

Bromford Flagship

Fire Safety Policy

Policy Statement & Purpose

The purpose of this policy is to demonstrate Bromford Flagship's commitment to ensuring the fire risk to people, buildings and the wider business are reduced as far as reasonably practicable while ensuring that all legislative requirements are met.

Our policies are supported by other documents including detailed procedures and processes to ensure that the policies are fully embedded into routine working practice.

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1. Scope

This Policy covers Bromford Flagship Limited (BFL) and its subsidiaries [excluding Gasway]. It details how BFL meets the requirements of the Regulatory Reform (Fire Safety) Order 2005 (FSO). The policy provides assurance to BFL that measures are in place to identify, manage and/or mitigate risks associated with fire. As part of the policy BFL will ensure compliance with any additional fire safety legislation and formally report at Executive and *Board level the details of material concerns and overdue actions relating to fire safety compliance and planned corrective actions.

The policy is relevant to all BFL colleagues, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services including subsidiary companies (excluding gasway). It should be used by all to ensure they understand the obligations placed upon BFL to maintain a safe environment for customers, contractors, and colleagues within the home of each customer and within all communal areas of buildings.

BFL will follow a systematic approach to the management of fire safety to ensure it meets the requirements set out in the Regulatory Reform (Fire Safety) Order 2005 and all other applicable fire safety legislation. This is to ensure the safety of customers, leaseholders, colleagues, and members of the public.

This policy applies to all BFL offices and buildings under its control or occupation and where Bromford Flagship is deemed as either the 'responsible' or 'accountable' person. It also applies to any of our blocks and schemes where the building is under our management. Where the

**References to "the Board" in this document and our governance arrangements mean the coterminous Board acting as the Boards of Bromford Flagship Limited (BFL), Bromford Housing Association Limited (BHA), Flagship Housing Limited (FHL), Merlin Housing Society Limited (MHS) and Bromford Home Ownership Limited (BHO).*

building is controlled or managed by a third party the responsibility for fire safety in their designated areas lie with the management company or commercial customer unless this is otherwise stated in the management contract. BFL will write to remind Management companies they should properly comply with its H&S obligations such as carrying out FRAs (Fire Risk Assessment) and follow up actions.

BFL will co-operate and coordinate fully with all responsible parties, informing them of any significant risks that have been identified as part of a FRA (Fire Risk Assessment). BFL will coordinate its resources to ensure its actions and working practises do not place others at risk and will create a co-ordinated emergency plan that operates effectively.

2. Legislative Requirements

The application of this policy will ensure compliance with the Safety and Quality Standard (consumer standards) April 2024.

Fire Safety is reported to the regulator via Customer Satisfaction measure (TSM) BS02 Fire Safety Checks.

2.1 Legislation

- The principal legislation applicable to this policy is the Regulatory Reform (Fire Safety) Order 2005

The policy operates in the context of the following legislation:

- Building Regulations 2010
- Housing Act 2004
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022 Building Safety Act 2022
- The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- Approved Document B (Fire Safety) Volume 1: Dwellings (2019 edition) and Volume 2: Buildings other than Dwellings (2019 edition)
- The Furniture and Furnishings (Fire Safety) Regulations 1988
- Fire & Rescue Services Act 2004
- The Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Electrical Equipment (Safety) Regulations 2016
- Gas Safety (Installation and Use) (Amendment) Regulations 2018
- The Construction, Design and Management Regulations 2015
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Other Building/Fire Safety legislation <https://www.gov.uk/guidance/the-building-safety-act-secondary-legislation>

2.2 Codes of Practice

- BS 5839-1:2017 Fire detection and fire alarm systems for buildings
 - BS 5839-6:2019-A1:2020 as above but for domestic premises
 - LACORS (Local Authority Coordinators of Regulatory Services) - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing
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- HHSRS (Housing Health and Safety Rating System) Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9
- National Fire Chiefs Council (NFCC) - Fire Safety in Specialised Housing
- DCLG (Department for Communities and Local Government) Fire safety in purpose-built blocks of flats
- Home Office: A guide to making your small block of flats safe from fire

BFL also acknowledges its obligations under the Health and Safety at Work Act (HASAWA) 1974 and Landlord Customer Act 1985.

It is essential to ensure that customers, residents, colleagues and visitors remain safe in Flagship’s premises (both individual homes and offices). Failure to properly discharge our statutory, legislative and regulatory responsibilities may also result in:

- Prosecution by the Fire and Rescue Service under the Regulatory Fire Safety Order 2005.
- Prosecution by the Building Safety Regulator (in the HSE) under the Building Safety Act and secondary legislation.
- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.

