

# Council Housing Fire Safety Management Plan

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## 1. Introduction

This Management Plan explains how Kirklees Councils' **(KC's)** commitment to fire safety will be met for Council Housing. It provides guidance and procedures which, with the Operational Guidance document, define how the commitments given within the Council Housing Fire Safety Management Policy will be delivered.

The Management Plan will be available to KC staff via the Quality Management System **(QMS)**, and training will be provided to those involved in delivering compliance to explain its content and use. Contractors will be provided with a copy of the Management Plan to ensure clarity in how the services must be delivered. Appropriate guidance will be provided for tenants and any members of the public occupying or visiting the building concerned.

For clarity, this document applies to Pinnacle properties only in as much as the requirement for third party assurance will need to be provided.

KC will also undertake a monitoring role to ensure that it is able to demonstrate a validated compliance position and provide assurance to other Third Parties that statutory, contractual, and regulatory standards are being achieved. The Management Plan will also provide guidance on Performance and Assurance.

It will also cover the roles and responsibilities in respect to compliance from the Council and Executive to teams and individual posts.

## 2. Scope

The management plan includes guidance on the delivery of the Councils policy commitments for council housing in the following areas:

- Fire risk assessment (FRA)
- Actions arising from FRA.
- Management of buildings in relation to fire safety
- The testing, inspection, and servicing of fire safety systems

It also covers includes guidance on:

- Data- how data in relation to the above area is captured and controlled in each of the four areas detailed above.
- Access- the process relating to gaining access.
- Performance and assurance- how and when performance is monitored and report and assurance in place.

It covers the following properties.

- All residential properties: (which include general needs housing, supported housing, sheltered housing, extra care housing and other rented properties owned and managed by KC).
- All non-residential properties: (which include offices, depots, shops, other commercial buildings, community premises, blocks and communal areas, remote plant, and garages) under the management of Homes & Neighbourhoods **(H&N)** through the Housing Revenue Account **(HRA)**.

- Leaseholders/ shared ownership properties and other rented housing managed by KC on behalf of a third party; unless other parties are explicitly specified as having statutory responsibility in a lease or management agreement.

### 3. Roles and Responsibilities

Role	Responsibilities	Frequency
<b>Kirklees Council</b>	<ul style="list-style-type: none"> <li>• They are the responsible legal entity and must oversee the discharge of the required standards.</li> <li>• They act as Duty Holders and are accountable for ensuring the implementation of this Management Plan and the associated policy.</li> <li>• They will receive assurance through regular performance reports that the management plan and policy are being implemented and that the regulations are being fully complied with.</li> <li>• In doing so they will ensure the safety of residents, staff, contractors and any other parties and the wider public has not been compromised.</li> <li>• They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested 3rd parties, informed of the regulatory landlord compliance position.</li> <li>• The Council will be responsible for ensuring that any necessary remedial action, arising from performance reports, are undertaken to comply with the policy and ensure that a regulatory landlord compliant position is maintained.</li> <li>• Agree and set budgets that are sufficient to meet the compliance requirements.</li> </ul>	Annually
<b>The Chief Executive Officer</b>	<ul style="list-style-type: none"> <li>• Retains the overall responsibility for the monitoring of the consistent implementation of this management plan and policy.</li> <li>• Through the implementation of the management plan and policy to effectively comply with the regulatory standards</li> <li>• If the regulatory standards are not maintained to report any breach in standards to the Regulator of Social Housing (RSH).</li> </ul>	Ongoing

<b>Homes and Neighbourhoods Improvement Board (HNIB)</b>	<ul style="list-style-type: none"> <li>• Will, on behalf of Cabinet, ensure ongoing compliance, with all relevant fire safety &amp; building safety legislation.</li> <li>• It will keep under review the effective management of fire safety across KC with the objective of always promoting fire safety.</li> <li>• Ensuring that the fire safety policy is communicated to all employees in the business.</li> <li>• Implementing an appropriate fire safety management system, which is compliant with the required health and safety standards.</li> <li>• Personally, encouraging a positive fire safety culture, leading by example, and taking visible actions.</li> <li>• Monitoring fire safety performance on a bi-monthly basis.</li> <li>• Conducting an annual review of the fire safety management system.</li> <li>• Ensuring a fire safety review of new acquisitions/new ventures is carried out.</li> <li>• Ensuring that the fire safety programme is adequately resourced.</li> <li>• Implement the Independent Review of Building Regulations (Fire Safety) Recommendations.</li> </ul>	Ongoing
<b>Strategic Director Growth and Regeneration</b>	<ul style="list-style-type: none"> <li>• They shall appoint /nominate sufficient resources to fulfil the Responsible Person(s) roles for all fire safety requirements and use this Management Plan to define their duties.</li> <li>• Ensure appropriate governance is in place for works to be delivered in-house or procured externally.</li> <li>• Seek assurance that the Regulations are being adhered to and regularly review internal service and contractor operational practices and performance.</li> <li>• Ensure that the conditions of all contracts are being fulfilled either by internal service or contractors.</li> </ul>	Ongoing

<b>Service Director Homes and Neighbourhoods</b>	<ul style="list-style-type: none"> <li>• Will provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance.</li> <li>• Will implement Data Governance protocols.</li> <li>• Will manage the availability of accurate stock data and landlord compliance data subsets against which to prepare work programmes and contracts.</li> <li>• Will oversee the preparation of the KPI/MPI and OPI reporting suite.</li> <li>• Will assist the implementation of this management plan and policy through monitoring implementation.</li> <li>• Will receive audit feedback and act upon the findings.</li> <li>• Seek assurance that the Regulations are being adhered to and regularly review internal service and contractor operational practices and performance.</li> <li>• Will ensure that Tenant Engagement Strategies are in place and guide the approach to engagement.</li> </ul>	Ongoing
<b>Head of Assets and Development</b>	<ul style="list-style-type: none"> <li>• Will manage the strategic implementation of this management plan and policy and ensure compliance with all regulations.</li> <li>• Will ensure the operational delivery of this management plan and policy and compliance with the Regulations.</li> <li>• Will produce the policy at the appropriate review dates.</li> <li>• Will formulate programmes of work consistent with the delivery of this management plan and policy.</li> <li>• Will instruct /consult with internal operational managers and contractors in respect to the operational delivery of this management plan.</li> <li>• Will consult and engage with Housing Management and Partnerships (HMP) and tenants and leaseholders to explain the importance of landlord compliance and the need to achieve access to complete safety checks and works.</li> <li>• Managing resident feedback (enquiries, complaints, and compliments) handling and progress in liaison with Customer Experience Team.</li> </ul>	Ongoing

