



Housing Services
Fire Safety Management strategy
(2020-2023)

CONTENTS

1. Introduction

- 1.1 - Purpose of this strategy
- 1.2 - Aims of this strategy
- 1.3 - Scope of this strategy
- 1.4 - Legal context of this strategy

2. Roles & Responsibilities

- 2.1 - Explicit Duties

3. Risk Assessments

- 3.1 - Types of Fire Risk Assessments
- 3.2 - Methodology for determining overall risk
- 3.3 - Frequency and programming

4. Time scales for completing works

5. Minimum Standards

- 5.1 - Assessors
- 5.2 - Work Contractors
- 5.3 - Products

6. Testing Regimes

- 6.1 - Alarms
- 6.2 - Emergency Lighting
- 6.3 - Dry Riser
- 6.4 - AOV
- 6.5 - Bin Chutes
- 6.6 - Fire Extinguishers

7. Data Storage & Testing

- 7.1 - Building Safety Case File
- 7.2 - Time scales for existing building
- 7.3 - Swordfish and Keystone

8. Staff training

9. Incident Management

10. New Build Gateways

- 10.1 - Gateway One
- 10.2 - Gateway Two
- 10.3 - Gateway Three

11. PEEPs (Personal Emergency Evacuation Plan)

12. Clutter

13. Unauthorised Alterations

14. Specific Items

- 14.1 - Fire Doors
- 14.2 - Scooters
- 14.3 - Fire Suppressant Systems
- 14.4 - Alarm Systems
- 14.5 - Emergency Lighting

15. Equal Opportunities Statement

16. Data Protection Statement

17. Dissemination and communication of this strategy

18. Implementation of this strategy

19. Monitoring and review of this strategy

20. Delegated authority to make minor changes to this policy

Appendix 1 – Incident Management Flowchart

1. Introduction

1.1 Purpose of this strategy

The London Borough of Havering considers the safety of its residents to be of paramount importance, and whilst fire safety has always been considered as a core part of our approach to safety, the terrible events at the Grenfell Tower has re-focussed attention on fire safety in and around our resident homes and will lead to additional obligations for landlords and tenants.

This fire safety policy intends to provide a structured approach, which identifies the key points required to achieve suitable arrangements for managing fire safety in properties owned and managed by the London Borough of Havering.

It reflects on both the current legislation and the regulation, which is likely to be introduced by the new Building Safety Bill and amendments to the Regulatory Reform (Fire Safety) Order 2005 Fire and the findings from the Hackett review.

1.2 Aims of this strategy

The Building Safety bill brings a clear approach to sanctions including defining non-compliance with the bill and making non-compliance a criminal offence.

We will keep our buildings safe throughout their lifecycle, from design through to maintenance in-use.

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.

1.3 Scope of this strategy

This document is the key operational document which ensures all relevant stakeholders are able to comply with LBH fire safety policy, detailing our approaches to surveying, testing and works and providing relevant methodologies.

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.

It also give clear guidance as to the responsibilities and training required by all stakeholders.

It is a live document and will be reviewed at annually, at any change in legislation or best practice is introduced or in the event of an incident.

1.4 Legal context of this strategy

This strategy operates in the context of the following legislation and Codes of Practice:

- Regulatory Reform (Fire Safety) Order 2005
- Building Safety Bill (2020) (applicable to buildings of 6 stories or 18m)
- Building Regulations and approved documents
- Housing Act
- Defective premise Act
- Local Authorities Coordinators of Regulatory Services
- Housing Health and Safety Rating System

This strategy is supported by the Housing Fire Safety policy which sets out the key processes in managing fire risk, including providing an appropriate matrix to assess risk, relevant processes to manage surveys, resurveys and incidents and details our core standards.

