Fire Safety Policy

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Policy Author: Helen Jones, Head of Safety Assurance

Policy Lead: Homes Director

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V.2, Mar 2024	S.2.1 Fire Safety (England) Regs requirement for fire door checks and information to residents S. 2.1 S.156 Building Safety Act requirement to communicate FRAs to residents S. 2.2, 6.14, 6.15, 7.2.2 Update re. EEIS referral to FRS S.3 Linked documents added S. 6 Role title updates
V.3, May 2026	S.4.1 New Residential Evacuation Plans legislation S.4.2 New BS8674 and BS9792 S.6 Role title updates and additional PCFRA responsibilities S.7.1.4 Update FRA competencies in line with BS8674

You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

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Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead

1 Policy Statement and Purpose

Brighter Places (BP) recognises its duty of care as a landlord, developer, and employer. The aim of this Fire Safety Policy is to set out the key principles and commitments, in line with all relevant statutory obligations, for the prevention, preparedness and response to all fire risks and events within its property portfolio. The policy and any associated procedures will set out the management framework that must be adhered to maintain compliance to relevant regulatory and other sector standards and codes of practice.

BP is committed to genuinely engaging with and listening to our customers, colleagues, contractors, and others on fire safety matters, acting as necessary to ensure they feel safe in their homes and workplaces.

Failure to comply with this policy and associated procedures may lead to increased risks and significant moral, legal and financial consequences. This includes criminal and civil legal action or interventions by the Fire & Rescue Service, Health and Safety Executive, Building Safety Regulator, Local authority, and/or the Environment Agency. It may also result in a downgrade of the overall Governance rating of BP as a registered provider by the Regulator for Social Housing or action taken by the Housing Ombudsman. Failure to adhere to this policy and associated procedures may result in disciplinary action where it is deemed relevant (refer to BP Disciplinary Policy and Tenancy Agreement).

2 Policy commitments (key objectives)

In addition to securing legal compliance, this policy and associated procedures are intended to promote a proactive, best practice approach to the planning, prevention, and response to fire risks within BP properties. As such, the key commitments and objectives of this policy is as follows:

2.1 Statutory compliance

BP will:

- Nominate an ‘Accountable Person’ for the purposes of relevant fire safety compliance under the Building Safety Act 2022 (refer to S.6)
- Nominate sufficient ‘Responsible Persons’ for the purposes of compliance with the Regulatory Reform (Fire Safety) Order (RRFSO)
- Take ‘general precautions’ for the prevention and protection from fire within BP premises in accordance with the ‘principles of prevention’ (schedule 1 of RRFSO)
- Complete a Fire Risk Assessments (FRA) for all premises that contain two or more sets of premises including the buildings’ structure, external

walls, common parts and doors between domestic premises and common parts[a]

- Complete PAS9980 Fire Risk Appraisal of External Wall Systems (FRAEWS) where recommended in FRAs or EWS1
- Maintain clear fire safety arrangements in relation to BPs undertaking and activities
- Eliminate and reduce fire risks, as far as is reasonably practicable, through the identification of potential ignition sources and combustible materials, and through the implementation of robust premises inspection regimes
- Maintain a strict no smoking policy in all communal and office areas (excludes customer homes)
- Maintain all fire and building safety facilities, equipment, and devices, including detection, alarm and fire-fighting equipment, and all relevant Golden thread'[1] documentation
- Maintain, and keep clear and unobstructed, all fire escape routes and exits in common parts and office accommodation in accordance with the Communal Spaces Policy
- Establish appropriate procedures for serious and imminent danger, including relevant training, drills and, where relevant, Personal Emergency Evacuation Plans[2] (PEEP) for colleagues and visitors
- Ensure adequate competent[3] fire safety assistance and technical support in order to complete robust fire risk assessments, preventative and protective measures
- Establish, implement, and maintain a robust process for the engagement of residents in all aspects of fire safety including the communication of the outcomes of FRAs
- Provide relevant and comprehensible information on fire risks, preventative and protective measures to colleagues, customers, and contractors[4]
- Cooperate and coordinate with managing agents and other partners within shared premises
- Ensure that all existing and new premises have a robust fire safety strategy, and that premises are specified to the relevant national or sector fire safety standards
- Ensure at least one hard-wired smoke alarm/detector is installed on each storey of the premises
- Ensure all Fire door sets[5] leading to common parts of buildings are minimum FD30S, and for buildings over 11m doors are checked annually
- Ensure that the premises FRA, evacuation strategy and importance of fire doors is communicated to new residents and annually to existing residents

[a] FRA may be needed for properties which have two or more premises that do not have an internal communal area but have the need for external FRA by virtue of the type and nature of the construction

