

Corporate Fire Safety Policy

Policy Number:	
Category:	
Ratification Committee:	Corporate Safety Board
Date of Ratification	17 December 2020
Author Name and Job title	Keith Todd, Head of Fire Safety (Housing) and Ian Kimmett, Head of Corporate Health and Safety
Sponsor Name and Job Title:	David Hughes, Director of Audit, Fraud, Risk and Insurance
Date issued:	17 December 2019
Next Version Date:	December 2021
Review Period	Any change of structure / legislation, annual review by Corporate Safety Board, three-yearly review by Leadership Team
Scope and target group	All services, all staff

Record of changes to this document

Version & Section Number	Amendment	Date of Change	Change/ Addition	Reason
1.2 (Nov20)	Minor amends			

Dissemination and Consultation with Stakeholders

Disseminated to (either directly or via meetings, etc.)	Position of Stakeholder or Name of Endorsing Committee	Format (paper or electronic)	Date

Contents

Foreword from the Lead Members for Grenfell, Housing and Property and the Lead Member for Finance	3
1. Introduction and Policy statement.....	6
2. Purpose	6
3. Explanation of Terms.....	7
5. Roles and responsibilities	8
6. Council Delivery Standards	15
Support	18
Operation	20
7. Equality Impact Assessment.....	22
8. Training.....	22
9. Process for Monitoring Compliance with the Document	22
10. Dissemination of this Policy	24
11. References.....	24
12. Associated Documentation	24

Foreword from the Lead Member for Grenfell, Housing and Property and the Lead Member for Finance

The Grenfell Tower tragedy will continue to define the work we do in the borough and the way we do it, it is of vital importance to us to make sure a tragedy of that nature never happens again here in central London and right across the UK.

We took the management of our housing stock back in March 2018, and facilities management in May 2019. Our focus on improving fire safety for our residents, buildings and service user has led to extensive work both on repairs, maintenance and fire safety compliance. We have prioritised the most urgent issues, developed plans to deal systematically with actions that have arisen as a result of the fire risk assessments we have done and have stated our ambition achieving the best standards of fire safety in England. Our programme of actions so far has included:

- dealing with insulated rendering and cladding immediately where our fire risk assessments have identified that there is a risk, however low. This includes Adair and Hazelwood Towers where we have informed residents of the risk as soon as we identified it, maintained waking watches and stripped the insulated rendering, taking these actions in consultation with residents. We have had waking watches in several buildings whilst undertaking any works to do with fire safety to provide further assurance that our residents are safe. We have addressed deficiencies and now only have waking watches in Lancaster West.
- strengthening our housing services' Fire Safety team to 6 officers to ensure we have the means to implement this policy. Our fire safety team within housing management is working closely with our new Corporate Health and Safety team to support the rest of the authority to achieve the high standards outlined in this policy.
- Updating fire risk assessments in all buildings that we own, both in terms of our homes and our corporate buildings. We now have a clear understanding of what needs to be done to bring our buildings up to the standards of fire safety that we are aspiring to.
- lobbying the Ministry of Housing, Communities and Local Government to share data on their tests on several different types of fire doors, supplementing this with our own tests. Both sets of tests identified one particular brand of fire door as the most reliable on the market and we have procured thousands of such doors which we will be fitting over the next 2-3 years.

This policy commits us to achieving the best standards of fire safety as highlighted in British Standards 9997 and we achieved our aim to be the first local authority to achieve BAFE-SP205 accreditation. We commit to maintaining this certification to demonstrate third-party verification of our competence to deliver suitable and sufficient fire risk assessments for our residents' homes.

However, this policy does not just focus solely on our own stock. The Council uses a variety of external providers for some of our core services, not least for temporary accommodation, adult social care services and children's services. It is vital that buildings owned by a third-party housing some of our most vulnerable residents reach the same standards as we are striving to achieve within our own stock.

We do not have the same level of control where we do not own the buildings, but we will use our contracting leverage, visiting properties where we have service users and being clear about our expectations with service providers.

That is why the Dame Judith Hackitt Review and the Public Inquiry's recommendations are so important. We need a more comprehensive legislative framework to increase the standards in all

buildings owned publicly or privately, and additional powers to enforce against this so that we can make sure that all the buildings we use are up to the required standard.

There is a changing legislative landscape so we will keep this policy and any associated guidance to Directorates under review; ensuring that we adapt to changes in legislation, best practice and any developments arising from the Public Inquiry.

It will not be a quick or easy to reach the standards that we are aiming for, but this policy provides us with a clear framework to reach it.

Cllr Kim Taylor-Smith

Cllr Mary Weale

Operational Summary

Policy Aim

To provide processes and procedures to strategically embed fire risk management across the Council in line with best-practice guidance contained in BS 9997:2019, to demonstrate a commitment to the highest level of quality to our stakeholders.

Policy Summary

The policy provides a formal framework for managing fire risk across the Council. It provides clear, measurable procedures for managing fire risk in our buildings, following the recommendations detailed in BS 9997:2019.

What it means for staff

- **Management – This policy is designed to help managers to ensure that they can manage fire safety in a consistent and effective way. It also provides a framework to ensure that reporting of fire safety performance is meaningful and contributes to safer buildings and work activities.**
- **Employees – This policy is designed to ensure that a safe working environment is provided, and that where people's work has an impact on fire safety, there are clear procedures to minimise fire risk.**
- **Other specific groups (as appropriate) – Residents of council accommodation have a key role in fire safety in that fire prevention is an effective method for ensuring fire safety. This policy contains information of how advice will be provided for residents in how to prevent fires in council properties.**

1. Introduction and Policy statement

The Council is committed to learning the lessons from Grenfell Tower and make the commitment that we will do everything in our power to prevent a tragedy like this from happening again in the Borough. This is the commitment of the most senior leaders within the Council, who fully endorse this policy.

The Council is directly responsible for over 600 corporate buildings and over 9,000 homes, to in excess of 6,500 tenants and 2,500 leaseholders. The housing portfolio is made up of over 580 blocks, of which 20 are 10 storeys or more. In addition, the Council commissions a portfolio of supported housing and has some 2,000 households living in temporary accommodation, as well as residential social care provision (from whom assurances will be sought that the obligations and duties imposed under this Policy are satisfied). We will endeavour to ensure that all these people are given safe homes to live in.

- We are committed to going above and beyond regulatory requirements, imposed by legislation including, but not necessarily limited to, the Regulatory Reform (Fire Safety) Order 2005, the Building Regulations 2010, and the Housing Act 2004. We have sought to be early adopters of the Hackitt Review's recommendations and will look to implement the Inquiry's recommendations.
- We are also committed to involving all our stakeholders in the management of fire safety, from residents through to chief executives, and regulators where possible. Through this approach, we will work to ensure that our buildings and the people using them are safe. This will be an ongoing process, and we realise that our fire protection arrangements will require continual consideration and maintenance to remain effective, taking into account managerial, technological, societal and economic developments.
- We will keep our buildings safe throughout their lifecycle, from design through to maintenance in-use.
- We will also address legacy deficiencies in a reasonably practicable timescale through strategic upgrade and refurbishment, prioritising works according to the level of risk they pose, and the Council's ability to address them. As part of this commitment, we will ensure that our staff have the necessary competence, systems and support to facilitate management of fire-safe buildings.
- We will implement systems for managing all aspects of fire safety and will keep all our systems and processes under review to ensure that they remain fit-for-purpose and are dynamic and adaptive to change where needed.
- We will co-operate, co-ordinate and actively collaborate with all third-parties and enforcing authorities, fostering a culture of trust and transparency, to rebuild our relationship with London and our communities.

2. Purpose

This Policy has been produced with the following objectives:

- To implement a fire risk management system in accordance with industry best-practice guidance contained in BS 9997:2019, led by the Fire Safety Team with assistance from and monitoring by competent persons.
- To engage stakeholders of all levels, from residents to executive directors, in the process of delivering fire safety, ensuring that we engage appropriately in all matters, and respond to any concerns in a suitable timeframe. We commit to giving residents a clear voice in the process of managing fire safety in their homes.

- To provide the best quality fire safety training and information to stakeholders across the Council and our partner organisations, and to utilise technology and clear communication tools effectively in support of our fire safety objectives. Included within this is our commitment that all relevant staff will receive and maintain adequate continuing professional development commensurate with the requirements of their role.
- To provide and maintain safe premises that are provided with suitable general fire precautions. This will be verified in the course of programmed, regularly reviewed, suitable and sufficient fire risk assessments, from which actions arising will be addressed. As part of the assurance of these processes, the Council's competent persons will maintain third-party certification against the BAFE SP205 Scheme for Fire Risk Assessment Services.
- To instigate a culture of openness and transparency with regards to our fire risk management, ensuring that we learn from any improvement points and dynamically adapt and grow in response to matters that arise, in a positive and productive manner.
- To maintain up-to-date arrangements, accounting for developments in fire safety engineering and industry best-practice.
- To ensure suitable planned, preventive maintenance, and reactive maintenance, procedures are in place for all fabric and systems that are provided for, or could impact on, fire safety.
- To engage, co-operate and collaborate with London Fire Brigade in all relevant matters, from operational response, facilities and access, through to fire safety enforcement in their role as the fire authority.
- To co-operate and co-ordinate with all third-parties who may be affected by our activities.
- To be 'early adopters' of the recommendations contained in *Building A Safer Future* (<https://www.gov.uk/government/publications/building-a-safer-future-an-implementation-plan>).