	<ul style="list-style-type: none"> <li>• Liaise with Technical Officer Fire Safety and ensure data is updated accurately and on time.</li> <li>• Liaise with Building Safety Team, IT service, Asset data Team Leader and ensure system(s) and interfaces operate effectively.</li> <li>• Inform the Service Director Homes and Neighbourhoods of any performance issues.</li> <li>• Receive feedback from 3rd Party External Validation Consultants and liaise with Technical Officer Fire Safety, Assets team and Contractors to address any delivery shortfalls.</li> <li>• Monitor the quality and correct storage of all certifications and documents required to demonstrate landlord compliance.</li> </ul>	
<b>Technical Officer Fire Safety</b>	<ul style="list-style-type: none"> <li>• Development of fire safety cyclical maintenance programmes arising from the risk assessments and tailored to the needs of each building (Fire Alarms, sprinklers, AOVs, emergency lighting etc.</li> <li>• Review property addresses and reconcile with contractor databases to ensure the programme remains accurate.</li> <li>• Responsible for the development and implementation of all required policies and procedures in relation to fire safety ensuring compliance with all legislative requirements.</li> <li>• Ensure that all relevant information is captured and uploaded into the Compliance Risk Database.</li> <li>• Manage and undertake FRA inspections and programme, including risk management of assets.</li> <li>• Responsible for identifying the technical solutions for fire safety works and supporting investment teams in the delivery of major schemes, repair teams and contractors in the delivery of minor works.</li> <li>• Responsible for consulting with other professional bodies including Building Control and the Fire Service.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Responsible for identifying all fire related risks and issues across the portfolio and design, arrange and oversee the necessary remedial actions and work packages.</li> <li>• Conduct all necessary non-domestic surveys such as reg4 asbestos inspections.</li> <li>• Assist the Building Safety Team in monitoring that remedial actions identified through the FRAs are being delivered within a timely manner.</li> <li>• Undertake 10% audit of all FRA's and a further 10% where the outcomes of the initial audit are of concern.</li> </ul>	
<b>Tenant Panel</b>	<ul style="list-style-type: none"> <li>• Providing regular input and resident perspectives on Building Safety performance and compliance.</li> <li>• Reviewing proposals for remedial works and programmes; providing advice on resident concerns and engagement approaches and connecting this to wider tenant involvement work.</li> </ul>	Ongoing
<b>Building Safety Assurance Board (BSAB)</b>	<ul style="list-style-type: none"> <li>• Will receive bi-monthly KPI reports and commentary on building safety compliance performance.</li> <li>• They will receive Internal Audit reports and monitor the delivery of manager's actions arising through to successful completion.</li> <li>• They will draw any concerns they may have arising from such reports to the attention of the council Committee responsible.</li> </ul>	Bi-Monthly (every 2 months)
<b>Responsible Person(s)</b>	<ul style="list-style-type: none"> <li>• To be appointed as required by the Strategic Director Growth and Regeneration in consultation with HNIB</li> </ul>	
<b>Specialist Fire Risk Assessment (FRA) providers, Contractors undertaking work arising from the FRAs, and specialist Fire Safety Systems Cyclical Maintenance</b>	<ul style="list-style-type: none"> <li>• Operational delivery of a three-year programme of FRAs and re-assessments within properties falling within the remit of the Regulatory Reform (Fire Safety) Order 2005 (RRFSO).</li> <li>• Review property addresses and reconcile with client databases to ensure the programme remains accurate.</li> <li>• Liaise with residents and leaseholders in relation to arranging/keeping</li> </ul>	Ongoing

<b>Contractors</b>	<p>appointments.</p> <ul style="list-style-type: none"> <li>• Liaise with the Building Safety Team in relation to access issues.</li> <li>• Update system(s) with accurate data.</li> <li>• Provide appropriate, complete, and correct certification for all fire safety works.</li> <li>• Provide QA checks in accordance with the contract.</li> </ul>	
<b>Assets Team and HMP</b>	<ul style="list-style-type: none"> <li>• Implementation and delivery of remedial works arising from the FRAs and re-assessments</li> </ul>	As required
<b>Resident</b>	<ul style="list-style-type: none"> <li>• Agreeing to and keeping appointments to provide access.</li> <li>• Informing KC staff in relation to any poor service, failure to attend/poor repair etc.</li> <li>• Provide satisfaction information.</li> <li>• Take note of and comply with fire advice provided and follow the appropriate procedures in respect to seeking authorisation for any alteration work.</li> <li>• Follow instructions to ensure that building safety measures are not damaged and kept in good working order. E.g. tampering with fire detection devices and fire doors.</li> </ul>	As required
<b>Independent External Auditor</b>	<ul style="list-style-type: none"> <li>• Undertake 10% external validation of fire safety remedial works and cyclical maintenance in line with the management plan.</li> </ul>	
<b>West Yorkshire Fire and Rescue Service</b>	<ul style="list-style-type: none"> <li>• Extinguishing fires and protecting life and property in the event of fire.</li> <li>• Responding to any other emergencies.</li> <li>• Assessing and preventing any fire and rescue-related risks.</li> <li>• Issuing Enforcement, Alterations and Prohibition Notices requiring mitigations and improvements to use of and state of premises.</li> </ul>	
<b>Regulator of Social Housing</b>	<ul style="list-style-type: none"> <li>• Pro-active regulation of the Social Housing sector through inspection and assessment</li> <li>• Assessment and enforcement of compliance with regulation including the Social Housing (Regulation) Act and Economic and Consumer Standards.</li> <li>• Assessment of Landlord performance through monitoring of Tenant</li> </ul>	

	Satisfaction Measures and other performance indicators.	
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#### 4. Data

Understanding and recording requirements is a key part of effectively managing and monitoring them. The guide below sets out the data we will hold and how it will be maintained:

##### Fire Risk Assessment (FRA)

KC will maintain a Master Database of all properties where it has a responsibility to provide FRAs. All the assets within the groups identified in the table below will be classified either 'Yes' or 'No' (**On for Yes, Off for No**) in respect of if an FRA is required.

	Dwelling	Common Part	Block	Depots	Office/Community Premises	Shop
<b>FRA Requirement</b>		✓	✓	✓	✓	✓

Note: Houses/Flats are recorded as dwellings in council data if they are occupied as single private dwellings – See Data Reconciliation Guidance and Process Map.

A monthly reconciliation check will be undertaken to ensure that all properties in the categories above have a confirmed **Yes** or **No** status. Any exception (i.e., an asset without an FRA requirement status) will be reported along with an explanation of any changes to the numbers. The results of the reconciliation check will be signed off on a monthly basis. Process Map 1 covers how the monthly reconciliation is undertaken.

All properties with a '**No**' status will require evidence to support the case that no FRA is required.

Some properties will have a '**Yes**' status where there is a requirement to undertake one, but where KC holds suitable and sufficient evidence to identify that it is not their responsibility to do so. For example, if a shop unit is let under a commercial lease and the FRA responsibility is clearly shown to be with the shopkeeper, KC will seek evidence from the shopkeeper that an FRA is in place. In these cases, KC will hold the information on the current FRA date and the date the FRA should be renewed. In the absence of evidence of a completed FRA, KC will attempt to complete an asset safety check where the terms of the lease permit.

All assets with a 'Yes' status will hold the following information within the data:

- Full address details including UPRN.
- The date the current and the previous FRAs were undertaken.
- The date of the last desktop review
- The outcome of the last desktop review (i.e., if the previous FRA remains valid)
- The target date for the renewal of the FRA

- The risk category of the building
- The evacuation strategy for the building
- A link to the full FRA report (for the current and previous FRAs)
- A link to the full list of remedial works

## Remedial Actions

KC will maintain a collated list of remedial actions for assets with a Yes status. For each remedial action we will hold the following information:

- Full address details including UPRN.
- The date the FRA was undertaken.
- The risk category of the building
- Description of the required remedial action
- The priority of the remedial action
- The target period for the remedial action
- The completion dates.
- A link to evidence of completion
- The date the action was verified as complete.
- The date that the action was post inspected.
- Photographic or document evidence. See process map 11a for the completion, sign off and post inspection of remedial works.

