

Fire Risk Assessment Policy

Policy Statement

Purpose

It is the policy of Orwell to protect employees, customers, contractors visitors and members of the public from potential the risk of injury or loss of life arising from fire and smoke Orwell's non-domestic premises, as defined by the Regulatory Reform (Fire Safety) Order 2005 (as amended), will have suitable arrangements in place to ensure a swift evacuation including smoke/heat detection, clear escape routes and fire extinguishers.

Good fire precautions save lives; they also reduce the potential for fire to disrupt Orwell's business, damage premises or harm the environment.

Legal Obligations

The Fire Safety (England) Regulations 2022 (commencement date 23 January 2023), supplemented by The Regulatory Reform (Fire Safety) Order 2005 (as amended) requires the Responsible Person of non-domestic premises to carry out a fire risk assessment or engage a competent person to do it on their behalf.

This policy reflects and complies with the following legislation and guidance (as amended):

- Regulatory Reform (Fire Safety) Order 2005
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022 (in force 23 January 2023)
- Building Safety Act 2022 – Section 156 (in force 1 October 2023)
- Housing Act 2004
- Smoke and Carbon Monoxide Alarm (England) Regulations 2015
- Homes (Fitness for Human Habitation) Act 2018
- Relevant statutory guidance issued under Article 50 of the Fire Safety Order

Where further guidance, British Standards or Publicly Available Specifications (PAS) are relevant, including PAS 9980 (Fire Risk Appraisal of External Walls), these will be applied proportionately based on building risk and complexity.

A fire risk assessment should:

- Review premises to identify any areas where a fire might start.
- Make recommendations to reduce the likelihood of fire and to keep people safe if a fire breaks out.
- Identify the fire safety measures that you need to take to make the premises safe for employees or residents, as well as other 'relevant people'.
- Set out management arrangements for dealing with fire and fire evacuations.

Checks of fire doors in buildings above 11 meters

The Fire Safety (England) Regulations 2022 made it a legal requirement from 23 January 2023 for responsible persons for all multi-occupied residential buildings in England with storeys over 11 metres in height to:

- undertake quarterly checks of all fire doors (including self-closing devices) in the common parts.
- undertake, on a best endeavour basis, annual checks of all flat entrance doors (including self-closing devices) that lead onto a building's common parts.

The regulations also require responsible persons to provide to residents of all multioccupied residential buildings with two or more sets of domestic premises (that have common parts) information on the importance of fire doors to a building's fire safety. Checks of fire doors in buildings below 11 meters

The regulations do not replace the existing duty for a responsible person to put in place general fire precautions in any premises covered by the 2005 Fire Safety Order, regardless of the building's height.

The Fire Safety Act 2021 has clarified that any residential building which contains two or more sets of domestic premises are within the scope of the Fire Safety Order.

Responsible persons for residential buildings below 11 metres in height have a duty to put in place general fire precautions in these buildings. This duty includes making sure that all fire doors – including flat entrance doors – are capable of providing adequate protection.

Responsible persons are also required to provide residents in all residential buildings with two or more sets of domestic premises with information on fire doors.

Fire door inspection frequency is determined using a risk-based profile (High, Medium, Low), taking into account building use, resident vulnerability, and likelihood of damage. Inspection regimes are proportionate and reviewed through the fire risk assessment process.

NOTE: Orwell Housing Association has one 5-storey block. This property has had a fire risk assessment carried out after 23rd January 2023 which recorded the height of the building as 10.6 meters. This building has been reviewed and the risk based profile confirms that the fire doors will be inspected annually. The Regulatory Reform (Fire Safety) Order 2005 is not prescriptive; it requires a risk-based approach. The assessor must decide how to address the risks identified, taking into account the occupants of the building, the age and construction of the building, the use of the building and any relevant Building Regulations, British and European standards.

Further relevant legal documentation is set out here:

- Housing Act 2004
- Smoke and Carbon Monoxide Alarm (England) Regulations 2015
- Homes (Fitness for Human Habitation) Act 2018

Orwell's Commitment

Orwell will provide and maintain safe communal areas, working conditions, equipment and safe systems of work for all employees. Orwell will also provide information, training and supervision to employees.

Fire risk assessments will be carried out by a competent person.

Fire Risk Assessments will be undertaken only by competent persons who can demonstrate appropriate qualifications, experience, professional indemnity insurance and third-party accreditation where applicable, which will be our appointed Fire Safety Consultant.

Orwell will maintain assurance processes to verify and periodically review the competence of appointed Fire Safety Consultants

Ensure that all Fire Risk Assessments are recorded in full, retained, and made available to enforcing authorities on request

Formally record the identity, organisation and competence of any person undertaking or reviewing a Fire Risk Assessment, in accordance with Section 156 of the Building Safety Act 2022.

Fire risk assessments will be carried out at Orwell's offices, supported housing schemes, extra care schemes, leasehold/managed properties and communal areas of general needs housing.

Fire risk assessments will be reviewed according to the interval specified on each individual fire risk assessment or upon alteration of the premises (whichever is earliest).

This will usually be a one-year period for Orwell's offices, supported housing schemes, sheltered and extra care schemes, and a two-year period for communal areas of general needs blocks. The review will be carried out by a competent person or Fire Safety Consultant as defined by the Regulatory Reform (Fire Safety) Order 2005. The reviews are to ensure that the fire prevention and fire protection measures remain effective.