3. Explanation of Terms

The definitions and terms used throughout this document are as follows:

British Standard (BS) – document published by the British Standards Institution, identifying best-practice. Whilst not holding legal status, adherence to the recommendations contained in a British Standard can assist in demonstrating compliance with legislation.

British Approvals for Fire Equipment (BAFE) – independent register of quality fire safety service providers, who are certified to ensure quality and competence to help meet fire safety obligations.

Competent Persons – person 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, which is often demonstrated through professional registration with a relevant body.

Fire Risk Assessment (FRA) – a process involving the systematic evaluation of the factors that determine the hazard from fire, the likelihood that there will be a fire and the consequences if one were to occur. There are both qualitative and quantitative methods of risk assessment that can be used. In residential buildings, there are different 'types' of fire risk assessment as defined within the Local Government Association's *Fire Safety in Purpose-Built Flats* guide, ranging from Type 1 to Type 4 depending on the level of invasive inspection and inspection of individual flats (in addition to the common parts). The methodology to be used will be that described in Publicly Available Specification – PAS 79.

Fire Risk Management System – a formal procedural system to reduce the risk to life, property, assets and the environment that are associated with fire in the working environment, specifying requirements for integrating fire safety as a management system approach.

Fire Safety Officer – person designated by the Council to implement the preventive and protective measures appropriate to their Directorate.

4. Background

We are implementing measures to assist us with meeting our aspirations to be early-adopters of the Hackitt Review and will look to adopt the recommendations that come out of the Public Inquiry into the Grenfell Tower tragedy. We will keep this Policy and any associated guidance issued to departments under review, to ensure that it keeps pace with changes in regulation and best practice guidance.

5. Roles and responsibilities

The Council

The principal accountability of the Council is to local residents, staff, contractors and other users of Council services as well as any person may be affected by our activities. In its fulfilment of the Council's duty in this regard, the Council must ensure that appropriate resources and oversight are provided for the development, dissemination and implementation of this Policy. The Council is also accountable for ensuring effective governance, scrutiny and support relating to this policy.

Elected Members

The Council and its Elected Members have a duty to ensure that appropriate resources and oversight are provided for fire safety, including the approval, dissemination and implementation of this policy. The Council is also accountable for ensuring effective governance, scrutiny and support relating to this policy.

The Lead Member for Finance and Transformation is the lead member for Health and Safety which includes fire safety matters. Elected Members will ensure that they consider fire safety when making decisions at a strategic level.

Members of the Audit and Transparency Committee will scrutinise the Council's fire safety performance, as part of a Corporate Safety Report, at least six-monthly.

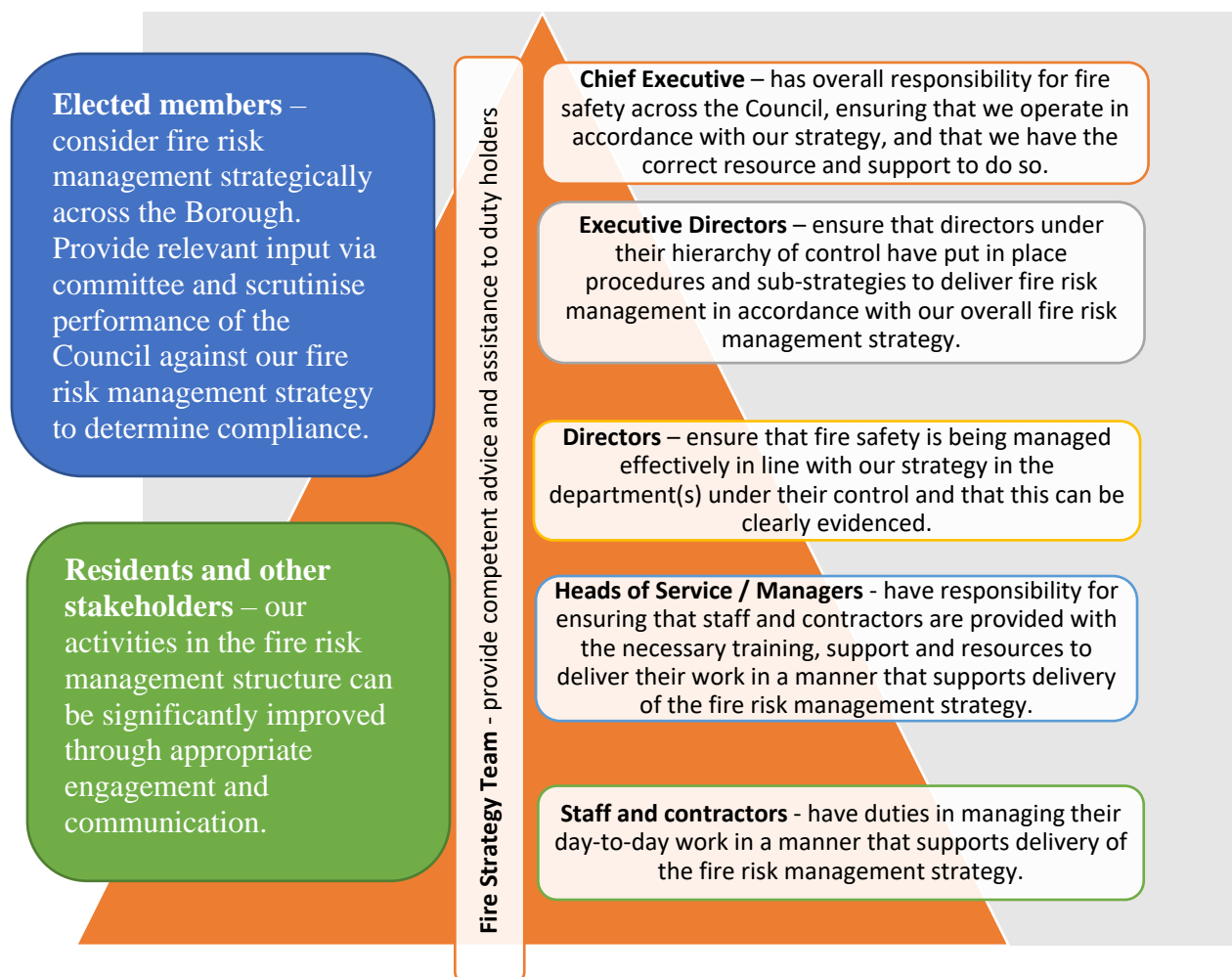
The Chief Executive

The Chief Executive is the accountable officer and responsible to the Council for ensuring that resources, policies and procedures are always in place and for promoting a positive attitude to Health and Safety and in the making of all decisions.

The fire risk management system is to be embodied across the general management hierarchy of the Council.

This document sets out to identify and clarify the commonalities in the way that fire safety is managed across both our residential and non-residential stock, and to establish a system by which fire safety can be managed across all Council sites and buildings.

The following are key duty holder roles with commensurate fire risk management responsibilities:



In this section, the roles and responsibilities associated with each level of management are identified and described in further detail.

Leadership and commitment

All leaders are required to be fully committed and engaged with fire risk management. The Council understands that fire risk management fits in with the general Council management structure and indeed is just part of general day-to-day management of operations, across the entire business structure.

Roles, responsibility and authorities

There are a number of specific roles within the Council that warrant some explanation in terms of fire safety. Fundamentally, all duty holders need to understand the competency requirements of their staff. Competency standards will be defined according to role, and assistance in evaluating and improving competence across the organisation will be provided by the in-house fire strategy team. The following pages explain responsibilities per role in a simple guide.

The following key executive director roles have some specific responsibilities, as follows:

Executive Director of Resources and Assets

- Responsible for ensuring application of the fire risk management system to **corporate buildings** and for ensuring fire safety practices are in place across the whole organisation.
- Will implement the 'Plan, Do, Check, Act' model as described in this document.
- Will nominate and appoint competent persons to assist with implementation.
- Will validate adequacy of services provided by external facilities management companies and other contractors who impact on fire risk management across relevant buildings and areas.

Executive Director Housing and Social Investment

- Responsible for ensuring application of the fire risk management system to **residential buildings**, throughout the building lifecycle (via delegation through Director of Housing Management).
- Will implement the 'Plan, Do, Check, Act' model as described in this document.
- Will nominate and appoint competent persons to assist with implementation.
- Will validate adequacy of services provided by contractors who impact on fire risk management across relevant buildings and areas.
- Will validate through audit the adequacy of externally-managed buildings commissioned for the placement of residents.

Executive Director Children's Services

- Responsible for ensuring application of the fire risk management system **to schools, nurseries, youth / children's centres, etc.**
- Will implement the 'Plan, Do, Check, Act' model as described in this document.
- Will ensure that competent persons are in place to assist with implementation.
- Will validate adequacy of services provided by contractors who impact on fire risk management across relevant buildings and areas.
- Will validate through audit the adequacy of externally-managed buildings commissioned for the provision of children's services.