## Fire Safety Management

KC will maintain a Master Database of all properties where specific cyclical management activities are identified. All the assets in the groups listed below will have a 'Yes' or 'No' status (indicating if the activity is or is not required) against each of the elements listed below:

	Dwelling	Common Part	Block	Depots	Office/ Community Premises	Shop
<b>Person-centered Fire Risk Assessment</b>	When required					
<b>PEEP</b>	When required			When required	When required	
<b>Management Inspection</b>		✓	✓	✓	✓	✓
<b>Fire Drill</b>		Where required by recommended best practice				

All properties with a 'No' status will require evidence to support the case that the activity is not required. This is likely to be confirmed by the competent person undertaking the assessment.

KC will maintain a collated list of assets where the above activities have a 'Yes' status. For each record we will hold the following information:

- Full address details including UPRN.
- The type of activity required.
- The frequency of the activity required - note one record will be held per activity/frequency combination.
- Last and previous completion dates (i.e., the last two completed actions)
- A link to evidence of completion
- The date the next action is due.

The Technical Officer Fire Safety will undertake a monthly reconciliation check to ensure that all properties in the categories above have a confirmed **Yes** or **No** status. Any exception (i.e., an asset without a requirement status for any of the activities listed) will be reported along with an explanation of any changes to the numbers. The Head of Assets and Development will sign the results of the reconciliation check on a monthly basis. Process Map 1 covers how the monthly reconciliation is undertaken.

PCFRAs are carried out for residents with a known vulnerability and in high-risk buildings. The Fire Safety Resident Engagement Team undertake assessments across all residential stock on a referral basis. Referrals come from Housing Management, Older Peoples Support Service, the Fire Safety Team and West Yorkshire Fire and Rescue Service (WYFRS). A member of the Fire Safety Engagement Team sits on the Hoarding Panel chaired by WYFRS, and this is also a source for referrals. Where they agree, residents enter into voluntary agreements to manage risks such as hoarding with ongoing support from their HMO and Fire Safety Engagement Team.

On completion of an assessment the information is passed to the Fire Safety Team within Building Safety to review and implement recommendations arising e.g., changes to fire detection systems, vibrating pillows etc. Risks identified that relate to resident behaviour, vulnerabilities or disabilities are referred to the individuals housing management officer and in most cases the Fire Safety Resident Engagement continues to provide support. PCFRA's will be reviewed at least annually based on the fire safety risk an individual poses. A mechanism is in place to monitor this via a RAG rating.

### Fire safety systems and equipment

KC will maintain a Master Database of all properties where fire safety systems and equipment are installed. All the assets in the groups listed below will have a **'Yes'** or **'No'** status (indicating if the activity is or is not required) against each of the elements listed below:

	Dwelling	Common Part	Block	Depots	Office	Shop
<b>Fire Alarm System</b>	*	✓	✓	✓	✓	✓
<b>Emergency Lighting</b>	*	✓	✓	✓	✓	✓
<b>Sprinklers</b>	*	✓	✓	✓	✓	✓
<b>AOV</b>		✓	✓	✓	✓	✓
<b>Dry/Wet Riser</b>		✓	✓	✓	✓	✓
<b>Fire Extinguisher</b>		✓	✓	✓	✓	✓

\* Dwellings linked to common parts where a system is present will have a Yes or No status indicating if related equipment existed within the dwelling.

All properties with a **'No'** status will require evidence to support the case that no systems or equipment is present. This is typically the result of an inspection (stock condition survey or the asset schedule accompanying the FRA) showing that the above elements are not present.

KC will maintain a collated list of fire safety systems and equipment for assets with a **'Yes'** status. For each record we will hold the following information:

- Full address details including UPRN of system.
- Location of the equipment (includes UPRN if the equipment is in a dwelling linked to main UPRN)
- The type of equipment
- The type and frequency of the activity required (i.e., test/service etc.)- note one record will be held per activity/frequency combination.
- Last and previous completion dates (i.e., the last two completed actions)
- A link to evidence of completion (e.g., certification)
- The date the next action is due.
- The date that the action was post inspected (where appropriate)

The Technical Officer Fire Safety will undertake a monthly reconciliation check to ensure that all properties in the categories above have a confirmed yes or no status. Any exception (i.e., an asset without a requirement status for any of the systems/equipment listed) will be reported along with an explanation of any changes to the numbers. The Head of Assets and Development will sign the results of the reconciliation check on a monthly basis. Process Map 1 covers how the monthly reconciliation is undertaken.

### **Additions/Reductions to Stock**

The following circumstances will require a controlled amendment to the Master Database where there is a responsibility for fire safety:

- New build property
- Acquisition of property
- Property disposal
- Property demolition
- Any other addition or reduction to the stock

The following circumstances will require a review of fire safety responsibilities and any changes to the existing responsibility should be updated in the Master Database:

- Property refurbishment.
- Change of property tenure.
- Change of property use

Please see Data Reconciliation Process Map 1 in the Operational Guidance section of this Management Plan for guidance on management of the core data.

## 5. Delivery

A top-level summary of the fire safety process is provided at the commencement of the Operational Guidance Section of this Management Plan

### Access

- Residents are required to provide reasonable access to Contractors to undertake fire safety checks and maintenance in accordance with their tenancy agreement. A clear and consistent process including front-line engagement and enforcement will be in place to obtain access to properties to undertake safety checks, which shall include legal action when required. See Process Map 2.
- KC will proactively assess available data for relevant information about the resident to help gain access (disability, vulnerability, local connections, etc.). Please see a copy of KC privacy notice.
- KC will comply with its legal responsibilities and will take reasonable steps to gain access to leasehold properties when KC is responsible for fire safety works. If fire safety issues are identified that are the responsibility of the leaseholder, this will be clearly communicated to the leaseholder in writing. If the works are risk critical and put others at risk within the building and remains incomplete, KC will take legal action to ensure the work is completed by the third party. This includes for example, works required to the leasehold flat entrance fire doors, if the responsibility for repair/ replacement is by the leaseholder. In certain cases, the Head of Assets and Development may approve for KC to proceed with the works may proceed to charge the costs back to the leaseholder. In which case, the No Access Protocol will be applied.

### The Fire Risk Assessment (FRA)

#### General

- All properties subject to the RRFSo will be subject to an FRA. FRAs will only be undertaken by contractors deemed competent in accordance with this Plan. Reports shall follow PAS 79 with a separate action plan.
- For new builds and refurbishments when the site is controlled by the contractor, regular FRA's must be undertaken as required by the HSE. When the building is handed over for occupation an FRA will be carried out by KC when the building is occupied.
- A type 1 FRA shall be the initial assessment. The inspection of the building is non-destructive. But, as well as considering the arrangements for means of escape and so forth, the fire risk assessment includes examination of at least a sample of flat entrance doors. It also considers, as far as reasonably practicable, the separating construction between the flats and the common parts without any opening up of construction. However, in this Type of fire risk assessment, entry to flats beyond the area of the flat entrance door, is not

involved. Where there are demountable false ceilings in the common parts, it may be appropriate to lift a sample of readily accessible false ceiling tiles. In addition, it will normally be appropriate to open a sample of service risers, provided access is practicable at the time of inspection.