RSH scrutiny and potential determination of a breach of the Safety and Quality Standard and serious detriment having been caused/potentially caused.

- Reputational damage
- Loss of confidence by stakeholders in the organisation

3. Responsibilities/Duty holder

Role	Responsibilities	Frequency
Board	<p>They act as Duty Holders and are accountable for ensuring the implementation of this Policy</p> <p>They are the responsible legal entity and must oversee the discharge of the required standards to ensure the safety of customers, colleagues, contractors, and any other parties and that the wider general public has not been compromised</p> <p>Ensure Bromford Flagship complies with legislation with effective controls in place to maintain fire safety compliance</p> <p>Review management reports and scrutinise areas of non-compliance and ensuring necessary action is taken to remediate where required</p> <p>Ensure appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, including the RSH, informed of the regulatory Landlord Compliance position</p>	6 Monthly/ Annually
Chief Officers	<p>Retain the overall responsibility for the monitoring of the consistent implementation of this Policy</p> <p>Through the implementation of the Policy to effectively comply with the regulatory standards</p> <p>If the regulatory standards are not maintained to report any breach in standards to the Regulator of Social Housing</p>	Ongoing
Audit and Risk Committee	<p>Reviewing Compliance reports and control frameworks and make recommendations to Board.</p> <p>Providing assurance to Board on compliance with law</p>	Quarterly

	<p>Will receive Quarterly KPI reports and commentary on Compliance Performance</p> <p>Will receive Internal Audit reports and monitor the delivery of managers' actions arising through to successful completion.</p>	
<p>Fire Safety Group/ FBSG / asset management committee</p>	<p>Ensure ongoing compliance with all relevant Fire Safety legislation</p> <p>Will produce, review, and update the Policy at the appropriate review dates</p> <p>Keep under review the effective management of Fire Safety across Flagship Housing Group with the objective of promoting Fire Safety at all times</p> <p>Ensure that the Fire Safety Policy is effectively communicated to all colleagues in the business</p> <p>Implement an appropriate Fire Safety Management System that is compliant with the required Health and Safety standards</p> <p>Encourage a positive Fire Safety culture, leading by example and taking visible actions</p> <p>Monitor Fire Safety performance on a Quarterly basis</p> <p>Carry out an Annual Review of the Fire Safety Management System</p> <p>Ensure a Fire Safety Review of new acquisitions/new ventures is carried out</p> <p>Ensure that the Fire Safety Programme is adequately resourced</p> <p>Implement the Independent Review of Building Regulations (Fire Safety) Recommendations</p> <p>The remit (Terms of Reference) of the Fire Safety Group can be found in Appendix 1</p>	<p>Monthly</p>
<p>Senior leaders</p>	<p>Agree and set budgets that are sufficient to meet the compliance requirements</p> <p>They shall appoint /nominate sufficient resources to fulfil the Responsible Person(s) roles for all Fire Safety requirements and use this Management Plan to define their duties</p> <p>Delegate appropriate authority for in- house delivery or procurement to meet the requirements</p> <p>Ensure that the conditions of all contracts are being fulfilled either by Internal Service Provider/s and/or external Contractors</p> <p>Will oversee the programme of Policy and Strategic Review</p>	<p>Ongoing</p>
<p>Head of Landlord Compliance / Fire Safety Business Lead</p>	<p>Will manage the strategic implementation of this Management Plan and Policy and ensure compliance with all regulations</p> <p>Will formulate Programmes of Work consistent with the delivery of this Management Plan and Policy</p> <p>Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or external) to address any delivery shortfalls</p> <p>Will provide an effective Performance Management Framework that will strengthen risk control and provide greater levels of assurance</p> <p>Will implement Data Governance Protocols</p>	<p>Ongoing</p>

