

## Fire Safety Policy

At the time of Policy approval Flagship Housing Group owns and manages in the region of 30,318 tenanted properties. Some 6,500 of these properties are Flats, a majority of which have Communal/Common Areas which fall within the remit of the Regulatory Reform (Fire Safety) Order 2005 (RRFSO)

<b>Department</b>	<i>Asset Management</i>
<b>Policy Owner</b>	<i>Head of Landlord Compliance</i>
<b>Approved Date</b>	<i>30/8/24</i>
<b>Date for Review</b>	<i>July 2025</i>
<b>Approving Body</b>	<i>Asset Management Committee</i>
<b><i>Associated Legislation/Regulation</i></b>	<i>the Building Regulations Safety and Quality Act 2024 the Housing Act 2004, and the Regulatory Reform (Fire Safety) Order 2005 the Fire Safety Act 2021 the Fire Safety (England) Regulations 2022 the Building Safety Act 2022</i>
<b>Equality Impact Assessment Date</b>	<i>22/07/24</i>
<b>Version Number</b>	<i>1.2</i>

## Purpose / Principles

This Policy explains how Flagship's commitments to Fire Safety will be met. It will be supported by a Fire Safety Management Plan providing more detailed guidance and procedures.

## Roles / Responsibilities

Role	Responsibilities	Frequency
<b>Flagship Housing Group Board</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 tenants, staff, contractors, and any other parties and that the wider general 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 third parties, informed of the regulatory Landlord Compliance position.</li> <li>• The Board will be responsible for ensuring that any necessary Remedial Action, arising from Performance Reports, is undertaken to comply with the Policy and ensure that a regulatory Landlord compliant position is maintained.</li> </ul>	6 Monthly/ Annually
<b>Asset Management Committee</b>	<ul style="list-style-type: none"> <li>• Will receive Quarterly KPI reports and commentary on Compliance Performance.</li> <li>• They will receive Internal Audit reports and monitor the delivery of managers' actions arising through to successful completion.</li> </ul>	Quarterly

	<ul style="list-style-type: none"> <li>• They will draw any concerns they may have arising from such reports to the attention of the Board.</li> </ul>	
<b>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.</li> </ul>	Ongoing
<b>Director of Strategic Asset Management</b>	<ul style="list-style-type: none"> <li>• Agree and set budgets that are sufficient to meet the compliance requirements.</li> <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>• Delegate appropriate authority for in- house delivery or procurement to meet the requirements.</li> <li>• Ensure that the conditions of all contracts are being fulfilled either by Internal Service Provider/s and/or external Contractors.</li> <li>• Will oversee the programme of Policy and Strategic Review.</li> </ul>	Ongoing
<b>Director Legal and Governance</b>	<ul style="list-style-type: none"> <li>• Seek assurance that the regulations are being adhered to and regularly review Internal Service Provider and/or external Contractor operational practices and performance.</li> </ul>	Ongoing
<b>Head of Landlord Compliance</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 formulate Programmes of Work consistent with the delivery of this Management Plan and Policy.</li> <li>• Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors</li> </ul>	Ongoing

	<p>(Internal and/or external) to address any delivery shortfalls.</p> <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 receive audit feedback and act upon the findings</li> </ul>	
<b>Asset Data Manager</b>	<ul style="list-style-type: none"> <li>• Will manage the availability of accurate Stock Data and Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts</li> <li>• Liaise with IT and ensure Data is updated accurately and in time.</li> <li>• Liaise with IT and ensure system(s) and interfaces operate effectively and Inform of any performance issues.</li> <li>• Monitor the quality and correct storage of all Certification and documents required to demonstrate Landlord Compliance</li> <li>• Will manage the preparation of the KPI/MPI and OPI reporting suite.</li> <li>• Will manage Data Governance Protocols</li> </ul>	
<b>Fire Safety Group</b>	<ul style="list-style-type: none"> <li>• Keep under review the effective management of Fire Safety across Flagship Housing Group with the objective of promoting Fire Safety at all times.</li> <li>• Ensure that the Fire Safety Policy is effectively communicated to all employees in the business.</li> <li>• Encourage a positive Fire Safety culture, leading by example and taking visible actions.</li> <li>• Monitor Fire Safety performance on a Quarterly basis.</li> <li>• Carry out an Annual Review of the Fire Safety Management System.</li> <li>• Implement the Independent Review of Building Regulations (Fire Safety) Recommendations.</li> <li>• The remit (Terms of Reference) of the Fire Safety Group can be found in Appendix 1</li> </ul>	Ongoing