- Unless there is reason to expect serious deficiencies in structural fire protection (such as inadequate compartmentation, or poor fire stopping) a Type 1 inspection will normally be sufficient for most blocks of purpose-built flats. Where doubt exists in relation to these matters, the competent person undertaking the assessment may recommend that one of the other types of fire risk assessment (Types 2,3,4) be carried out or that further investigation be conducted by specialists. This recommendation will carry a time limit in accordance with the risk. However, this should not be a generic recommendation of all Type 1 fire risk assessments and should be based on identification of issues that justify reason for doubt.
- The FRA will establish the current and recommended evacuation strategy for the building (see general guidance below).
- The FRA will establish a risk rating against each applicable property. This will be identified by the competent person undertaking the FRA along with a recommended date for a new FRA to be undertaken (see section below). In summary, the risk categories to be used and typical examples are as follows.

<b>Risk Profile of the Premises</b>	<b>Example of Property Type</b>
<b>Level 3</b>	Purpose built, general needs residential blocks of no more than 2 storeys above ground.
<b>Level 2</b>	Purpose built, general needs residential blocks of between 3 and 5 storeys (inclusive) above ground.
<b>Level 1</b>	Premises with vulnerable occupants (e.g., sheltered, and supported housing), HMO's, converted premises, high rise blocks (greater than 5 storeys), assembly buildings, offices etc.
<b>Category Stock</b>	<b>B</b> Buildings where some element of common part exists but there is negligible foreseeable risk in relation to that common part at the time of inspection

## Review and Renewal of FRA

- The FRA is a ‘live’ document and needs to remain valid.
- KC will undertake a review of FRAs following any of the events below:
  - a fire, near miss or threat of arson.
  - the introduction of new work practices.
  - any works affecting the means of escape or alarm systems.
  - structural or material changes to the building or its use.
  - widespread changes in the type of residents occupying the building; and
  - a significant change in legislation or guidance.
- If there is a reason to suspect that the FRA may no longer be valid, this will prompt a new FRA. This decision is made by the Responsible Person.
- Outside the circumstances outlined above, FRAs will be renewed on or before the date recommended by the competent person undertaking the previous assessment. In any event renewals of FRAs will be undertaken at frequencies not greater than those in the table below. Refer to **Appendix 1** for a more detailed breakdown of Property Types (this is the current version at time of the revision of this Management Plan).

Risk Profile of the Premises	Example of Property Type	New FRA
<b>Level 3</b>	Purpose built, general needs residential blocks of no more than 2 storeys.	Every 3 years
<b>Level 2</b>	Purpose- built, general needs residential blocks of between 3 and 5 storeys (inclusive).	Every 2 years
<b>Level 1</b>	Premises with vulnerable occupants (e.g., sheltered, and supported housing), HMO's, converted premises, high rise blocks (greater than 5 storeys), assembly buildings, offices etc.	Annually
<b>Category B</b>	Buildings where some element of common part exist but there is no foreseeable risk in relation to that common part at the time of inspection	N/A

### Actions Arising from the FRA

Actions arising from the FRA are categorised into the following areas:

- Management Actions.
- Remedial Works.

#### A. Management Actions

- Defined as actions to be taken in relation to the management of the building where further confirmation is required or further site checks needed.

- Examples of management actions are non-compliance with Smoking policies, storage of items in communal areas, unlocked cupboards in communal areas.

*Management Action Priority*

Management Actions will be prioritised according to the nature of the risk identified within the FRA and timescales for completion will be provided by the Fire Risk Assessor (having previously been established as a risk matrix in consultation with KC). As a general guidance, Management Action priorities are likely to be as follows:

Priority
Urgent
Man1
Man2
Man3

*B. Remedial Works*

- Defined as works which generally involve the need for contractors to complete.
- Examples of remedial actions are replacement or repair of fire doors, compartmentation improvements, automatic fire detection and alarm works etc.

*Remedial Works Priority*

Remedial actions will be prioritised according to the nature of the risk identified within the FRA and timescales for completion will be provided by the competent person. As a general guidance Remedial Action priorities will be categorised as follows:

Priority
Urgent
A
B
C
R

*Timescales*

- Actions arising from the FRA will be dealt with in accordance with the priorities and periods set out by the competent person undertaking it. As a guide the following priorities and timeframes will be used:

Building Risk/Action Priority	Level 1	Level 2	Level 3
<b>Urgent</b>	1 Day	1 Day	1 Day
<b>A</b>	3 Months	6 Months	12 Months
<b>B</b>	12 Months	18 Months	24 Months

<b>C</b>	18 Months	24 Months	30 Months
<b>Man 1</b>	1 Month	1 Month	1 Month
<b>Man 2</b>	3 Months	12 Months	24 Months
<b>Man 3</b>	6 Months	18 Months	30 Months
<b>R</b>	Unspecified	Unspecified	Unspecified

- There are circumstances where it is appropriate to review and potentially extend the periods attached to actions. However, it is essential that any changes are appropriate, risk based, and the process is controlled and visible. Action priorities/timeframes will only be changed if the Fire Risk Assessor agrees in writing that it is appropriate to do so. Evidence of the same will be held. Changes to timeframes or priorities will be signed off by the Service Director and shall be clearly explained when the first subsequent set of KPIs are recorded. See process map 11b.

### **External Wall Assessments**

KC will develop and maintain a record of multi-occupancy buildings external wall materials; records will be held centrally electronically.

Information on external wall materials will be obtained through the Stock Condition Survey Programme, operational and maintenance manuals and as built drawings from any new developments that take place as well as any additional Fire Risk Appraisal of External Walls (FRAEW).

KC Accountable Person will also appoint a contractor to undertake FRAEWs to identify external wall construction and cladding using PAS 9980 Code of Practice. KC will instruct FRAEW assessments on the following types of buildings:

- High Rise Residential Buildings (a building containing two or more sets of domestic premises that are at least 18 metres above ground level or have at least seven storeys).
- As recommended by the Fire Risk Assessor or informed by the Fire Risk Prioritization Tool - for buildings below 18 metres – i.e., where there is known or suspected risk from the form of construction used for the

external wall, such as the presence of combustible materials used for cladding or external wall insulation.

FRAEWs will provide recommendations on remedial action considered necessary, with a suitable timeframe that considers both the nature of the works required for remediation and any recommended interim measures.

The programme for FRAEWs will be managed by KC Accountable Person, including the preparation of any remediation programmes of work. Project management of major works such as cladding replacement will be the responsibility of the Asset Team.

If there are any significant changes to the external walls of buildings, the records held will be revised and updated.

## **Management of Buildings**

### *Evacuation*

- Ensure each building has an evacuation strategy stated clearly in the FRA. The FRA will record the current and recommended evacuation strategy. Any exceptions, i.e., where the current and recommended strategy differ will be reported and referred to the HNIB. The recommended evacuation strategy will be confirmed or proposed by the Fire Risk Assessor, however as a general principle:
- Residential accommodation (with common parts):
  - Purpose-built accommodation will have a 'stay put' policy. Occupants have the option to stay in the building provided they feel it is safe to do so. The 'stay put' policy may change based on the instructions of the Fire and Rescue Service during an emergency situation.
  - Aged, converted accommodation will have a 'total evacuation' policy. All occupants self-evacuate in the event of fire or once the fire alarm sounds.
  - Residential buildings which are managed 24 hours or which house vulnerable residents may require bespoke evacuation strategies specific to the premises (outlined below in 'Assisted Evacuation').
- Commercial accommodation and community premises:
  - Premises to have a 'total evacuation' policy. All occupants self- evacuate in the event of fire or once the fire alarm sounds.
- Assisted Evacuation:
  - For commercial, community and non-residential premises it is the responsibility of each employee to inform their line manager of any physical or sensory impairment he/she may have, including temporary impairment, which may affect how they evacuate the premises. KC will be proactive in becoming aware of people who may need assistance to escape in the event of a fire.
  - In residential premises:

- General Needs - where practicable and should assistance be requested, and where KC is made aware, it will provide advice and guidance to assist residents in developing their own means of escape plan in general needs premises. This will not involve the assistance of KC in the evacuation.
- Specialised Housing – assessment of individuals will be made by the specialist care providers. This will involve detailed and up to date records of occupants, in some buildings will require person centered fire risk assessments (PCFRAs). Assistance in evacuation provided by staff will be determined on a case-by-case basis. The Fire and Rescue Service will be included in the process. PCFRAs will be undertaken at the start of tenancy and reviewed on the same basis as FRAs for the premises.
- Where appropriate, provide equipment to aid evacuation which should only be used by appropriately qualified or trained persons e.g., the Fire and Rescue Service.
- Evacuation drills will be carried out in all non-residential buildings and a selected set of residential buildings. This will be determined by the FRA. In non-residential buildings KC will conduct drills twice annually. Residential premises with alarms will be assessed as to the appropriateness of regular fire drills as part of the FRA. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.

#### **Provision of Signage (Including Wayfinding Signage):**

KC will ensure the provision of suitable fire safety signage within the means of escape and communal areas, requirements for signage will be identified from the Fire Risk Assessment and addressed via the FRA Actions Programme.

In addition, to comply with the requirements of the Fire Safety (England) Regulations 2022, KC will ensure there is suitable 'Wayfinding' signage to assist fire and rescue service crews in buildings in high-rise residential buildings. KC Head of Assets and Development will ensure these are included in a planned programme for installation when they are not already present.

All existing fire safety signage will be checked as part of routine communal area inspections, to ensure they are maintained in good condition.

#### **Provision of Building Plans for the Fire & Rescue Service**

KC Accountable Person will ensure the appointment of a qualified professional to prepare Buildings Plans for High Rise Residential Buildings (i.e., 7 storeys and above / or measuring 18 metres or greater). The preparation of the plans will be in accordance with published guidance at the time of instruction. They will

be made available as required by the local Fire & Rescue Service and copies provided within the building's Secure Information Box (see section further below).

KC Accountable Person will ensure the Plans are obtained for all High-Rise Residential Buildings. They should include:

- **Preparation of Floor Plans** - including a plan for each floor of the building, including identifying the location of all lifts and identifying if the lift is one used by firefighters or an evacuation lift, the key firefighting equipment in the whole building.
- **Preparation of a single page building plan** - which should include information such as the items listed below (but not limited to):
  - the environs of the building.
  - details of the use of the building, for example for commercial or residential purposes.
  - access for fire and rescue appliances.
  - the dimensions of the building.
  - information on the number of storeys in the building and the number of basement levels (if any).
  - information regarding the presence of maisonettes or scissor section flats.
  - inlets for dry-rising mains.
  - inlets for wet-rising mains.
  - the location of shut-off controls for any sprinklers.
  - access points for the building.
  - the location of the secure information box.
  - the location of the controls for any smoke control system.
  - the location of any firefighting shaft.
  - the location of the main stairways in the building.
  - the location of the controls for any evacuation alert system.

*Communication/Fire Emergency Evacuation Plan (FEEP)/Fire Action Notice (FAN)*

- All new staff to the organisation will be instructed in the fire evacuation procedure relating to their workplace on induction.
- It is imperative that KC plan and inform relevant parties on the site-specific procedures in the event of a fire emergency. For each relevant property, an emergency plan will be provided which will include the following:
  - How occupants are warned in the event of a fire.
  - What staff and occupants should do if they discover a fire.
  - How the evacuation of the premises should be conducted.
  - The needs or risks relating to individuals.
  - Where occupants should assemble after they have left the premises and procedures for checking whether the premises have been evacuated.

- Identification of key escape routes, how people can gain access to them and escape from them to a place of total safety.
  - The duties and identity of staff that have specific responsibilities if there is a fire e.g., Fire Wardens.
  - Arrangements for the safe evacuation of people identified as being especially at risk, such as occupants and others with disabilities, children, people working alone and members of the public.
  - Any machines, processes, appliances, or power supplies that need to be stopped or isolated if there is a fire.
  - Specific arrangements, if necessary, for high-fire-risk areas.
  - Contingency plans, such as restrictions on the use of the building for when life safety systems, such as evacuation lifts, fire detection and warning systems, sprinklers or smoke control systems are out of order.
  - How the Fire and Rescue Service and any other necessary services will be called and who will be responsible for doing this.
  - Procedures for meeting the Fire and Rescue Service on their arrival and notifying them of relevant information such as the locations of any persons still in the building or any special risks, e.g., the location of highly flammable materials.
- The Fire Emergency Evacuation Plan outlined above (and specifically detailed in the FRA) will, in most cases, be communicated in the form of a Fire Action Notice situated in areas of high footfall and/ or near final exits. The FRA will make recommendations if the FANs within the buildings are not currently sufficient, and the rectification of any issues will be dealt with as actions outlined above.
  - Critically, a fire action notice will inform occupants of the building's evacuation strategy (for example stay put or total evacuation) and on actions to take in the event of a fire as follows:
    - I. **Raising the alarm** - Advise occupants on the recommended way to raise the alarm. If appropriate, whether it is verbally or through using an available fire alarm call point.
    - II. **Fire and Rescue Services** - Advise occupants on the method of contacting the fire brigade.
    - III. **Assembly Point** - Advise occupants of the location of the assembly point as a safe area.
    - IV. **Lift** - Advise Occupants that in the event of fire, not to use the lift.
    - V. **Do not collect belongings** – Advise occupants to vacate the premises without delay in the event of a fire.

### **Secure Information Boxes (Premises Information Boxes)**

Secure Information Boxes will be provided within higher risk premises to ensure information is made available to the fire and rescue services on arrival in the event of an emergency, this will include details captured from PEEPs, such as identifying those residents with impaired mobility and residents using oxygen etc. Higher risk premises include:

- Specialised Housing (Sheltered Schemes / Extra Care)
- Care Homes
- High Rise Buildings (6 storeys and above)

More robust information will be held within the Secure Information Boxes for high-rise buildings (6 storeys and above) including Building Plans and Emergency Response Packs (see Operational Guidance for relevant detail to be included).

In addition, KC will also engage with the Fire & Rescue service to share up to date information regarding resident profile, identifying residents that may require assistance in the event of an emergency.

### **Responsive Repairs**

- All responsive repairs must consider fire safety and should be conducted in accordance with the relevant British Standard, approved code of practice or associated best practice guidance.
- The adequacy of the proposed 'temporary' repairs should be approved by the relevant Manager in consultation with the Head of Assets and Development.
- Key staff and contractors involved in the delivery of repairs will be trained in the key risks to Fire Safety resulting from the repairs activity. This is outlined in the competence section below.
- Due to higher risk profile, HRRBs will be designated 'permit to work' areas, KC are currently working towards putting this in place and will aim to further introduce this to Level 1 Buildings. Signage will be displayed on the premises to explain the procedure. Before any work can commence a suitable method, a statement will be prepared to ensure continuity of fire safety, particularly relating to work on fire safety systems or when hot works are being undertaken. This will be agreed in advance by the Building Safety Manager or Service Manager Building Safety as appropriate.

