Fire Safety Policy

1.0 Purpose and Scope

The purpose of this policy is to ensure that all properties within the control and responsibility of Notting Hill Genesis (NHG) have effective systems for fire safety. NHG will use best endeavours to seek assurances on fire safety matters for where we have residents that are under different levels of management regarding ownership where NHG is not directly responsible and in control.

The policy lays out our approach to fire safety and how we will meet our responsibilities and duties as a landlord and employer for life safety.

We are committed to meeting legislative requirements and developing best practice in fire safety management and will ensure that this is fully integrated with our management of activities, facilities and premises.

The policy covers all our employees and contractors undertaking works to the stock, customers and anyone likely to be put at risk from work in these properties.

The policy is fundamental to keeping our residents and employees safe.

2.0 Definitions

Fire Risk Assessment (FRA) – An assessment of the fire risks to occupants of a building, the common parts and other people in the vicinity of the building, to ensure that those people are safe from the risk of fire and its effects. Also, for the purpose of identifying the general fire precautions needed to comply with the requirements imposed by the Regulatory Reform Fire Safety Order.

Simultaneous evacuation – a strategy to deal with circumstances where all parts of a building are evacuated at one time in the event of a fire.

Stay put – a strategy where, other than the property where the fire occurs, or if people are in the communal areas, reliance can be placed on the integrity of the property to contain the fire such that people do not need to evacuate.

Phased evacuation – a strategy where a floor or a number of floors are evacuated at the same time often implemented by the fire and rescue services.

Information on the type of strategy for a building can be found within the FRA.

Higher Risk Buildings (HRB's) – buildings within the scope of the Building Safety Act which are 7 storeys or over 18m in height and have at least 2 residential dwellings.

Building Safety Manager (BSM) – person appointed to manage a HRB's *safety case* and *resident engagement strategy*, liaise with customers and ensure they are appraised of the safety of an HRB that they live in.

3.0 Policy principles

Best Practice

Our aim is for residents to be and feel safe in their homes. Working with relevant stakeholders NHG will ensure we meet all the requirements of the Building Safety Act and Regulatory Reform (Fire Safety) Order 2005 (RRFSO) and all other relevant fire legislation.

We apply the precepts of the PAS 7 fire risk management system to develop a clear, formally documented system to reduce our fire risk.

We undertake work so that we meet requirements from the Building Safety Act 2022 where applicable, including:

- review plans internally at key points in the process.
- follow new build Gateway submissions and approval process for all HRB work.
- updated Duty holder roles, responsibilities and competencies are met across all development projects.
- construction Product Regulations are met across all development projects.
- a Fire Statement is provided through Gateway 1 submissions.
- a Fire & Emergency File is developed through Gateways 2 and 3 submissions.
- clear, documented change control processes are in place at Gateways 2 and 3
- a Mandatory Occurrence Reporting process is in place from Gateway 2 into occupation.
- ensure handover of building regulation 38 documentation
- readily accessible storage of Health and Safety manuals
- detailed asset component information loaded onto asset database.
- commencement of building safety cases.
- the principles of the Golden Thread of building information and data are applied and maintained.

Further information on the requirements set out in the Building Safety Act 2022 are covered in NHG's Building Safety Policy.

We will endeavour to get consistent fire regulatory advice and support with fire safety enforcement activity through local Fire and rescue services through our Primary Authority Partner (FRS we have partnered up with) and where required via third party organisations and consultants.

We work to the PAS 9980:2021 standard which will provide a fire risk appraisal of external wall construction and cladding of existing blocks of flats. This key piece of work will assess the risk to residents from a fire spreading over or within the external walls of a building, and to decide whether remediation or other mitigating measures are needed to address the risk are needed due to the specific circumstances of the building.

All fire safety components for existing buildings and new build developments will comply with the requirements of BS 9991 (Fire safety in the design, management and use of residential buildings) and/or Approved Document B.