	<p>Will manage the availability of accurate Stock Data and Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts</p> <p>Will receive audit feedback and act upon the findings</p>	
Fire Safety Business lead	<p>Perform Building Safety Manager role for high rise blocks</p> <p>Create and deliver Resident Engagement Strategies for high rise blocks</p> <p>Monitor any risk occurrences at high rise blocks and trigger Mandatory Reporting Process if required</p> <p>Create Safety Case report and ensure controls are effective at reducing risk of harm from fires or structural collapse</p>	Ongoing
Asset and Building Safety Manager/ Fire Safety Manager	<p>Will instruct/liaise with internal operational managers and external Contractors in respect to the operational delivery of this Management Plan</p> <p>Will liaise with Neighbourhood Management Team (NMT) and customers to explain the importance of Landlord Compliance and the need to achieve access to complete Safety Checks and Works</p> <p>Managing customer feedback (enquiries, complaints, and compliments) handling and progress</p> <p>Liaise with IT and ensure Data is updated accurately and in time</p> <p>Liaise with IT and ensure system(s) and interfaces operate effectively and Inform of any performance issues</p> <p>Monitor the quality and correct storage of all Certification and documents required to demonstrate Landlord Compliance</p> <p>Will oversee the preparation of the KPI/MPI and OPI reporting suite</p>	Ongoing
Specialist Assessors or Contractors	<p>Operational delivery of a Three-Year Programme of FRAs and Re-Assessments within Properties falling within the remit of the Regulatory Reform (Fire Safety) Order 2005 (RRFSO)</p> <p>Implementation of Remedial Works arising from the FRAs and Re-Assessments</p> <p>Development of Fire Safety Cyclical Maintenance Programmes arising from the Risk Assessments and tailored to the needs of each building (Fire Alarms, sprinklers, AOVs, Emergency Lighting etc)</p> <p>Review Property Addresses and reconcile with any Contractor Databases to ensure the Programme remains accurate</p> <p>Liaise with customers in relation to arranging/keeping appointments</p> <p>Liaise with the Compliance Team in relation to access issues</p> <p>Update system(s) with accurate data</p> <p>Provide appropriate, complete, and correct Certification for all Fire Safety Works</p> <p>Provide QA Checks in accordance with the Contract</p>	Ongoing
Colleagues	<p>Carrying out their work in line with this policy and associated procedures and processes</p> <p>Applying Bromford Flagship's DNA in everything they do Reporting non-compliance to line management as soon as possible</p>	Ongoing

	Considering fire safety in all activities and notifying compliance leads of any activity which puts compliance at risk	
Customer	Agreeing to and keeping appointments to provide access Liaising with Flagship Housing Group colleagues in relation to any poor service, failure to attend/poor repair etc	Ongoing
Independent External Auditor	Undertake External Validations of Fire Safety Remedial Works and Cyclical Maintenance in line with the Management Plan	Ongoing

4. Principles

BFL are committed to providing a robust, safe, and cost-effective service to our customers in relation to fire safety. In respect of our responsibilities for fire safety BFL will:

Fire Risk Assessment

- Undertake suitable and sufficient FRAs in accordance with the Regulatory Reform (Fire Safety) Order 2005 (as per the table below), record the significant findings and undertake necessary remedial work within the timescales recommended by the Competent Person who completed the FRA.
- Review FRAs for multi-occupied residential buildings with two or more sets of domestic premises and update the fire risk assessment to include an assessment of the building's structure, external walls, and flat entrance doors and where deemed necessary carry out a Fire Risk Appraisal of External Walls (FRAEW).
- Ensure that each property that includes a communal shared access area or facility and to which the FSO applies, has, as a minimum, a Type 1 fire risk assessment including assessment of the external wall and attachments, but will make best endeavours to carry out a Type 3 fire risk assessment in place which is PAS79 compliant from the British Standards Institute (BSI), or the Home Office - A guide to making your small block of flats safe from fire, and has been undertaken by a competent Fire Risk Assessor.
- BFL aim to train operatives to recognise compartmentation issues within high-risk sites as part of the Void Process,
- Review all FRAs, no matter what the risk category, following any of the events below:
 - a fire, near miss or threat of arson
 - the introduction of new work practices
 - any works affecting the means of escape or alarm systems.
 - structural or material changes to the building or its use, and
 - changes in statute, legislation, or regulation (or significant changes to guidance)
- The above circumstances may prompt a new FRA not just a review. This decision is made by the Compliance Manager (Fire)/Fire Safety Manager. Outside of these circumstances, FRAs will be renewed on or before the date recommended by the Competent Person undertaking the previous assessment. In any event, renewals of FRAs will be undertaken at frequencies not greater than those below:

Risk Profile of the Premises	Example of Property Type	FRA Programme Frequencies
All Stock, All Risks	Fire Risk Assessments to ALL Communal Blocks.	
High Risk Level 1	Fire Risk Assessment to High-Risk locations – premises with vulnerable occupants (e.g., sheltered, and supported housing), HMOs, converted premises, high rise blocks	Annually