Executive Director Adult Social Services

- Responsible for ensuring application of the fire risk management system to **adult day centres, care homes and other accommodation provided for the placement of vulnerable adults.**
- Will implement the 'Plan, Do, Check, Act' model as described in this document.
- Will nominate and appoint competent persons to assist with implementation.
- Will validate adequacy of services provided by contractors who impact on fire risk management across relevant buildings and areas.
- Will validate through audit the adequacy of externally-managed buildings commissioned for the provision of adult social services.

Premises Controllers and Building Safety Managers

- Manage the implementation of procedures in respect of the Council's fire risk management and emergency response requirements.
- Identify and control risks associated with day-to-day operation of buildings.
- Maintain competence in accordance with Council policy.
- Assist with the implementation of the 'Plan, Do, Check, Act' model as described in this document.

- Report concerns and assist in measuring performance of fire risk management at a local level.

Competent Persons

- Assist in preparing, reviewing and monitoring strategies to support implementation of the continuous improvement fire safety model.
- Setting standards and monitoring compliance with those standards.
- Maintain competence required to provide the highest standard of fire risk management support.
- Provide support, guidance and training to stakeholders across the Council to assist with ensuring competence of staff.
- Preparing and delivering fire safety materials for use by residents / others to assist in engaging a culture of fire safety across all of our buildings, people and operations.

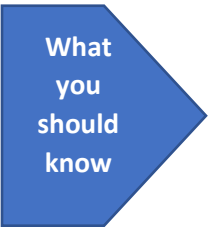


Fire Safety Officers

- Will undertake fire safety duties as assigned by the local arrangements of their directorate.
- Assist with implementing local policies, procedures and arrangements as assigned for their place of work.

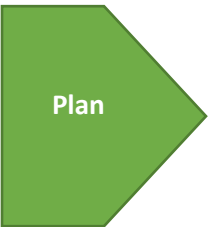
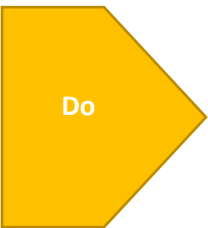
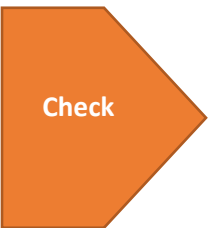
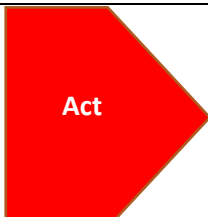
Please note that the Responsibilities, Accountabilities, Consultation and Information (RACI) document are included in Annex 7.

Responsibilities for Council staff at different levels

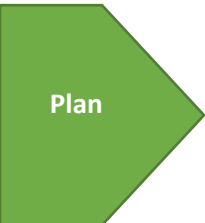
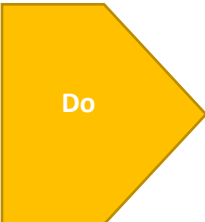
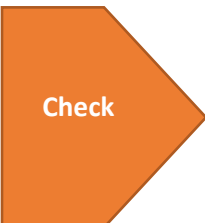
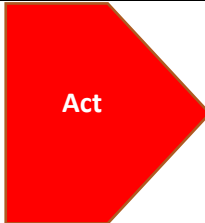
All Council staff

	Have an awareness of and cooperate with the Council's fire safety policies.	EMPLOYEE RESPONSIBILITIES
	Familiarise yourself with fire and emergency arrangements and escape routes.	
	Participate in any training, exercises and drills to ensure fire safety working practices are implemented.	
	Maintain competence for your role as required (and know what competence is expected of you).	
	Take reasonable care of yourself and all others who may be affected by what you do or don't do.	
	Take ownership of any fire safety concerns raised to you, making sure that you report them to Corporate Health and Safety using the Council's incident reporting system.	
	Set a high personal standard and carry out activities based on excellent service, collaboration, empowerment and innovation.	
	If aware of, or in any doubt about, any unsafe practice or condition, tell your manager immediately.	
	Understand risks of your work and comply with procedures and method statements, only engaging in activities when competent to do so.	
	Tell your manager of any arising unforeseen risks which do not have control measures in place.	
	Avoid improvised safety arrangements and ensure that all fire safety works and precautions are approved.	
	If any stakeholders raise any fire safety concerns with you, escalate these via the Council's incident reporting system.	
	Report all fire incidents and near-misses appropriately via the Council's incident reporting system.	

All Council line managers

	<p>Establish responsibilities of your staff in line with fire policy.</p>	<p>LINE MANAGER RESPONSIBILITIES</p>
	<p>Ensure that each employee knows their responsibilities (and competences required to meet them) and have necessary competences, including appropriate training where needed.</p>	
	<p>Set annual performance objectives in consultation with staff.</p>	
	<p>Consult with the Council's competent persons in a timely manner when expert advice and support is required.</p>	
	<p>Ensure staff receive fire safety induction.</p>	
	<p>Ensure visitors and contractors receive relevant information.</p>	
	<p>Ensure that fire safety arrangements are adequate so far as they fall within your control, and that any issues are reported via your manager or the Council's competent persons for your directorate.</p>	
	<p>Ensure that personal emergency egress plans (PEEPs) are formulated and implemented where required.</p>	
	<p>Ensure that Fire Safety Officers are appointed at a ratio of 1/8 (and a minimum of two per team) staff within your department.</p>	
	<p>Ensure that staff (and contractors where relevant) are aware and confident with their duties under the fire risk management system and relevant findings of risk assessments.</p>	
	<p>Ensure that risks that are outside of your control are appropriately escalated to your manager or other relevant duty holders.</p>	
	<p>Monitor the implementation of arrangements, procedures and operational effectiveness, carrying out reviews, inspections and investigations to determine effectiveness.</p>	
	<p>Monitor completion of actions arising from FRAs, etc. and general employee / contractor performance.</p>	
	<p>Analyse relevant data to identify emerging trends in area of responsibility.</p>	
	<p>Monitor your employees' training programmes and ensure that competency objectives form part of appraisal processes.</p>	
	<p>Ensure that employees and/or contractors are held to account and dealt with appropriately if failing to meet their responsibilities.</p>	
	<p>Undertake annual appraisals of performance in accordance with objectives to implement improvements.</p>	
	<p>Ensure that fire risk management processes and procedures are in place so that regular review can take place and lessons learnt / data are taken into consideration.</p>	

All Executive Directors and Directors

	<p>Confirm that adequate fire procedures and arrangements are in place to meet all department obligations under the system.</p>	<p>EXECUTIVE DIRECTOR AND DIRECTOR RESPONSIBILITIES</p>
	<p>Ensure adequate resources are available to manage fire safety.</p>	
	<p>Prepare clear plans for who will do what in your fire risk management structure.</p>	
	<p>Prepare plans for managing all of the work done by your department in terms of complying with the fire strategy.</p>	
	<p>Ensure that leases of Council property to non-commercial tenants include service charges that enable the Council to carry out essential fire safety works where necessary.</p>	
	<p>Confirm that all of your staff complete fire safety training (induction and refresher).</p>	
	<p>Confirm that adequate numbers of Fire Safety Officers are appointed for all of your areas (1/8 staff).</p>	
	<p>Confirm that PEEPs are in place where needed.</p>	
	<p>Confirm that your department is acting on all relevant actions contained within FRAs and other risk assessments.</p>	
	<p>Take ownership of incident management where necessary.</p>	
	<p>Implement procedures to control work done by contractors, where necessary and relevant.</p>	
	<p>Clearly communicate all fire safety requirements to relevant staff so that they fully understand what is expected of them.</p>	
	<p>Ensure that you and your staff have suitable fire safety competence for roles and record / report any issues.</p>	
	<p>Foster a culture of openness and empowerment in terms of fire risk management across your department.</p>	
	<p>Carry out audits to ascertain compliance with training regimes, PEEPs and Fire Safety Officer appointments.</p>	
	<p>Carry out regular checks of completion of FRA actions and actions arising from other risk assessments and record and monitor findings.</p>	
	<p>Actively participate in fire drills and review exercises to evaluate emergency procedure performance.</p>	
	<p>Monitor and oversee appraisal processes to confirm that they identify competency requirements, and that these are addressed.</p>	
	<p>Monitor employee and contractor performance reviews carried out by managers, to ensure that the department is effectively managing fire safety policy.</p>	
	<p>Ensure that all findings from 'check' stage are fed back into management system.</p>	
	<p>Undertake annual reviews of fire risk management delivery.</p>	
	<p>Confirm that fire risk management processes and procedures are capable of supporting continuous improvement and report any issues with the system to the Council's fire strategy team.</p>	

6. Council Delivery Standards

The Council is committed to implementing an effective fire risk management system across the organisation as a whole, so that it meets the needs of all stakeholders and other interested parties, and in a way that is achievable and measurable.

The buildings that we operate, and the people who use them routinely (either as homes, workplaces, or places in which they receive support or education, etc.), differ greatly in terms of risk profile. The management system must therefore be flexible enough to accommodate all of these different needs. Across the organisation, we commit to continual improvement through the 'Plan, Do, Check, Act' cycle.

Each Directorate within the organisation may adopt their own operational procedures to meet the requirements of the fire risk management system, providing that the functional requirements of the system are met. Corporate Health and Safety will have oversight, via the Corporate Safety Board, to ensure that these procedures are appropriate and achieve the levels required by BS 9997.