2.2 Best practice and sector standards

BP will:

- Use only Class A1 or A2 materials for external cladding of any new buildings
- Implement appropriate mitigations and fire reduction strategies for any buildings which are identified as having materials that do not meet Class A1 and A2
- Engage with leaseholders to ensure flat front doors that lead onto common parts comply with FD30S
- Fire resistance[6] test evidence will be verified for timber and GRP[7] fire doors or, where possible, will be verified as to notional FD standard[8], UKAS accredited
- Installation, inspection, test and management of fire door self-closing and other devices[9] within common parts
- Fire suppression systems[10] will not be retrofitted for existing premises but will be fitted for any new developments over 11m (and considered for other relevant high-risk MORBs)
- New automatic fire detection[11] (AFD) and alarm systems to be installed in line with the classification system within BS5839-1:2017 (non-domestic) and 6:2019 (domestic) as amended
- Existing residential AFD and alarm systems will be to min Grade D2, Category LD3 and will be upgraded to BS5839 where currently not meeting this standard
- Supported housing accommodation will be to a minimum LD2 but will be upgraded to LD1 for new build or refurbishment, or as identified by RA
- Fire risk appraisals for external wall systems (FRAEWS) to be in accordance with PAS9980
- Complete pre-occupancy surveys for all new developments prior to habitation
- Inspection, test, and maintenance programmes for all fire safety equipment in line with British Standards or manufacturers' guidelines
- Operate a general 'Stay put' evacuation strategy within purpose-built blocks and schemes unless otherwise specified by relevant guidance or within the FRA
- Where there is an existing 'stay put' strategy within purpose-built blocks of flats, together with an installed communal fire alarm, BP will review in consultation with occupants whether they wish the communal alarm to be removed at the next refurbishment opportunity (in line with Building Regulations)

- Complete home visit referrals to local Fire and Rescue Service (FRS) for relevant vulnerable customers, where notified, under the Emergency Evacuation Information Sharing (EEIS) protocol
- Completion of Person Centred FRAs[12] (PCFRA), where required, and Personal Emergency Evacuation Plans (PEEP) for vulnerable[13] customers
- Fire-fighting equipment will not be installed in any common parts where there are no trained persons to use them except for specific use by the FRS and for specialist contractors
- Strict control of powered mobility equipment (PME) within common parts including scooters, wheelchairs, and other mobility aids
- Zero tolerance for storage of any items, electrical appliances, or combustible materials within common parts
- Prohibition of the installation and use of open fires or open flued appliances within BP premises

3 Linked documents

- Health and Safety Policy
- Fire Safety Procedure
- Clear Communal Spaces Policy and Procedure
- Tenant Handbook
- Hoarding Policy

4 Legal and other requirements

4.1 Legal

This policy operates in the context of the following key legislation:

- Health and Safety at Work Act etc. 1974 (HASWA)
- The Regulatory Reform (Fire Safety) Order 2005 (RRFSO)
- Fire Safety Act 2021 (FSA)
- The Building Safety Act 2022 (BSA)
- The Smoke and Carbon Monoxide Alarm (Amendment) Regs 2022 (SCMAR)
- Fire Safety (England) Regulations 2022 (FSER)
- Fire Safety (Residential Evacuation Plans) (England) Regulations 2025
- Landlord and Tenant Act 1985 (LTA)
- Housing Act 2004 (HA)
- Homes (Fitness for Human Habitation) Act 2018 (HFHHA)
- The Management of Health and Safety at Work Regulations 1999 (MHSWR)
- Housing Health and Safety Rating System Regulations 2005 (HHSRS)
- The Furniture and Furnishings (Fire) (Safety) Regulations 1988

- The H&S (Safety Signs and Signals) Regulations 1996
- The Building Regulations 2010 (BR)
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Construction, Design and Management Regulations 2015 (CDM)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Health Act 2006 (No smoking)

4.2 Other

This policy operates in the context of relevant best practice, sector standards and codes of practice, specifically (Issuing organisation in brackets):

- Building Regulations Approved Document B vol.1 Dwellings
- Building Regulations Approved Document B vol.2 Buildings other than Dwellings
- Fire Safety Risk Assessment – Various guides (Home Office)
- Housing – Fire safety Guidance (LACORS)
- Fire safety in purpose-built blocks of flats (LGA)
- HHSRS – Guidance for landlords (MHCLG)
- Fire Safety Specialised Housing Guide (NFCC)
- NFCC guidance documents (all)
- BS8674:2025 Competence of Fire Risk Assessors Code of Practice (BSI)
- BS9792:2025 Fire Risk Assessment Housing Code of Practice (BSI) (as amended)
- PAS9980:2022 Fire risk appraisal of external wall construction and cladding of existing blocks of flats. Code of practice (BSI)
- Building Safety Programme (MHCLG)
- British Standards (BS) for relevant fire safety equipment (BSI)

5 Scope and context

5.1 Persons

This policy applies to all relevant persons including customers, colleagues, contractors, and other persons who may be affected by fire whilst permanently or temporarily occupying, living, or working within any premises which is owned or managed by BP.