<b>Fire Safety Manager</b>	<ul style="list-style-type: none"> <li>• Will instruct/liaise with internal operational managers and external Contractors in respect to the operational delivery of this Management Plan.</li> <li>• Will liaise with Neighbourhood Management Team (NMT) and tenants to explain the importance of Landlord Compliance and the need to achieve access to complete Safety Checks and Works.</li> <li>• Managing tenant feedback (enquiries, complaints, and compliments) handling and progress.</li> <li>• Ensure that the Fire Safety Programme is adequately resourced.</li> <li>• Implement an appropriate Fire Safety Management System that is compliant with the required Health and Safety standards.</li> <li>• Will produce, review, and update the Policy at the appropriate review dates</li> <li>• Ensure ongoing compliance with all relevant Fire Safety legislation.</li> <li>•</li> <li>• Ensure a Fire Safety Review of new acquisitions/new ventures is carried out.</li> </ul>	
<b>Responsible Person(s)</b>	<ul style="list-style-type: none"> <li>• To be appointed as required by the Director, Strategic Asset Management in consultation with the Fire Safety Group.</li> </ul>	
<b>Specialist Fire Risk Assessment (FRA) providers, Contractors undertaking work arising from the FRAs, and specialist Fire Safety Systems Cyclical Maintenance Contractors</b>	<ul style="list-style-type: none"> <li>• Operational delivery of a Four-Year Programme of FRAs and Re-Assessments within Properties falling within the remit of the Regulatory Reform (Fire Safety) Order 2005 (RRFSO).</li> <li>• Implementation of Remedial Works arising from the FRAs and Re-Assessments.</li> <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> </ul>	Ongoing

	<ul style="list-style-type: none"> <li>• Review Property Addresses and reconcile with any Contractor Databases to ensure the Programme remains accurate.</li> <li>• Liaise with tenants in relation to arranging/keeping appointments.</li> <li>• Liaise with the Compliance 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>Tenant</b>	<ul style="list-style-type: none"> <li>• Agreeing to and keeping appointments to provide access.</li> <li>• Liaising with Flagship Housing Group staff in relation to any poor service, failure to attend/poor repair etc.</li> <li>• Provide tenant satisfaction information.</li> <li>• Take note of fire advice provided and follow the appropriate procedures in respect to seeking authorisation for any alteration work/s.</li> </ul>	As required
<b>Director of Health and Safety</b>	<ul style="list-style-type: none"> <li>• Deliver an internal assurance testing framework to provide assurance on operational procedures</li> <li>• Provide critical friend advice and support</li> </ul>	
<b>Independent External Auditor</b>	<ul style="list-style-type: none"> <li>• Undertake 5% External Validations of Fire Safety Remedial Works and Cyclical Maintenance in line with the Management Plan.</li> </ul>	Ongoing

## Main Content

A key objective of this Policy is to describe how Flagship Housing Group will meet the required statutory, legislative, and regulatory requirements in relation to Fire Safety. It will also cover how Flagship's Board, as Duty Holder, will receive assurance of statutory, legislative, and regulatory compliance.

The scope of this Policy includes:

- all properties that fall within the remit of the Regulatory Reform (Fire Safety) Order 2005 (RRFSO)
- all properties that fall within the remit of the Fire Safety Act 2021 (FSA)

- all properties that fall within the remit of the Fire Safety (England) Regulations 2022 (FSR) (New duties in Appendix A)
- all properties that fall within the remit of the Building Safety Act 2022 (New duties Appendix B)
- the undertaking of Fire Risk Assessments (FRA), and the remedial works and actions arising from the FRA
- the undertaking of Fire Risk Appraisals of External Wall Systems
- cyclical maintenance of Fire Safety systems and Equipment, Automatic Fire Detection and Alarm Systems, Emergency Lighting, Automatically Opening Smoke Vents or Smoke Control Systems, Fire Doors, Portable Fire-Fighting Equipment, Dry or Wet Risers, Sprinkler/Mist Systems, Fire-Fighting Lifts (or Fireman Lifts)
- general repair and maintenance activity which could have an impact on Fire Safety within a building or individual property.

