

ISLINGTON & SHOREDITCH HOUSING ASSOCIATION FIRE SAFETY POLICY

1 Introduction

This Fire Safety Policy details Islington and Shoreditch Housing Association (ISHA)'s arrangements for achieving compliance with the requirements of Regulatory Reform (Fire Safety) Order 2005 (FSO) as amended by the Fire Safety Act 2021 and, where applicable, the Housing Act 2004. ISHA recognises its role as “the responsible person” as defined by the FSO. It is ISHA's ultimate aim to take such general fire precautions that will, so far as is reasonably practicable, preserve and protect life in the event of a fire and take reasonable measures to prevent fires from occurring.

ISHA's housing stock is varied but most of its housing stock is constructed post 2000 period. Some of ISHA's stock is provided for people needing support. ISHA provides sheltered housing for the elderly residents.

The ISHA's housing stock is in London area, covering Boroughs of Waltham Forest, Hackney, Haringey, Islington, Camden and Tower Hamlets.

2 Legislation

In respect of fire, ISHA's undertaking is governed by two main statutory requirements, the Regulatory Reform (Fire Safety) Order 2005 as amended by the Fire Safety Act 2021. This applies to commercial properties and “relevant buildings” meaning a building in England containing two or more sets of domestic dwellings. The Fire Safety Act 2021 amends the Regulatory Reform Fire (Safety Order) 2005 to include an assessment of external walls and flat front entrance doors. The Housing Act 2004 applies to the whole property.

- The Regulatory Reform (Fire Safety) Order came into force on the 1st of October 2006. The aim of the Order is to improve fire safety, make those responsible for safety take ownership and to reduce the legislative overlap.

For ISHA, the Order applies mainly to its offices and the “relevant buildings” of the housing stock. It either consolidates or rationalises many workplace statutes including the Fire Precautions Act 1971 and the Fire Precautions (Workplace) Regulations 1997/99. One of the main impacts of the Order was to clarify the move away from a prescriptive, certified system arising from the Fire Precautions Act to a risk-based approach to fire safety whereby all risks are identified, assessed, appropriate action determined and taken, together with systems to record the action taken and ensure that the assessment is maintained and reviewed.

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Another significant aspect of the Order is to define anyone who has control of premises or anyone who has a degree of control over certain areas of premises as a ‘Responsible Person’, with specific and defined duties. In accordance with the Order, the responsible person must:

- take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of any of his employees; and
- in relation to relevant persons who are not his employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe.

This involves ensuring that risks have been assessed, remedial actions are prioritised, any passive and active fire precautions in offices and housing stock are maintained and staff are competent/sufficiently trained to undertake the fire safety tasks assigned to them. The responsible person can be an employer, a self-employed person with business premises, a managing agent or owner of a shared premises, a charity or voluntary organisation or a contractor with a degree of control over premises. As an employer and a landlord, ISHA has clear responsibilities in relation to office areas and the common areas of general needs blocks, supported housing blocks, sheltered schemes and other buildings. The Fire Safety Act 2021 amends the FSO to include an assessment of the external walls and flat front entrance doors to “relevant buildings”.

- The Housing Act 2004 brought in a new system of regulation for fire safety in existing residential premises by way of the housing health and safety rating system (HHSRS), licensing provisions for houses in multiple occupation (HMOs) and management regulations for HMOs. In practice the HHSRS is the principal tool used to assess and regulate fire safety standards, but HMO licensing conditions will reflect HHSRS assessments. The responsible person for the purposes of fire safety provision and maintenance at the residential accommodation is the person having control – usually the landlord or alternatively, in HMOs, the manager. The Housing Act places a clear duty on ISHA for ensuring safety (risk assessment, remedial action, management and maintenance) in both domestic and common parts.

A revised guidance document called ‘Fire Safety in Purpose Built Blocks of Flats’ has recently been published. The document has been developed to assist the management of the relationship between the Housing Act and the Fire Safety Order. It is ISHA’s intention that this and other relevant guidance documents will be given consideration in the fire risk assessment of its purpose built and converted housing stock. ISHA will also monitor best practice and innovation to ensure that its fire safety arrangements remain current and up to date with developing technical standards, regulations, guidance and other fire related approved documents.

