory Reform (Fire Safety) Order 2005, Housing – Fire Safety Guidance - Local Authorities Coordinators of Regulatory Services (LACoRS) and other appropriate regulations (Appendix A).
- 3.3 Relevant Government guidance will be followed, for example the Local Government Association Fire Safety in Purpose-built blocks of flats (2011), and the National Fire Chiefs Council Fire Safety in Specialised Housing which is applicable to Retirement Living Schemes.

- 3.4 East Suffolk Council is committed to the effective management of risk, and the prevention of any associated injury or ill health to tenants, staff, visitors, contractors, and any persons affected by the premises including Fire and Rescue personnel.

## 4 Legislation and Guidance

The following external legislation and guidance will be used to design and implement this strategy. The internal guidance will then be developed or updated in accordance with this Strategy.

### 4.1 External

- 4.1.1 Regulatory Reform (Fire Safety) Order 2005
- 4.1.2 Health and Safety at Work etc Act 1974
- 4.1.3 LGA Fire Safety in purpose-built blocks of flats
- 4.1.4 NFCC Specialised Housing Guidance
- 4.1.5 Housing Act 2004 – Housing Health and Safety Rating system
- 4.1.6 Equality Act 2010 – Equality Duty
- 4.1.7 Fire Safety Act 2021
- 4.1.8 PAS 9980:2022
- 4.1.9 PAS 8671 Standard for the Built Environment Competence Programme
- 4.1.10 Proposed Building Safety Bill
- 4.1.11 New code of practice for external wall fire risk assessment

### 4.2 Internal

- 4.2.1 Tenants Handbook and Repairs Charter
- 4.2.2 East Suffolk Council Tenancy Agreement(s)
- 4.2.3 HRA Management of Fire Risk in Communal Areas Policy
- 4.2.4 Mobility Scooter Policy
- 4.2.5 HRA Asset Management and Compliance Strategy
- 4.2.6 Fire Safety Information for Residents
- 4.2.7 Removal of Fire Hazards in Shared Areas Policy
- 4.2.8 Removal of Fire Hazards in Shared Areas Procedure
- 4.2.9 Removal of fire Hazards in Shared Areas Fire Safety Leaflet
- 4.2.10 Removal of Fire Hazards in Shared Areas Mobility Aids Guidance
- 4.2.11 Hoarding Policy
- 4.2.12 Hoarding Procedure
- 4.2.13 Smoke Free Policy
- 4.2.14 Smoke Free Procedure
- 4.2.15 Gas Safety Policy
- 4.2.16 Electrical Safety Policy
- 4.2.17 Void Standard
- 4.2.18 Adaptations Policy
- 4.2.19 Stay Put Policies

- 4.3 The government have made recent announcements around the Building Safety Bill on 20 January 2020 and Fire Safety Bill on 19 March 2020. This policy will be updated with any subsequent legislative changes.

## 5 Roles and Responsibilities

- 5.1 The Responsible Person – The Chief Executive of East Suffolk Council is the person with overall responsibility for fire safety issues in East Suffolk Council properties.
- 5.2 The Head of Housing has responsibility for the whole of the HRA Housing Stock and shall ensure the following are in place:
- 5.2.1 A Fire Safety Strategy (this document) is adopted and implemented
  - 5.2.2 That the Fire Safety Technical Standard is implemented
  - 5.2.3 That nominated appointed persons (see below) are available to undertake the statutory fire safety checks/ tests and the recording of all such actions as required in the Fire Safety Logbook/ Checklists for the building;
  - 5.2.4 That appointed persons receive training deemed necessary to ensure they are competent to carry out their duties with regard to fire safety;
  - 5.2.5 The correct implementation and monitoring of the fire safety management system for those buildings, including the Fire Risk Assessments and Weekly/ Monthly Fire Safety Checklist, and Evacuation Plans (where appropriate)
  - 5.2.6 That other Housing Service staff and contractors are trained and competent to carry out their duties with regard to fire safety
- 5.3 **The Competent Person:** The Maintenance Manager will act as the ‘competent person’, until the role a Building Safety and Compliance Manager is appointed, at which point they will become the ‘competent person’.
- 5.4 **Housing Managers:** Will be responsible for ensuring that this Strategy is known and acted upon by staff directly under their control. Fire safety can only be dealt with correctly when all stakeholders play their part, which includes tenants, housing services maintenance contractors and all Housing Services staff.
- 5.5 **The Fire Safety Management Plan** sets out detailed responsibilities for all Housing teams, it’s the Housing Managers’ responsibility to ensure their teams are compliant with these elements.
- 5.6 **Appointed Persons** will take ownership for the completion of relevant fire safety checks and management of the site, for which they are responsible.