5.2 Premises

This policy applies to all BP premises which might be permanently or temporarily occupied by the persons identified at 3.1 for residential, community, administrative or other work purposes. For example:

- Office accommodation

- Domestic premises
- Supported housing schemes*
- Purpose built block of flats*
- Converted town Houses, including Grade I & II
- Houses in multiple occupation (HMO's)
- Commercial premises
- Common parts[14] (internal and external) including storage areas
- New builds and new conversions/major refurbishment**

BP has responsibility for fire safety within the common parts of BP owned residential premises, including structural and external walls, and for all parts of office or other staff accommodation.

*Where the supported schemes or purpose-built blocks are under the control of the 'Building owner' or 'Managing agent' this policy will apply in the context of BP's role as a landlord and registered provider but the building owner or Managing agent will have additional duties as the responsible person in control of the premises.

**Where BP premises are under the control of a Principal Contractor (PC) under the Construction Design and Management (CDM) Regulations 2015 this policy will apply in the context of the BP 'Client' role but the PC will have additional duties as the responsible person in control of the 'construction site' (please refer to the BP CDM and Control of Contractors Policy and Procedure).

5.3 Leasehold and shared ownership properties (domestic)

BP has no direct responsibility for managing fire safety within domestic leasehold or shared ownership premises. However, BP recognises that holistic building safety is very much dependent on the management of any fire risks within *relevant* domestic leasehold premises[15], such as Multi-Occupancy Residential Buildings[16] (MORBs) or those situated within Higher Risk Buildings[17] (HRBs) which are managed by others. BP will take a risk-based approach to managing this in liaison with managing agents and building owners (freeholders).

5.4 Leasehold properties (commercial)

BP has no direct responsibility for the management of fire risks arising from activities within commercial leasehold premises. However, commercial leaseholders have legal duties as an employer under the HASWA, and the RRFSO. They are responsible for assessing and controlling fire risks and for maintaining any relevant fire safety equipment within their premises.

BP takes a risk-based approach and recognises that holistic building safety is very much dependent on the safe maintenance of all fire safety related equipment within commercial leasehold premises that are structurally linked to other BP domestic premises. As such BP will coordinate annually with commercial leaseholders to ensure that FRAs are completed, and any fire equipment checks have been completed.

5.5 Partnerships and other contractual arrangements

For the purposes of property management, BP has a number of contractual partnership arrangements with managing agents and service providers, both within BP owned property and within third party owned premises. BP also partners and contracts out its construction and maintenance activities. As such, BP will cooperate and coordinate with all contractual partners to ensure clarity of fire safety responsibilities within any contract and/or service level agreement, and that fire safety risks are adequately assessed, controlled, and informed.

5.6 Context

This policy is applicable to BP, including any associated subsidiaries or incorporations, in the context of ensuring all fire safety risks are addressed, precautionary measures are taken, and that all occupants are provided with adequate fire emergency information.

This policy sits within the context of the Corporate, Asset Management and Property Safety Strategies to provide ‘Safe homes’ for our customers.

6 Roles and responsibilities

6.1 Board and Executive Team

The Board and Executive team shall be accountable for:

- Planning and setting the strategic direction for all aspects of fire legislative and best practice compliance
- Overseeing adequate resourcing and advice for the implementation of a robust fire safety management system
- Overseeing fire safety performance proactively and reactively including appropriate KPIs and periodic audits
- Ensuring fire and other H&S safety implications are considered in all Board and Executive decision making
- Periodically examining the effectiveness and continuous improvement for the key objectives of this policy.

6.2 Chief Executive

Has overall strategic accountability for this policy and associated procedures and, as the nominated ‘Responsible’ (RRFSO) and ‘Accountable’ (BSA) duty holder, is accountable for:

- Leading the strategic direction for all aspects of fire and H&S legislative and best practice compliance
- Providing sufficient resources to meet the requirements of this policy and associated procedures
- Ensuring that the Fire Safety Policy delivers BP’s strategic objectives and reflects BP values

- Responding timely and appropriately to any regulatory interventions in relation to fire safety
- Appointing a 'Responsible Person' (RP) to lead on building fire safety, using appropriate technical advice where required
- Providing assurance to Board on BP's fire safety management framework.

