



## WCHG Fire Safety Management Policy

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| <b>Date of approval</b>              | 28 <sup>th</sup> July 2025   |
| <b>Responsible director</b>          | Paul Butterworth - Executive Director of Assets  |
| <b>Policy monitoring body</b>        | WCHG Board   |
| <b>Resident input into policy</b>    | Customer High Rise Forum   |
| <b>Date for policy review</b>        | July 2028  |
| <b>Linked strategies/policies</b>    | WCHG Compliance Framework Policy<br>WCHG Building Safety Policy<br>The Resident Involvement Strategy |
| <b>Statutory and Legal Framework</b> | Regulatory Reform (Fire Safety) Order 2005<br>Fire Safety Act 2021<br>Building Safety Act 2022       |
| <b>Version/date</b>                  | Juy 2025 V4  |

## WCHG Fire Safety Policy

### 1. Background

- 1.1. Wythenshawe Community Housing Group (WCHG) recognises the role and obligations it has in respect of Fire Safety management, both as an employer and landlord. This policy clearly states our commitment to meeting these responsibilities, and it directly supports the strategic theme of Great Places within the WCHG corporate plan, that governs our building safety delivery objectives.
- 1.2. Fire Safety management is one of the main compliance functions, governed by robust legal and regulatory requirements and aims to demonstrate WCHG has measures in place to manage fire safety under the current legislation.
- 1.3. The current legislation places a duty on WCHG to ensure Fire Risk Assessments (FRA'S) are carried out to all buildings including offices, Houses of Multiple Occupation, sheltered accommodation, extra care facilities and common areas of flats or maisonettes.

### 2. Legislation, Guidance, Regulatory Standards and Sanctions

#### 2.1. **Legislation** – The principal legislation applicable to this policy is:

- The Regulatory Reform (Fire Safety) Order 2005 (RRO)- that places responsibility on individuals to carry out risk assessments.
- The Fire Safety Act 2021- that supplements the Regulatory Reform Order to clear ambiguity on external walls and flat entrance door within the RRFSO.
- Fire Safety (England) Regulations 2021 – that implements the majority of the recommendations made by the Grenfell Tower Inquiry from the phase 1 report.

Other relevant legislation is listed in **Appendix 1**. NB – Grenfell Inquiry phase 2 recommendations timeline and implementation is due for publication from Government in September 25. This policy will be updated to reflect these changes thereafter.

#### 2.2. **Regulatory Standards** - We will comply with the Regulator of Social Housings regulatory framework and consumer standards for social housing in England. The Safety and Quality Standard is the primary one applicable to this policy. We will comply with the Building Safety Regulators requirements under the Building Safety Act.

#### 2.3. **British Standards** – Under the remit of this policy we will comply with the requirements of the following standards:

- Emergency light testing (BS5266)
- Emergency light servicing (BS5266)
- Fire alarm servicing (BS5829)
- Fire alarm testing (BS5839)
- Smoke alarm testing (communal areas and individual dwellings) (BS5839)
- Dry Riser Testing (BS9990)

- Sprinkler Testing (BS9251)

### **3. Risk Management**

- 3.1. The WCHG Board annually review the Corporate Risk Register and agree the risk appetite for each one.
- 3.2. The WCHG Audit and Risk Committee is responsible for overseeing the management of corporate risks associated with this policy.
- 3.3. The specific risk associated with this policy is:

#### **GP2 Failure to meet asset compliance in line with regulatory standards'**

- 3.4. The risk appetite set by the Board is 'Averse', defined as 'avoidance of risk and uncertainty as a key organisational objective. The key focus of the Board is that regulatory compliance continues to be achieved, and the Regulator of Social Housing Standards and Consumer Standards are met.
- 3.5. We will maintain a suite of procedures and processes, and provide adequate resources to implement them, to mitigate the risk of service delivery failing to adhere to this policy.
- 3.6. Specific arrangements in place to manage the operational risks associated with fire safety include the following:
  - 3.6.1. WCHG will take advice from its fire risk assessor as to the type of FRA to be carried out.
  - 3.6.2. Type 3 FRA's are undertaken annually for high-risk buildings and every 3 years for lower blocks.
  - 3.6.3. Type 4 surveys are undertaken where the FRA advises to do so, for example in the case of unknown compartmentation or external wall insulation information.
  - 3.6.4. The Fire Safety Act 2021 amended the RRO so that in buildings with two or more sets of domestic premises, the RRO applies to:
    - the structure and external walls of the building, including cladding, balconies and windows, and
    - all doors between the domestic premises and the common parts (e.g. entrance doors to individual flats which open on to common parts).
  - 3.6.5. This means that the Fire Risk Assessment of buildings with two or more sets of domestic premises, needs to take account of structure, external walls and doors. The Responsible Person and/or Fire Risk Assessor may consider that the Fire Risk Appraisal of the external wall needs to be an in-depth assessment following the PAS 9980 methodology, for example where the external wall system contains combustible materials. This will be determined on a case-by-case basis.