- 5.7 **All Staff** shall ensure that they are aware of and follow recognised procedures for fire safety. They shall inform their manager or team leader of any concerns regarding fire safety and participate in fire safety training as agreed with their manager / team leader.

## 6 Fire Risk Assessments

- 6.1 The Housing Maintenance Service will implement a robust fire risk assessment-based regime, of communal areas and shared dwellings (excluding houses) that complies with relevant legislation and ensure relevant actions identified in those assessments are carried out to prevent future fires and protect against death and injury.
- 6.2 The Housing Service, so far as reasonably possible will ensure that routes to emergency exits from premises and the exits themselves are kept clear at all times. Residents should also ensure they do not leave items, which would impede emergency access routes.
- 6.3 Fire Risk Assessments will consider the structure of the premises for the spread of flames including fire resistance and compartmentation of fire between communal areas and residential accommodations.
- 6.4 East Suffolk Council housing properties are categorised as A, B, or C according to risk.
- 6.5 The properties, which require a Fire Risk Assessment are set out in Appendix B (This will be added in time for Cabinet!)
- 6.6 Risk is determined by examining the hazards and fire safety measures present on a particular site. Consideration is given to the complexity of the building (e.g. properties over 18m due to the number the storeys), the fire measures in place that require checking (e.g. alarm systems) and the profile of the residents (e.g. if there are a high number of residents with reduced mobility such as Retirement Living Schemes).
- 6.7 It must be remembered that categorisation remains fluid and can be changed due to the finding of an FRA itself or other changes to structure and occupancy.
- 6.8 Fire Risk Assessment Frequency:
- Category A – Annually  
Category B – 2 Yearly  
Category C – 3 Yearly
- 6.9 The review of the fire risk assessment will in most cases just require a simple assessment of the changes that have occurred to the building (if any), and how the building is used. If there have been no building changes, and the staffing working patterns and type of use has not changed then the FRA will remain fit for purpose. Where there are significant changes (to the building or occupant type), or if there is any reason to suspect that it is no longer valid it is likely that the completion of a new

FRA will be required. This will be organised by the current Housing Maintenance Manager until a new Building Safety and Compliance Manager is appointed.

- 6.10 The recommended actions identified in the fire risk assessment will be set out in an action plan listing physical and managerial measures necessary to ensure that fire risk is maintained at, or reduced to, an acceptable level.
- 6.11 The FRA will set out high, medium and low remedial actions with target completion times determined by the East Suffolk Council.
- 6.12 The recommended remedial works will be reviewed, actions raised, allocated and monitored, with evidence required by the Housing Maintenance Manager, and with the overview of the Housing Health and Safety Board.
- 6.13 We will use a dedicated system to monitor and track when FRA's are due, and all actions identified and whether they are complete. The system will provide a detailed audit trail, which enables us to clearly evidence where and when remedial works have taken place.
- 6.14 Any high or medium risk remedial works/ improvements detailed within the FRA remedial action plan relating to building structure, or detection and alarm systems will be implemented by the Housing Maintenance Team as part of a rolling programme of works.