6.3 Homes Director (Policy Owner)

Accountable for:

- Managing all aspects of fire safety compliance for BP premises including existing homes, new homes, and development sites
- Ensuring this policy and associated procedures are maintained in date and regularly reviewed
- Delivery of the principles and key objectives of this policy through appropriate team plans
- Sponsoring audits of this policy and procedure to monitor the effectiveness within agreed timescales
- Ensuring adequate oversight and scrutiny of measured performance in line with key commitments.

6.4 Head of Safety Assurance

Accountable to the Policy Owner and responsible for:

- Keeping the Board and Executive appraised of any legislative changes for fire and any required changes to strategy, policy, or procedure
- Oversight of the implementation of this policy and its aims, section 1
- Ensuring all legal and other compliance requirements are met, section 2 and 4
- Provide adequate and competent advice and support to the business to assist them in meeting their roles and responsibilities, section 6
- Performance monitoring and assurance reporting in line with section 8
- Developing a rigorous approach to Quality Assurance (QA) of fire safety processes and the identification of potential service improvement opportunities
- Investigation of serious fire safety incidents or near misses, including written investigation reports to senior management with recommendations for improvements

6.5 Head of Property and Compliance

Accountable for:

- Identifying required resources necessary to implement a proactive fire safety investment strategy
- Ensuring accurate collation and management of asset component data through Stock Condition Surveys to adequately inform fire safety compliance programmes

- Ensuring sufficient planning and investment for the delivery of the FRA and FRAEWS programme and completion of resulting remedial works
- Ensuring sufficient planning and investment for existing BP assets to maintain fire safety compliance programmes including the inspection, test, and maintenance of all fire safety equipment
- Ensuring that fire safety arrangements for planned refurbishment work is properly planned, organised, controlled, monitored, and reviewed in coordination with contractors throughout the project
- Ensuring robust procurement processes for all fire safety contracted works and any other construction work[18] which may have an impact on fire safety, to include the use of subject matter experts (internal or external) to advise and verify required competence and technical standards

6.6 Property Compliance Manager

Responsible for:

- Ensuring robust systems and controls are in place to deliver a compliant fire risk assessment and remedial works programme including quality assurance, specification, and allocation of actions to both contractors and colleagues, ensuring their completion
- Management of the inspection, test and maintenance programmes for all fire safety equipment, components, and systems in line with the relevant standards
- The management of relevant aspects of contractor delivery and performance in relation to fire safety compliance programmes
- Establishing, implementing, and maintaining a robust process for the communication and provision of fire safety information and outcomes of FRAs to customers annually

6.7 Responsive Maintenance Manager

Responsible for:

- Communication of all relevant aspects of BP Fire safety policies and procedures to Repairs team colleagues
- Ensuring adequate levels of fire awareness training to Repairs team colleagues including any requirements for compliance to HHSRS and other relevant aspects of fire legal compliance and best practice standards
- Ensuring only competent and BAFE registered contractors are used for fire repair work
- Ensuring all fire safety work is planned, organised, controlled, monitored, and reviewed (in line with CDM)
- Prioritisation of any response repair requests for fire safety components
- Ensuring that void and response repair work does not impact on any existing fire compartmentation or, where it does, to ensure adequate fire stopping is used

- Liaison with insurers where required for the completion of fire repair works
- Forward all relevant Fire certification (e.g. doors) to the Compliance Team

6.8 Asset Manager

Responsible for:

- Ensuring accurate collation and management of asset component data to adequately inform fire safety compliance programmes
- Escalation of any identified high-risk actions resulting from compliance programmes and wider property data
- Replacement of fire safety whole components within cyclical and planned programmes (e.g. fire doors) as informed by the stock condition surveys and fire risk assessments
- Compliance with aspects of fire safety and contractor management relating to planned, Cyclical Programme and Major works under the CDM Regulations including the need to ensure there is a fire strategy e.g. access/egress for residents/visitors
- Ensuring the continued safety and integrity of existing fire compartmentation and fire emergency arrangements for customers and contractors during planned works and major projects
- Ensuring appropriate use of fire-resistant materials in all planned and project works – class 0 where required
- Ensure appropriate RAMS are in place for use of any heat applications in the carrying out of planned or cyclical works e.g. hot works, welding, etc.