3 Fire Safety Policy

The purpose of ISHA’s fire safety policy is to set a framework for ensuring, so far as is reasonably practicable, the safety of staff working for the ISHA and others, such as residents, contractors and visitors to ISHA’s premises, from the risk of fire.

The policy covers all the ISHA’s workplaces including offices, sheltered housing, residential buildings and any other locations and/or parts of building/s for which the ISHA have responsibility under the Regulatory Reform (Fire Safety) Order 2005 as amended by the Fire Safety Act 2021 and, where applicable, the Housing Act 2004.

To achieve its objectives, ISHA will:

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- Take all reasonable steps to prevent and control the risk from fire in the properties that it owns.
- Maintain an open information policy and will work with tenants, residents, staff groups, contractors and statutory bodies to agree and deliver solutions to fire safety issues.
- Develop and implement its Policy by empowering designated operational staff with the appropriate training, skills and resources needed to safely manage fire safety.
- Ensure that any FRAs which prompt remedial action are prioritised to mitigate the risk from fire.

Background

The policies and procedures put in place by ISHA can have a significant impact upon the safety of its residents. ISHA is committed to reducing the risk of fire in its premises and housing stock to the lowest reasonably practicable levels.

ISHA recognises that while escape within flats is based on similar principles to those for houses, reaching a place of ultimate safety usually relies on the use of common parts.

4 Fire Risk Assessment

ISHA regards risk assessment as an essential tool for the identification and control of significant fire hazards associated with its undertaking, in addition to the prioritisation of the control measures. Fire risk assessments (FRAs) will be undertaken for all offices, existing building stock, acquisitions and new builds in accordance with Regulatory Reform (Fire Safety) Order 2005 as amended by the Fire Safety Act 2021 requirements. Assessments of housing stock will also take account of Housing Act 2004 requirements.

All initial fire risk assessments will provide sufficient information to determine whether any further, more invasive forms of assessment or survey will be necessary to adequately identify hazards and suitable control measures to ensure the safety, so far as is reasonably practicable, of relevant persons from the risk of fire.

4.1 Risk Estimation and Control Planning

It is ISHA's intention that all assessments undertaken either by trained employees or 3rd party contractors/competent persons will conform to PAS 79-2: 2020 'Fire Risk Assessment' guidance in terms of methodology. This document is currently being revised by BSI and has subsequently been withdrawn whilst the British Standard is in development. ISHA will adopt the latest standard once published.

Likelihood of Harm	Severity of Harm		
	Slight Harm (1)	Moderate Harm (2)	Extreme Harm (3)
Low 1	Trivial Risk 1	Tolerable Risk 2	Moderate Risk 3
Medium 2	Tolerable Risk 2	Moderate Risk 4	Substantial Risk 6
High 3	Moderate Risk 3	Substantial Risk 6	Intolerable Risk 9

Actions and timescales arising from assessments will be allocated using the risk level control plan (below).

Risk level	Action and timescale				
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Trivial: 1	No action is required and no documentary records need be kept.
Tolerable: 2-3	No additional controls are required. Consideration may be given to a more cost effective solution or improvement that imposes no additional cost burden. Monitoring is required to ensure that the controls are maintained.
Moderate: 3-4	Efforts should be made to reduce the risk, but the costs of prevention should be carefully measured and limited. Risk reductions measures should be implemented within an agreed time period. Where the moderate risk is associated with extremely harmful consequences, further assessment may be necessary to establish more precisely the likelihood of harm as a basis for determining the need for improved control measures.
Substantial: 6	Work should not be started until the risk has been reduced. Considerable resources may have to be allocated to reduce the risk. Where the risk involves work in progress, urgent action should be taken.
Intolerable: 9	Work should not be <i>started or continued</i> until the risk has been reduced. If it is not possible to reduce the risk even with unlimited resources, work must remain prohibited.

4.2 Property Categorisation

ISHA has categorised its housing and commercial stock to determine a logical approach to risk prioritisation and profiling. In addition to considering the primary archetype of property, other data available to ISHA will be used to help with the prioritisation process. Where there is knowledge of vulnerable persons being resident in particular buildings that will have a bearing on the overall risk categorisation and ultimately prioritisation. Information relating to premises that have suffered arson attacks or malicious damage will be used in part to determine priorities for action. It is noted that this is clearly a dynamic process and one which requires cooperation and communication between a range of key stakeholders.