- 3.6.6. WCHG set the deadline dates of the recommendations according to the dates set by the Fire Risk Assessors, so that site conditions etc are taken into consideration owing to the algorithm used.
- 3.6.7. Each finding is rated as either Tolerable, Moderate, Substantial or Intolerable as rated by the Fire Risk Assessor. The individual recommendations and resultant actions are monitored through an online portal and require Executive Director/Head to sign off following completion and oversight submission by Managers.
- 3.6.8. Completion timescales are set to align with the priority provided by the risk assessor as below, from the date the recommendations are provided on the Fire Risk Assessors 'Aurora' system:
- P1 1 month (30 days)
  - P2 2 months (60 days)
  - P3 3 months (90 days)
- Any extensions requested to these timescales will be discussed with the Fire Risk Assessor and any necessary interim measures put into place by the assignee of the recommendation. All target dates are approved by senior managers.
- 3.6.9. The anniversary dates for the Fire Risk Assessments will be completed and monitored on the Power BI system and any overdue blocks will be discussed at the Health and Safety Committee.
- 3.6.10. Front Entrance Fire Door inspection information and Secure Information Box (SIB) information will be provided and updated within anniversary dates.



### **3. Scope**

- 3.7. This policy covers all buildings to which the Regulatory Reform Fire Safety Order (RRFSO) and Fire Safety Act (FSA) 2021 applies, and for which WCHG is the 'Responsible Person'.
- 3.8. They include offices, Houses of multiple occupation, sheltered accommodation, Extra care facilities and common areas of blocks of flats or maisonettes.
- 3.9. WCHG is the Accountable Person (AP) with legal responsibility under the Act, with the duty to prevent and reduce fire and structural safety failures in the High-Risk Buildings (HRBs).
- 3.10. This policy does not focus on single dwellings such as houses or bungalows.

### **4. Commitments and obligations**

- 4.1. Under the RRO WCHG is obliged to:

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- 4.1.1. Take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of any of their employees.
  - 4.1.2. In relation to relevant persons who are not their employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe.
  - 4.2. The responsible person must make a suitable and sufficient assessment of the risks to which relevant persons are exposed for the purpose of identifying the general fire precautions needed to comply with the requirements and prohibitions imposed under the Order. WCHG will therefore:
    - 4.2.1. Ensure that FRAs are undertaken in a timely manner on either a 1, 2 or 3 year anniversary date (as advised by the relevant fire risk assessor).
    - 4.2.2. Keep a register of all FRAs completed, with date of last assessment and next date due.
    - 4.2.3. Ensure that all actions identified from FRAs are completed in accordance with recommendations made by the competent persons determined by the facilities manager.
    - 4.2.4. Ensure that all fire safety equipment and fire doors are inspected in accordance with statutory guidance and legislation.
    - 4.2.5. Keep detailed electronic information of all landlord inspections, maintenance, and statutory safety inspection records.
    - 4.2.6. Ensure that all FRAs are completed by accredited risk assessors who are listed on a recognised register of life safety risk assessors.
    - 4.2.7. Ensure that all fire installation maintenance and safety checks are conducted by a suitably qualified and registered engineer.
    - 4.2.8. Periodically inform residents of the importance of fire safety and emergency procedures, through the provision of information via our website, newsletters, and leaflets.
    - 4.2.9. Ensure that the findings of the FRAs are made available for residents to view if requested.
    - 4.2.10. Following a fire in a block, where WCHG is responsible for the FRA, we will undertake a new FRA.
    - 4.2.11. Ensure that the FRA for a building is reviewed following a fire near miss, or any building change that may affect fire safety, or if required following an independent fire safety audit.
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- 4.2.12. Ensure that those employed to undertake FRAs are competent and qualified to do so with the appropriate skills and knowledge. At the time of writing this policy This could mean having BAFE SP205/ IFC or Warrington Testing and Certification Ltd certification for a company which is accredited by certification body (UKAS).
  - 4.2.13. Have in place adequately competent colleagues to manage the FRA process and recommendations.
  - 4.2.14. Utilise the assessors recommended timescales by risk for the deadline dates to managers and only extend dates for valid reasons ensuring the risk is minimised meanwhile and approved by a Senior Manager.
  - 4.2.15. Ensure the recommendations are monitored and completions are auditable and signed off by the appropriate directors following the managers sign off.
  - 4.2.16. Have any work that involves penetrating fire compartmentation, adequately fire stopped and inspected and signed off.
  - 4.2.17. Carry out annual inspections on flat entrance fire doors for all residential blocks of any height, and quarterly inspections on communal fire doors for buildings above 11m/5 storey in height, and ensure any issues found are acted upon in a timely manner.
  - 4.2.18. Comply with requests and recommendations from the fire service and Building Safety Regulator.
  - 4.2.19. Review balconies and windows for safety, compliance and proper use.
  - 4.2.20. Provide secure information boxes (SIB's) with the required documentation and continually monitor the information to ensure it remains updated.
  - 4.2.21. Carry out requirements under the Building Safety Act 2022 (BSA).
  - 4.3. In addition to the requirement to undertake fire risk assessments and complete remedial actions, a programme of preventative maintenance and inspection may need to be completed in line with the relevant British Standards.
  - 4.4. The introduction of the Fire Safety (England) Regulations 2022 imposes additional requirement in relation to fire safety. These are:
    - 4.4.1. In all residential buildings with two or more domestic premises with common areas, information must be provided to residents about fire doors and the evacuation strategy for the building annually.
    - 4.4.2. In addition, fire door checks must be carried out in all buildings over 11m (communal doors quarterly and flat entrance doors annually).
    - 4.4.3. In addition to 5.4.1 and 5.4.2, in buildings over 18m the correct wayfinding signage, and a secure information box, which contains site and floor plans,
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information about the external walls, information about lifts and firefighting equipment and information about vulnerable residents, will be provided.