Additionally, each Directorate (or department) may implement individual processes, documented under this fire risk management system, to manage the particular risks and activities for which they are responsible.

Generally, property types in which the Council have a relevant degree of control can be summarized as:

- Buildings provided for housing (residential).
- Corporate buildings in which Council activities take place (non-residential).
- Investment portfolio buildings in which the Council has an interest although are not necessarily owned, managed or staffed by the Council (either residential or non-residential).
- Commissioned services, including social care residential provision, which is privately-owned / managed properties and which the Council seeks assurance that fire risk is managed appropriately.

The fire risk management system will be applied to the extent appropriate in each relevant property and management structure.

Fire risk assessment (FRA) programme

The Council commit to the implementation of a robust fire risk assessment process that assists us in identifying our risks and necessary remedial work programmes. Our requirement is that all FRAs are suitable and sufficient.

To ensure that we have assurance built into our FRA programme, we will use only BAFE SP205 third-party certified external organisations to carry out FRAs. To provide further assurance, our internal Council fire safety team will also obtain BAFE SP205 third-party certification to demonstrate competence to stakeholders (who can provide structured assistance to Directorates across the Council as necessary).

The methodology recommended in PAS 79 will be adopted. The process for preparing and delivering the FRA programme will follow best-practice current guidance. Frequencies for undertaking fire risk assessments of Council stock will not exceed 36 months and frequency will be assessed on the basis of risk.

How we will plan our activities with third-parties

We recognise the requirement of Article 22 of the Fire Safety Order, which states that we must co-operate and co-ordinate as necessary to ensure compliance with legislation.

Where we have residents or other stakeholders using premises owned and/or managed by third-parties, we will plan the interface of our fire safety management system so that our people benefit from the same level of safety as they would have in our directly-owned stock.

Where we lease buildings or parts of buildings, we will undertake due diligence, both prior to taking up such arrangements, and in periods not exceeding one year (at which point we will ask to see relevant documentation and evidence that the buildings are being maintained correctly in respect of fire safety).

Where we are the landlord, we will carry out due diligence checks of tenants and their activities, to ensure that they are meeting all their relevant duties.

We will embed fire safety within our supply chain, by ensuring that our contractors and suppliers understand their part in fire risk management in our buildings, through the need for them to work safely and adhere to our policies and standards. We will do this by clearly stating our requirements in this regard and checking compliance with our standards on an ongoing basis.

Risks and opportunities

We recognise at the Council that, whilst we manage specific risks (particularly in terms of our housing stock), we also have the opportunity to innovate and to use new technology to the benefit of our customers.

We manage a number of risks that are commensurate with older building technologies and types. In particular, older building codes and standards implemented different strategies to support fire safety than would be adopted if those buildings were currently under construction.

Whilst Building Regulations do not apply retrospectively, we recognise that the developments in current codes, standards, research and technologies represent a good opportunity to improve safety within our buildings, and that doing this can be reasonably practicable when considering the associated cost in comparison to the risk.

How we will meet our objectives

In order to meet the objectives of our fire risk management system, it is appropriate to consider what we will do in terms of our people and our buildings, and we note that these factors are interrelated and will not be carried out in isolation.

Our people

- We will develop and provide appropriate, bespoke fire risk management training
- We will ensure that all of our people are involved in the fire risk management system, and are empowered to participate fully within the fire risk management process
- We will review the effectiveness of our fire risk management training, and be adaptive to changes in technology, the organisation and to change, to ensure that our fire risk management system and the training that underpins it remain relevant at all times
- We will share out fire risk management plans with our people, allowing and empowering them to shape our future plans
- We will monitor and routinely check whether we meet all of goals in terms of our people
- We will respond to findings and commit to continual improvement

- We will make sure that service users in privately owned/leased buildings can expect the same fire safety standards as those owned and used by the Council.

Our buildings

- We will assess our stock
- We will maintain our stock
- We will review our stock
- We will upgrade our stock, where necessary
- We will carry out further work and improvements, following reviews, where necessary

Planning changes

The Council recognises that changes within the organisation have the potential to impact on our fire risk management system.

Changes in personnel will be so planned that handovers are carried out to the extent necessary for continuity in fire risk management.

Changes to buildings will be so planned that they maintain at least the standard that was in place prior to the changes, and where possible improvements to standards are made.

Fire risk management strategy

The outputs of the fire risk management strategy can be summarised as follows:

- We will assess and evaluate our activities and operations and their associated risks, and ensure that fire risks are managed across all of these
- We will appoint suitable staff to our organisation to manage fire risks across our business, ensuring that they are provided with adequate resource and authority to meet the functional requirements of the fire risk management system, and ensure that our staff are adequately trained and engaged in the fire risk management system
- We will adopt a risk-based approach to fire risk management, suitably prioritising people and buildings who may be at higher risk in case of fire, and utilising technology and current best-practice to take the opportunity to address risk management in a reasonable and long-term manner
- We will utilise our fire risk assessments as the basis to manage fire risk across our portfolio and people, and will carry FRAs out in a strategic and appropriate manner, to the highest levels of quality
- We will address all significant findings from our fire risk assessments to ensure that Council properties meet high standards of fire safety
- We will provide suitable training to all relevant stakeholders that is appropriate to their role
- We will adequately plan, design, and control all works on site in our buildings to manage the risks associated with such work
- We will carry out adequate testing and maintenance of all relevant systems and equipment, and ensure that it is in adequate repair to be fit-for-purpose
- We will communicate clearly and appropriately on all matters relating to the fire risk management system
- We will ensure that adequate emergency arrangements and planning is implemented
- We will regularly review our fire risks and our fire risk management system, ensuring that it is maintained up-to-date

- We will make continual improvements by collecting data relating to our operation, people and buildings, analysing trends, and adopting sensible and practical solutions where problems are encountered

Support

In order to ensure that our fire risk management is effective, the Council will ensure that adequate support is provided across the organisation.

Support is provided by our internal *competent persons*. However, given the size of the portfolio and undertaking, our internal competent persons will be supported by external specialists, where complex risks exist that are outside the scope of competence of our internal staff, or where the volume of work is greater than could reasonably be undertaken internally.

Resources

The Council will make suitable resource available to manage fire risk across the organisation. In particular, the fire strategy team will lead on housing, and will act as the point of liaison for arranging fire risk assessment surveys, receiving fire risk assessment reports and allocating actions arising from fire risk assessments to relevant duty holders within the Council.

The Fire Safety, Corporate Health and Safety and Workplace and Facilities teams will be provided with the resource, in terms of personnel, time and budget to discharge their duties. The internal fire safety team will also be supported in maintaining third-party certification under the BAFE SP205 Scheme.

Fire risk assessments will be completed primarily by external consultants who hold BAFE SP205 certification. Adequate budget will be provided by the Council to facilitate this. The Council will implement appropriate quality assurance procedures to ensure that fire risk assessments are suitable and sufficient.

Adequate resources, in terms of staff and budget, will be provided to ensure that actions arising from fire risk assessments can be completed to the appropriate standard and within the appropriate time. Resources will also be allocated to ensure that all Council staff receive training in the fire risk management system to the extent that they need to in order that they can discharge their duties in support of the system.

Infrastructure

The Council will provide the infrastructure necessary to ensure the effective operation of the fire risk management system.

We will provide adequate buildings and utilities for the promotion of positive working towards achievement of the successful implementation of the fire risk management system. This will include access to the internet for the purposes of utilising online resources.

All staff involved in the delivery of the fire risk management system will be provided with Surface Pro computers that will enable agile and remote working. Software will be provided as necessary to encourage collaborative working and enable staff to avoid silo working. Any other equipment required for the carrying out of fire safety work, such as measuring devices, etc., will be provided as required.

Fire and health and safety staff will be provided with the means to claim back travel expenses to ensure that they are able to work effectively and without barriers across the Council's portfolio, attending meetings and site surveys as required by the needs of the fire risk management system.

Environment

The Council will provide a non-discriminatory and non-confrontational work environment to support the successful implementation of the fire risk management system. Office facilities will maintain a suitable and fit-for-purpose workplace in terms of temperature, humidity, light, hygiene and noise, and will comply with the Workplace (Health, Safety and Welfare) Regulations 1992. The Council acknowledges the potential for working at the organisation post-Grenfell to pose a specific psychological challenge to relevant staff, and will offer support in the form of ensuring staff have a healthy work / life balance and are offered free counselling services and other support in carrying out their duties, making every effort to identify any potential support that employees require and providing them with that support.

We will provide a supportive and transparent environment that enables and empowers our residents to engage with us in confidence. We will ensure that residents are treated with respect and encouragement and will focus on removing any blocks or mistrust that could undermine the important role that they play in keeping our residential buildings safe from fire.

Knowledge, competence and awareness

All Council staff will be provided with the knowledge, competence and awareness to ensure that they support the fire risk management strategy to the extent appropriate to their role.

The Council recognises that there is internal knowledge (i.e. that gained by staff through the practical carrying out of their duties, and local knowledge of the portfolio, estates and historic issues) as well as the fact that we can benefit from external knowledge (particularly in respect of innovating with new types of fire safety system and equipment). We will seek to use a blend of resources to deliver the best outcomes for our stakeholders.