2. Roles and Responsibilities

Accountable Person:	Chief Executive of the London Borough of Havering
Duty Holder:	Director of Property Service
Assistant Duty Holder:	Assistant Director of Property Service
Responsible Person:	Fire Safety Manager
Building Safety Manager:	New role

2.1 - Explicit Duties

Stakeholder	Duty
Accountable Person	Legally responsible for ensuring the structural and fire risk are understood for each building and ensuring those risk are adequately managed so the building can be safely occupied They can delegate duties
Duty Holder	Undertake all functions delegated by the accountable person Oversee all fire safety activity and put in place a rigorous assurance approach Ensure adequate resource (Staff and financial) to deliver the FSMP Approve changes to the FSMPs Determined the appropriate resident engagement strategy Oversee reporting to regulatory bodies and London Fir Brigade
Assistant Duty Holder	Support and deputise for the Duty holder as required

Responsible Person	<p>Manage day to day operation FRA programme and associated works</p> <p>Ensure policy and FSMP are adhered to</p> <p>Determine relevant training programmes for stakeholder and ensure they are implemented</p> <p>Update Duty holder on relevant changes to legislation</p> <p>Manages contractors and surveyors undertaking fire safety works</p> <p>Provide expert advice to other teams undertaking works</p> <p>Report any non-compliance to the duty holder</p>
Building Safety Manager	<p>Complying with their own statutory duties as set out in the Bill</p> <p>Managing the building in accordance with the Safety Case Report for the building and ensuring that the requirements of the Building Assurance Certificate are complied with</p> <p>Keeping informed and co-operating with the managing agents (if any) of the building (if different) about safety measures and works;</p> <p>Complying with all directions given and statutory notices issued by the Building Safety Regulator</p> <p>Co-operating with other occupiers or owners of the building, including any other person acting as the Responsible Person under the Fire Safety Order, to secure an integrated approach to managing building safety risks</p> <p>Maintain the Building Safety Case File</p> <p>Engage with residents on all fire related matters and implement a resident engagement strategy</p> <p>Ensure competence to those involved in the maintenance of the building</p>
All Housing Staff	<p>To ensure the FSMP is enforced</p> <p>To ensure fire safety is considered as part of any projects</p>
All Staff	<p>To report any areas of concern within an appropriate timescale</p>

3. Risk Assessments

3.1 - Type of Fire Risk Assessments

We will hold, as a minimum, TYPE 1 surveys on a cyclical basis (or the minimum required following any changes in legislation).

On or before the next assessment date for each building we will undertake a Type 4 FRA (invasive survey to communal areas and at least 10% of flats).

We may determine the need to undertake additional levels of survey on an ad-hoc approach, this will be approved by Compliance board.

3.2 - Methodology for determining overall risk

Risk	Factor
High Risk	<ul style="list-style-type: none"> • As identified on the FRA • High Rise (over six stories or 18m) • Sheltered • Hostels • Single dwellings converted to multi-occupancy before 1999 • Properties above shops or commercial premises
Medium Risk	<ul style="list-style-type: none"> • As identified on the FRA • 3-5 stories purpose built • Single dwellings converted to multi-occupancy after 1999
Low Risk	<ul style="list-style-type: none"> • As identified on the FRA • Below 3 stories

3.3 - Frequency and programming

The frequency for undertaking FRAs will be determined by the overall risk for each property as determined on the last FRA.

Generally;

Risk	Frequency
High Risk	Every year
Medium Risk	Every 2 years
Low Risk	Every 3 years

All programmes for undertaking FRAs will be on Keystone asset management system. The asset management team will be responsible for an oversight function to ensure the system is correctly updated and FRAs are not overdue.

The Fire Safety team will be responsible for updating Keystone and Swordfish as required and to ensure all FRAs and works are completed in their given timescales. This will including liaison with contractors and other teams within LBH.