## **5. Significant Non - Compliance and Escalation**

- 5.1. WCHG defines non-compliance as any incident that has the potential to result in a possible breach of legislation or regulatory standard; or causes a risk to health or safety, and needs to be managed as an exception to routine processes and procedures.
- 5.2. Any non-compliance issue identified at an operational level will be formally reported to the Executive Director of Assets, who will agree an appropriate course of corrective action with the Head of Assets/Building Safety and Building Safety Manager and will update the Group Leadership Team (GLT). Escalation to A&R Committee & Board will be considered.
- 5.3. The local Fire and Rescue Authority can commence an enforcement process if WCHG are found to be non-compliant, and they can carry out an audit of processes. WCHG colleagues will respond quickly to any Fire Service enquiries and work with them to provide information where requested
- 5.4. In cases of serious non-compliance, GLT and the WCHG Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.
- 5.5. We will investigate and manage all RIDDOR notifications submitted to the Health and Safety Executive in relation to Fire Safety, and will act to address any issues identified or lessons learnt, to prevent a similar incident occurring again.
- 5.6. The occurrence of a fire related near miss, accident or RIDDOR reportable incident, will also trigger a formal review of this policy.

## **6. Quality Assurance**

- 6.1. There will be regular updates with operational teams to ensure the requirements under both legislation and this policy, remain at the forefront of all activities and policy decisions.
- 6.2. The Building Safety Management system which outlines fire safety activity for each team and includes the requirements under the Fire Safety legislation, will be reviewed by the Building Safety team and updated with full engagement with operational team leaders/managers.
- 6.3. The Senior Manager for Facilities will ensure that the Fire Risk Assessors engaged can evidence that they are audited and their performance reviewed.

## **7. Performance Measurement, Monitoring and Review**

- 7.1. We will use a range of Key Performance Indicators (KPI) to monitor and report performance against Fire Safety. These include metrics that follow the requirements set out in the Tenant Satisfaction Measures (TSMs), specifically **TP05 Satisfaction that the home is safe**.
- 7.2. The Fire Risk Assessment process KPIs are monitored via the Power BI dashboard to show if FRA's have been reviewed within their anniversary date and will be investigated and discussed at the Health and Safety Committee group where this is not the case.
- 7.3. All management actions under this policy will be regularly reviewed by the Building Safety Manager and Senior Contract Manager for Facilities.
- 7.4. Fire Risk Assessment anniversaries will be monitored by the Contract Manager for Facilities to ensure they are reviewed in a timely manner.
- 7.5. We will annually report performance against the TSM's to the Regulator of Social Housing, in accordance with the definitions set out in Regulatory Guidance.
- 7.6. The WCHG Fire Safety performance on FRA compliance will be reported internally as follows:

| Monitoring Body       | Frequency                  |
|-----------------------|----------------------------|
| WCHG Board            | Every meeting – bi monthly |
| Group Leadership Team | Every Meeting - monthly    |
| CX Committee          | Every meeting – bi monthly |