The categories chosen are not based on any legal definition and are not to be considered an absolute in terms of risk identification. For example, a poorly managed property 3-stories high might well have a higher fire risk than a sheltered housing scheme or high-rise residential building. The fire risk rating of a property will ultimately be determined by the outcome of an assessment undertaken by a competent person.

The overall Fire Risk Assessment Risk Scoring is defined as;

- Intolerable
- Substantial
- Moderate
- Tolerable
- Trivial

4.3 Risk Assessment Review

ISHA's property inspection regimes planned preventative maintenance programmes and defect reporting arrangements have the effect of risks being constantly under review. However, all ISHA's fire risk assessments will be subject to regular formal reviews to ensure that they remain to be valid.



A full assessment will be instructed where there has been:

- A fire.

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- Arson attack or attempted arson attack/malicious damage.
- Significant change to the use of the property.
- Major change to the structure of the property.
- Significant change affecting the passive or active fire precautions.
- Significant change to the needs of the person(s) occupying the property.
- Significant development in industry best practice relating to fire precautions.
- Change in statutory requirements.

For new developments ISHA will endeavour to undertake an FRA, taking into consideration the designed fire regime, as soon practicably possible after completion / hand-over.

4.4 Functional Requirements

As a minimum, assessments will, where applicable, address the following:

- Means of escape in case of fire:
 - Means of escape provisions for different purpose groups and building types
 - Emergency lighting provision
 - Design for horizontal and vertical escape
 - Special requirements for dwellings (communal areas, stay put vs. evacuation etc.)
 - Flat front entrance doors (FSA 2021)
- Internal fire spread (linings):
 - The design and application of provisions
 - Variations and special provisions
 - A section on thermo-plastic materials
- Internal fire spread (structure):
 - Structural load-bearing elements
 - Fire compartmentation
 - Concealed spaces (cavities)
 - Protection of openings and fire stopping
 - Special provisions
- External fire spread:
 - Construction of external walls (assessment in accordance with PAS 9980)
 - Space separation
 - Roof coverings
- Access and facilities for the fire and rescue service:
 - Fire mains
 - Vehicle access
 - Personnel access
 - Areas requiring special consideration
- General fire precautions including:
 - Housekeeping
 - PPM and maintenance regimes
 - Property inspection regimes
 - Communication with residents
 - Community fire safety initiatives

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- Means for giving warning
 - Automatic detection
 - Fire alarm systems

4.5 Storage and Submission of Assessments

It is ISHA's intention to gather the information generated by fire risk assessments into a central compliance database to facilitate an overview and aid in the assessment of risk and management reporting so that, in line with the principles of the FSO, collective preventative and protective measures can be put in place. Third parties undertaking fire risk assessments on behalf of ISHA will therefore be required to submit and upload reports directly in an electronic format capable of being imported into the organisation's compliance database.

4.6 Initial Assessments and Assessor Competency

It is ISHA's intention to engage competent and accredited consultants to undertake initial fire risk assessments of its office portfolio and building stock to establish a consistent baseline standard. The consultants will be suitably qualified 3rd party assured and, as a minimum, be registered with an accredited body such as the Institution of Fire Engineers.

Assessors will be expected to provide clear and concise FRA recommendations. Reports providing cut and pasted sections of the Home Office RR(FS)O, LACORS and similar guides as recommendations will not be accepted. The assessor will be required to provide a recommendation based on their experience and knowledge that will guide the reader/ end user to a positive action to either eliminate, mitigate or manage the risk identified. Recommendations that identify actions such as 'install door closing device on the third floor' are equally unacceptable. The assessor will be expected to provide a detailed description of the location of the door, type of closer and reason for the action to satisfy ISHA's requirements.

5 Responsible Person

The Regulatory Reform (Fire Safety) Order 2005 defines the 'Responsible Person' as "the person who is ultimately responsible for ensuring the fire safety measures are completed". In practice this is likely to be anyone who has control of premises or anyone who has a degree of control over certain areas or systems. The Order requires the responsible person to ensure that the risks associated with fire that might foreseeably affect 'relevant persons' are identified and controlled. The Order identifies the following as examples of a responsible person:

- An employer for those parts of a place of work that they have control of.
- A self-employed person with business premises.
- A managing agent or owner of shared premises in relation to the common parts of a premises or common fire safety equipment which may be shared by a number for occupants.
- A charity or voluntary organisation with control of premises.
- A contractor with a degree of control over any premises.
- Any other person who has some control over a part of a premise may also have a duty in so far as that control extends.