4. Timescales for completing works

Category	Maximum Timescale	Examples
Category A	Within 2 weeks	Clearance of combustible materials and hazards which may impeded safe evacuation or fire brigade access from communal areas.
Category B	Within 6 months	Minor repairs to fire doors Minor fire stopping works, cable penetrations Defective electrics Signage
Category C	Within 24 months	Larger scale fire stopping and compartmentalisation Larger repairs and maintenance Upgrade fire detection systems
Category D	Within 5 years	Replacement fire door

5. Minimum Standards

5.1 - Assessors

All Fire Risk assessors must be registered with any of the following recognised professional bodies;

- Institute for Fire Engineers (IFE)
- BAFE – fire safety register
- NAFRAR

All fire risk assessor must be able to demonstrated at least 5 years' experience, and be able to:

- Demonstrate suitable qualification and appropriate training
- Provide evidence of professional indemnity insurance of a minimum £M10.

5.2 - Work Contractors

Work contractors must be third party accredited by the relevant recognised professional bodies including UKAS, BAFE, FIRAS.

The Fire Safety Manager will be responsible for approving the use of contractor who cannot demonstrate accreditation by the above bodies.

5.3 - Products

All fire stopping products must have been fully tested and suitably fire rated for the intended use and application intended.

Only products defined as Designated Products or Safety Critical Products will be allowed. Data sheets must be provided as part of contractors RAMS.

6. Testing Regimes

6.1 - Alarms

We will test all communal automatic fire detection systems:

Control panel: annually
Detector head: monthly
Sounders: weekly
Tyne tech and telecare systems: weekly

Annual and monthly test will be via an external contractors and a record of the test will be provided to LBH within 5 working days. Any failures will be immediately reported.

Weekly tests will be undertaken by scheme managers and TMO managers. We will complete a functional test on all smoke alarms to individual properties annually as part of the gas inspection, faulty alarms of those whose batteries have failed will be replaced or a new battery installed.

For all individual properties in Hostels and HMOs, we will undertake a monthly detector test.

Where properties have no gas and are not subject to an annual service we will ensure smoke alarms are tested annually.

We will have a cyclical programme to replace all battery-operated smoke alarms and hardwired alarms which are 10 years old.

6.2 - Emergency Lighting

We will test all emergency lighting:

- Flick test monthly
(unless a self-monitoring system is installed)
- Batteries annual drain down test

This will be via an external contractor and a record of the test will be provided to LBH within 28 working days. Any failure will be immediately reported.

6.3 - Dry Riser

- Visual test Six-monthly
- Wet pressure test Annually

This will be via an external contractor and a record of the test will be provided to LBH within 28 working days. Any failure will be immediately reported.

6.4 - AOV

This will be an annual test conducted by an external contractor and a record of the test will be provided to LBH within 28 working days. Any failure will be immediately reported.

6.5 - Bin Chutes

This will be an annual test conducted by an external contractor and a record of the test will be provided to LBH within 28 working days. Any failure will be immediately reported.

6.6 - Fire Extinguishers

All fire extinguishers are serviced on an annual basis by an external contractor. Defective or out of date extinguishers will be replaced immediately. A record of the service will be provided to LBH within 28 working days.

7. Data Storage & Sharing

7.1- Building Safety Case File

The Fire Safety Bill recognises that information held on existing properties may not be as easily available as those on new properties and has suggested an incremental approach implementing Building safety case file, so we will adopt the following:

Item	New build	Existing properties
Building Registration Certificate	On handover	N/A
FRA	On handover	Phase 1
O&M Manual	On handover	Phase 2
Full as built drawings 2D	On handover	Phase 2
Full as built drawings 3D or BIM	On handover	Phase 3
Fire Strategy	On handover	Phase 1
M&E Manual	On handover	Phase 2
Resident information	On handover	Phase 1
PEEPs	On handover	Phase 1
Oxygen Users	On handover	Phase 1

7.2 - Time scales for existing buildings

Phase 1:	within 1 year
Phase 2:	within 2 years
Phase 3:	within 5 years

7.3 - Swordfish and Keystone

All property data will be help on the Swordfish document management system and must be accessible to relevant stakeholders.

Keystone will hold links to the data where relevant

8. Staff training

Relevant training will be provided to all staff. This will be dependent on roles and responsibilities.