Only contractors that are appropriately trained who have industry recognised accreditations are authorised to carry out specialist fire safety works, repairs to or installations of fire doorsets (for example under a relevant UKAS accredited third party certification scheme e.g., BM Trada, Certifire, Firas etc.). New fire doorsets must come with a primary burns test certificate or a field of application which is a manufacturing variation of the former. An installation/repairs certificate is required for every doorset. The signed installation certificates must confirm that each doorset installed complies with guidance e.g., ART (BM Trada's Q-Mark scheme of Accepted Repair Techniques if any).

Fire and Rescue Service and Statutory Body Inspections

Where NHG is made aware of an impending fire and rescue services or statutory body fire inspections we endeavour that these visits are supported by the Rapid Response team (Homes Compliance Fire Team) who will also deal with outputs and notices following the visit if these are issued.

New Properties, Regeneration schemes, Refurbishments

We will utilise competent contractors and consultants at all stages of a project, ensuring that they are brought into the project in a timely manner and are provided with all relevant information. This will include specialist Fire Engineers who ensure appropriate fire safety measures are designed in, and Fire Guardians who monitor the quality of the blocks that we develop. Projects involving HRBs will go through the Gateway process and blocks will only be occupied once the necessary permissions have been received from the Regulator of Building Safety. The required information about all blocks will be passed on to the relevant Fire & Rescue Service (FRS) in an agreed format.

Fire Risk Assessments (FRAs)

We conduct FRAs in our offices and buildings where we have ownership or control. Where we will have entered into agreements with third parties which transfer responsibility for conducting FRAs to them, we will take appropriate steps to gain assurance that they are undertaking this work and have completed remedial actions. We will request copies of the FRAs.

We generally undertake a Type 1 FRA (assessing the common parts of a building but not individual dwellings), extending it to confirm (on a sample basis) that there are appropriate hard-wired smoke and heat detectors in place and working, and that the flat front door meets the current legislation (i.e. has a self-closer, strips and seals, a letter plate cover) and request assessors' access to loft space.

In understanding the safety of blocks where we have insufficient documentation to demonstrate other materials used for the insulation and facing, or the compartmentation, we will use Level 4 FRA's (most comprehensive assessment) in conjunction with other investigatory techniques.

The retesting cycle will follow the timescales listed below in terms of levels for property classification which indicate the years for when a new FRA will be undertaken (where we have stock that apply to the property type):

Property Designation	No. of Storeys	No of Flats	Property Type	Property Classification
General Needs (5 Storeys and under)	1 to 2	1 to 10	Converted	Level 3
General Needs (5 Storeys and under)	1 to 2	11 and over	Converted	Level 2
General Needs (5 Storeys and under)	3 to 5	1 to 10	Converted	Level 2
General Needs (5 Storeys and under)	3 to 5	11 and over	Converted	Level 1
General Needs (6 Storeys and over)	6 and over	Any	Converted	Level 1
General Needs (5 Storeys and under)	1 to 2	Any	Converted (P/B Standard)	Level 3
General Needs (5 Storeys and under)	3 to 5	1 to 10	Converted (P/B Standard)	Level 3
General Needs (5 Storeys and under)	3 to 5	11 and over	Converted (P/B Standard)	Level 2
General Needs (6 Storeys and over)	6 and over	Any	Converted (P/B Standard)	Level 1
General Needs (5 Storeys and under)	1 to 2	Any	Purpose-Built	Level 3
General Needs (5 Storeys and under)	3 to 5	1 to 10	Purpose-Built	Level 3
General Needs (5 Storeys and under)	3 to 5	11 and over	Purpose-Built	Level 2
General Needs (6 Storeys and over)	6 and over	Any	Purpose-Built	Level 1
Sheltered Housing	Any	Any	Any	Level 1
Supported Living	Any	Any	Any	Level 1
Extra Care	Any	Any	Any	Level 1
HMO (House in Multiple Occupation)	Any	Any	Any	Level 1
FMO (Flat in Multiple Occupation)	Any	Any	Any	Level 1
Cluster Accommodation	Any	Any	Any	Level 1
Hostel Accommodation	Any	Any	Any	Level 1
Foyer Accommodation	Any	Any	Any	Level 1
Residential Care Home	Any	Any	Any	Level 1
Residential Nursing Home	Any	Any	Any	Level 1
Community Centre	1	N/A	Any	Level 2
Community Centre	2 and over	N/A	Any	Level 1
Commercial	Any	N/A	Any	Level 1
Office	1 to 2	N/A	Any	Level 2
Office	3 and over	N/A	Any	Level 1
Place of Assembly	Any	N/A	Any	Level 1
Educational Facility	Any	N/A	Any	Level 1
Car Park (enclosed or open-sided)	Any	N/A	Any	Level 1
Caravan Park	N/A	N/A	Any	Level 2
Category B - Single Family Dwelling House - No Common Areas	Any	N/A	Any	Level 5
Category B - General Needs Flats - No Common Areas	Any	Any	Any	Level 5
Category B - Specialised Housing - No Common Areas	Any	Any	Any	Level 5
Category B - External Car Park - No Common Areas	Any	N/A	Any	Level 5
Category B - Other (See Building Description) - No common areas	Any	Any	Any	Level 5
Other (See Building Description)	Any	Any	Any	Level 1