We will ensure that we set standards of competence for employees performing the various tasks and work functions that have the potential to impact on the fire risk management strategy. In so doing, we will consider the different tasks that our employees undertake and how they could impact our management system, and we will then ensure that we provide the necessary training and ongoing support and development to enable our staff to work effectively under the fire risk management system.

Part of this competence will inherently require and also lead to an awareness of the fire risk management system. Staff will be provided with relevant training to ensure that they are aware of the fire policy, the objectives of the fire risk management system, as well as the part that they play in the system, the potential impact of failing to perform, and also how any risks affect them in the course of carrying out their duties (which is also a requirement of the Fire Safety Order).

Communication

The Council accepts that well-planned and delivered communications are critical to the effectiveness of the fire risk management system, and we will communicate clearly, at all times, with all relevant stakeholders. Matters that we will communicate on include:

- Fire procedures in operation of our buildings
- Fire prevention
- Fire protection

- Relevant policies and procedures
- Significant findings of fire risk assessments
- The fact that stakeholders can communicate concerns directly with us, and that we have a policy for investigating and resolving concerns
- News of fires, incidents, etc. within the Council's properties
- What we are doing in terms of policies, projects and other works in the Borough

We will communicate with relevant stakeholders, including staff, residents, contractors and London Fire Brigade, as necessitated by what we are communicating, and will do so using a range of media, including emails, newsletters, websites, resident and staff meetings, etc.

Fire safety communications will be managed by the Head of Fire Safety in conjunction with the Council's Communications team. Communications will be sensitive to the needs of relevant parties. Communications will be provided regularly (i.e. we would expect each stakeholder to receive fire safety communications in a period not exceeding one year), and will additionally take place where significant change occurs, or where there is a fire.

In many circumstances, key appointed staff will act as a conduit of communication to other stakeholders (i.e. contract managers may feed information to contractors, or resident liaison officers may engage with residents). Communication will be facilitated to key stakeholders by competent persons.

Documented information and document control

The Council will ensure that there is a robust document control system in place for all relevant documentation that supports the fire risk management system. Relevant directorates will create and maintain a document management system. This will ensure that suitable information on the Council's stock is fully maintained in an appropriate and up-to-date manner. Documentation will be provided in accordance with relevant regulatory requirements.

Each critical document will be provided with a tracking page that includes author, person who has performed recent changes, quality assurance mark, date updated, version number, as necessary. The document management system will ensure that the following are easily and immediately locatable, and are preserved against the effects of accidental or wilful inappropriate deletion (i.e. are backed up frequently), and include, as a minimum:

- Council's Corporate Fire Safety Policy document (this document)
- FRA for each building
- Records of fire safety arrangements

Operation

Planning and control

As the heart of operating an effective fire risk management system is the accurate and robust planning of our activities. In order to prove that we are operating an efficient and effective fire risk management system, we will produce suitable documentation and maintain such documentation available for review.

To ensure that we have appropriate planning, we will:

- Produce Employers' Requirements documentation and supporting guidance to ensure that we procure in accordance with the fire risk management system through our supply chain

- Produce and deliver suitable training and information to stakeholders of all levels
- Operate the fire risk management system across our business, ensuring that we have means of recording and measuring our performance and compliance
- Produce incident report templates, collate received incident reports and review all incidents, whilst promoting a culture whereby people know how to report incidents and actively engage with us in recording these
- Prepare web information for stakeholders that is kept up-to-date and accurate, and that we continually monitor and review this information
- Ensure that we control all information and data that we manage centrally at the Council

Works will be undertaken under the fire risk management system and will be subject to checks on site by competent persons.

Control of site work

We recognise the specific hazards associated with site works (which can include general repairs and maintenance, as well as refurbishment or construction works, hot works, etc.).

In order to ensure that the Council mitigate the risks associated with site work, relevant control will be implemented, supported by:

- Clear Employers' Requirements (ERs) for commissioned works and products
- Clear governance (allocation of duty holders)
- Implementation of hot works permitting system, including checks of RAMS
- Training to duty holders in the Council's requirements
- Preparation of guidance and checklists for site work requirement checking
- On site audits to check compliance
- Further training and changes to information delivery where audits identify issues

In terms of governance, the Council is the primary duty holder (*responsible person*) under legislation, although, in effect, practical duties will be transferred down through the organisational structure, via the Executive Directors, to individual directors, then to heads of service and the client representative (i.e. project manager) responsible for overseeing site work on behalf of the Council.

We will ensure that contractors are made aware of Council's expectations by putting in place measures to clearly communicate our ERs and supporting policies and procedures and means for checking compliance with our standards. We will also ensure that there are mechanisms in place to make changes and improvements, where necessary.

Maintenance and testing

We recognise the requirement of Article 17 of the Fire Safety Order to carry out adequate maintenance of systems that have a bearing on fire safety. The Council will carry out testing and maintenance in accordance with best practice, by following the recommendations of BS 9999, as well as BS 7671 and other relevant codes of practice and legislative requirements, such as Gas Safe.

We note that there will be significant resource required to meet our obligations to carry out adequate testing and maintenance, and the Council will make such resource available in support of meeting our duties imposed under the fire risk management system and relevant legislation.

Again, the overall duty holder will be the Council, although specific responsibilities will be delegated through the management hierarchy to the individual maintenance managers responsible for the specific elements of equipment. The Council commit to ensuring that the duty holder is aware of

their duties and are provided with the resource required to discharge their duties effectively. The Council will prepare procedures for planned, preventive maintenance as necessary.

7. Equality Impact Assessment

The Council is committed to promoting an environment that values diversity. The Council aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others. This document has been equality impact assessed and this can be found in [Annex 6](#).

8. Training

The Council will provide adequate training to ensure that the fire risk management system is correctly implemented and maintained. Specific training will include:

- Training for managers in fire risk management.
- Training for all staff in basic fire safety (prevention, protection and procedures).
- Training for staff with specified roles, such as providing support during building evacuations, checking fire precautions, or other prevention, protection/procedural duties assigned to them.

Training will be fit-for-purpose and bespoke where necessary.

Training will be refreshed for all staff in periods not exceeding three years, and more regularly where determined as required through assessment.

9. Process for Monitoring Compliance with the Document

Compliance aspect or effectiveness being monitored	Monitoring method	Responsibility for monitoring	Frequency	Group or Committee
Fire risk assessments surveys carried out in accordance with delivery strategy	Records of properties requiring FRA plus planned and actual dates	Duty holder	Annual	Corporate Safety Board
Fire risk assessment remedial actions – number raised	Records of FRA actions	Duty holder	Annual	Corporate Safety Board
Fire risk assessment remedial actions – number completed within specified timescale.	Records of completion of FRA actions	Duty holder	Annual	Corporate Safety Board
Fire safety training completed within specified	Records of fire safety training	Duty holder	Annual	Corporate Safety Board

Compliance aspect or effectiveness being monitored	Monitoring method	Responsibility for monitoring	Frequency	Group or Committee
Appointed persons (Fire Safety Officer etc.) appointed	Records of appointed persons	Duty holder	Annual	Corporate Safety Board
Fire incidents (including fires, false alarms, near-misses, non-compliances with processes leading to risks, etc.)	Incident records	Duty holder	Annual	Corporate Safety Board
Planned, preventive maintenance compliance	Records of testing and maintenance	Duty holder	Annual	Corporate Safety Board
Co-operation and co-ordination compliance checks	Records that we have engaged with third-parties where necessary to confirm due diligence	Duty holder	Annual	Corporate Safety Board
Fire drills required / carried out	Records of fire drills against property	Duty holder	Annual	Corporate Safety Board
Fire safety complaints and response times in accordance with Service Level Agreements	Records of complaints and resolution	Duty holder	Annual	Corporate Safety Board
LFB Notices received and response to these	Records of Notices and action taken	Duty holder	Annual	Corporate Safety Board
(Housing only) Building Safety Cases delivered in accordance with Phased Delivery Plan	Records of Building Safety Cases against target delivery dates	Duty holder	Six-monthly	Corporate Safety Board

10. Dissemination of this Policy

This policy document will be available to all staff via Corporate Inductions and Managers should ensure it forms part of the local induction process. It will also be available on the Intranet and via internal communications teams.

Line managers will ensure that the Policy is clearly communicated to all members of their teams, including specifically at-risk groups, including lone workers and those who do not have regular access to information technology facilities.

11. References

- Other relevant Council policies, including the Corporate Health and Safety Policy
- Relevant fire safety British Standards (herein mentioned)
- Guidance that supports fire safety legislation, including but not limited to Approved Document B to the Building Regulations, *Fire safety in purpose-built flats*, *Fire safety in specialised housing*, LACORS, fire risk assessment guides, etc.
- Legislation, including the Building Regulations 2010, the Regulatory Reform (Fire Safety) Order 2005, the Housing Act 2004.

12. Associated Documentation

Housing Management's Fire Safety Manual.

Annex 1 – Emergency Planning for Housing

The Council will support people affected by an emergency under its 24/7 call-out arrangements. It will liaise with the emergency services through its control centre, activate arrangements to open Emergency Rest Centres for evacuated residents, and co-operate and co-ordinate communications to senior management for oversight and decision making.

Housing (Temporary Accommodation Team) will provide 24/7 Emergency Duty Officers, senior management and others, who will assist in finding alternative accommodation for those made homeless and ensure adequate response to issues affecting their buildings.