## **7 Policy**

### **Fire Management Plans**

- 7.1 The Housing Service will establish and maintain plans as well as procedures to identify the potential for and responses to, fire incidents (including emergency situations) in order to prevent or mitigate the likely illness and injury that may be associated with fires.
- 7.2 The Council will prepare and publish a Fire Safety Management Plan for preventing or controlling the risk of fire within HRA properties for any sites with an increased risk of fire, including St Peters Court, Retirement Living Schemes and Temporary Accommodation Schemes, with communal areas.

### **Signage and Documentation**

- 7.3 Directional signage for the fire and rescue service should be provided in blocks of flats with a top storey more than 11m above ground level, on each entrance to stairs and lifts.
- 7.4 Fire Safety notices are displayed in East Suffolk Council blocks, Retirement Living.
- 7.5 Schemes and Temporary Accommodation sites and Fire Exits are clearly signposted.

- 7.6 The Council will ensure that there is adequate illumination to communal, emergency escape routes.

### **Fire prevention works and surveys**

- 7.7 In addition to carrying out Fire Assessment works, to keep homes safe, the Council will regularly carry out a range of works and surveys. These will be set out in the HRA Asset Maintenance and Compliance Strategy, which is currently being developed.
- 7.8 For blocks of flats over 11m and high risk buildings, we will arrange a Type 4 Fire Risk Assessment, which includes an intrusive inspection to confirm compartmentation and fire stopping.
- 7.9 The Void Standard includes consideration for means of escape, fire protection in the kitchen and will ensure a kitchen fire rated door is present or installed.

### **Tenants and Leaseholders**

- 7.10 It is a Tenant's and Leaseholder's responsibility to be aware of possible fire hazards around their home and to take steps to protect their household from fire.
- 7.11 Fire safety awareness will be promoted to tenants and leaseholders using appropriate communication channels including but not exclusive to the Council website, Social Media, Tenants' Newsletters, information leaflets, and tenancy handbooks.
- 7.12 Housing Officers, Repairs and Maintenance Operatives and our contractors undertaking tenancy visits will report any unauthorised property alterations that may compromise fire safety and if remedial action is required, recharges for the tenant / leaseholder will be considered on a case-by-case basis. More information on recharges is set out in our Recharges Policy.
- 7.13 Tenants and leaseholders must request written permission from the Council before commencing any significant changes to their flat. Permission will not be granted if the fire integrity of the property is likely to be adversely affected. The reasons for refusal will be explained to the tenant / leaseholder, so they understand the risk posed by the alterations being carried out.
- 7.14 Tenants and Leaseholders are not permitted to BBQ in communal areas, such as communal walkways or balconies, or on private balconies and grassed areas.

### **Retirement Living Schemes**

- 7.15 Every Retirement Living Scheme will have a specific Incident Management Plan that sets out the process in the event of a fire.

- 7.16 The Scheme Manager will be responsible for carrying out Health and Safety checks within the schemes including regularly testing scheme alarms such as pull cords and fire call points and recording these.
- 7.17 The Scheme Manager is responsible for ensuring residents are aware of the Incident Management Plan and if relevant, Stay Put Policy. This will be completed as part of the resident's scheme induction & at regular support review meetings.
- 7.18 Fire instructions are displayed on the inside of every resident's front door in each scheme and will be checked monthly by the Scheme Manager.
- 7.19 Each Scheme's Fire Risk Assessment is reviewed periodically by an external consultant. Resident's Personal Emergency Evacuation Plans (PEEPs) are reviewed regularly & if the resident's circumstances change.
- 7.20 The Scheme Manager will ensure Fire alarms are tested on a weekly basis, logged in the Fire Management Record Book and that residents and visitors will be pre-warned, before the test is undertaken.
- 7.21 Residents are not permitted to fit extra door locks or chains to their front door. In the event of an emergency, a Scheme Manager or emergency services may need to gain urgent access to the property. Adding additional locks to Fire Doors, may also compromise their integrity and reduce their effectiveness.
- 7.22 BBQ's are only permitted if a Scheme Manager is on site and a bucket of sand must be available, in the event of a fire.
- 7.23 A BBQ can be used if it is not gas and is a safe and reasonable distance away from the building.
- 7.24 Gas BBQ's are not permitted
- 7.25 BBQ's are not permitted if there is a planned Fire Strike.
- 7.26 The Scheme Manager ensures Health and Safety activities in relation to fire safety are carried out in line with the checklist detailed in the HRA Management of Fire Risk in Communal Areas Policy