Where a building is identified as having an external wall system, it will be assessed by the Building Safety Team to determine whether there are any defects and undertake a risk assessment to determine whether works are required. The assessment will take the form of visual and intrusive surveys, and the scope of any remediation work will be assessed using PAS 9980 methodology in conjunction with fire engineer advice. In discussion with a fire engineer, it will be determined whether the evacuation strategy for the building can remain as stay put, or whether it needs to change to simultaneous evacuation and whether interim measures need to be installed.

We review or carry out a new fire risk assessment if:

- there is reason to suspect that the fire risk assessment is no longer valid;
- there have been any significant changes to the premises, activities, equipment etc covered by the assessment that could affect the fire risks; or
- there has been a significant fire impacting on the communal area or more than one dwelling.

We ensure that those engaged to carry out the risk assessment are approved and competent to do so through a review of their knowledge, experience, training and accreditations.

Where a post development or significant refurbishment happens has been handed over, the first FRA will usually be carried out within the first six months of occupation, and not more than a year after handover.

FRA’s for blocks are available to residents on request.

We ensure our FRA’s meet the requirements of the Building Safety Act 2022 and Regulatory Reform (Fire Safety) Order 2005.

Where the FRA requires actions, these are programmed in, but the presumed timescales based on a combination of their urgency and the risk (these are based on the professional opinion of our fire risk assessors as our competent experts and based on industry best practice) of the building they have been identified in.

When the cost of completing Fire Risk Assessment (FRA) actions exceeds the Section 20 (S20) threshold, leaseholders and qualifying tenants are usually consulted. This consultation can be full, involving one or two stages, depending on whether the contract is a Qualifying Long Term Agreement (QLTA).

If a full S20 consultation couldn't reasonably be conducted before the works start, dispensation may be sought from the first-tier tribunal, with approval from a senior manager.

In the event approval is agreed by a senior manager, NHG will ensure notification is given to the impacted residents and the S20 process still adhered to as far as is reasonably practical.

Where it is determined priority works are needed, we will complete the works as a matter of urgency in line with our commitment to keep residents safe.

Urgent works are those that:

- Comply with notices from the fire brigade or local authority.
- Address Priority A, B, and Man1 actions in Level 1 buildings.
- Pose significant inconvenience or safety risks to residents.
- Risk worsening and increasing costs if delayed for full consultation.
- Necessary for other dependent works

FRA’s for Commercial Units on Commercial Leases Lets and Sales

When we let/sell commercial units on commercial leases we will pass on the responsibility for the FRA to the commercial tenant/leaseholder. As such units either let/sold to a commercial occupier, or being marketed to be let/sold to a commercial occupier, are marked “Not NHG” in terms of responsibility on NEC (previously known as Northgate and is NHG's main property information database). However, where we retain the responsibility for the FRA (i.e. where there are shared areas we are responsible for or we are occupying the property for our own use) we will undertake FRA’s in the usual way.

Permanent Tort Notice – Simultaneous Evacuation Blocks

In buildings where a simultaneous, or phased, evacuation strategy is in place, activated either by an alarm or a waking watch, a permanent TORT notice will be installed to advise residents that items found in escape routes will be removed immediately as they are in the escape route and can be considered as dangerous items as the escape route needs to be clear at all times.