Emergency plans in the event of an unplanned event, potential emergency or disaster are held centrally. The plans include logistical issues such as shelter provision, communications, transport, weather. A duty system is in place 24/7, with trained staff in place to assist.

A critical part of the emergency plan is ensuring that we communicate clearly to all parties that need to be involved in the response, including the short, medium- and long-term actions needed to effectively respond to an incident. To facilitate this, a communication mechanism to all relevant team leaders will be created, whereby emails are sent to make relevant parties aware of what is needed to manage the Council's response.

Each building will have a specific emergency plan developed, appropriate to the type of building and occupants. These may include 'stay put' strategies for purpose-built blocks of flats, or simultaneous evacuation procedures for residential blocks that do not have the necessary compartmentation to support 'stay put'. Most non-residential buildings will also operate simultaneous evacuation procedures.

Staff and residents of the Council, as well as other relevant stakeholders, will be provided with training in the relevant emergency procedures. Where necessary, routine fire drills (at least twice annually for corporate buildings) will be undertaken. Consideration will be given to carrying out fire drills in housing where fire alarm systems are in place and where carrying out of such drills is considered to be of benefit for evaluation of emergency plan performance or reinforcement of training objectives.

The Council will identify those occupants who will require assistance in the event of an evacuation. In corporate buildings, staff requiring assistance must complete a Personal Emergency Egress Plan. Housing Management will develop a strategy to communicate with residents seeking information on anyone in their household who could potentially require assistance to evacuate. Person-centred risk assessments within specialised housing blocks are undertaken, reviewed on a six-monthly basis and details of the residents requiring assistance to evacuate in the event of a fire made available to LFB.

Meetings will be held with Housing, Social Investment and Property and Corporate Health and Safety to review incidents and to review arrangements on a quarterly basis.

Annex 2 – Monitoring and measurement (Housing)

To facilitate performance monitoring and measurement, the following items are considered to be important data relating to the fire risk management system:

- Resident engagement data
- Number of fires and how they were responded to
- Number of false alarms
- Staff (and resident) training
- Fire drills
- Fire risk assessments booked / completed
- Data relating to fire risk assessment actions
- Building Safety Files / Cases
- Risks and opportunities taken i.e. changes of fire strategies in line with opportunity, installation of new technologies, etc.
- Data from CRM about actions and progress against them.

Analysis and evaluation

We need to set benchmarks for 'what good looks like'. Clearly a major part of this involves having the data set available to enable us to evaluate our performance.

We will analyse and evaluate datasets available to us to inform our continued improvement.

Resident engagement

We therefore need to actively encourage residents and staff to engage with the fire risk management system. Failure for any engagement (i.e. queries, reports, etc.) from key stakeholders would in itself be poor performance of the system, and we will therefore maintain records and monitor statistics for engagement (i.e. number of individual times that engagement has taken place). For the purposes of engagement, meetings at which fire safety is raised as an agenda item may also be considered to be a form of engagement.

Following some form of engagement, particularly where residents or staff raise concerns or ask questions, we need to determine whether we meet our targets in terms of responding within adequate time. We set ourselves objectives in the section entitled *How the Council's fire strategy team will respond to engagement and concerns* and we will evaluate our performance against this benchmark.

Fires

The Council accepts that fires will happen, and that suffering a fire does not necessarily mean poor performance of the fire risk management system; it is how we respond to fires, and whether we took all reasonable steps to prevent fires, that are our performance benchmarks. The following will indicate our performance in responding to fires:

- Did the Housing team respond at the time of the fire quickly and effectively?
- Did re-housing (where necessary) and repairs get arranged immediately after the fire?
- Did the incident get reported in the right way, using the correct incident report form?
- Did the incident report form go to the correct people?
- Were any lessons learned from the fire communicated quickly and any necessary actions completed?

False alarms

The Council also accept that, where common fire detection and alarm systems are installed (for example in older premises that may not support 'stay put' procedures), there will be, from time-to-time, unwanted fire signals / false alarms. As with fires, we need to measure how effectively we learn from any false alarms and how effectively we put in place measures to prevent their recurrence.

As such, the following benchmarks are key to determining our performance:

- How quickly did the situation get addressed i.e. the alarm get silenced / reset in non-fire situations?
- Did a report get raised for each alarm activation?
- Was it possible to put in place measures to prevent recurrence, and, if so, did these measures get implemented?

Training

The Council is committed to providing relevant and up-to-date training to meet our objectives as detailed in this fire risk management system. As a starting point, we will create training in conjunction with stakeholders.

Following the creation, we will evaluate the success of our training by:

- Evaluating whether all persons who require training have completed the initial training
- Evaluating whether all persons have completed the refresher training within required timescales
- Evaluating customer satisfaction with the training through course feedback forms
- Evaluating any changes to training that are necessary to respond adequately to customer feedback or any other changes in legislation, best practice, etc.

Fire drills

The Council will evaluate our compliance with our requirement to carry out fire drills, analysing:

- Whether all buildings that require a fire drill have had one carried out in the six-monthly interval
- Whether all fire drills have a report prepared and recorded
- Whether all actions arising from a fire drill report are dealt with in good time

Fire risk assessments and actions

The Council will evaluate our performance in terms of FRAs and actions, analysing:

- Whether all FRAs have been carried out within three years
- Whether all FRA reviews were carried out at the 12-month interval
- Whether all actions arising from FRAs and reviews have been carried out within specified timescales

Building safety files and cases

The Council will evaluate our compliance with our objective to be early adopters of *Building A Safer Future* by:

- Putting in place a programme to create documented building safety case files
- Checking our adherence to the programme

Risks and opportunities

The Council will evaluate our performance in terms of managing risks and opportunities, analysing:

- Where we have encountered new broad organisational risks
- Where have taken the opportunity to innovate to address risks (such as where we have changed fire strategies utilising new technology and research)

Annex 3 – Internal audit and improvement

The Council will implement a robust audit programme and procedure, to ensure that we identify any areas for improvement in managing fire risk across our portfolio.

Audits of local compliance will be an annual objective of team leaders / line managers i.e. compliance with staff training regimes, testing and maintenance responsibilities (where relevant) will be required to be undertaken on an annual basis. These will be

- Communication – audit of measurement / record keeping, analysis and evaluation
- Response to fires – audit of measurement / record keeping, analysis and evaluation
- Number of false alarms - audit of measurement / record keeping, analysis and evaluation
- Staff (and resident) training - audit of measurement / record keeping, analysis and evaluation
- Fire drills - audit of measurement / record keeping, analysis and evaluation
- Fire risk assessments - audit of measurement / record keeping, analysis and evaluation
- Statutory documents – audit of measurement of meeting our programme, where relevant
- Risks and opportunities - audit of measurement / record keeping, analysis and evaluation

Where there is a duty or expectation for staff to audit the parts of the fire risk management under their control, individual instruction will be provided, and the duty holder will be provided with clear training and instructions on how to carry out the audit to the extent necessary.

Internal audits of the overall fire risk management system will be carried out annually by competent persons. Reports of audit outcomes will be prepared, which will contain the following information:

- Scope of the audit
- Names and roles of persons carrying out the audit
- Compliance with fire risk management requirements (as detailed in this document)
- Any non-compliances with fire risk management requirements

Where non-compliances (or non-conformances) are identified, a corrective action report will be raised. The critical details of the corrective action report will include the following:

- Area of non-compliance
- Details of non-compliance
- Details of action to be taken to address non-compliance
- Duty holder responsible for addressing non-compliance
- Timescale to address non-compliance
- How to report completion of non-compliance

Records of all audits will be maintained centrally in the fire risk management document management system, operated by competent persons.

Management review

The Council will carry out an annual management review. This will look at the fire risk management holistically, supported by:

- The requirements and procedures detailed in this document
- Consideration of the relevance of requirements detailed in this document
- Considerations of any existing challenges in meeting or resourcing support of this fire risk management system
- Data including the following:

- Feedback from relevant parties
- Extent of objectives met
- Incidents, non-conformities and corrective actions
- Monitoring and measurement results
- Effectiveness of actions taken to address risks and opportunities
- Audit results
- Evaluation of compliance with requirements
- Performance of external providers
- Findings from this and previous management reviews
- Adequacy of existing resources in meeting the requirements of the fire risk management system, and determination of additional resource requirements
- Recommendations for continual improvement

The management review will take place on an annual basis and a report will be generated and maintained for future review. The report will detail opportunities for development, changes needed to the fire risk management system and resource needs. The key features of the report will also be shared with all relevant parties i.e. team leaders and managers.

Improvement

Continuous improvement is the key part of the Council's fire risk management system. We accept that the system is new and that there will be incidents and non-conformances that allow us the opportunity to learn and to grow as an organisation, and we commit to using all instances as an opportunity to develop and improve in a positive manner.

Incident, nonconformity and action

Where incidents or non-conformities occur, we will take action to control and correct these, and deal with the consequences in an appropriate manner. We will do this by:

- Reviewing the incident, working out the cause of the incident and identifying any similar situations that could lead to a repeat of the occurrence
- Evaluating the need for action to eliminate the root causes of the incident
- Implementing any actions required
- Reviewing the effectiveness of any actions taken in addressing the issue
- Updating our planning in terms of risks and opportunities
- Changing our fire risk management system, where necessary

We will prepare and maintain records of reports that detail the nature of incidents / non-conformities and any actions taken to address them, as well as the results of any actions that were taken.