External Walls and Building Fabric

Fire Risk Assessments will include consideration of external wall construction, balconies and attachments in accordance with the Fire Safety Act 2021 and relevant guidance

Where a detailed appraisal of external walls is required, this will be undertaken in line with PAS 9980 by a suitably competent professional.

Material fire safety risks, overdue high-risk actions, or instances where risk cannot be mitigated within prescribed timescales will be escalated to the Executive Team and reported to the Board with a clear risk-based recommendation

The Chief Executive and Board retain ultimate oversight of fire safety compliance and any formal acceptance of residual fire risk.

Specific Responsibilities of Key Individuals

Chief Executive

The Chief Executive has overall responsibility for ensuring that:

- The effectiveness of this policy is monitored.
- Fire risk assessments are carried out to all properties that require them under The Fire Safety (England) Regulations 2022, supplemented by The Regulatory Reform (Fire Safety) Order 2005 (as amended).
- Appropriate resources are made available to enable the Association to fulfil its legal duties.

The Chief Executive delegates day to day responsibility for undertaking these duties through line management and identified roles. The following people are identified as having responsibility for fire safety issues in those areas, and for those relevant persons, that fall under their control:

Assistant Director of Property & Construction

The Assistant Director of Property & Construction is responsible for:

- Implementing this policy and ensuring that any recommendations identified by fire risk assessments are recorded in Fire Risk (Pro) and that findings of fire risk assessments

relating to building fabric and structure are properly addressed and control measures are implemented in accordance with the relevant timescales.

- Ensuring that the appropriate Fire Safety Consultant is in place to carry out the required assessments.
- Escalating matters which cannot be resolved to the Director of Customers & Communities or the Chief Executive.
- Reporting FRA compliance matters to the Board.

Compliance & Planned Works Manager

The Compliance & Planned Works Manager is responsible for ensuring that:

- Fire risk assessments of buildings are undertaken and that the significant findings of these assessments are reported to the relevant duty holders.
- An inventory of fire risk assessments is undertaken and kept under review on an ongoing basis to include the date the risk assessment was carried out and the required review date.
- Information is given to residents in blocks of flats of two or more domestic premises annually covering the importance of keeping fire doors closed, that doors and self-closing devices are not tampered with, and that any faults or damage to doors should be reported immediately. This information is to also be issued on changes of tenancies.
- Fire risk assessments which have been issued are reviewed and checked for quality and compliance.
- All necessary actions are prioritised appropriately, that works orders are raised and that the orders or communications are raised to the correct contractors or OHA teams to ensure completion.
- The completion of remedial actions recommended in the assessment is monitored, and for providing monthly reports to the Head of Property to evidence current compliance.
- Updates are provided to the Head of Property, the Assistant Director of Property & Construction and the Director of Customers & Communities regarding outstanding actions.
- Appropriate fire safety information, instruction and training is made available to all relevant members of the staff and others as required.

Scheme Managers

Scheme Managers in settings where Orwell provides the Care and Support and which are staffed on a 24/7 basis are responsible for implementing this policy within their areas of responsibility or control, which includes ensuring that:

- The significant findings of fire risk assessments are addressed.
- Fire alarm call points are checked weekly, emergency lighting checks to ensure charging (monthly), fire protection measures such as fire extinguishers, internal fire doors, escape routes, final exit doors and assembly points are checked to ensure they are clearly marked, tested and, where appropriate, fully operational.

- Regular fire safety checks are carried out and that significant findings are reported to the Compliance & Planned Works Manager in order for appropriate remedial works to be raised and completed.
- Members of staff receive fire safety training on induction or on being exposed to new or increased risk and periodically thereafter.
- An assessment is undertaken of how many fire wardens are appropriate to the size of scheme.
- A suitable number of fire wardens are appointed, identified and trained for each premise.
- All employees, tenants and visitors are made aware that they are expected to participate in fire evacuation tests.
- Appropriate arrangements are put in place (for example, Personal Emergency Evacuation Plans) to secure the safety of all relevant persons.
- No works are carried out on building fabric or services or Orwell's provided/ maintained plant and equipment without the prior agreement of Compliance & Planned Works Manager.

Visiting Officers

Visiting Officers, including ORS, estate services operatives, caretakers, housing officers, community officers and supported housing officers for schemes where other agencies provide the care and support) are responsible for implementing this policy within their areas of responsibility or control, which includes:

- Reporting any issues regarding fire safety issues to the Compliance & Planned Works Manager in order for appropriate remedial works to be raised and completed.
- Advising/educating customers whilst on site with regards to any fire safety issues.
- Advising customers whilst on site to remove any items restricting evacuation routes or providing an ignition source.

Fire Safety Consultant

The Fire Safety Consultant is responsible for implementing this policy within their areas of responsibility or control, which includes:

- Arranging and completing the necessary fire risk assessment within the required timescales.
- Contacting the HOC&PW immediately with details if any issue is identified whilst on site carrying out the assessment that could cause a 'risk to life.'

Issuing the fire risk assessment to OHA within seven working days of carrying out the site inspection with a written report or by submitting directly into Fire Risk Pro. **FRA Audit Process**