Stakeholder	Training	Frequency
Lead member for Housing	Understanding of legal requirements and responsibilities Fire Safety Regulations training	Bi-annually or at any significant change in legislation
Accountable Person	Understanding of legal requirements and responsibilities Fire Safety Regulations training	Bi-annually or at any significant change in legislation
Duty Holder	Understanding of legal requirements and responsibilities Fire Safety Regulations training	Bi-annually or at any significant change in legislation
Assistant Duty Holder	Understanding of legal requirements and responsibilities Fire Safety Regulations training	Bi-annually or at any significant change in legislation
Responsible Person	Understanding of legal requirements and responsibilities Fire Safety Regulations training NBOSH Fire Safety Risk and Management or equivalent	Bi-annually or at any significant change in legislation One-off and continual CPD

Building Safety Manager	To be confirmed	
All Housing staff	Fire safety awareness training including understanding FRAs and PEEPs	Annually
	Fire marshal training (staff who manage any evacuations)	Annually
All other Staff	Fire safety awareness training	Bi-annually

9. Incident Management

See appendix 1 for incident management flow chart.

10. New Build Gateways

10.1- Gateway One

The first gateway point (Gateway one) will be before planning permission is granted when fire safety issues which impact on planning should be considered, including emergency fire vehicle access to a building and whether there are adequate water supplies in the event of a fire.

To aid the planning authority in their decision as to whether to grant planning permission, LBH will be required to submit a Fire Statement setting out fire safety considerations specific to the development with their planning application. National guidance will be published to help prepare effective Fire Statements.

It is anticipated when assessing an application at Gateway one, the local planning authority will consult their local Fire & Rescue Service (as necessary) on a statutory basis.

The Fire Statement will provide information on the near vicinity area of the development highlighting key considerations for future nearby developments in relation to this.

Where a development benefits from a permitted development right, it will proceed straight to Gateway two for assessment by the Building Safety Regulator before any construction work can commence.

In addition, where there is a permitted development right which requires prior approval from the local planning authority, LBH, at the time of submitting the prior approval application will also notify the Building Safety Regulator of the proposal to change a building and bring it in scope of the new regime.

10.2 - Gateway Two

This will be before construction begins at the current 'deposit of full plans' stage under the Building Regulations 2010. Under the new regime, the Building Safety Regulator will take on the role of the Building Control Body and be legally responsible for regulating in-scope buildings in respect of building regulations.

LBH will be required to submit key information to the Building Safety Regulator demonstrating how LBH will comply with building regulations through the submission of full plans, a construction control plan, fire and emergency file, and other supporting documentation that will help the assessment team determine whether the application meets the building regulations requirements and that the duty-holder has sufficiently demonstrated that they are managing building safety risks.

At Gateway Two, LBH will also be required to ensure they are satisfied that the Principal Designer and Principal Contractor can demonstrate the necessary competence to discharge their responsibilities effectively.

The Building Safety Regulator, working with local regulators, will within a reasonable timeframe, assess the full plans and associated information against all the requirements of the building regulations. They will be able to seek further information from LBH or reject an application outright if they are not satisfied it meets the necessary requirements to proceed to the next development stage.

Gateway Two will, therefore, be a 'hard stop' before the Building Safety Regulator gives permission for construction to begin. If permission is granted to proceed, the Building Safety Regulator will, in discussion with LBH, set an appropriate site inspection programme for specific stages of the construction work.

Where information required at Gateway two is not available but waiting for it could delay construction (such as in complex builds), the Building Safety Regulator will be able to allow a staged approach to construction. This will still represent a 'hard stop' approach but instead be managed in stages (for example: foundations, superstructure, etc.).

Where the staged approach is adopted, the Principal Contractor will not be permitted to begin work on other parts of the building until an inspection of the previous stage by the Building Safety Regulator has been successfully passed and the plan(s) for the subsequent phases of work have also been approved.

A change control strategy will be submitted as part of the construction control plan at Gateway two and will need to be updated and maintained throughout the construction phase, to record all changes from the original plans as submitted. Critical safety management changes will need to be notified to the Building Safety Regulator before further work can begin on site.