Continual improvement

To demonstrate continual improvement, we will maintain all records of the 'plan, do, check, act process', which will allow us to maintain close observation of the effectiveness of our fire risk management system and will help us to ensure our system remains suitable and adequate. Management will review the effectiveness of our system and supporting processes on an ongoing basis, and, supported by regular formal review, will ensure that we continue to improve and develop as an organisation responsible for fire risk management.

Annex 4 – Resident Engagement - Housing

This section is specifically relevant for residents and housing staff. In this section, we state the primary issues that we need to engage with our residents on, and how we intend to do this. This information is an overview on what we want to achieve, and we will produce other guidance for you using a range of sources as appropriate (i.e. web-based information, letters, emails, face-to-face discussion, resident association meetings, etc.).

Fire prevention

Residents – Residents need to know what to do to keep homes safe from fire. This includes simple actions to prevent fires. Some general fire prevention measures include:

- The importance of good housekeeping, within your home, the common parts and on balconies
- How to prevent fires caused by smoking materials
- How to prevent fires caused by heaters
- How to prevent fires caused by cooking
- How to prevent fires caused by electrical appliances

The Council – we need to provide you with up-to-date advice and guidance, in an easily-interpretable format accessible to all. It is important for us to provide not only information to you, but to respond appropriately to concerns and queries raised by you, and we will commit to:

- Provide you with clear guidance relating to fire prevention
- Provide you with a clear means to communicate with us in relation to concerns
- Provide you with adequate service by addressing fire prevention concerns in reasonable time and to an appropriate extent
- Record and measure our performance, and commit to continual improvement

Fire protection

Residents – you need to understand the measures that are in place to protect yourself and your neighbours should a fire occur, and how to ensure that these are not impaired or undermined. Fire protection measures vary from block to block, depending on design, but the kind of things you need to have a basic understanding of (how they work and when there might be a problem that we need to know about) include:

- | | |
|---------------------|---------------------------|
| • Fire doors | • Smoke ventilation |
| • Fire alarms | • Dry risers / wet risers |
| • Compartment walls | • Sprinklers |
| • Emergency light | |

The Council – we need to provide you with clear advice and guidance, in an easily-interpretable format accessible to all. It is important for us to provide not only information to you, but to respond appropriately to concerns and queries raised by you, and we will commit to:

- Provide you with clear guidance relating to fire protection
- Provide you with a clear means to communicate with us in relation to concerns
- Provide you with adequate service by addressing fire protection concerns and defects in reasonable time and to an appropriate extent
- Record and measure our performance, and commit to continual improvement

Evacuation strategies

Residents – you need to understand what to do if there is a fire, either in your home or elsewhere in your block, and the measures that are in place to keep you safe. Fundamentally, you need to understand whether there is a need to evacuate if there is a fire in the building that is not in your flat, or whether it is safe to stay where you are. You will always need to evacuate if there is fire or smoke within your flat.

The Council – we need to give you clear information on what to do if there is a fire, and why we have made that decision. We need to deliver this information using a suitable range of communication media and we commit to doing this. We also need to respond to any concerns or queries that you have at any point relating to the evacuation strategy in a reasonable time, and to record and measure our performance in responding to your concerns and queries.

Emergency procedures and protocols

Residents – you need to understand what will happen in an emergency (i.e. after you have evacuated from your home). This includes who to call and where to go. We have emergency teams in place to provide assistance, and you need to understand how this will work in real terms.

The Council – we need to provide you with an excellent, supportive service in the event of an emergency. This includes quickly re-housing you if you lose your home and assisting you with getting key belongings and a warm, dry place for you to wait while we get everything in place for you. We need to make you aware of how we will do this, and we need to record and check our performance to ensure that we provide the best service possible for our residents.

Improvement works

Residents – you need to know what works we are planning and carrying out, and why we are doing them. You also need to know what to do if you feel that the works are not being carried out to the right standard.

The Council – we need to clearly communicate what works we are doing and why we are doing them. We need to give you a point of contact within the Council who is responsible for ensuring that we manage our work properly and complete it to the right standard. We need to monitor and measure the performance of delivery of our works and ensure that we always seek to improve our service.

How to engage with the fire risk management system at the Council

Residents – you need to know that we are putting in place a robust system to manage fire risk across the Borough. You also need to know that we consider your safety to be our absolute priority. As of September 2019, the Council have a specialist fire safety team, and our job is to ensure that we reduce risk from fire across Kensington and Chelsea. You can contact us directly at any time by emailing firesafety@rbkc.gov.uk. You can also engage directly through your local Resident Liaison Officer or Residents Association.

The Council – we need to listen and to respond to any comments, queries or complaints that our residents have. We need to respond to you in good time, and in a professional and appropriate manner. Our response times need to be appropriate to the seriousness of your communication, and we need to be accurate in working out how urgent your query is and making sure that we meet required timescales in terms of response.

Annex 5 – General Fire Strategy Information Relating to Housing

Our residential estate relies on effective resident engagement supported by knowledgeable staff who are adequately trained in fire risk management to help us manage fire risks. The residents are an integral part of the fire risk management system, not only being exposed subjectively to risks, but having the opportunity to actively participate in identifying and controlling risks. We must provide them with a system with which they can interact to achieve this.



The above provides a visual representation of the relationship between residents, the Council's housing staff and fire strategy team. London Fire Brigade provide an additional interface in their role as the enforcing authority, and residents may report concerns to them in some cases. The Council's fire strategy team will be the primary contact LFB has with the Council, who can co-ordinate joint interventions, audits and responses.

High Risk Residential Buildings

In order to meet our objective of being early adopters of *Building A Safer Future*, we will start to compile Building Safety Files and Building Safety Cases, in a planned, programmed manner, starting with our tallest building and working down in height order. We will also prioritise buildings housing predominately vulnerable people, such as sheltered housing.

Proactive work

The Council's fire strategy team will provide information, instruction and training to housing staff, who will pass this on to residents. This will involve information that may include:

- Specific fire risk management training for housing staff.
- Information relating to the evacuation strategy of the block.
- Significant findings of the fire risk assessment.
- Information of forthcoming interventions, such as drills, exercises or inspections.
- Other relevant information contained within Section 10 of this document.

Reactive response

We will provide a number of routes for residents to engage with the Council, and we will commit to investigating and responding to all engagement in a structured and logical manner. Residents will be able to engage with their local neighbourhood officers, managers and directors. They will also be able to engage directly with the fire safety team, by emailing firesafety@rbkc.gov.uk. Where residents engage with the fire strategy team via other Council staff, those staff will raise the incidents to the fire strategy team email inbox so that these matters can be appropriately logged and dealt with.

Governance within Housing Management

The various teams that sit within the Council's Housing Directorate will be required to appoint a **Fire Safety Officer** and a **Deputy Fire Safety Officer**. These nominated persons will act as the 'champions' of fire safety matters within their specific team area. The fire strategy team will arrange to provide specific scope, instructions and training for this nominated individual

People

We manage over 9,000 homes, for residents of all ages with varying needs. Some of our residents would be considered to be vulnerable, for various reasons, and we recognise that our residents may have specific needs that we have a duty to meet to ensure that they are safe, particularly in light of fire statistics reinforcing the fact that vulnerable residents are particularly at risk in case of fire.

The degree to which our residents may be at risk, due to age, disability or other factors, will vary greatly from individual to individual. It is therefore appropriate that we consider how best to meet each person's needs on an individual basis.

In some cases, new technologies in relation to personal suppression systems (such as those utilising water mist extinguishing technology) may be appropriate. The Council will undertake person-centred risk assessments, which will consider the requirement for such controls. We will also utilise a range of approaches to determine whether there is a need for a resident to receive a person-centred risk assessment, such as housing staff receiving training and being provided with a mechanism to identify persons who may have specific needs for such, and having a clear way to escalate this to the fire strategy and/or health and safety teams.

Buildings

We recognise that the buildings in which our housing is provided take different forms and have different associated challenges.

Some of the main typologies of housing stock can be summarised as follows:

- Single family dwelling houses
- Flats located in converted buildings (i.e. heritage townhouses converted into flats)
- Flats in historic purpose-built mansion blocks
- Flats in purpose-built post-war blocks designed and built in accordance with CP3
- Flats in purpose-built blocks designed and built in accordance with Approved Document B Volumes 1 and 2
- Flats in purpose-built blocks designed and built in accordance with BS 9991

Some of our purpose-built blocks are high rise residential buildings. These blocks fall under the remit of *Building A Safer Future* and we recognise the special status of these blocks and the need to maintain up-to-date building safety files on these buildings.

The key risks with these buildings vary greatly depending on means of escape design strategy, fire detection and alarm provision and compartmentation. For example, buildings built in the Georgian or Victorian eras are unlikely to have adequate compartmentation to support 'stay put' arrangements (due to use of lath and plaster construction for ceilings and walls). The risk, historically, is that such buildings had notional fire-resistance which may have been originally considered sufficient, although what not be with current knowledge. The opportunity here is to address the risk by adopting simultaneous evacuation support by a common fire detection and alarm system. There is additional opportunity to reduce the burden, aesthetically and logistically, in the installation of such a system by using radio technology, where appropriate.