### **Mobility Scooters**

- 7.27 Council does not permit Mobility Scooters to be stored on site in communal areas.
- 7.28 Mobility Scooters are considered a health and safety risk and fire hazard in terms of either blocking or reducing the means of escape in the event of a fire or the scooters themselves causing the fire.

- 7.29 Suitable storage is provided for Mobility Scooters, in external stores. More information can be found in the Mobility Scooter Policy.

### **Storing goods in communal areas**

- 7.30 The Council does not permit storage of any items in communal areas, they can increase the likelihood of fire spreading and hinder evacuation if required in the event of an emergency.

## **8 Housing Health and Safety Board**

- 8.1 The Housing Health and Safety Board will monitor the effectiveness of this policy and in addition will seek residents' views, using the Tenant Involvement Framework.
- 8.2 The following comes under the remit of the Housing Health and Safety Board:
- 8.2.1 Review East Suffolk Council Fire Safety Strategy to ensure fit for purpose and future proofed
  - 8.2.2 Review the policies which are part of the Fire Safety Strategy
  - 8.2.3. Monitor progress of tasks on the Action Plan
  - 8.2.4 Monitor progress with FRA remedial works
  - 8.2.5 Identify funding/budget implications
  - 8.2.6 Monitor performance against the KPIs
  - 8.2.7 Delivery of the Resident Engagement Strategy elements related to Fire Safety
  - 8.2.8 Monitor fire related complaints
  - 8.2.9 Ensure competency/training standards are met

## **9 Monitoring, review and evaluation**

- 9.1 This policy will be reviewed every 2 years or in line with legislative or regulatory changes.
- 9.2 Current Published Version: TBC
- 9.3 Next Review Due: TBC

## Appendix A - Relevant Legislation, Regulation and Guidance

### Regulatory Reform (Fire Safety Order) 2005

The main regulatory legislation which sets standards for the control measures to be taken for fire safety, including the need for all workplaces to have Fire Risk Assessments undertaken.

General measures include:

- a) Reduce the risk of fire occurring on the premises and the risk of fire spread
- b) Measures in relation to the means of escape from the premises
- c) Measures for assuring that, at all material times, the means of escape can be safely and effectively used
- d) Measures in relation to the means of fighting fires
- e) Measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises
- f) Instruction and training of employees and providing tenants with relevant information.

The Regulatory Reform (Fire Safety) Order 2005 came into effect 1st October 2006 and is enforced by the Suffolk Fire and Rescue Service (SFRS). The key actions of this Order are detailed below. This Order replaced all previous fire legislation, and gives Suffolk Fire and Rescue Service powers to visit and inspect for fire safety issues within any of East Suffolk Councils Housing Services schemes as part of normal routine, or where there is believed to be just cause, i.e. via a formal Complaint.

The key actions under the Regulatory Reform (Fire Safety) Order 2005 are:

- a) A Fire Risk Assessment is required for each place of work, with an action plan to manage any deficiencies/ recommendations identified by the assessment, undertaken by a 'competent' Fire Risk Assessor. As a Social Landlord East Suffolk Council is required to undertake a Fire Risk Assessment covering the communal areas of a property, and consider who may be harmed by a fire
- b) Fire Risk Assessments are reviewed regularly and revised when significant operational or property changes have occurred
- c) The appointed Fire Risk Assessor should have their competency assessed against relevant national standards (Ref. Fire Risk Assessment Competency Council: Guide to Choosing a Competent Fire Risk Assessor 29th April 2014)
- d) The 'Responsible Person' shall ensure there is an Appointed Person for each supported/ sheltered scheme site, and given suitable training and instruction, and sufficient time for the role
- e) Fire Awareness training is required for all staff, TBC.
- f) Additional fire extinguisher training will be provided as necessary
- g) Firefighting equipment, smoke/ heat detection and alarm systems must be tested and maintained
- h) An Evacuation Plan will be in place for relevant sites e.g., extra care schemes