### **Planned Investment and Refurbishment Programmes**

- Where required, KC will ensure that all relevant building control legislation is complied with, for fire safety. KC will ensure that building regulations approval and completion certificates are obtained and that the premises are fire risk assessed prior to occupation.
- Before commencing any planned maintenance or upgrade programmes a risk assessment must be undertaken. The risk assessment will consider the scope of work and the premises included, against the available fire safety information (FRA, current reports/examinations, remedial works, management actions etc.). The primary purpose of the risk assessment shall be to assess if there is a foreseeable risk relating to the impact on fire

safety and if the current proposals adequately manage that risk. The risk assessment will form part of the CDM/RAMS for the scheme.

- Where the risk assessment indicates that work being conducted by a contractor has a foreseeable risk of an impact on existing fire safety measures in a building, KC will ensure that an appropriate volume of post project fire safety checks, proportionate to risk, will be completed by a competent person independent to the contractor. This check will provide confirmation that all existing fire safety measures remain in place and are fully functional.
- As it is not unusual for fire compartmentation and fire stopping to be disturbed or breached during construction or services work, the post project fire safety check will include visual inspection of vulnerable locations such as roof voids and services risers etc.
- For major refurbishment projects the following principles will be applied:
  - The design responsibility matrix should be developed as early as practical and should target early consideration of Building Regulations requirements and must result in full sign-off of fire safety design prior to any construction.
  - Early involvement of competent people to ensure design, and again in particular that relating to fire safety, is well considered, and coordinated.
  - early involvement of the Fire Consultant, local FRS and Building Control should be sought.
  - Care will be required to ensure that the design team has the appropriate skills, knowledge, and experience in accordance with the requirements and timing set out in the design responsibility matrix.
  - An evaluation of the potential conflict in the design and procurement strategies and risk associated with the contractor being incentivised to deliver the lowest cost solution to meet employers' requirements.
  - Client appointed independent inspection by a competent person during the construction phase should be used to provide assurance.
  - Agreed mandatory activities prior to occupation to include an FRA and involvement of the Fire Authority at this stage will be key.

### ***Residential Properties***

All residential properties will receive the following checks which contribute to reducing the risk of fire:

- an annual gas and heating installations safety check, thereby reducing the risk of fire from gas faults (see Gas Safety policy)
- An electrical safety test in general needs accommodation (dwellings) in accordance with the Electrical Safety Policy. Five-yearly electrical safety tests in general needs common areas, sheltered and supported schemes, thereby reducing the risk of fire from faulty electrical systems.

- an additional gas safety check and electrical safety test when a property is re-let (including mutual exchanges)
- regular checks and testing where portable electrical appliances (such as vacuum cleaners or toasters) are provided and maintained by KC, in line with the Portable Appliance Testing procedure located in the Electrical Safety policy.
- Beyond the scope of the RR(FS)O, all Dwellings owned across KC's portfolio (excluding Leasehold and Shared Ownership) will have Mains-Powered with standby Battery Smoke Detection Systems installed across all properties as part of the 5-year EICR programme, they will also be installed as part of tailored Planned Improvement Programmes and Void Improvement Works.
- These Smoke Alarm installations will take place in full compliance with the requirements of both The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022– all Dwellings owned by KC (excluding Leasehold and Shared Ownership) will have working Mains-Powered Smoke/Heat Alarms installed (or Battery-Powered Smoke Alarms as an interim measure until Mains-Powered can be installed).
- In accordance with the Regulations, at least one Smoke Alarm will be installed on each storey of homes where there is a room used as accommodation. The appropriate level of provision will be installed in accordance with British Standard (BS 5839:6 2019) and will include LD2 (Additional Protection – a Smoke Alarm also in the 'principal habitable room' i.e., Room and a Heat Detection Alarm in the Kitchen), or Category LD1 (Maximum Level Protection – detection installation in all rooms and all circulation spaces) within homes occupied by high-risk residents, such as within specialised housing.
- Residents of individual general needs, shared ownership and leasehold properties are responsible for their own fire safety within their private homes, including carrying out regular tests of their individual fire detection system.

### ***Furniture and Furnishings***

In all residential properties where furniture and furnishings are provided, whether in common areas or as part of a furnished tenancy, all will be fire retardant in compliance with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).

Furniture and furnishings will be checked for condition every 2 years and replaced, as necessary.

### **Fire Door Inspections**

Fire Doors will be sample inspected as part of the FRA process and at regular intervals as recommended within the FRA.

KC will aim to comply with Regulation 10 of The Fire Safety (England) Regulations 2022, and will endeavour to ensure for all multi-occupied residential buildings, with two or more sets of domestic premises, over 11 metres in height, this will include undertaking:

- Quarterly fire door checks for common area fire doors (including self-closing devices), and:
- Annual checks of all flat entrance doors (including self-closing devices) that lead onto a building's common parts.

KC's Head of Assets and Development is responsible for overseeing the door inspection programme and associated performance with key targets, and ensuring an evidence base is collected within the database.

Records of gaining access and escalation letters to residents will be controlled and monitored by the General Manager, Quality and Performance, in line with KC's No Access Protocol.

#### *Communal Area Inspections*

- All properties subject to the RRFSO will receive regular inspection of communal areas.
- The frequency of inspections will be determined by the premises risk level. In the absence of specific guidance, the following frequencies will apply:

Priority	Timescale
Level 1: 1. Attended 2. Non-Attended	Weekly Monthly
Level 2	Quarterly
Level 3	Quarterly

#### *Common Areas and Escape Routes*

- Goods left in communal areas by residents can be a source of ignition and support combustion, as well as potentially blocking escape routes. For this reason, storage of goods in communal areas is not allowed without express permission and all tenancy agreements include a clause prohibiting the storage of goods in communal areas.
- KC will take action to remove items that are left in communal areas. Bicycles, motorbikes, and mobility scooters can present a hazard by blocking important access and escape routes.
- The storage of bicycles, motorbikes and other resident goods will not be permitted in communal areas, except in designated storage areas.

- In the case of mobility scooters, where no designated storage area exists, they must not be stored in access or escape routes. Under no circumstances should mobility scooters be charged in any communal areas other than specially equipped designated charging/storage rooms.
- Where residents are storing goods in communal areas, if the owner is known, KC will contact them to request removal. See process map 7 covering management actions arising from the FRA.
- To deal with a general problem a range of approaches will be considered, including for example putting up signs, or carrying out a mailshot to all residents and leaseholders in the building.
- Under no circumstances should flammable materials be stored in any communal areas other than designated storage rooms.
- Celebratory decorations will not be allowed in communal areas unless installed by KC in designated “protected” areas such as residents’ lounges or office accommodation.
- Celebratory decorations will meet all relevant safety standards.
- Celebratory decorations not meeting the required standards, or unauthorised installation will be removed in line with KCs sterile areas process.
- KC’s Communal Areas Policy 2023 will always apply here.

#### *Managing Customer Influences on Fire Safety*

- **Stored Oxygen** - Where residents have stored medical oxygen on their properties, they are responsible for informing KC so the Local FRS can be alerted to the presence of stored oxygen on the premises. Arrangements are in place for information to be exchanged between the health service’s oxygen provider and the local FRS. Where KC is informed that oxygen is present appropriate records will be kept.
- **Gas Cylinders** -These are prohibited from being used or stored inside the home. In some cases, KC may have provided bottled gas where mains gas or bulked supply is unavailable, in such cases they must be stored externally and, in a location, confirmed by the provider.
- **Paraffin, Petrol, or other flammable/ explosive materials** –These are prohibited from being used or stored inside the home or nearby. If a resident is in doubt, they should seek advice from their Housing Officer.