10.3 - Gateway Three

The third and final gateway point is before occupation of the building at the completion certificate/final notice stage under the building regulations. The Building Safety Regulator will provide the building control function working with local regulators. LBH will be required to submit to the Building Safety Regulator information on the final, as-built building. This will include:

- updated as-built plans indicating any agreed variations since Gateway two;
- a complete construction control plan;
- an updated fire and emergency file; and
- a complete key dataset

LBH, the Principal Designer and the Principal Contractor, will also be required to produce and co-sign a final declaration confirming that to the best of their knowledge the building complies with building regulations.

To provide adequate regulatory oversight on receipt of this declaration the Building Safety Regulator, taking advice where necessary, will decide whether to accept the declaration, and associated information providing evidence that the building complies with all the requirements of Gateway three, with the option to request further information from duty-holders if not satisfied.

Key information related to fire and structural safety submitted during the three Gateways will form part of the golden thread of data, which will be kept up to date and made accessible to relevant people throughout the lifecycle of the building.

Where developments are to be occupied in stages, the Building Safety Regulator will have the ability to permit partial occupation before the overall building is completed. This should form part of the design strategy from the outset and planning for this should be included in the documents submitted before Gateway three.

A suitable fire management strategy will need to be in place prior to commencing partial occupation. To consider whether partial occupation should be allowed, LBH would need to demonstrate the measures being put in place to ensure the safety of residents. Any application will be made to the Building Safety Regulator through the gateways process before any occupation.

11. PEEPs (Personal Emergency Evacuation Plan)

PEEPs will be produced in line with the PEEP process as attached in appendix 1.

Housing management are responsible for the production and maintenance of PEEPs for all residents who they consider require one and will liaise with the fire safety team as required.

Person centred risk assessments will be undertaken for all residents in sheltered schemes which will determine the need for a PEEPs and a care plan

PEEPs will be completed for residents in general needs properties on an ad-hoc basis as residents are identified. A flag identifying residents with PEEPs will be visible on our housing management systems.

LBH will share on a monthly basis with the LFB an address list containing relevant information around vulnerabilities and PEEPs

12. Clutter

LBH adopts a zero tolerance approach to combustible items and hazards in communal areas, please refer to the Sterile Communal Use Policy.

13. Unauthorised Alterations

Please refer to the Landlords consent policy.

14. Specific Items

14.1 - Fire Doors

All doors to individual flats (flats entrance doors – FEDs) will be generally a minimum of self-closing FD30S standard, which will include full certification and testing (including burns and smoke testing) of whole door set, including frame, intumescent seals and furniture.

All communal compartmentation doors will be self-closing FD60S which will include full certification and testing of whole door set, including frame, intumescent seals and furniture.

Fire doors will not be specified unless they are have been fully certified by an accredited third party organisation.

New installations of fire doors will only be undertaken by third party accredited installers, LBH preference is for BMTRADA accreditation but others may be considered.

Any new door installation will not be considered compliant until a final installation certificate has been received from the installer.

Repairs works to fire doors will only be allowed where they are undertaken by accredited contractors (BMTRADA) and works undertaken in a way which does not compromise the integrity of the fire door.

Where possible, FEDs will not be fitted with individual letterboxes, alternative provision will be provided. Where existing doors have letterboxes only replacement boxes with intumescent seals will be accepted.

All application from residents and leaseholder to replace their own FED must complete with LBH standards.

14.2 - Scooters

Individual mobility scooters will only be allowed;

- In sheltered schemes where there is sufficient space in the designated storage area which will allow both secure storage and charging for the scooter. LBH will ensure all sheltered scheme have a number of stores available to residents. (See policy at appendix 3).
- In general needs properties only where residents have been given consent to keep a scooter on the property. This permission will be dependent on where the scooter will be stored and how it can be safely charged.

Scooters will not be allowed where they are to be stored in communal areas.