External Wall Systems

In relation to external wall systems (EWS), in the event of prioritisation needing to be applied to NHG’s stock the EWS Risk matrix will be used.

The risk matrix uses data held about various building elements primarily associated with the external walls. It places all buildings into an external wall risk category.

In the event that a supplier that has provided services relating to the external walls has their credentials changed detrimentally (e.g. an accredited body sanction or loss of accreditation), NHG's records will be reviewed to understand reliance on that service.

Where there has been sole reliance on that supplier, those buildings will be prioritised for relevant actions according to their risk matrix banding.

Where other suppliers have been relied upon in conjunction with that supplier, those buildings will follow suit after those that have had sole reliance on the affected supplier.

Building Safety Act 2022

The Building Safety Act 2022 sets out safety requirements for landlords including all duty holders of relevant buildings and higher-risk buildings. We will meet the requirements from this act. A resident engagement plan and building safety case will be developed for all HRBs that are NHG's responsibility. These will be maintained by Building Safety Managers following engagement with residents, and subsequently updated by the BSM in conjunction with resident facing staff.

The Health & Safety team will review and manage the mandatory occurrence notification and reporting process in consultation with relevant BSMs, Compliance team, and the Rapid Response team. Further information is covered in NHG's Building Safety Policy and the Mandatory Occurrence Reporting Procedure.

Fire Safety Act 2021

We will comply with the requirements of the Fire Safety Act ensuring the structure, external walls (including cladding and balconies) and individual flat entrance doors between domestic premises, flat front doors and communal fire doors and the common parts of a multi-occupied residential building are assessed in line with the timescales of the Act.

Fire Safety Regulations 2022

We will meet the requirements of the Fire Safety Regulations 2022 and this will include the following areas where we have responsibilities to provide information to the local F&RS where appropriate.

For higher risk buildings:

- Building plans - requirement to provide the local F&RS with up-to-date electronic building floor plans and to place a hard copy of these plans, alongside a single page building plan which identifies key firefighting equipment, in a secure information box on site.

- External wall systems information – providing the local F&RS information about the design and materials of a high-rise building's EWS and to inform the F&RS of any material changes to these walls. Also required is to provide information in relation to the level of risk that the design and materials of the external wall structure gives rise to and any mitigating steps taken.

- Lifts and other key fire-fighting equipment - Monthly checks to be undertaken on the operation of fire fighting (use by F&RS) and evacuation lifts in the building and check the functionality of other key pieces of firefighting equipment. Any defective lifts or critical life safety equipment has to be reported to the local F&RS for all blocks over 18m if it cannot be fixed within 24 hours, and the record of the outcome of checks made available to residents via the residents portal within Risk Hub.

- Premises information boxes - Requirement to install and maintain a secure information box in the building and must contain the name and contact details of the Responsible Person and hard copies of the building floor plans. It is worth noting that for new build developments built to 2022 Approved Document B, a secure information box also be provided for 11m+ buildings and not just for higher risk buildings as required under the Fire Safety Regulations 2022.

- Wayfinding signage – Install visible signage in low light or smoky conditions that identifies flat and floor numbers in the stairwells of relevant buildings.

For blocks over 11 metres in height, we are required to:

- Fire door checks – Undertake quarterly checks of all fire doors in the common parts and annual checks of flat entrance doors.

- In all multi-occupied residential buildings with 2 or more sets of domestic premises we are required to:

- Fire safety instructions – Provision of relevant fire safety instructions residents, including instructions on how to report a fire and instructions on what a resident must do once a fire has occurred, based on the evacuation strategy for the building.

  Fire door information – Residents are to be provided with information relating to the importance of fire doors.

Fire safety information to residents

As part of these requirements we will ensure that our residents (who come under our direct management and their building comes under the NHG FRA scope) are informed of the evacuation strategy for their building, what to do and who to contact in the event of a fire, as well as information around the importance of fire doors. Signs in the form of fire action notices are up in the communal areas and these contain some of this information with new residents receiving this information when they move in.