6.9 Contract Managers (Surveyors and Project Managers)

For the purposes of this policy Contract Managers refers to any BP colleague who contracts physical works within any BP property e.g. surveyors and project managers. Where relevant, Contract managers will be responsible for:

- Consulting with the relevant ‘competent persons’ in relation to the fire strategy for relevant projects and designs
- Ensuring robust and adequate checks on the competency of contractors and sub-contractors, including relevant knowledge and experience of sector fire safety
- Ensuring the project specification includes relevant standards for fire safety, including for example, passive fire protection, hot works safety, and where intrusive works are being undertaken, adequate provisions to ensure fire stopping is completed to the relevant standards
- Seeking specialist fire technical advice where there is any likelihood or potential for interference or impact on any fire safety equipment or provisions, or any increased risk from the undertakings
- Compliance with all relevant aspects of the Building Regulations, approved doc B
- Maintaining adequate exchange of information with contractors and the ‘golden thread’ of building safety data in relation to fire provisions

6.10 Head of Development

Accountable for:

- Establishing, implementing, and maintaining a robust process for the design and management of all aspects of fire and building safety within new build projects, including the effective planning, organisation, control, monitoring, and review of the preventive and protective measures
- Establishing, implementing, and maintaining a robust process for the management of fire safety within the context of CDM[19] and contractor management for new build projects
- Ensuring competent fire technical advice and competencies in relation to defined CDM and BSA roles
- Establishing, implementing, and maintaining a 'Golden thread' of building safety information in relation to all fire safety aspects for new build premises
- Ensuring all relevant registrations, certificates and safety case reports are completed and submitted for relevant buildings, prior to occupation

6.11 Development Manager

Responsible for:

- Pre-contract technical review – consult with colleagues to ensure all aspects of the fire safety within design specifications meets with the Employers Requirements and all comments are reviewed and signed off prior to Exchange of contracts
- Commissioning of independent fire strategy review by competent advisors (pre and post contract)
- Ensuring the build meets the fire strategy requirements through Clerk of Works and Employers Agent site inspections
- Completion of pre-occupancy survey/FRA prior to handover (from 8 weeks prior to property completion) with close out of remedial works by the Contractor
- Ensuring all fire safety documentation (required by BR, Reg. 38) is in place prior to property completion

6.12 Customer Services Director

Accountable for:

- Establishing, implementing, and maintaining a robust process for the management and prevention of fire safety within common parts of BP premises and the FRA (refer to Communal Spaces Policy)
- Establishing, implementing, and maintaining a robust process for the engagement of residents in all aspects of fire safety
- Establishing, implementing, and maintaining a robust process for the communication and provision of fire safety information to customers at sign up and within the tenant handbook

- Establishing, implementing, and maintaining appropriate emergency procedures within supported schemes and general needs for identified vulnerable persons
- Establishing, implementing, and maintaining a clear matrix of fire responsibilities for commercial units and managing agents (whether BP owned or leased premises)

6.13 Head of Housing

- Ensuring all Housing colleagues are aware of BP fire safety and Communal spaces policies and protocols
- Ensure Housing colleagues attend fire awareness training to including any requirements for estate inspections, HHSRS, emergency fire procedures and other relevant aspects of fire legal compliance
- Maintaining a strict Clear Communal Space policy and application of Tort notices in accordance with agreed process
- Maintaining regular estate preventative safety inspections to identify potential fire risks in accordance with agreed policy
- Responding promptly to requests for management actions resulting from the FRA process and reporting completed actions to the Compliance Team
- Referral of customer fire safety concerns to relevant internal departments and follow up on addressing action
- Completing PCFRA and PEEPs for vulnerable customers in over 11m buildings with simultaneous evacuation, where identified
- Ensuring a robust EEIS process is in place with the Fire and Rescue Service (FRS), including sharing relevant risk and evacuation information for vulnerable general needs customers and completing an agency referral where appropriate (e.g. for a Home Fire Safety Visit), with records retained on the customer file.
- Referral of vulnerable customers to FRS where a home fire safety visit may be required, logging of any requirements on the Housing Management System and ensuring other BP Teams are made aware of increased risks where relevant
- Taking appropriate action to support the compliance team for the No access and other legal processes
- Maintaining robust resident engagement in liaison with other BP teams on all aspects of building safety and responding promptly and formally to any concerns
- Reporting of any known fire incidents, risks, or non-compliance in accordance with agreed policy

6.14 Specialist Housing Manager

Responsible for:

- Ensuring adequate levels of fire awareness training to Rackfield colleagues including any requirements for safety inspections, HHSRS, emergency fire procedures and other relevant aspects of fire legal compliance