Flagship Housing Group will comply with all current and relevant legislation and specifically as detailed in the following:

- the Building Regulations
- the Housing Act 2004, and
- the Regulatory Reform (Fire Safety) Order 2005
- the Fire Safety Act 2021
- the Fire Safety (England) Regulations 2022
- the Building Safety Act 2022

Flagship Housing Group also acknowledges its obligations under the Health and Safety at Work Act (HASAWA) 1974 and Landlord Tenant Act 1985.

In addition, as a landlord and provider of Social Housing, Flagship must meet the requirements of the Regulator of Social Housing's (RSH) Home Standard.

It is essential to ensure that tenants, residents, employees and visitors remain safe in Flagship's premises (both individual homes and offices). Failure to properly discharge our statutory, legislative and regulatory responsibilities may also result in:

- Prosecution by the Fire and Rescue Service under the Regulatory Fire Safety Order 2005.
- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.
- RSH scrutiny and potential determination of a breach of the Home Standard and serious detriment having been caused/potentially caused.

- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

## **Policy**

To comply with statutory, legislative and regulatory standards and obligations, and to manage the risk to our tenants, staff, contractors and other visitors to our properties, Flagship Housing Group will:

### **Process**

Provide clear lines of responsibility for all properties within the scope of this Policy supported by written guidance in the Fire Safety Management Plan

Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to conduct the Safety Checks and works, which shall include legal action when required.

Proactively assess available data for relevant information about the tenant to help gain access (disability, vulnerability, local connections, etc.).

Maintain a process for dealing with unsafe situations in accordance with the regulations.

### **Fire Risk Assessment**

Undertake suitable and sufficient FRAs in accordance with the Regulatory Reform (Fire Safety) Order 2005 (as per the table below), record the significant findings and undertake necessary remedial work within the timescales recommended by the Competent Person who completed the FRA.

Review FRAs for multi-occupied residential buildings with two or more sets of domestic premises and update the fire risk assessment to include an assessment of the building's structure, external walls, and flat entrance doors and where deemed necessary carry out a Fire Risk Appraisal of External Walls (FRAEW)

The basic FRA will be a Type 1 assessment.



Flagship aim to train operatives to recognise compartmentation issues within high-risk sites as part of the Void Process

Review all FRAs, no matter what the risk category, 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, and
- changes in statute, legislation, or regulation (or significant changes to guidance)

The above circumstances may prompt a new FRA not just a review. This decision is made by the Compliance Manager (Fire). Outside of these circumstances, 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:

Risk Profile of the Premises	Example of Property Type	FRA Programme Frequencies
All Stock, All Risks	Fire Risk Assessments to ALL Communal Blocks.	
High Risk Level 1	Fire Risk Assessment to High-Risk locations – premises with vulnerable occupants (e.g., sheltered, and supported housing), HMOs, converted premises, high rise blocks (greater than 5 storeys), assembly buildings, offices etc.	Annually
Medium Risk Level 2	Fire Risk Assessment to High-Risk locations purpose built, no more than 4 storeys above ground level, well managed and checked every week/month by FSO's and neighbourhood officers	Every 2 years with annual review
Low Risk Level 3	Fire Risk Assessment to High-Risk locations purpose built, no more than 3 storeys above ground level and checked by FSO's weekly/monthly	Every 3 years with annual review
Very Low Level 4	purpose built, no more than 2 storeys above ground and checked weekly/monthly by FSO's or Neighbourhood team so constantly checked	Every 4 years with annual review

In addition to, and in order to supplement FRAs completed to Common Parts of Flat Blocks of more than two storeys Flagship Housing Group will undertake an Internal inspections of fire compartmentation as individual flats become void.

### **Fire Risk Appraisal of External Walls**

Undertake a more detailed PAS 9980 fire risk appraisal - called Fire Risk Appraisal of the External Wall system (FRAEW in PAS 9980) where under the Fire Safety Act 2021 review of the FRA has deemed it necessary. This appraisal will provide recommendations on remedial action considered necessary, with a suitable time frame that takes into account both the nature of the works required for remediation and any recommended interim measures.