- 7.7. Performance reporting to all monitoring bodies will be a snapshot position on the last day of the month. Access to live daily data is available to all colleagues with strategic and operational responsibility for Fire Safety, through our performance management system.
- 7.8. Health & Safety Committee will receive a suite of more detailed fire safety metrics including progress and position of Fire Safety Actions recommended by the FRA.
- 7.9. The management measures reported will include but are not limited to:

**Data - The total number of:**

- Risk assessments carried out
- Dry risers inspected
- sprinkler systems inspected
- Fire Alarms tested
- Emergency lighting tested
- Smoke Vents tested
- Portable fire Appliances Inspected
- Bun Chutes Inspected



### **Commentary to explain:**



- Current position of compliance
- Corrective action required.
- Progress with completion of follow-up works.

## **8. Customer engagement**

- 8.1. Each high-rise block resident will be provided with a Building Safety booklet annually and invited to the High Rise Forum which is set up for engagement with high rise residents. Each booklet provides contact details and photographs for the relevant WCHG colleagues for Fire Safety discussions
- 8.2. Every resident in a block will have access to evacuation information and fire door information.
- 8.3. The Resident Involvement Strategy has been considered within this policy to ensure full engagement with residents on significant matters relating to fire safety.
- 8.4. Details of the Fire Risk Assessors will be displayed on the Building Safety Board in every High Risk Building communal area.

## **9. Roles and Responsibilities**

- 9.1. The WCHG Board is responsible for setting and approving the priorities of this policy and ensuring it is fully implemented to ensure full compliance with legislation and regulatory standards. They will formally review and approve it every three years or sooner if there is a change in legislation or regulation.
- 9.2. The Group Chief Executive is responsible for discharging their duties to the Executive Director of Building Safety and Head of Building Safety and having an overview of Building Safety Activity.
- 9.3. The Group Leadership Team are responsible for monitoring compliance against this policy to ensure it is being achieved.
- 9.4. The Health and Safety Committee receive and review performance data related to the delivery of this policy and report to the Audit and Risk Committee. The Audit and Risk Committee review assurance reports on the delivery of this policy.
- 9.5. The Customer Experience Committee receive and review performance data related to the delivery of this policy and how services are received and impact customers.
- 9.6. The Executive Director of Assets has strategic responsible for the management of Fire Safety and ensuring compliance is achieved and maintained. They oversee the implementation of this policy and ensure any significant Fire Safety issues are discussed at Board and Leadership Team, liaising with the Head of Asset and Building Safety to ensure there is adequate remediation.

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- 9.7. The Executive Director of Assets has been appointed as the Health and Safety Lead under the requirements of the Social Housing Regulation Act 2023.
- 9.8. The Executive Director of Development is responsible for ensuring all new homes or those acquired are designed, specified and built to meet the full suite of standards to ensure the safety of new customers prior to occupancy including pre occupancy FRA recommendations compliance.
- 9.9. The Head of Assets and Building Safety is responsible for the operational delivery, management and monitoring of this policy. They will ensure that overall Fire Safety compliance activity associated is delivered through the nominated managers, and will support the Building Safety Manager to ensure fire safety compliance is achieved,
- 9.10. The Building Safety Manager is responsible for:
- Ensuring that all colleagues are aware of Fire Safety legislation, and that processes and procedures are in place to work safely under it.
  - Routinely updating this policy, and distributing it to relevant managers.
  - Supporting colleagues to carry out their duties under the legislation.
  - Having oversight of fire risk assessment recommendations and helping colleagues to achieve adequate remediation works.
  - Meeting regularly with the Fire Risk Assessors to discuss all Fire Risk Assessments and works.
- 9.11. The Building Safety Officer is responsible for:
- Ensuring the SIB boxes are constantly reviewed, and data remains up to date at all times. This ensures that residents who require evacuation assistance and locations of relevant equipment is available to the fire service.
  - Attending meetings with the Fire Service, Fire Risk Assessors or other stakeholders where fire safety may be a concern, or to bring awareness to fire safety activity.
  - Carrying out regular visits to all high-risk blocks to promote awareness of fire safety, and to make note of any areas of concern, report to the relevant team and track through to remediation.
  - Ensuring the Power BI monitoring system is always reviewed and up to date.
- 9.12. The Senior Contract Manager for Facilities is responsible for:
- Ensuring all relevant contracts are in place for the delivery of fire safety work and inspections.
  - Confirming that contractors employed for the work are adequately qualified and competent.
  - Ensuring that the management of actions carried out within facilities is carried out by colleagues who are adequately trained and competent.
- 9.13. The Contract Manager for Facilities is responsible for:
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- Ensuring the Fire Risk Assessments are carried out within the annual anniversary dates.
- Recommendations are allocated to the appropriate managers for actioning.
- Updating KPI data to allow effective monitoring through Power BI
- Monitoring contractor works to HRBs to ensure there is no fire compartmentation breach.