All residents who come under the direct management of NHG (as indicated for the blocks where we carry out FRA's) will receive an annual letter to remind them of their relevant fire safety information. Where there has been a change in the evacuation strategy for the building residents will be informed immediately.

More information is included in the supporting procedure which also includes information about managing agents.

Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

We will meet the requirements within this regulation to ensure there is smoke detection on each storey of homes where there is a room used as living accommodation.
Where applicable (according to type of building) we ensure both devices are tested on day 1 of a new tenancy and that this is recorded.
The supporting procedure discusses this area in more detail.

Fire prevention

We take all relevant steps to ensure that suitable fire prevention measures are in place in all buildings, including the constructing of new buildings, to minimise the risk of fire.

We have a zero-tolerance approach to the storage of goods in common areas of our buildings, or on escape routes, and where found these will be removed immediately if the block is a simultaneous evacuation strategy block or via the TORT process if the block is a stay put block. This includes mobility scooters and e-scooters unless they are stored in designated areas (an area that has been specially developed or converted into a room that can store and charge these). Door mats that are not frayed and do not curl at the edges are permitted.

For the safety of the household and neighbours, residents are not permitted to store ignition sources or combustible items on their balcony or in an area of their garden that is within 6 metres of a building. This includes:

- BBQs (including those marketed as being safe for balconies)
- Motorcycles
- Electrical appliances such as white goods
- Gas/electric heaters
- Bamboo screens or other type of privacy screening (wood/material etc)
- E-scooters
- E-bikes
- Mobility scooters
- Plug in solar panels

Residents are also not permitted to throw cigarettes off their balcony and must use an ashtray. Reports of this behaviour will be investigated, and where evidence is gathered, we will consider the proportionality of taking action against the occupancy agreement.

We have a zero-tolerance approach to the storage of any flammable items on a balcony in a building or close to a building where there are known building issues. Permitted items are limited to non-flammable metal table and chairs and terracotta plant pots.

We will ask a resident to remove items that pose a high risk as soon as it comes to our attention that they are being stored on the balcony. If a request for removal is not met, we will consider seeking an injunction requiring the resident to remove the items, based on advice from a fire engineer and our FRA provider, which is accepted as final.

E-bikes, E-scooters and Mobility Scooters

These items are not allowed to be stored in the communal areas unless a relevant fire rated area has been converted or developed for them. We will use our website and social media to advise residents of guidance from the London Fire Brigade and other areas if applicable, on the charging of e-bikes and e-scooters.

In light of the increasing fires and risks from e-scooters and e-bikes we will review the policy as and when required.

Emergency Plans

Every property where we are responsible for managing fire safety must have a suitable emergency plan and/or fire action notice for the premises. We require fire drills to take place in our offices at least every six months. These will be conducted by NHG staff or contractors and recorded centrally.

If a member of staff would require assistance to leave the building safely during an evacuation, a personal emergency evacuation plan (PEEPs) should be developed by their manager or with visitors by the person they are visiting.

We may require fire drills in Supported Housing sites where there are extensive communal amenities. Drills in these areas only apply to people present in the common areas; residents in their flats are not expected to take part, unless there is a simultaneous evacuation strategy when we expect all residents to participate in fire drills.

For buildings with complicated layouts that may have many parts to the building and designated housing for older people, information about residents with mobility or other issues affecting their ability to escape in an emergency must be available to the F&RS. These documents, PEEPs, where completed should be updated and reviewed regularly (and where possible, shared with the F&RS). These will also be contained in a premises information box (PIB) at the property if one is installed or with staff if there is 24/7 coverage. Where there are staff on site, they would be expected to assist with the evacuation **but only if safe to do so.** Evacuation lifts can only be used by staff if they are trained in using them.

We will undertake Person Centred Fire Risk Assessments (PCFRAs) for residents in our Specialised Housing stock (Supported Housing).

We also may undertake PCFRAs and PEEPs for residents in general needs where NHG has been made aware of a resident who may require assistance in an evacuation or where they have themselves reached out to NHG. Alternatively, this may come on the back of an action within the FRA. When a PEEP is completed, these will be stored appropriately.

NHG arrangements for compliance to The Fire Safety (Residential Evacuation Plans (England) Regulations 2025 are covered below and will be separate to what has been discussed here if the blocks are not in scope of the regs.