- Communication of all aspects of BP fire safety policies and protocols to Rackfield colleagues and Managing Agents
- Responding promptly and formally to any concerns raised by residents within managed Supported Housing Services
- Oversight of regular preventative fire safety inspections and repairs in accordance with agreed policy, contract, or service level agreement
- Oversight of regular preventative fire safety procedures and testing regimes in accordance with agreed policy, contract, or service level agreement
- Responding promptly to requests for management actions resulting from the FRA process and, where required, engaging with managing agents to ensure FRA actions are completed
- Communication of BP fire emergency arrangements to staff and customers during the sign-up process
- Ensuring there is a process for PCFRAs and PEEPS for vulnerable customers within supported accommodation, where required
- Providing appropriate EEIS through FRS agency referral for customers where a relevant vulnerability or other risk issue has been identified
- Reporting of any known fire incidents, risks, or non-compliance in accordance with agreed policy

6.15 Head of Customer Experience

Responsible for:

Ensuring colleagues log contact, incidents, feedback, complaints and concerns reported by customers in relation to fire safety and respond appropriately

- Coordinating the internal response to customer-reported fire safety issues by ensuring concerns are passed to the appropriate team for review and action, progress is followed up where required, and customers receive a clear response or update in line with agreed processes.
- Engaging with customers to ensure they are fully aware of fire safety hazards, prevention, and emergency response procedures during the sign-up process with ongoing communication

6.16 People Director

As Executive Lead for H&S Assurance is responsible for:

- Providing assurance to the Board and Executive that a robust fire safety management framework is in place, is effective and meets all statutory and best practice requirements
- Maintaining oversight of the delivery of the fire safety aspects of the HSMS action plan.

6.17 HR Manager

Responsible for:

- Engaging with relevant business leads to ensure fire safety competency needs are identified
- Ensuring that competency levels are met and that adequate records are held to verify competency levels
- Ensuring that appointed training provision is competent, and that feedback is assessed and used to determine future needs

6.18 Facilities Manager

Responsible for fire safety within head office accommodation including:

- Completing a fire risk assessment for BP's area of responsibility at Eden House
- Ensuring any remedial actions identified within the office fire risk assessment are completed in a timely manner
- Maintaining fire-fighting equipment checks on annual basis
- Ensuring that appropriate fire notices are in place, in the correct place and up to date
- Monitoring the completion of six-monthly fire drills and evaluate evacuation performance (organised by landlord)
- Monitoring contractors sign in procedures and ensure they have received the correct fire safety information
- Managing any onsite hot works through RAMS or permits
- Monitoring any contractor activity in relation to passive fire protection on site
- Ensuring regular monthly office fire inspections are conducted and recorded to monitor fire precautions
- Ensuring suitable emergency procedures and controls are in place at Brighter Places office facilities and that regular testing and maintenance of emergency processes and equipment is undertaken
- Appointing and training adequate numbers of Fire Marshals for all office sites depending on size and layout
- Ensuring PEEPs are in place for any staff or visitors, where vulnerabilities are identified
- Maintaining records for all fire incidents and false alarm activations

6.19 Governance & Risk Manager

Accountable for:

- Ensuring internal audit programmes are in place to monitor the effectiveness and compliance to this policy

6.20 Colleagues

In relation to fire safety, responsible for:

- Taking reasonable care for their own safety and that of other relevant persons who may be affected by their acts or omissions at work
- Not interfering with, misusing, removing, or disabling any equipment, devices or provisions that is provided for the purposes of fire safety
- Co-operating with BP management, as far as is necessary, to enable legal fire safety duties and requirements to be complied with
- Informing line management or the Head of Safety Assurance of any situations or shortcomings which may constitute a fire hazard or risk
- Attend and comply with any identified training or instruction in fire safety and emergency arrangements

7 Training and competency requirements

Competencies, training, and awareness requirements associated with Fire Safety, as identified within the following subsections, will be identified within the BP Training Matrix and annual training budget. Competency levels will apply to both BP colleagues and, where relevant, any fire safety responsibilities delegated to contractors or consultants, as per specifications.

7.1 Responsible Persons training (level 3)

7.1.1 Accountable (Responsible) Persons

The Accountable (Responsible) Persons, identified at section 6, should attend an appropriate and accredited strategic level training course to allow them to understand their obligations under fire and building safety legislation. Accrediting bodies include, for example, the IFSM, IFPO, IFE, and FPA[b].

7.1.2 Fire “Competent Persons”

Fire “competent persons” and those responsible for providing relevant legislative and technical guidance to BP should, as a minimum, have appropriate sector experience, knowledge and an appropriate Level 3 NQF qualification, for example, the NEBOSH Fire Safety Certificate, or appropriate technical qualifications accredited by the FIA/IFE and hold professional membership of an accredited body (e.g. IFPO, IFSM or IFE).