9.14. The M&E Managers are responsible for:

- Ensuring the front entrance fire doors are inspected annually during the gas and electric inspections, recorded and any repairs ordered.
- Ensuring 'In House' operatives consider fire safety in their operations on HRBs.

9.15. The Executive Director of Customers and Senior Housing Manager is responsible for the production, management and implementation of key fire safety policies such as;

- Communal areas & scooter management policies
- Customer engagement policy
- Actions and interventions to manage non-compliance of customers or visitors

9.16. All Managers and Team Leaders are responsible for Ensuring their teams are aware of the building Safety Management System and Fire Safety Policy and consider fire safety in their work at all times.

## **10. Competence, Training and Professionalism**

- 10.1. WCHG is committed to realising the capability and potential of colleagues by investing in them through learning, training and professional study. Line managers will use the WCHG Continuous Performance Engagement process to ensure that mandatory training and required qualifications are maintained and kept up to date for all colleagues involved in the delivery of this policy
- 10.2. Our Board is recruited to meet the requirements of the governance skills matrix to ensure appropriate strategic control and oversight is provided across the Group's operations. Members receive regular and ongoing training to ensure skill and competency levels are maintained.
- 10.3. The Executive Director of Assets and the senior management team holds or is working towards the Chartered Institute of Housing Level 5 Diploma in Housing, or equivalent.
- 10.4. The Building Safety Manager will hold a level 6 Fire Safety Qualification and a level 6 Building Safety qualification.
- 10.5. Any manager in charge of engaging contractors for fire safety works will ensure they hold the relevant qualifications and accreditations during the procurement process, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately. The Building Safety Team will be provided with copies.

10.6. We will deliver training on this policy and its supporting procedures through mechanisms including but not limited to:

- Team Meetings
- One to one meeting
- On the job training
- Toolbox talks.

#### **4. Equality Diversity and Inclusion**

10.7. WCHG will ensure that the Fire Safety Policy is accessible to it all customers. WCHG recognises that customers of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly. We will make every reasonable effort to ensure that no-one is discriminated against directly or indirectly on the basis of any protected characteristic as defined by the Equality Act 2010.

10.8. We recognise that some protected groups may be disproportionately impacted and will take additional steps in the application of this policy and make reasonable adjustments to ensure compliance with the Act. For example, WCHG will:

- 10.8.1. Provide a tailored response to the Fire Safety policy according to individual circumstances.
- 10.8.2. Provide support to residents who have difficulty in managing their tenancy due to mental health issues, learning disabilities, physical disabilities, special needs or old age.
- 10.8.3. Provide information on request, in languages other than English, in Braille, Large Print and Audiotape where required. In addition, our receptions and interview rooms are fitted with a hearing loop system.

(This policy can be provided in a different format, translated, large print, easy read, braille, or an audio copy. Requests can be made by contacting us by phone on: 0300 111 0000 or: 0800 633 5500 or by email: [inclusionanddiversity@wchg.org.uk](mailto:inclusionanddiversity@wchg.org.uk).)



## **Appendix 1 Legislative and Regulatory Framework**

This policy takes account of WCHG's obligations related to:

- Social Housing (Regulation) Act 2023
  - The Regulatory Reform (Fire Safety) Order 2005- places responsibility on individuals to carry out risk assessments.
  - The Fire Safety Act 2021- supplements the Regulatory Reform Order to clear ambiguity on external walls and flat entrance door within the RRFSO
  - Fire Safety (England) Regulations 2021. To Implement the majority of the recommendations made by the Grenfell Tower Inquiry from the phase 1 report.
  - The Health and Safety at Work Etc Act, 1974.
  - The Management of Health and Safety at Work Regulations, 1999.
  - Workplace (Health, Safety & Welfare) Regulations 1992 (as amended).
  - BS 9999: 2017, Fire safety in the design, management and use of buildings, Code of practice.
  - BS 9997: 2019. Fire Risk Management System, August 2019.
  - BS 9991: 2015. Fire safety in the design, management and use of residential buildings. Code of Practice. Second edition, October 2015.
  - Landlord and Tenant Act 1985 Housing Act 1988.
  - NFCC Fire Safety in Specialised Housing
  - Building Safety Act 2022 and subsequent legislation and regulations as set out in the Building Safety Policy.
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