Where a resident has stored oxygen or gas cylinders in or about their property, a referral will be made for a PCFRA to be undertaken.

- **Security gates and grills** - Residents should not fit metal security gates to their homes without seeking permission. Where residents have already fitted metal security gates and these have been identified as an unacceptable fire risk in the fire risk assessment, KC will request them to be removed.

## *Fire Investigation*

- Following a fire at any KC property, the Technical Officer Fire Safety and the Safety, Health, and Environment Manager (**SHE Manager**) will lead an internal fire investigation. The investigation will assess the current FRA and management and remedial actions completed, as well as the effectiveness of any fire precautions present, how procedures worked including learning outcomes.
- A fire investigation report will be requested from the local FRS which will be integrated within the internal investigation report. Additionally, a fire within any property may trigger a new FRA reassessment to be undertaken (see above).
- The internal fire investigation and the Fire Authority report will be considered by HNIB at the next meeting, and any resulting actions agreed.
- The fire investigation reports should be electronically stored on a central file and a running count kept of fire incidents within a twelve-month period, with any learning points and actions arising /changes in process, recommendations of HNIB, captured on the central file.

## Enforcement

- Due to the location of KC property portfolio the West Yorkshire Fire and Rescue Service will be the enforcing fire authority. The relevant fire and rescue services will be engaged should KC's portfolio expand into new geographical areas. They have the power to inspect all premises to establish if a suitable and sufficient FRA has been conducted, and if significant findings have been recorded and the assessments have been acted upon.
- If they are dissatisfied with the outcome of the FRA or the action taken an Enforcement Notice may be issued. This may contain specific improvements, or in extreme cases a Prohibition Notice may be issued to restrict the use of all or part of the premises until improvements are undertaken.
- If the premises are considered by the Fire and Rescue Services to be high risk, they may issue an Alterations Notice that requires them to be informed before any changes are made to the premises or the way they are used.
- Failure to comply with any duty imposed by the Order or any notice issued by the Fire Service is a criminal offence.
- KC will follow a procedure and timescales as indicated within Process Map 12.
- KC has the right to appeal to a Magistrate's Court against any notice issued. This may be where they agree there is a need for improvements to the fire precautions but disagree with the enforcing authority on the technical solution to be used (e.g., what type of fire alarm system is needed). This may be referred for an independent determination.

- During any inspection, the inspecting officer may wish to view the following documents:
  - FRA.
  - Fire logbook.
  - Records of colleague training and fire evacuation drills.
  - Records of testing and maintenance of firefighting equipment.
  - Records of testing and maintenance of all fire safety systems including fire alarms, emergency lighting, sprinkler systems and smoke ventilation systems.
  - Evidence of other test and inspection regimes present within the premises – gas, electrical, asbestos, lifts, etc.
  - Records of inspections of communal areas
  - The Fire Inspector may also wish to inspect all or part of the premises and to talk to employees based on site.

### **Maintenance of Fire Systems and Equipment**

- The testing of fire detection systems will be undertaken by competent engineers (as defined in section 6 below).
- The frequency for inspection/ testing will be determined through manufacturers guidelines and considering age and condition of the system and any other local circumstances which could affect the performance specific fire safety systems. The specific maintenance needs for each system will be confirmed in consultation with the competent engineer representing the maintenance contractor.
- Typical systems to be included in the fire safety equipment maintenance programme will include:
  - AFD and alarm systems (and associated equipment such as hold open devices, door release mechanisms, fire curtains etc.)
  - Smoke control systems (such as automatically opening smoke vents)
  - Emergency lighting systems
  - Portable firefighting equipment
  - Rising (dry and wet) mains
  - Firefighting lifts
  - Fire suppression systems such as sprinklers / mist systems
  - Lightning protection systems

## **6. Competency**

### **Contractors Competency and Control**

- KC has a responsibility to ensure that directly employed staff and contractors are appropriately skilled and qualified and are competent to undertake the relevant services. The following controls will operate to ensure competence can be demonstrated:

### **Competency of Fire Risk Assessors**

- KC will ensure that any fire risk assessors undertaking fire risk assessments on their premises are competent to do so.

- External consultant fire risk assessors should be able to demonstrate competency individually via registration on a recognised national scheme such as the Institution of Fire Engineers Register of Fire Risk Assessors or similar.
- Companies providing fire risk assessment services should be assessed and registered under BAFE SP205-1. External fire risk assessment providers (whether individuals or companies) should be able to demonstrate reasonable experience of undertaking fire risk assessments in the type of properties concerned.
- In selecting fire risk assessors KC will refer to the document 'A Guide to Choosing a Competent Fire Risk Assessor' by the Fire Risk Assessment Competency Council.

### **Contractor Controls**

- All contractors used by KC will be assessed as being suitably competent to undertake the work for which they are being considered. Contractors, where possible, should be third party accredited to a nationally recognised scheme, such as BAFE SP203 (relevant part) for fire alarm contractors, BAFE SP101 for firefighting equipment etc.
- KC will ensure there are appropriate fire safety conditions imposed on all outside contractors. This will be work specific but should ensure that contractors do not place themselves at risk or place any other relevant persons at greater risk from their acts (or omissions).
- In addition, KC will ensure satisfactory control over works conducted by both outside and in-house contractors, for example hot works permits. This will involve confirmation of competent contractors and controlling and monitoring safe working practices and procedures.
- Control over work and contractors within high-risk fire safety buildings is particularly important and KC will consider a hierarchy of measure to manage such situations:
  - Through regular review of Contractor competencies and the qualifications and training of individual operatives
  - By the use of signage within high-risk buildings prohibiting contractor actions without notification of the relevant building manager in advance.
  - Through the use of a Permit to Work process to enable monitoring and inspection of all work activity within a particular building and establishing a golden thread of all work (repairs, cyclical maintenance, and major investment) undertaken.
  - By post inspection of works
  - Through regular review of the FRA for the building
- It is the responsibility of the contractor to conduct a risk assessment before carrying out any repairs. This risk assessment may:
  - demonstrate that no further action needs to be taken before the works can proceed.

- demonstrate that works can proceed but methods need to be adjusted to account for fire safety issues highlighted.
  - require the contractor not to proceed with works until they have looked at the fire risk assessment for the property; and
  - require the contractor to request a survey/testing to be undertaken.
- Contractors must provide suitable Method Statements prior to work commencing and KC will require contractors to replace any fire stopping on completion of any works and interim and post work inspections will be conducted to ensure this is carried out.
  - If any responsive repair needs to be carried out to a related fire safety installation, the appointed contractor attending the address must review the examination reports on the compliance database and any other available related information. The correct use of fire-rated materials must also be considered and agreed with KC prior to any works commencing.
  - Where contractors may undertake works which could disrupt fire compartmentalisation such as satellite TV and telecoms installations, and KC is aware, it will put in place a process that will require the contractor to seek appropriate approvals prior to commencing works.
  - All contractor competencies will be subject to annual assessment or to change of contract /contractor, as detailed within the Management Plan.

### **Internal Competency**

- KC will maintain a skills/training matrix to ensure that all staff involved in the processes and procedures included in this Management Plan have appropriate training.
- A detailed competency framework will be in place to provide assurance that all internal staff are appropriately skilled and are subject to regular appraisal.