7.1.3 Fire Safety Management

Persons responsible for the delivery of programmes for fire risk assessments and/or fire safety property surveys or inspections should attend an appropriate and accredited Fire Safety Management training course to allow them to understand fire legislation, fire hazards and fire preventative controls within the social housing sector. For example, FPA, HQN, Fire Service College, or other equivalent training.

[b] Institute of Fire Safety Managers, Institute of Fire Protection Officers, Institute of Fire Engineers, Fire Protection Association.

7.1.4 Fire Risk Assessor(s)

Fire Risk Assessors should, as a minimum, comply with the requirements of BS8674 Framework for competence of individual fire risk assessors – Code of Practice, and be registered with a relevant professional body e.g.:

- National Fire Risk Assessors Register (NFRAR)
- Institution of Fire Engineers (IFE)
- Institute of Fire Prevention Officers (IFPO)

7.2 Task based fire training (level 2)

7.2.1 Fire Marshalls/Wardens

Fire marshals/wardens will be issued appropriate training by e-learning to understand their duties for assisting with prevention and evacuation of premises. In addition, training will be provided on the use of fire extinguishers where relevant.

7.2.2 Property inspectors, Surveyors, Contractors, SHOs

Colleagues and contractors involved in the inspection, repair, and maintenance of BP properties or who have influence on the planning, inspection or practical delivery of fire safety works should attend appropriate training courses. For example, the following CITB, BWF[20] or BM Trada[21] accredited training (in accordance with ISO standards) or other appropriate training:

- Timber door assemblies (BS 8214)
- Fire door maintenance and installation
- Fire Door Auditor
- Fire stopping standards & installation
- Passive fire protection
- When required, individual product(s) training

7.2.3 Housing and Supported Housing Officers

Colleagues involved in supporting customers with vulnerabilities (both general needs and supported schemes) should attend PCFRA and PEEPs training to complete the relevant forms and EEIS referral to the Avon Fire & Rescue Service for a Home Fire Safety Visit.

7.3 General Fire Safety Awareness (level 1)

New starters must receive local fire instruction on Day 1 of employment as part of their induction process.

Colleagues will receive relevant e-learning or instruction in fire safety awareness and will cover general fire hazards, fire prevention and emergency escape procedures, and any other training and instruction to fulfil their duties within this Fire Safety Policy.

7.4 Refresher training

All fire safety training will need to be refreshed according to any relevant certificate expiry date or as determined necessary for in-house training, within 1 to 3 years depending on role and risk level, refer to Training Matrix.

7.5 Training records

Records must be kept of all training and awareness delivered in line with this policy and the H&S Training Procedure. Copies of certificates for externally provided training must be forwarded to HR for recordkeeping and expiry tracking. Any other team-based instruction or training for fire safety should be recorded as an attendance sign in sheet and forwarded to HR.

8 Delivery, monitoring, and review

8.1 Delivery

All aspects of this policy including the delivery of key commitments and objectives (Section 2) and responsibilities (Section 6) will be implemented through the associated H&S Management System Procedure. This will be used as the framework for reporting and providing assurance to Board that the delivery of objectives and legal compliance is being met.

8.2 Change management

Changes relevant to this policy include new legislation or sector best practice, lessons learned from incident investigations, changes to responsibilities, equipment, technology, systems, or processes. Any business decisions that result in the introduction of new systems or processes will need to be fully assessed for H&S impacts to all stakeholders. Including the documenting of any records or information relating to H&S or other compliance requirements.

Any changes that may affect the delivery of the key objectives (section 4) of this policy and associated Fire Safety procedure must be agreed by the Executive prior to implementation. Any changes which affect the operational processes or procedures must be agreed by the Policy Owner prior to implementation.

Relevant changes must be recorded within the Document Control section with version control and change references.

8.3 Monitoring and review

This policy will be subject to robust performance monitoring and management review processes including its suitability, adequacy, and effectiveness, as detailed within the associated Fire Safety Procedure. These will be overseen in line with the Three Lines of Defence (3LoD) assurance model through:

- Performance meetings – monthly KPIs and compliance performance

- Executive team – regular reviews of Operational and Strategic Risk Registers
- H&S Steering Group – quarterly monitoring of action plans, policies, risks, and training
- Audit & Risk Committee – quarterly review of Strategic Risk Register
- Homes & Treasury Committee – quarterly property safety assurance report
- People and Governance Committee – quarterly HSMS assurance report
- Board – quarterly KPIs and annual assurance report

Performance monitoring will include:

- Measurement of success – key performance indicators
- Data, documents, and recordkeeping – quality assurance checks for the storage, validation, reconciliation, and service records
- Internal and external audits – periodic oversight of effectiveness and compliance
- Improvement – reviews of incident recording and investigation, non-conformity, and corrective actions
- Management reviews – as above

This policy and associated procedure will be subject to a minimum three yearly H&S management system audit and review.