In all blocks, the fire signage will include an NHG contact number, and our staff will signpost residents to appropriate support providers, such as the F&RS.

The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 (also referred to as Residential PEEPS)

We will meet the requirements of the regulations by:

- Identifying in scope buildings, that being buildings over 18m or 7 storey above ground with any evacuation strategy, and buildings 11-18m above ground with a simultaneous evacuation strategy.
- Communicating in various ways to residents within those buildings to help identify them as ‘relevant residents’
    - Communications will be at least annual through annual fire safety letters
    - Targeted communication strategies will be utilised for residents with known relevant service adjustments
- Offering ‘relevant residents’ a PCFRA and subsequent Emergency Evacuation Statement
- Ensuring that residents are supported with suitable and proportionate mitigations measures for risks identified through appropriate funding (including grants and self-funding)
- Information is shared in methods and template set out by the local fire and rescue service through provision of a Building Emergency Evacuation Plan (BEEP)

- Resident consent is gathered for all steps of the process. Where consent is not given, the potential risks of not taking part are clearly explained to the resident and this is recorded. An annual re-confirmation will be obtained in these instances of refusal.

Records of the above will be kept in a central digitised location with appropriate data protection controls.

Where NHG or a group entity employs a external managing agent (EMA) to be the Responsible Person within buildings of the relevant height scope, the EMA will be required to complete the process for these regulations, save for adaptations or equipment within a dwelling which may be subject to funding through grant available to NHG, NHG funds or self-funded by the resident.

Although NHG will not be required to complete PCFRAs and other parts of this process on buildings outside of scope, a PEEPs process will still be offered where it is an appropriate tool to assess a person centred fire risk and/or where it is recommended as part of other guidance such as the NFCC Specialised Housing Guidance in Care and Support for example as has been discussed previously.

Fire safety equipment

We will provide suitable firefighting equipment/systems where required by building regulations or legislation and remove them where they have been installed but do not meet these requirements.

We will ensure that, where they are installed by us, fire safety systems such as fire alarms and smoke and heat detectors, comply with the relevant British Standards at the time they are installed or upgraded. Where fire alarms are not required (for example, in purpose built general needs blocks) they will be removed.

We will inspect, service, maintain, and test all fixed, and portable, fire safety equipment owned by us on a regular basis and hold records.

Where fixtures and fittings provided for the purposes of fire safety are removed, altered or tampered with is considered as criminal damage which we may report to the police and could lead to us taking possession proceedings against the resident.

We will communicate with residents when fire safety works are being undertaken. Fire alarm testing will be undertaken on agreed intervals by contractors or staff.

Information, guidance and training

Employees will receive technical advice, suitable and sufficient information, instructions and training regarding fire safety and our risk control strategy as required for their role.

We will provide information and guidance to residents on fire safety in general but also as part of the requirement under the Fire Safety Regulations 2022, the Building Safety Act 2022 and its supporting secondary legislation. Generally, this will also include elements from the Regulatory Reform (Fire Safety) Order 2005 (RRFS) too.

Responsibilities

The NHG Board are the responsible persons as defined by the RRFSO and have a direct responsibility for the management of fire safety and to ensure that the duties are complied with in regard to workplaces and other areas falling under the requirements of the RRFSO. The responsible person is also defined within the Fire Safety Act 2021.

NHG have a responsibility for all owned and managed properties where they are responsible under the lease.

The Chief Executive Officer retains overall accountability for this policy. Notting Hill Genesis, as the Duty Holder and a corporate body is responsible for overall fire safety in properties.

The Executive Board has the day-to-day responsibility for fire safety and the implementation of the Fire Safety Policy and supporting arrangements.

The Chief Executive shall provide, as part of the update report to Board, information as necessary as to NHG's fire safety performance including details of significant fires.

Directors will have ownership of the fire risks within the properties /areas that they are responsible for.

The Director of Compliance is responsible for the creation and adherence to the procedures ensuring delivery of the key policy objectives and for achieving the associated targets. This will include delivery of the FRA programme.