As an employer, building owner and Landlord, ISHA is the responsible person. It is important to recognise that those tasked with ensuring fire compliance at a local level are not taking on the 'Responsible Person' role as defined in RR(FS)O. Obviously this does not relieve those tasked

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with implementation from the general duties imposed by the RR(FS)O and other relevant health and safety legislation.

ISHA will ensure that, in buildings where there is more than one 'responsible person', cooperation and coordination arrangements are suitably addressed and periodically reviewed.

ISHA will ensure that the 'Responsible Person' is clearly defined for buildings where there is combined management and repairs responsibility through Service Level Agreements, Working Arrangements documents and/or Contractual document arrangements (i.e. leases).

6 Organisational Arrangements

6.1 Group Chief Executive

Overall and final accountability for fire safety within the ISHA rests with the Group Chief Executive. The Group Chief Executive is responsible for:

- Ensuring that fire policy objectives are communicated to the Board, Directors and Managers.
- Organising, controlling and co-ordinating the activities of Directors and Managers to facilitate the effective implementation of the fire Policy.
- Ensuring that the installation, maintenance, and assessment of fire safety precautions is suitably addressed in budgets submitted for Board approval.
- Ensuring that suitable levels of insurance are maintained.

6.2 The Development Director

The Development Director is responsible for:

- Ensuring that suitable and sufficient consideration is given to fire safety in the design of new build and refurbished properties. This includes, but is not limited to, compliance with Building Regulations, the materials used in construction, including those used to decorate or enhance the property and the potential needs of the end users across their lifetime (disabled access etc.).
- Ensuring that measures are in place to evaluate the competence of designers, contractors, consultants and other professionals involved in construction projects.
- Ensuring that designers take account of technological advances in the design, application and availability of both passive and active fire precautions.
- Ensuring that fire safety information contained with construction project Health and Safety Files is sufficient for those managing the project to meet their statutory duties.
- Ensuring that, where timber framed projects are planned, additional consideration is given to fire safety management during the construction phase by designers and contractors to mitigate the risk of fire from construction activities.
- Ensuring that the materials used in development projects meet current fire safety standards.

6.3 Director Of Housing and Neighbourhoods

The Director of Housing and Neighbourhoods has responsibility for:

- Developing and maintaining the group fire Policy.
- Monitoring and reviewing the effectiveness of the fire policy and procedures.
- Advising the Group Chief Executive, Directors and Heads of Departments on fire safety matters.

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- Advising the Group Chief Executive of any shortcomings in group fire safety arrangements and, where applicable, new mitigation measures required.
- Ensuring that management teams are adequately resourced and suitably empowered to facilitate full implementation of the group fire Policy.
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6.4. Finance Director

The Finance Director has responsibility for:

- Ensuring that all new contractors are subject to a health and safety (inc. fire) arrangements review prior to engagement.
- Maintaining a list of preferred contractors.

6.5 Head of Assets and Repairs

The Head of Assets and Repairs has responsibility for:

- Oversight and monitoring of statutory fire servicing arrangements.
- Periodic reporting of performance to the Chief Executive, Board and Senior Management Team.
- Notifying the Director of Housing and Neighbourhoods of shortcomings in fire safety arrangements.
- Ensuring fire safety arrangements are addressed in ISHA’s health and safety plan.
- Representing ISHA in discussions with enforcement authorities and stakeholders
- Ensuring that incidents of fire are investigated and, where possible, the underlying causes identified and communicated throughout the organisation for lessons to be learnt.
- Ensuring that documented periodic inspections are undertaken in communal areas and void properties.
- Reviewing budgets to ensure that sufficient provision has been included for fire servicing.
- Ensuring that materials used in refurbishment works meet current fire safety standards.

6.6 Head of Building Safety

- Oversight and monitoring of statutory fire safety arrangements.
- Periodic reporting of performance to the Chief Executive, Board and Senior Management Team.
- Notifying the Director of Housing and Neighbourhoods of shortcomings in fire safety arrangements.
- Ensuring fire safety arrangements are addressed in ISHA’s health and safety plan.
- Representing ISHA in discussions with enforcement authorities and stakeholders.
- Ensuring that incidents of fire are investigated and, where possible, the underlying causes identified and communicated throughout the organisation for lessons to be learnt.
- Ensuring that documented periodic inspections are undertaken in communal areas and void properties.
- Reviewing budgets to ensure that sufficient provision has been included for fire safety.
- Ensuring that materials used in refurbishment works meet current fire safety standards.