	(greater than 6 storeys or over 18 metres), medium rise (5 to 6 storey), assembly buildings, offices etc.	
Medium Risk Level 2	Fire Risk Assessment to High-Risk locations purpose built, no more than 4 storeys above ground level, well managed and checked every week/month by FSO's and neighbourhood officers	Every 2 years with annual review
Low Risk Level 3	Fire Risk Assessment to High-Risk locations purpose built, no more than 3 storeys above ground level and checked by FSO's weekly/monthly	Every 3 years with annual review
Very Low Level 4	purpose built, no more than 2 storeys above ground and checked weekly/monthly by FSO's or Neighbourhood team so constantly checked	Every 4 years with annual review

Fire Risk Appraisal of External Walls

- Undertake a more detailed PAS 9980 Fire Risk Appraisal of the External Wall (FRAEW) where review of the FRA has deemed it necessary. This appraisal will provide recommendations on remedial action considered necessary, with a suitable time frame that takes into account both the nature of the works required for remediation and any recommended interim measures.

Safety Cases

- Ensure a Safety Case regime is in place for our high-rise blocks, supported by the safety management system and mandatory reporting processes

Evacuation

- Ensure each building has an Evacuation Strategy stated clearly in the FRA. Ensure that all buildings managed by BFL have adequate emergency arrangements clearly explained to the customers of each building. The Evacuation Strategy will be agreed with the Competent Person undertaking the FRA, however as a general principle:
- Residential Accommodation (with Common Parts):
- Purpose-Built accommodation will generally have a 'Stay Put' Policy. Occupants have the option to stay in the building provided they feel it is safe to do so. The 'Stay Put' Policy may change based on the instructions of the Fire and Rescue Service during an emergency.
- Converted accommodation will have a 'Simultaneous Evacuation' Policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds.
- Residential buildings which are managed 24 hours or which house vulnerable residents may require bespoke Evacuation Strategies specific to the premises (outlined below in 'Assisted Evacuation').

Commercial Accommodation and Community Premises:

- All premises to have a 'Simultaneous Evacuation' Policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds.
- In the case of Community Centres, hirers responsibilities are set out in the Terms and Conditions of Hire. These require that hirers make themselves familiar with the content of Fire Action signage within the premises, take charge of evacuations and ensure that appropriate help is available to those that require it.

Assisted Evacuation

- General Needs/Market Rented – where practicable, and should assistance be requested, BFL will provide advice and guidance to assist residents in developing their own 'Means of Escape' Plan. This will not involve the assistance of colleagues in the evacuation.
- Student and Specialist Housing (Sheltered Housing Schemes/Extra Care Frail Elderly etc.) – assessment of individuals will be made by appropriate colleagues. This will involve detailed and up-to-date records of occupants and in some buildings will require Personal Emergency Evacuation Plans (PEEPS).

Remedial Works

- Ensure that priorities and completion targets for remedial actions are defined by the Competent Person undertaking the FRA. Any changes will be agreed by the Fire Action Group and will be

subject to the written agreement of the Competent Person who undertook the FRA (Fire Risk Assessor).

Testing and inspection

- Ensure preventative planned maintenance programmes are in place that comply with British Standards and manufacturer's recommendations for all fire detection, prevention and firefighting systems and equipment
- For blocks over 11m or 5 storeys and over, flat entrance doors will be inspected annually and communal fire doors quarterly

Domestic Smoke Detection

- Ensure that all properties owned by BFL (excluding shared ownership and leasehold) will have mains or battery-operated Fire Detection Systems located as a minimum in the escape route on every floor. Upgrading to mains operated systems and across all properties will be part of ongoing Investment Work Programmes.

Responsive and Planned/Upgrade Works

- Ensure that contractors (Internal and External) have a general awareness of Fire Safety and undertake a Risk Assessment considering Fire Safety when undertaking responsive repairs or major works that may have an impact on Fire Safety. Work to be carried out in accordance with the relevant British Standard, approved Code of Practice or associated good practice guidance.

Development and New Homes

- Create an audit trail, ensuring that the management of all stages of design and construction can be tracked through robust control processes. A formalised Fire Risk Management system to define, document, implement and maintain procedures to ensure that an adequate level of fire safety information is developed and retained from land acquisition through to handover and occupation. Leading to a clear traceable pathway of information throughout the design and construction process.
- Involve Fire Safety colleagues in the design phases including consultation and approval of Fire Strategies. Have robust processes to ensure any deviations from the Fire Strategy during the construction phase are highlighted and considered. Involve Fire Safety and M&E colleagues in the commissioning of life safety systems before handover.