### **Evacuation**

Ensure each building has an Evacuation Strategy stated clearly in the FRA. The Evacuation Strategy will be agreed with the Competent Person undertaking the FRA, however as a general principle:

#### Residential Accommodation (with Common Parts):

- Purpose-Built accommodation will generally 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.
- Converted accommodation will have a 'Simultaneous Evacuation' Policy. All occupants to 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:

- All premises to have a 'Simultaneous Evacuation' Policy. All occupants to self-evacuate in the event of fire or once the fire alarm sounds.

- In the case of Community Centres, hirers responsibilities are set out in the Terms and Conditions of Hire. These require that hirers make themselves familiar with the content of Fire Action signage within the premises, take charge of evacuations and ensure that appropriate help is available to those that require it. In addition, regular hirers will have further responsibilities as detailed within the Fire Safety Management Plan.

### Assisted Evacuation:

In residential premises.

1. **General Needs/Market Rented** – where practicable, and should assistance be requested, Flagship Housing Group will provide advice and guidance to assist residents in developing their own 'Means of Escape' Plan. *This will not involve the assistance of staff in the evacuation.*
2. **Student and Specialist Housing (Sheltered Housing Schemes/Extra Care Frail Elderly etc.)** – assessment of individuals will be made by appropriate staff. This will involve detailed and up-to-date records of occupants and in some buildings will require Personal Emergency Evacuation Plans (PEEPS). 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 and where required appropriate information will be held on site in SIB (Secure Information Box) boxes.
  - Where appropriate, Flagship Housing Group will provide equipment to aid evacuation which should only be used by appropriately qualified or trained persons e.g. the Fire and Rescue Service.
  - Residential premises with alarms will be assessed as to the appropriateness of regular fire drills on an individual basis. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.

### **Delivery**

### Remedial Works

Ensure that priorities and completion targets for remedial actions are defined by the Competent Person undertaking the FRA. Any changes will be agreed by the Fire Action Group and will be subject to the written agreement of the Competent Person who undertook the FRA (Fire Risk Assessor).

All Fire Safety remedial work should be carried out in accordance with the relevant British Standard, approved Code of Practice or associated best practice guidance. The fire risk will be reviewed regularly from the time of FRA completion until remedial works have been completed. Upon completion of all remedial actions, approved contractors will demonstrate that the works have been inspected to the required level to provide assurance that our tenants, residents, employees, and visitors remain safe in the premises and in line with the RRFSO 2005

Test and maintain all Fire Safety Equipment within the scope of this Policy in accordance with all statutory, legislative and regulatory requirements and considering manufacturer's requirements.

#### Domestic Smoke Detection

Ensure that all properties owned by Flagship Housing Group (excluding shared ownership and leasehold) will have mains or battery-operated Fire Detection Systems. Upgrading to mains operated systems and across all properties will be part of ongoing Investment Work Programmes.

Check Smoke Detection annually as part of the Gas Heating Servicing Contract.

Where works are refused by the tenant, Flagship will treat the situation sensitively but will be clear that the work must be completed to ensure their Health and Safety and that of others in the property and will take legal action as appropriate and where necessary to undertake required works.

#### Responsive and Planned / Upgrade Works and embedding fire safety throughout the process

Ensure that contractors (Internal and External) have a general awareness of Fire Safety and undertake a Risk Assessment considering Fire Safety when undertaking responsive repairs that may have an impact on Fire Safety. Repairs to be carried out in accordance with the relevant British Standard, approved Code of Practice or associated good practice guidance.

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Ensure contractors maintain suitable Method Statements relating to fire stopping and compartmentation.

Risk assess planned maintenance or upgrade programmes to consider any impact on Fire Safety. Current reports/examinations/FRAs should be provided together with any historic works records (both responsive and planned).

At the time of Major Works within a Flat, where compartmentation is exposed or accessible the compartmentation will be subject to a detailed check by a Competent Person so that a detailed record can be built-up to confirm and provide assurance as to the level of compartmentation provided.

Ensure that a post-project Fire Safety Check is completed by a Competent Person, independent to the contractor, where the Risk Assessment indicates a likely impact on existing Fire Safety measures in a building.

Development and embedding Fire safety throughout the construction process.

Create an audit trail, ensuring that the management of all stages of design and construction can be tracked through robust control processes. A formalised FRM system to define, document, implement and maintain procedures to ensure that an adequate level of fire safety information is developed and retained from land acquisition through to handover and occupation. Leading to a clear traceable pathway of information throughout the design and construction process

## **Management**

Comply with the requirements of the Building Regulations and other relevant Fire Safety legislation when carrying out any works.