In respect of actions listed in Fire Risk Assessments:

The Directors of the various other departments are responsible for organising the resolution of 'management actions' raised.

The BSM is responsible for ensuring the safety of HRB's under their responsibility and be the lead for technical safety discussions with residents.

Customer facing staff across all departments will support contractors in gaining access to carry out Fire Risk Assessments and other related work.

The Director of Health and Safety is responsible for ensuring the policy is reviewed in line with changes to legislation.

Competencies

The RRFSO requires that one or more competent persons are appointed to assist in undertaking the preventive and protective measures. A person is to be regarded as competent where they have sufficient training and experience or knowledge and other qualities to enable them properly to assist in undertaking the preventive and protective measures. The Homes Compliance Fire Team are deemed the competent persons appointed by NHG along with the Health and Safety team who have the responsibility for the development of the policy.

4.0 Monitoring and review

This policy will be reviewed every three years in an agreed policy review programme unless there are significant changes to legislation or regulation or deficiencies or where there are changes to best practice identified. If this occurs an immediate review will be initiated.

Monitoring and Quality Control

NHG will monitor implementation of this policy using a set of performance measures as below. This list is not exhaustive and may be updated or amended as appropriate to ensure appropriate KPIs are captured, monitored and reported.

KPI Measure	Target	Progress and Review
Overdue FRA remedial actions by age and priority	0	Quarterly Board Report Executive Board Meeting Health & Safety Group
Fire safety checks (overall) - Proportion of homes for which all required fire risk assessments have been carried out (Low Cost Rental Accommodation (LCRA) and Low Cost Home Ownership (LCHO) combined)	100%	Quarterly Board Report Executive Board Meeting Health & Safety Group
Fire safety checks (directly managed) - Proportion of homes for which all required fire risk assessments have been carried out (LCRA and LCHO combined) - directly managed	100%	Quarterly Board Report Executive Board Meeting Health & Safety Group
Fire safety checks (appointed external managing agent) - Proportion of homes for which all required fire risk assessments have been carried out (LCRA and LCHO combined) - appointed external managing agent	100%	Quarterly Board Report Executive Board Meeting Health & Safety Group
Fire safety checks (third party external managing agent) - Proportion of homes for which all required fire risk assessments have been carried out (LCRA and LCHO combined) - third party external managing agent	100%	Quarterly Board Report Executive Board Meeting Health & Safety Group

5.0 Our approach

In writing this policy we have considered the need for assessments to ensure that we are considering equality, diversity and inclusion and privacy impact assessment but these are not relevant to this policy.

6.0 Reference

- Regulatory Reform (Fire Safety) Order 2005
- Fire Safety Act 2021
- Building Safety Act 2022
- Fire Safety Regulations 2022
- The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025
- Smoke and Carbon Monoxide Alarm Regulations 2022
- Housing Act 2004
- Health & Safety at Work etc. Act 1974
- Management of Health & Safety at Work Regulations 1999

Document control

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Policy owner	Chief Governance and Risk Officer

Version Control

Date	**Amendment**	**Version**
April 2019	New NHG policy.	1.0
November 2019	More information about our approach to FRAs.	2.0
April 2022	Review in light of audit recommendations and references to new legislation and various updates.	3.0
December 2022	Added statement on balcony storage. Summary of Building Safety Act and Fire Safety Act added.	3.1
January 2023	Inclusion of information on Fire Safety Regulations 2022 and Smoke and Carbon Monoxide Alarm Regulations 2022. Other various minor updates and changes included too.	4.0
March 2025	Updated information on role of the Building Safety Manager, how our FRA's will meet various parts of the FSA and RRFSO, information on provision of fire safety information to residents and around testing on day 1 of a new tenancy for smoke and carbon monoxide alarms. Also update on S20 process, permanent TORT notice and on EWS issues.	5.0
July 2025	Plug in solar panels added as items not permitted on balconies. KPIs section also updated.	5.1
September 2025	Sentence added regarding KPI's.	5.2
March 2026	Inclusion of NHG process to meeting requirements of The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025.	5.3
August 2026	Update to KPI section to remove H&S Committee and H&S Leadership Group and put in Health and Safety Group in place.	5.4