- i) In house Fire Safety checks and monitoring should be detailed in the Fire Safety Logbook, via the Weekly/ Monthly Fire Safety Checklist. Items of non-compliance should be raised up the management chain for resolution

## **The Housing Act 2004**

Part 1 – The Housing Health and Safety Rating System (HHSRS). There are 29 categories of potential hazard considered and number 24 is fire.

The HHSRS is the principal tool for assessing fire safety risk and regulating standards in all types and tenures of residential accommodation.

The underlying principle of the HHSRS is that any residential premises should provide a safe and healthy environment for any potential occupier or visitor.

The HHSRS provides a mean of assessing dwellings which reflects the risk from any hazard and allows a judgement to be made as to whether that risk, in those particular circumstances, is acceptable or not.

For these purposes, for example, it would consider the likelihood of an uncontrolled fire (and associated smoke) and the severity of the outcome (e.g. illness; injury; death; etc.).

The enforcing authority for the Housing Act 2004 is the local housing authority.

## **National Fire Chiefs Council (NFCC) - Fire Safety in Specialised Housing – May 2017**

This guidance applies to Retired Living Schemes.

## **Regulations**

### **Building Regulations**

Guidance on compliance with Building regulations Part B: Fire Safety is given in Approved Document B 2010, 2019 edition. Functional requirements:

- a) Means of warning and escape
- b) Internal fire spread (linings)
- c) Internal fire spread (structure)
- d) External fire spread
- e) Access and facilities for the fire service

### **Furniture and Furnishings (Fire) (Safety) Regulations 2010**

### **Electrical Equipment (Safety) Regulations 1994**

**Gas Safety (Installation and Use) Regulations 2018** (Landlord duties covered by regulation 36)

**The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020** – apply from June 2020 to private rented tenures

**Guidance, Standards and Codes** – Including:

- Fire Safety in Purpose built blocks of flats – LGA – May 2012
- Housing – Fire Safety: Guidance on fire safety provisions in certain types of existing housing - Local Authorities Coordinators of Regulatory Services (LACoRS), in partnership with the Chief Fire Officers
- Association and the Chartered Institute of Environmental Health – July 2008

## **Recent Government Announcements**

### **Fire Safety Bill – 19 March 2020**

The bill will amend the Fire Safety Order 2005 to clarify that the responsible person or duty-holder for multi-occupied, residential buildings must manage and reduce the risk of fire for:

- The structure and external walls of the building, including cladding,
- balconies and windows
- Entrance doors to individual flats that open into common parts This clarification will empower fire and rescue services to take enforcement action and hold building owners to account if they are not compliant.
- The bill will provide a foundation for secondary legislation to take forward recommendations from the Grenfell Tower Inquiry phase one report, which stated that building owners and managers of high-rise and multi-occupied residential buildings should be responsible for a number of areas including:
- Regular inspections of lifts and the reporting of results to the local fire and rescue services
- Ensuring evacuation plans are reviewed and regularly updated and personal evacuation plans are in place for residents whose ability to evacuate may be compromised
- Ensuring fire safety instructions are provided to residents in a form that they can reasonably be expected to understand
- Ensuring individual flat entrance doors, where the external walls of the building have unsafe cladding, comply with current standards

### **Building Safety Bill - 20 January 2020**

Provides clearer accountability and stronger duties on those responsible for high rise buildings. Measures include:

- New Building Safety Regulator within the Health and Safety Executive
- Clarified and consolidated advice for building owners, proposal to extend cladding ban, update on fire sprinklers