The above is also true of conversions that took place prior to 1991 (when Approved Document B was adapted to incorporate what is considered current standards of compartmentation in the course of conversions), and buildings converted to the older standards (with only notional fire-resistance between flats) now fall under requirements for Houses in Multiple Occupation within the Housing Act).

With our purpose-built stock, CP3 allowed maisonettes and other internal designs based on alternative escape via balconies. In some cases, allowance was made for alternative escape to be based on rescue by fire and rescue service ladders, or 'break-in' to neighbouring properties, neither of which would be an accepted approach within current guidance. Where balconies served a number of flats as alternative escape, in some cases, over time, these have become blocked or altered. All of these factors present a risk, in that the original design ethos for alternative escape may have become undermined over time.

In such cases, it is relevant to consider the most favourable opportunity to address the risk. For example, prioritising reinstatement of the original alternative escape strategy may not robustly address the risk; this could be the case where a balcony was returned to use, although could be quickly undermined again by residents modifying the balcony, thus placing a management burden on the Council to continually monitor the situation. Furthermore, where fire and rescue service rescue via ladder was the original design intention, this would no longer be acceptable, so it is more appropriate to look to implement a modern solution.

In these cases, a greater standard of internal fire detection coverage within the flat is appropriate, as well as ensuring that fire doors are provided to all risk rooms within the flat.

The Council's minimum standard for detection coverage is Category LD2 as defined in BS 5839-6:2019. To afford the highest level of protection to compensate for other issues, The Council's standard for detection coverage in such cases will be Category LD1 as defined in BS 5839-6:2019.

In terms of fire doors, where existing internal flat doors are in situ and are in good condition, these can be considered satisfactory without the need for replacement. Doors may have originally had self-closing devices installed. Current guidance is that internal flat doors do not require self-closers, and that focus should instead be on engaging with residents and informing and instructing them to keep doors closed, and the Council recognise this guidance and will adopt it in line with current practice.

We will utilise other current technology with fire doors to upgrade with cold smoke seals, where original doors are to be left in situ in common areas. All flat front entrance doors within the Borough are on a replacement programme.

Where our buildings are provided with old bin chutes that are within the staircase enclosure (i.e. they are not separated from the staircase by fire-resisting construction), we recognise the risk that this

poses to the means of escape, and we will engage with residents to block up the chutes and agree alternative arrangements for waste transfer.

We recognise the risks and opportunities associated with smoke control systems in our housing stock. In particular, older thinking on methods of smoke dispersal, particularly where these involved open, interconnecting shafts, or indeed use of staircase enclosures as part of dispersal strategies pre-dated extensive modern research on smoke movement and modelling. This presents a risk of smoke-logging of protected areas in case of fire, and loss of escape routes. However, we recognise the significant improvements in technology, utilising detection, automatically-opening vents (AOVs), mechanical extraction, etc., and we will seek to address the legacy risks in a way that offers us an opportunity to make significant and long-term improvements to smoke ventilation strategies, where practicable.

Annex 7 – RBKC Housing Management - Functional Requirement Processes for Meeting Corporate Fire Safety Policy

Fire Risk Management System (FRMS) Housing Management Functional Requirement Processes (FRPs) – FRP-000

Introduction

This document details the underlying processes that enable Housing Management to meet the functional requirements of the Fire Risk Management System described in the Council's Corporate Fire Safety Policy.

The Fire Risk Management System is designed to meet the requirements of legislation as well as facilitating best practice and assists with delivering the Council's commitment to controlling risk associated with fire to life, property, assets and the environment.

The primary functional requirements of the system, and the process for complying with which are described, can be summarized as follows:

FRP-001 – Fire Risk Management System Implementation Process (KT)

FRP-002 – Building Safety Case Process (KT)

FRP-003 – Works Authorization Process (WAP) (KT)

FRP-004 – Planned, Preventive Maintenance Assurance Process (KT)

FRP-005 – Fire Risk Assessment Process (SHM)

FRP-006 – BAFF Operations Manual and Quality Management Process (SHM)

FRP-007 – London Fire Brigade Liaison Process (SHM)

FRP-008 – Housing Fire Safety Training Process (OP)

FRP-009 – Resident Engagement Process (OP)

FRP-010 – Community Initiative Process (KT)

FRP-011 – Housing Fire Safety Complaints Process (OP)

FRP-012 – Competency Specification (OP)

FRP-013 – Employer Requirements (KT)

FRP-014 – Due Diligence Process (KT)

FRP-015 – Fire Safety Incident Recording and Investigating Process (OP)

FRP-016 – Grenfell Tower Public Inquiry Recommendation Response Process (KT)

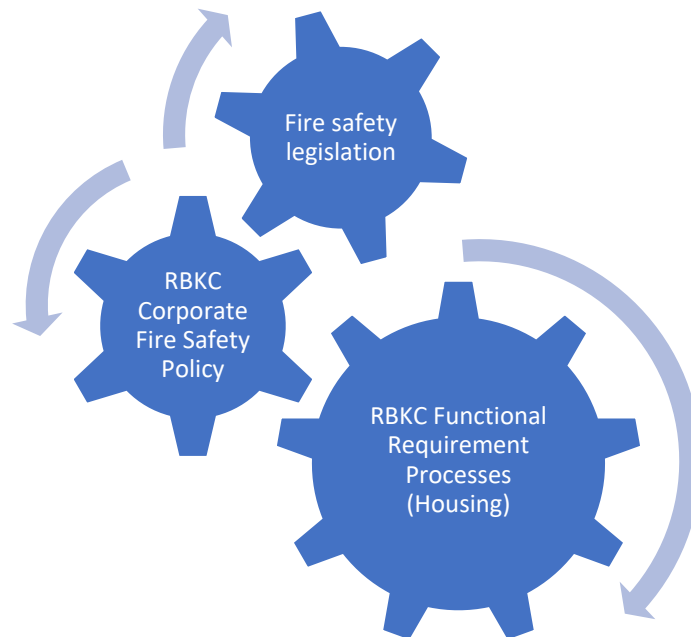
FRP-017 – Fire Precautions Upgrade Process

Annex 8 – Function Requirements Processes for the Council’s Housing Management to Meet This Policy The Requirement

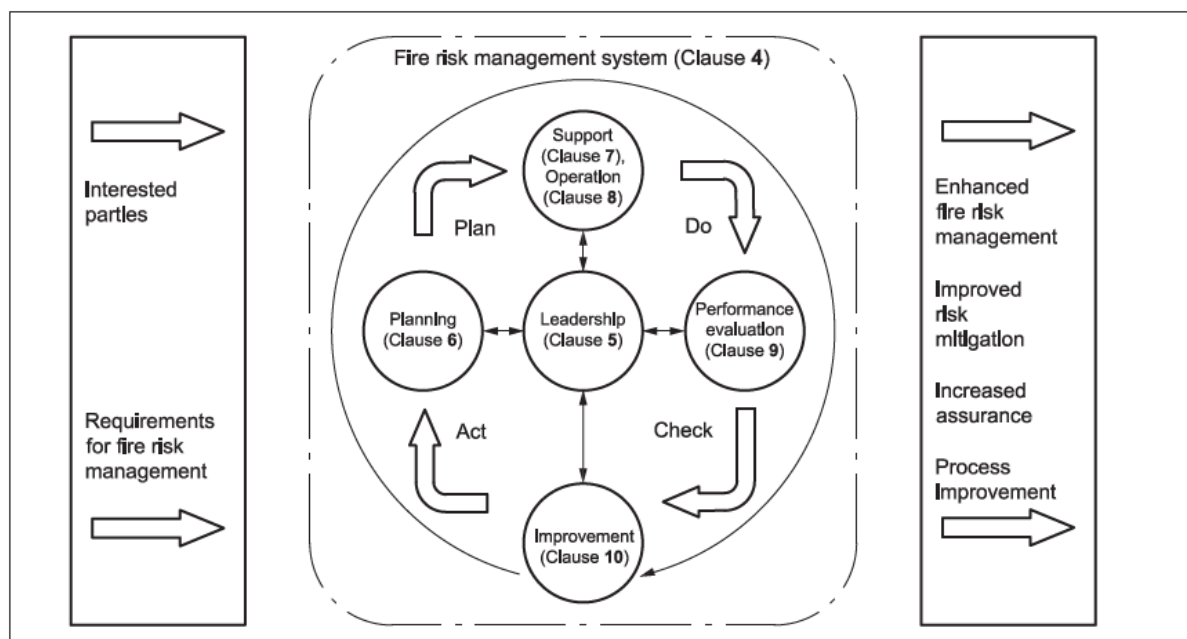
To implement the fire risk management system in accordance with BS 9997 and as described within the Corporate Fire Safety Policy.

Process to Meet Requirement

The Housing fire safety team will implement the Functional Requirement Processes (FRPs) to meet the requirements of the Corporate Fire Safety Policy.



The basis of the fire risk management system is the 'Plan, Do, Check, Act' model.



As such, the suite of FRPs details what the Council's Housing Management are going to do to operate, how we are going to measure and record what we do, how we are going to evaluate our performance and how we make improvements, where needed.