6.7 Head of Housing

Head of Housing is responsible for:

- Ensuring that ISHA’s zero tolerance policy for storage in the communal areas of housing stock is enforced.

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- Preparing budgets that address fire safety within their remit for Board approval.
- Ensuring that all staff under their control receive general fire safety training (e-learning as a minimum) and those delegated specific responsibilities are competent to undertake their roles.
- Notifying the Director of Housing and Neighbourhoods of any shortcomings in housing fire safety arrangements.

6.8 Facilities Team

The Facilities Team is responsible for:

- Ensuring that the facility team is adequately resourced and suitably empowered to facilitate full implementation of the fire Policy.
- Maintaining records of fire precautions maintenance, Fire Warden training etc at all ISHA office locations.
- Arranging six monthly fire evacuation drills at all ISHA office locations.
- Producing fire evacuation drill reports detailing clearance times and any additional measures required to improve performance.
- Monitoring false alarms at office locations and, where required, taking action to prevent reoccurrences.
- Requesting and evaluating the significant findings of office building tenant’s fire risk assessments.
- Reviewing and monitoring the performance of contractors engaged for the installation and / or maintenance of active / passive fire precautions.
- Arranging FRA reviews in all ISHA office locations and ensuring that resultant risk mitigation actions are implemented.
- Ensuring that procedures are in place to notify those renting or hiring commercial units of their responsibility to ensure fire safety measures are considered and maintained throughout the period of hire.
- Notifying the Housing and Neighbourhood Director of any shortcomings in fire safety arrangements.

6.9 Building Safety/Compliance/Asset and Repairs/Neighbourhood Teams

The Building Safety/Compliance/Asset and Repairs/Neighbourhood Teams have responsibility for:

- The developing and maintaining a fire risk assessment documentation and records on relevance compliance database system/s.
- Tracking and reporting implementation of the fire risk assessment programme, risk mitigation measures and adherence to fire safety arrangements.
- Reviewing and monitoring the competence and performance of contractors engaged for the installation and / or maintenance of active / passive fire precautions.
- Supporting development, publishing, and distributing fire safety guidance for residents with the Communication Team.
- Notifying the Head of Assets and Repairs/Director of Housing and Neighbourhoods of any shortcomings in fire safety arrangements.
- Monitoring best practice and innovation to ensure that fire safety arrangements remain current and up to date with developing technical standards

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- Arranging FRA reviews to identify significant changes that would trigger a full assessment.
- Ensuring the remedial works identified from the FRA process are completed in accordance with the risk rating.
- Ensuring that incidents of fire are investigated and, where possible, the underlying causes identified and communicated throughout the organisation for lessons to be learnt.
- Putting measures in place to ensure that locally engaged contractors comply with ISHA's health and safety rules
- Arranging and reviewing fire safety performance audits. The audits will address maintenance of active fire precautions, inspections, contractor performance and damage repairs.

6.10 Managers

Managers are responsible for:

- Notifying their line managers of any shortcomings in fire safety arrangements.
- Planning for the effective implementation of the fire policy in ISHA's offices and housing stock.
- Organising, controlling and co-ordinating the activities of subordinate staff to facilitate the effective implementation of the fire policy and promote continuous improvement.
- Monitoring and reviewing the performance of employees and any other parties (contractors etc.), reporting exceptions to senior management in accordance with the company's reporting procedures.
- All new starters receive a local induction on the first day of employment that includes fire safety instruction.
- Ensuring all staff under their control receive general fire safety awareness training and instruction.
- Ensuring good standards of housekeeping are maintained in areas under their control, including maintenance of walkways, escape routes and fire exits.
- Promoting fire safety awareness and adherence to group policies, procedures and safe systems of work.
- Undertaking fire inspections and, where applicable, contractor compliance audits in areas under their control.