Scooters will not be allowed where they rely on extension cables to be charged.

It may be necessary that residents require outbuildings or scooter storage to be fitted, where this is required LBH will consider the feasibility of a request, approval must be granted before consent is given.

Any costs associated with the provision of scooter storage or charging points in general needs properties will be met by the resident.

14.3 - Fire Suppressant Systems

LBH will not routinely fit fire suppression systems to its existing properties unless it is a requirement to meet the overall fire strategy of a building. This will be identified as part of the FRA.

All new build properties over 18m or 6 stories will have fire suppressant systems fitted as part of the fire strategy and in line with building regulations.

Individual fire suppressant systems may be fitted in individual properties where the PEEP has identified a need for such a system.

14.4 - Alarm Systems

All domestic properties will be fitted with an appropriate fire detection and warning system.

Properties will be fitted with communal detection system where they are identified as part of the fire strategy for the building. Each system will be designed to current British Standards BS5839 (including part 6 amendment) with appropriate warning systems and sounders.

Where residents have specific needs, specialist warning equipment will be fitted.

All domestic properties will be fitted as a minimum with a heat detector in the kitchen and smoke alarms in the hall and landing. Where possible these will be hardwired and interlinked and will be installed as part of any Decent Homes electrical upgrade or EICR checking programme. Where properties are waiting for upgrades then battery operated alarms will be fitted.

14.5 - Emergency Lighting

LBH will install emergency where it has been identified that the LUX levels are below the required British Standard to provide safe escape from a property.

Systems will be hardwired with battery back-up, minimum 5-year battery life and each system must include adequate testing points.

15. Equal Opportunities statement

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

An EqHIA (Equality and Health Impact Assessment) has been carried out and accompanies this policy.

The Council seeks to ensure equality, inclusion, and dignity for all in all situations.

The Council will seek to ensure that this policy is, at all times, implemented in a manner that is fair to all sections of the local community.

All applicants for housing or re-housing will be invited to indicate if they wish to make use of the Council's translation and interpretation services, or if they require additional services to enable them to access and understand the policy to ensure that they are not disadvantaged in any way.

They also will be invited to provide details of ethnic origin, sexuality, disability and other equalities information. Provision of this information is not obligatory or a requirement for acceptance of an application.

However, such information will help monitor the number and types of protected characteristics requiring hostel support, and will help ensure that service improvement evolves in line with any changing local needs.

Equalities records will be kept and monitored to ensure hostel accommodations are offered and allocated fairly. This policy will be regularly reviewed ensure it is not operated in any way that could discriminate or disadvantage against any particular group of people.

All information provided will be kept confidential and treated with respect at all times.

16. Data Protection statement

Havering Council takes personal privacy matters very seriously and will never share the individual's personal data without their prior knowledge, unless required to do so by law.

For full details about how the Council protects personal data, please visit [Havering Council Data Protection policy](#).

17. Dissemination and communication of this policy

Housing Services will consult with all affected stakeholders to ensure this policy clear and transparent.

This policy will be made available to all affected stakeholders and in any required formats (e.g. hard copy and electronic versions, easy read, multi-lingual, braille and audio, etc) upon request.

18. Implementation of this policy

This policy will take effect from August 2020 and will operate for three years.

Responsibility for the successful implementation of this policy will be with Havering Council's Assistant Director of Housing Demand.

19. Monitoring and review of this policy

This policy will be reviewed annually by an independent external expert to ensure continued compliance with legislation and best practice.

However, it will be subject to alteration to accommodate any relevant, new or adjusted legislative or regulatory requirements that may be introduced.

For any advice or assistance concerning this policy, please email:

housing.solutions@havering.gov.uk

20. Delegated authority to make minor changes to this policy

The Assistant Director of Housing Demand, in consultation with the Director of Housing, will be able to approve minor amendments; i.e. amendments that do not significantly change this policy or associated procedures.

APPENDIX 1 – INCIDENT MANAGEMENT FLOW CHART