Prohibit the storage of any items in Communal Areas and upon escape routes without Flagship's express permission. Maintain a 'No Smoking' Policy in all Communal Areas

Implement a risk-based approach to the periodic inspection of Communal Areas and escape routes in line with the Fire Safety Management Plan to enforce the above.

Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).

Ask residents to alert Flagship Housing Group to the presence of stored oxygen so that it can alert the Fire and Rescue Service to its presence.

Ask residents to remove any alterations that they have made if the FRA indicates that this is required. Flagship will take a reasonable approach according to the risk presented but will take enforcement where required.

### **Additional Measures**

Ensure that residential properties will receive further checks which contribute to reducing the overall risk of fire, including Annual Gas and Other Heating Installation Checks, Electrical Safety Checks, and Portable Electrical Appliance Checks to any appliances provided and supplied by the group.

All new prospective tenants of Flat Blocks, Houses in Multiple Occupation or Independent Living/Sheltered Housing Schemes shall be assessed to confirm that they are able to comply with the Evacuation Strategy applicable to the building.

### **Contractors Competency**

Only engage with companies assessed and registered under BAFE SP205-1 in providing Fire Risk Assessment services. External Fire Risk Assessment providers (whether individuals or companies) should be able to demonstrate reasonable experience of undertaking Fire Risk Assessments in housing stock.

Only engage with contractors 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 Fire-Fighting Equipment.

Carry out an assessment of all contractor competencies annually or at change of contract/contractor, as detailed within the Fire Safety Management Plan.

### **Internal Competency**

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Maintain a Skills/Training Matrix to ensure that all staff undertaking key roles within the scope of this Policy have appropriate training.

## Data

Maintain an up-to-date Master Database of all properties where it has a responsibility to provide Fire Risk Assessments (FRAs) and/or maintain Fire Safety Equipment as set out in the scope of this Policy.

Where a requirement exists, hold information including (but not limited to) (i) UPRN, (ii) Property Designation, (iii) Construction Type, (iv) Building Management, (v) Shared Responsibilities, (vi) Risk Profile, (vii) Evacuation Strategy, (viii) Type of Equipment (including Manufacturer's Requirements and associated Testing/Service Frequency) and (ix) the date of the last two FRAs and next FRA due date.

Maintain current and up-to-date records of remedial works for the entire portfolio which will detail all recommendations from the FRAs. The records will include (i) Address and Risk Profile of the property, (ii) Detail of the Work Item required, (iii) Priority and Target Completion Date/s, (iv) Person Responsible, (v) Date/s when the Work was Completed, (vi) Who it was Signed-Off by and (vii) Evidence of Completion.

Hold Fire Safety Maintenance Records electronically in the Master Database with other Landlord Compliance records. There may be instances where a hard copy is kept on site, and these will be detailed in the Fire Safety Management Plan.

Where required, and in agreement with the Fire and Rescue Service, provide specific site information within a Gerda Box on site (SIB)

## EIA statement

An Equality Impact assessment was undertaken on this policy on 22/07/24 and all identified negative impacts have been mitigated.

## Training statement

This Fire Safety policy will be trained to the Compliance Team, Asset Management Team, Flagship Services and Gasway.

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## Measuring Effectiveness

### Assurance

Ensure that all persons involved with the management of Fire Safety are properly trained and accredited in accordance with this Policy.

Ensure that the fire safety management team have sufficient authority and resources to maintain and implement the Fire Risk Management System (FRM)

Where necessary, operate a Permit to Work system when safety-critical work is being carried out.

Carry out works-based assurance activity including checks on certification and post-inspection of on-site works to the level stated within the Fire Safety Management Plan. A sample of such checks will be carried out by our health and safety team on a periodic basis.

Set a timetable for the review of the Fire Safety Policy and the associated Fire Safety Management Plan.

Use the BS 9997 Using BS 9997 which enables us to align and integrate our fire risk management (FRM) system with the requirements of other management system standards.

### Communication

Operate a Fire Safety Group comprising of a cross- organisation team of staff. The Terms of Reference of the Group will be included in the Fire Safety Management Plan.

Communicate with staff through training, fire drills, appropriate signage, and the Intranet.