6.11 Employees

Employees are responsible for:

- Co-operating with their employer, work colleagues and contractors to ensure the implementation of the fire policy.
- Communicating any shortcomings in ISHA's fire safety arrangements to management to ensure that a safe and healthy workplace is maintained.
- Controlling their own activities to take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions.
- Not intentionally or recklessly interfering with or misusing anything provided in the interests of health, safety or welfare.
- Carrying out instructions and complying with their training whilst undertaking safety related and general work duties, as required in implementing the fire policy.
- Communicating to their line manager when their level of competence is such that they cannot carry out a task in a safe and healthy manner.

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- Reporting all incidents resulting in injury and/or damage, or dangerous occurrences (near misses) with the potential to cause injury and/or damage to persons or property.
- Complying with ISHA's requirements including, but not limited to, fire safety training, personal protective equipment, and safe systems of work etc.

6.11. Residents

Residents are responsible for:

- Allowing reasonable access for the maintenance and servicing of all fire safety assets and undertaking of the fire risk assessments.
- Not installing security gate (goal gates) or sitex type doors which are not permitted.
- Not changing the flat front doors which provide a key line of defence in compartmentalisation (fire safety) without written consent from ISHA.
- Not smoking within communal areas.
- Not storing their belongings in communal areas, riser cupboards and particularly fire escape stairwells within ISHA communal areas.

7 Monitoring

It is ISHA's intention that all offices and the communal areas of housing stock will be subject to planned inspections and planned maintenance activities to ensure that fire safety arrangements remain effective. A fire log will be kept for each property detailing the maintenance, testing and inspection of active and passive fire precautions.

7.7 Staffed Premises

Inspections / Checks/ Information	Frequency/ Requirement
Site/ location induction training	First day of employment
Group induction	Within the first 4 weeks of employment
Visitor and contractor records	Daily
Fire escape routes and fire exit doors	Daily (start and finish of each shift)
Fire signage	Daily
Fire alarm	Weekly testing (same day, same time)
	Annually - test / service by contractor
Emergency lighting	Weekly – visual check by staff
	Monthly functional test
	Annually - full discharge test by contractor
Fire extinguishers	Daily - visual check by staff
	Annually - test / service by contractor
Smoke ventilation	Weekly for AOVs and other electrically operated systems

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	Manual opening windows annually
Fire mains	Inspection every 6 months
	Tested every 12 months
External fire escapes	6 monthly inspections by staff
	3 yearly by competent surveyor
Fire dampers	Annually by a contractor
Dry risers	Annually by a competent contractor
Lightning conductors (where installed)	Annually by a competent contractor
Fire action notices	Displayed throughout building
Fire Warden list	Displayed on each level of the building
Personal evacuation plans	As and when required
Electrical installation	5 yearly by a competent contractor
Portable electrical appliances	Annually
Fireman's lift	6 monthly thorough inspections. Planned maintenance dependent upon usage.

7.8 Communal Parts of Blocks

It is ISHA's ultimate intention that all staff visiting housing stock will carry out a basic health and safety check and report back their findings. The active and passive fire precautions listed below will not be found in the communal parts of every block.

Inspections / Checks/ Information	Frequency/ Requirement
Fire safety information for residents	On moving in (handbooks etc), web portal
Fire escape routes and fire exit doors	Weekly by cleaning staff
	Quarterly by Neighbourhood Officers (NO)
	Annually by Technical Officers
Fire signage	Weekly by cleaning contractor/staff
	Quarterly by Neighbourhood Officers (NO)
Automatic detection	Weekly visual check by cleaning contractor/staff
	Annually - test / service by the specialist fire contractor
Emergency lighting	Monthly functional test by Neighbourhood Officers (NO)
	6 monthly/Annually - full discharge test by specialist fire contractor
Smoke ventilation	6 monthly AOVs and other electrically operated systems by the specialist fire contractor

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	Manually opening windows by NO
Fire mains	Inspection every 6 months
	Tested every 12 months
Fire doors/door sets	Quarterly by Housing Staff
External fire escapes	Quarterly by Neighbourhood Officers
	3 yearly by competent surveyor
Fire dampers	Annually by a competent contractor
Dry risers	Annually by a competent specialist fire contractor
Gas systems	Annually by a competent contractor
Lightning conductors (where installed)	Annually by a specialist contractor
Communal area electrical installation	5 yearly by a competent contractor
Fireman's lift	Monthly by the competent lift contractor, 6 monthly thorough inspections by lift insurer. Planned maintenance dependent upon usage.