9 Data protection

Any personal data created or used in the application of this Policy must be done so in line with the BP Data Protection policy and employee privacy notice.

10 Equity, diversity and inclusion

This policy and procedure support BP's commitment to equality, diversity, inclusion and safety of all customers, colleagues, contractors, and members of the public. Refer to the Fire Safety Procedure for specific sections relating to vulnerable persons. The policy and procedures apply to the health, safety, wellbeing, and protection of all.

Where required, reasonable adjustments will be considered to support colleagues to engage with this Policy. Please speak to Human Resources for assistance.

11 Definitions and glossary

[1] Golden thread – a level of detailed standards, structural and safety information that is held and passed from responsible persons through the design, construction, occupation and management phases to inform the risk assessment of a HRB and MORB building.

[2] PEEP – Personal Emergency Evacuation Plan is a specific procedure that is developed for people with vulnerabilities who may not be able to follow normal evacuation procedures and to allow them to remain safe in the event of a fire

[3] Competent – for the purposes of fire safety this will depending on the required area of expertise but will be defined within NFCC guidance as those person registered to any relevant technical or professional body relating to fire engineering, assessor, management or industry standards.

[4] Contractors – includes all contracted workers engaged by BP through partnering organisations such as construction, repairs and maintenance workers, agency workers, managing agents support workers and building managing agents

[5] Fire door set - A complete door assembly consisting of the door frame, door leaf or leaves, essential hardware and any integral side panel or fanlight (but excluding coupled assembly, a door set and window that are supplied as separate self-contained frames and fixed together on site)

[6] Fire resistance - The ability of a component of a building to resist fire spread for a stated period of time in accordance with defined standards e.g. FD30 fire door.

[7] GRP – Glass Reinforced Plastic, a type of composite door

[8]Notional fire doors – as per Government Guidance Note (Ref doc. 869532) and Annex A (Ref doc. 859279)

[9] Self-closing devices – a device that closes a door, when open at any angle, against a door frame.

[10] Fire suppression systems - used to extinguish, contain, or prevent fires from spreading or occurring, for example, water sprinklers or misting systems.

[11] AFD - Automatic fire detection, typically a smoke or heat detector, usually linked to an audible alarm system.

[12] Person centred FRA (PCFRA) – refer to the NFCC Fire Safety in Specialised Housing guidance and checklist

[13] Vulnerable person – “a person who is or maybe in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself from harm or exploitation” (DoH Safeguarding definition)

[14] Common parts (often referred to as communal areas) – shared parts of a premises where there are two or more dwellings which may include grounds, paths, stairs, corridors, entrances, bin stores, storage areas, laundry areas, balconies, communal lounges, communal kitchens, community spaces, integral parking areas.

[15] *Relevant* leasehold premises – refers to any domestic and/or commercial property which forms part of the construction of a larger block of tenanted properties e.g., commercial shop units or leasehold flats, which may impact on the overall safety the block due to its occupational activity or due to failure to manage property safety risks adequately.

[16] MORB - Multi-Occupancy Residential Buildings, for the purpose of this policy (not yet defined in law), includes any premises with two or more dwellings that exceeds 11m, for example, general needs blocks or independent living schemes.

[17] HRB – Higher Risk Buildings are prescribed as one in which the floor surface of the building's top storey is at least 18 metres in height or has at least 7 storeys, and contains at least 2 residential units

[18] Construction work – as defined within the Construction Design and Management Regulations 2015 including:

a) the construction, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration or other maintenance (including cleaning which involves the use of water or an abrasive at high pressure, or the use of corrosive or toxic substances), de-commissioning, demolition or dismantling of a structure;
b) the preparation for an intended structure, including site clearance, exploration, investigation (but not site survey) and excavation (but not pre-construction archaeological investigations), and the clearance or preparation of the site or structure for use or occupation at its conclusion;
c) the assembly on site of prefabricated elements to form a structure or the disassembly on site of the prefabricated elements which, immediately before such disassembly, formed a structure;
d) the removal of a structure, or of any product or waste resulting from demolition or dismantling of a structure, or from disassembly of prefabricated elements which immediately before such disassembly formed such a structure;
e) the installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure

[19] CDM – Construction Design and Management Regulations 2015 in relation to all "construction work" (as per note 18)

[20] BWF - British Woodworking Foundation

[21] BM Trada - Timber Research and Development Association UKAS accredited and ISO certified