## **7. Performance and Assurance**

The following KPIs will be reported to HNIB and Council:

<b>Cat</b>	<b>Indicator</b>	<b>Frequency</b>
<b>KPI</b>	% of properties with a completed and in date FRA where required	Quarterly
<b>KPI</b>	Total no of actions outstanding (but in date) and total number of actions overdue	Quarterly
<b>KPI</b>	% buildings with outstanding (but in date) and overdue remedial actions	Quarterly
<b>KPI</b>	% of buildings with fire safety systems/equipment present where all systems/equipment has been assessed/maintained in accordance with this policy	Quarterly

<b>KPI</b>	Number of notices received from the Fire and Rescue Services in the reporting period	Quarterly
<b>KPI</b>	Number of outstanding notices received from the Fire and Rescue Services	Quarterly

Commentary will be provided for any properties out of date to include the date they became overdue, days overdue, and the action proposed to bring them back into a compliant position. To provide additional context, the commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

In addition to Board KPIs a detailed PI suite will include the following:

<b>Cat</b>	<b>Indicator</b>	<b>Frequenc y</b>
<b>KPI</b>	Number of properties requiring an FRA re-assessment	Monthly
<b>KPI</b>	Number of properties which require remedial actions and timeline	Monthly
<b>KPI</b>	The number of routine communal inspections against the timescale	Weekly
<b>KPI</b>	The number of fire incidents and completed fire investigation reports	Weekly
<b>KPI</b>	The number of re-inspection surveys to communal areas	Weekly
<b>KPI</b>	Improvement and prohibition notices issued, and actions completed in accordance with the required timescales	Monthly
<b>KPI</b>	Audit checks undertaken in relation to FRA assessments and works undertaken, and engineers work on a minimum of 10% sample	Monthly
<b>KPI</b>	The number of reportable incidents in accordance (RIDDOR)	Quarterly
<b>MPI</b>	Communal Inspections Completed in Time	Monthly
<b>MPI</b>	Number of blocks that meet communal area policy requirements	Monthly
<b>MPI</b>	Number of FRAs stating means of escape do not contain storage	Monthly
<b>MPI</b>	Resident Satisfaction that the home is safe as measured by the tenant perception survey	Quarterly
<b>OPI</b>	Contractor/consultant accreditations and operative qualifications	Monthly
<b>OPI</b>	Fire alarm/emergency lighting and fire-fighting equipment assessed on time	Monthly
<b>OPI</b>	Fire Alarm repairs completed right first time.	Monthly
<b>OPI</b>	Average cost of FRA inspection	Monthly

## Assurance

The following assurance activity will be undertaken and reported to HNIB:

Activity	Description
<b>Internal Audit</b>	This service area will be included within the annual Internal Audit programme which will review adherence to process, data and record keeping.
<b>3<sup>rd</sup> Party Assurance</b>	In addition to the internal QA process, a third party, external, independent specialist will be engaged to regularly inspect, monitor, and report on the technical performance and quality of the FRA remedial work arising, and the quality and certification of the cyclical maintenance of fire safety systems and equipment. The independent specialist shall inspect a minimum of 10% of completed remedial works and cyclical maintenance programmes. and report their findings each month.
<b>Strategic review</b>	Fire Safety is a high-risk area, and this plan will be reviewed on an annual basis. An external strategic review will be undertaken every 2 years which will include all operating procedures
<b>Early Strategic intervention</b>	If because of either the finding of the internal audit process or the independent quality assurance work, the service is not performing to the desired level then this will trigger an earlier external strategic review.

## Changes to Regulations, Legislation and Annual Review

The Head of Assets and Development working with the HNIB will proactively monitor any changes to legislative and regulatory requirements and, through consultation with the SHE Manager, ensure KC effectively prepares for potential changes.

Potential changes in legislation will be identified where there is an impact upon policy. Any changes will be discussed at the HNIB and disseminated to all relevant staff across KC, Contractors, consultants, and residents. This will be undertaken through an internally circulated briefing note which will be discussed in all relevant team meetings depending on the nature and implications of the change.

All staff have a responsibility to remain alert and share knowledge and good practice across all teams within KC. This includes dissemination of information from statutory regulators, institutions, media articles from fire safety contractors, professional bodies, and other trade media.

The Building Safety Act 2022 (received Royal Assent April 2022) is currently allowing for an 'implementation period' for organisations, and the new Regulatory body the Building Safety Regulator (within the HSE), to prepare for the introduction of new a new legislative regime. The Service Director will ensure KC implements appropriate measures and responds to the new Regulatory requirements.

## **8. Communications**

All KC residents with communal areas will receive a Fire Safety information leaflet as part of the new tenancy pack (this is currently in development). The full range of customer leaflets will also be available on the KC website and through the intranet for all staff.

Materials and information will be made available to residents through the website, printed documents and engagement visits and meetings. The Tenant Involvement Strategy provides the overarching framework for communication.

Resident liaison will be clear, transparent, and managed primarily through the Fire Safety Resident Engagement Team. It is the intention of Kirklees Council to communicate specific building information as outlined in FRAs to residents as required.

Resident Engagement Strategies will be prepared and acted upon for higher-risk buildings in accordance with the Building Safety Act 2022. Mechanisms will be in place to ensure strategies are reviewed at prescribed intervals and when otherwise appropriate.

The HNIB will co-ordinate with national fire safety awareness campaigns which will be proactively supported and will be used to proactively promote and improve customer's understanding of fire safety issues.

All front-line staff will receive training on the importance of fire safety issues and make them aware of signs that may indicate a concern relating to fire safety so an 'every contact counts' approach is developed to support fire safety. Information will be available in different formats upon request.

### **Customer Complaints and Compliments**

Customer complaints and compliments are an indicator of service performance and will be monitored. Individual complaints will be responded to in accordance with the Complaints Policy.

## **9. Process Maps applicable to this service.**

The applicable processes can be found in the Operational Guidance section.

## APPENDIX 1

Property Designation	No. of Storeys	No of Flats	Property Type	Property Classification
General Needs (5 Storeys and under)	1 to 2	1 to 10	Converted	Level 3
General Needs (5 Storeys and under)	1 to 2	11 and over	Converted	Level 2
General Needs (5 Storeys and under)	3 to 5	1 to 10	Converted	Level 2
General Needs (5 Storeys and under)	3 to 5	11 and over	Converted	Level 1
General Needs (6 Storeys and over)	6 and over	Any	Converted	Level 1
General Needs (5 Storeys and under)	1 to 2	Any	Converted (P/B Standard)	Level 3
General Needs (5 Storeys and under)	3 to 5	1 to 10	Converted (P/B Standard)	Level 3
General Needs (5 Storeys and under)	3 to 5	11 and over	Converted (P/B Standard)	Level 2
General Needs (6 Storeys and over)	6 and over	Any	Converted (P/B Standard)	Level 1
General Needs (5 Storeys and under)	1 to 2	Any	Purpose-Built	Level 3
General Needs (5 Storeys and under)	3 to 5	1 to 10	Purpose-Built	Level 3
General Needs (5 Storeys and under)	3 to 5	11 and over	Purpose-Built	Level 2
General Needs (6 Storeys and over)	6 and over	Any	Purpose-Built	Level 1
Sheltered Housing	Any	Any	Any	Level 1
Supported	Any	Any	Any	Level 1
Extra Care	Any	Any	Any	Level 1
HMO (House in Multiple Occupation)	Any	Any	Any	Level 1
FMO (Flat in Multiple Occupation)	Any	Any	Any	Level 1