Communicate with residents through appropriate 'Fire Action' signage in conjunction with other forms of communication provided on a regular basis such as website, newsletters, leaflets, and home information packs.

Comply fully with Article 22 of the RRFSO and ensure that where Flagship are considered jointly responsible for a property or Common Area, it will share its Fire Risk Assessment with other relevant parties and co-operate with them so far as is necessary to ensure the safety of relevant persons.

Engage in a regime of regular communication with the Fire and Rescue Service to ensure good lines of communication and operational familiarity.



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## Implementation

This Policy is approved by Asset Management Committee and is effective from 25<sup>th</sup> July 2023.

Staff will be made aware of the Policy at priority training and a copy will be available on the Intranet and on the Board App. Where appropriate we will publish on our website.

This Policy should also be read in conjunction with the overarching Landlord Compliance Policy and Fire Safety Management Plan.

There will be training provided for all those staff involved with the operational delivery and implementation of the Landlord Compliance requirements and obligations in respect to Fire Safety detailed within this Policy.

## Consultation

This Policy is based on statutory, legislative and regulatory requirements and as such consultation with tenants has not taken place. There has been consultation with Internal Teams within the Group.

## Monitoring Performance

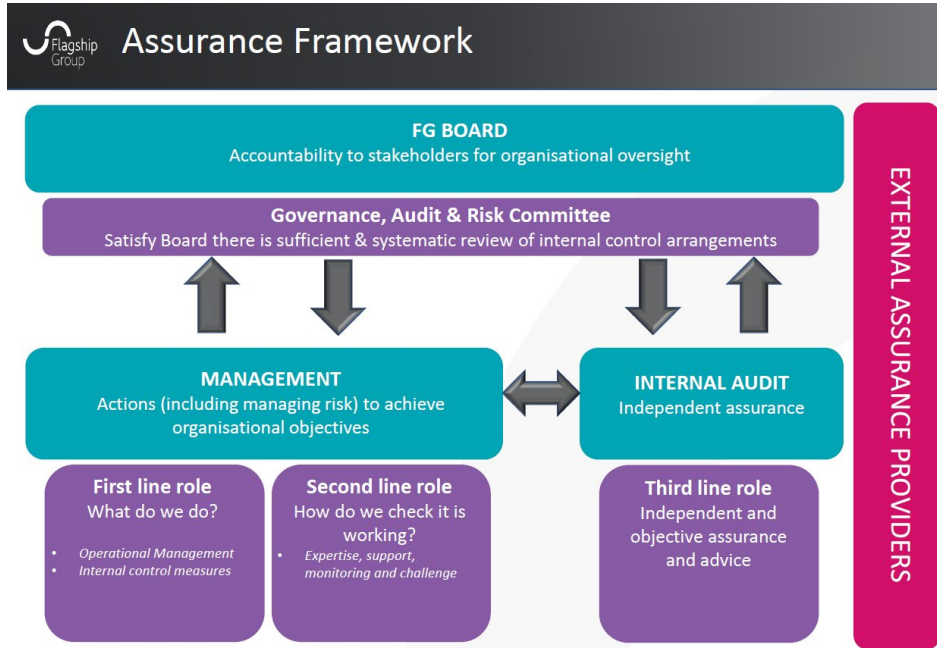
The following KPIs will be reported:

- % of buildings (against the stated Total Landlord Requirement) with a valid FRA renewed within its due date.
- Total number of outstanding and overdue remedial building works actions.
- Total number of outstanding and overdue remedial management actions.
- % buildings (against the stated Total Landlord Requirement) with outstanding and overdue remedial actions.
- % of buildings (against the stated Total Landlord Requirement) with Fire Safety Systems/Equipment present where all Systems/Equipment has been tested/maintained in accordance with this Policy.
- Number of Notices received from the Fire and Rescue Services in the reporting period.
- Number of outstanding Notices received by the Fire and Rescue Services.

Commentary will be provided where appropriate, for instance overdue requirements including action to bring them back into a compliant position and contextual commentary.

A detailed PI suite will be defined within the Fire Safety Management Plan.

Quality Assurance (QA) activity will be undertaken using our approach of three Lines of Defence (LOD) and typically over a three-year cycle. Outcomes of the audit program will be reported via the Flagship Group H&S Committee:



### Review Period

This Policy will be reviewed annually or earlier if deemed necessary through the Performance Monitoring process.