7.9 Void Property

Void properties in conversions and blocks will be inspected for the following:

- Fire compartment breaches and suitability of fire stopping (intrusive inspections).
- Active fire precaution provision (automatic fire detection etc)
- Suitability of fire doors leading off communal areas

The inspections will be documented, uploaded to the asst management database and used to determine the suitability of the wider fire safety arrangements at the property.

8 Fire Precautions

It is ISHA's intention that, where dictated by fire risk assessment findings and / or Building Regulation requirements, active and passive fire precautions will be installed and maintained in accordance with recognised standards and industry sector best practice.

8.7 Passive Fire Precautions

- ISHA will adopt the default 'zero tolerance' position recommended in Department of Local Government fire safety guidance in respect of resident storage in communal areas.
- Fire doors: The fire Policy of individual properties will dictate requirements for the resistance of fire doors (generally FD30 or FD60). ISHA's staff will periodically inspect fire doors protecting communal areas to ensure that, as far as reasonably practicable, the areas remain available to aid the safe evacuation of the building occupants.

Tenants will not be permitted to change dwelling access doors for alternatives that do not meet the original fire resistance standards. ISHA does not currently have any legal jurisdiction over leaseholders who change dwelling access doors. In these cases, ISHA staff will write to the leaseholder and inform them of their duty to cooperate with ISHA in meeting its RR(FS)O 2005 duties. A total of 3 formal letters will be issued to the leaseholder requesting that the door is changed for an alternative that meets the appropriate standard; after which, the issue

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will be brought to the attention of the local Fire and Rescue Services. Like other landlords, ISHA Group is awaiting legislation and / or case law to develop in this area.

- Alterations affecting means of escape and or any compartmentation within a property will be subject to a review by a competent person (Designer, Building Control etc) prior to sign off and implementation of the works.
- The materials (wall and floor coverings, doors, windows etc.) used in new construction projects and refurbishments will be required to meet industry standards for fire safety as a minimum.

8.8 Active Fire Precautions

- It is ISHA's intention that active fire precautions located within its offices and housing stock are installed and maintained in accordance with the relevant British Standard. Clearly this poses some challenges in housing stock with requirements for the visual inspection of items such as emergency lighting. In these circumstances ISHA will take a reasoned approach to the frequency of inspections based on the level of risk associated with the property. ISHA will utilise all staff (housing officers, cleaners etc) visiting properties as a resource for checking that active fire precautions are functioning as intended. The level of inspection will be developed to reflect the varying competencies of those undertaking the review.
- In all cases ISHA will put appropriate measures in place to prevent tampering with active fire precautions (i.e. securing fire alarm isolators, etc.).
- ISHA will continue to evaluate the viability of fire residential sprinklers and other fire suppression systems, particularly in respect of timber framed properties.

9 Fire Evacuation

All ISHA's office space will have suitable fire alarm systems installed as determined by the fire risk assessments and an evacuation strategy appropriate to the risk will also be implemented. This is likely to be either a simultaneous evacuation, or staged evacuation of the office.

For the residential stock and as set out in the draft guidance for fire safety in existing blocks of flats, ISHA recognises the underlying principles in respect of the fire evacuation strategy adopted for such premises. The policy is based on the principle that rarely would there be any merit in evacuating an entire block when the fire is contained in one of the flats.

In the event of a fire within a purpose-built individual flat, the occupants would be expected to alert others in the flat of origin and make their own way out of the building using the common escape routes and summon the fire and rescue service.

If the fire were to start within any of the common areas, any occupants in these areas who become aware of the fire would be expected to make their own way out of the building and summon the fire and rescue service.

All other residents not directly affected by a fire in either of the scenarios detailed above would be expected to stay put and remain in their flats unless and until directed to leave by the fire and rescue service.

Whilst a stay put policy will ultimately be dictated by the fire risk assessment process, it will not be appropriate in the following circumstances:

- Converted properties where standards of compartmentation are not satisfactory.
- Standards of compartmentation are not satisfactory.
- The integrity of compartmentation has been breached.
- The premises have employed members of staff present.

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- Standards of housekeeping and general fire protection measures fall below a reasonable level.