Management

- Prohibit the storage of any items in Communal Areas and upon escape routes without BFL's express permission. Maintain a 'No Smoking' Policy in all Communal Areas.
- Implement a risk-based approach to the periodic inspection of Communal Areas and escape routes in line with the Fire Safety Management Plan to enforce the above.
- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).
- Ask residents to alert BFL to the presence of stored oxygen so that it can alert the Fire and Rescue Service to its presence.
- Ask residents to remove any alterations that they have made if the FRA indicates that this is required. BFL will take a reasonable approach according to the risk presented but will take enforcement where required

Data

- Maintain an up-to-date Master Database of all properties where it has a responsibility to provide Fire Risk Assessments (FRAs) and/or maintain Fire Safety Equipment as set out in the scope of this Policy..
- Where required, and in agreement with the Fire and Rescue Service, provide specific site information within a Gerda Box on site (SIB).

5. Linked documentations (including policies, procedures, standards, processes, reconciliation frameworks)

Bromford Flagship Documents	Bromford only	Flagship only
		Fire Safety

		Management Plan
		Landlord Compliance Policy
	Fire Safety Procedure	Fire Safety Operational Guidance Notes
	Fire Risk Assessor Competency Procedure	

6. External References

External references
The Regulatory Reform (Fire Safety) Order 2005
Fire Safety (England) Regulations 2022 - GOV.UK

7. Competence and Training

Ensure anyone undertaking a fire risk assessment has appropriate skills, qualifications and experience appropriate to the complexity of the building they are assessing.

Maintain a Skills/Training Matrix to ensure that all colleagues undertaking key roles within the scope of this Policy have appropriate training

8. Engagement of Contractors

Only engage with companies assessed and registered under BAFE SP205-1 in providing Fire Risk Assessment services. External Fire Risk Assessment providers (whether individuals or companies) should be able to demonstrate reasonable experience of undertaking Fire Risk Assessments in housing stock.

Only engage with contractors assessed as being suitably competent to undertake the work for which they are being considered. Contractors, where possible, should be Third Party accredited to a nationally recognised scheme, such as BAFE SP203 (relevant part) for Fire Alarm contractors, BAFE SP101 for Fire-Fighting Equipment.

Only use CEng registered Fire Engineers to undertake FRAEW or design Fire Strategies.

9. Communication

Communicate with colleagues through training, fire drills, appropriate signage, and the Intranet.

Communicate with residents through appropriate 'Fire Action' signage in conjunction with other forms of communication provided on a regular basis such as website, newsletters, leaflets, and home information packs. Encourage an environment of fire prevention will all building users.

Engage with customers and leaseholders in a participative and empowering manner so that they can contribute to service provision in relation to fire safety, including building specific resident engagement strategies for our high-rise blocks.

Comply fully with Article 22 of the RRFSO and ensure that where BFL are considered jointly responsible for a property or Common Area, it will share its Fire Risk Assessment with other relevant parties and co-operate with them so far as is necessary to ensure the safety of relevant persons.

Commit to working with the Fire & Rescue Service (FRS) to create safer places to live and work supported by a Primary Authority agreement. Provide the FRS with plans and information about

the external wall for all buildings over 18m or 7 storeys and over. Notify the FRS of any life safety equipment that will not be repaired within 24 hours

10. Agreed KPIs

The following KPIs will be reported:

- % of buildings (against the stated Total Landlord Requirement) with a valid FRA renewed within its due date
- Number of Fire Risk Assessments due in 30 days
- Number of Intolerable and Substantial (P1) actions overdue from completed FRAs
- Number of Intolerable and Substantial (P1) actions due in 30 days
- % of buildings (against the stated Total Landlord Requirement) with Fire Safety Systems/Equipment present where all Systems/Equipment has been tested/maintained in accordance with this Policy
- Number of Notices received from the Fire and Rescue Services in the reporting period
- Number of outstanding Notices received by the Fire and Rescue Services.

11. Assurance Framework

Our risk appetite is **averse** for health and safety risks. We have zero tolerance for actions or omissions that could compromise the health and safety of individuals affected by our operations. We are committed to upholding the highest standards of health and safety compliance, proactively identifying and mitigating risks, and fostering a culture of safety throughout the organisation.

Our assurance framework should be read in conjunction with this document to understand how we undertake assurance in line with our risk appetite.

Quality Assurance (QA) activity will be undertaken using our approach of three Lines of Assurance and typically over a three-year cycle. Outcomes of the audit program will be reported via the Flagship Group H&S Committee.

Document Details

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