10 Timber Framed Buildings

Recent reviews of building standards and building regulations have suggested that fire safety requirements have not kept pace with innovation in the construction industry, particularly regarding the design and construction of timber framed buildings. In the main, the 'flaws' identified relate to fire safety management during the construction phase of the properties. ISHA recognises the additional risks associated with the development and occupation of timber framed housing stock. To mitigate these risks, ISHA will:

- Require designers and contractors to consider additional fire safety management measures in design and construction phases. As a minimum, the fire safety management regime will be required to comply with the '16 Steps to Fire Safety' guide produced by the UK Timber Frame Association.
- Not permit partial or full occupation of timber framed developments until the whole development has been signed off as complying with the approved building regulations.
- Ensure that those undertaking refurbishment/repair works in the communal areas and void units of properties do not undertake any works that will compromise fire safety.
- Issue residents in timber framed properties with guidance (resident handbooks etc) detailing the risks from unauthorised alterations and DIY works.
- Undertake inspections of void properties and communal areas to establish that passive fire precautions remain effective.

11 Contractor Control

ISHA recognises the importance of reviewing and managing contractors and agents acting upon its behalf effectively. To achieve these goals, ISHA will:

- Require contractors to submit their health and safety arrangements for review prior to formal engagement.
- Require contractors to provide task specific risk assessments and method statements that, where relevant, suitably address fire safety management.
- Issue contractors with a set of rules (hot works, smoking, etc.) for working on ISHA's property.
- Undertake periodic reviews of contractors working on ISHA's behalf to ensure compliance with rules and adherence to method statements/ risk assessments, etc.
- Review the competence of Designers, CDM Coordinators, Principal Contractors and others involved in projects meeting CDM Regulation criteria.
- Agents managing premises (schemes etc) on behalf of ISHA will be required to supply the significant findings of fire risk assessments along with associated action plans annually to the Assets and Repairs Department for consideration.

12 Communication

ISHA recognises the importance of effective communication with:

- Residents
- Employees
- Contractors
- Enforcing authorities
- Partner organisations

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	1	February 2022	Scott Hughes	March 2025	16 March 2022

- Community groups
- Agencies involved in supporting vulnerable persons

ISHA will ensure that suitable arrangements are in place to communicate with all relevant parties to assist in achieving fire safety objectives.

Various means of communication will be used which will include:

- Website material
- Periodical newsletters/briefings
- Fire safety leaflets/flyers
- Posters in estate offices and on communal area notice boards
- Staff training (e-learning and classroom delivered)
- Initiatives, such as estate days, in conjunction with the Community Fire Safety teams at the local fire and rescue service, which may include work with the arson prevention teams
- Notifications of special events and sources of information
- Resident handbooks
- Staff handbooks
- Email - buildingsafety@isha.co.uk

13 Consultation

Fire safety management performance will feature under the broader health and safety agenda item of Executive Management Team and Senior Management Team meetings. Fire safety management will also feature in health and safety committee meetings as a standalone agenda item. The minutes of these meetings will be posted on the company intranet to make it publicly available to all employees. Health and safety committee meetings will review:

- The outcome of fire investigations.
- Insurance survey findings.
- Enforcement authority inspection findings.
- Progress with the fire risk assessment process and any actions arising.
- Significant changes to use or occupancy of ISHA stock.
- Innovation in fire safety management.
- Non-conformances identified from staff inspections.
- Audit findings.

14 Training

ISHA recognises the benefits of providing fire safety training for staff. As such, ISHA will:

- Ensure fire safety is addressed in staff inductions. This very basic instruction will include:
 - The identification of means of escape.
 - The location of the assembly point.
 - Instruction on how to trigger a fire alarm call point.
 - The location of Fire Wardens.
 - How and where to report non-conformances/ fire safety concerns.
- Provide fire safety awareness training for staff working in offices and manned residential locations. To achieve this, all staff will be required to complete a fire safety e-learning package as a minimum standard which will be periodically revisited as refresher training.

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- Ensure that all persons are provided with the necessary information, instruction, and training to fulfil their roles and responsibilities.
- Provide training to a nationally recognised standard for staff required to undertake or review fire risk assessments.
- Provide enhanced fire safety awareness training for those members of staff who are managing premises and / or providing advice to residents.

15 Review

This Policy will be reviewed at least annually to ensure that it remains valid.

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	1	February 2022	Scott Hughes	March 2025	16 March 2022