Fire & Building Safety Policy

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Fire & Building Safety Policy

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Version History			
Version No	**1.0**	**Doc ID (if applicable):**	**CUS-P-2024-1**
Date Produced: 28 June 2024			
Audience: Customers/colleagues/auditors/homeowners			
Strategic Theme: Quality Homes for the Future/Underpinned by Organisational Resilience			
Approval Route: Strategic Health & Safety Group			

VERSION	APPROVED BY	REVISION DATE	NEXT REVIEW DATE	DESCRIPTION OF CHANGE New docs and major changes must be communicated to colleagues e.g. SharePoint/TBT/ eLearning	AUTHOR
1.0	SH&SG 15/07/2024	28/06/2024	28/06/2026	New Policy	Adam Vanden
1.1	SH&SG	18/08/26	18/08/27	Updates to reflect business changes and review	Colin Reilly & Jacob Gibbons

Purpose: Accent Housing Limited ("Accent") is a housing association that works to improve people's lives. Accent exists to provide individuals and their communities with the service and support they need to aspire to better living. In doing so, Accent ensures that the decisions it makes constitute excellent customer service, impeccable service standards, and represent value for money.

This policy aims to ensure that Accent meets its obligations as a responsible landlord and employer and to provide assurance that statutory requirements and best practice is adequately managed in relation to Fire and Building Safety.

This policy applies to all properties owned, leased or managed by Accent, and all work undertaken in these properties on Accent's behalf.

Contents

1. Introduction 4
2. Scope 4
3. Obligations 5
4. References 8
5. Requirements 9
   - Customer & Building Safety Team 9
   - Colleagues 10
   - Customers 10
6. Fire Safety 11
   - Fire Risk Assessments (FRA's) 11
   - Evacuation Policies 13
   - Fire Detection – Communal Systems 13
   - Fire Detection – Domestic Dwellings 13
   - Firefighting Equipment and Fixed Installations 14
   - Fire Doors 14
   - Emergency and Escape Lighting 14
   - Wayfinding, Signage and Notices 14
7. Building Safety 15
   - Registration of Higher Risk Buildings 15
   - Building Safety Case Reports 15
   - Mandatory Occurrence Reporting 15
   - Building Safety Engagement Strategy 15
8. Contract Management 16
9. Performance Monitoring 16
10. Quality Assurance 16
11. Roles and Responsibilities 16
12. Policy Review 17
13. Exceptions 17
14. Summary 17

1. Introduction

Accent Housing Limited ("Accent") recognises its duty of care and legal responsibility to protect our customers, colleagues, and visitors by ensuring that all fire safety and building safety risks are effectively identified, managed, and controlled across every building within our ownership and/or management.

This policy sets out Accent's approach to the proactive management of fire and building safety, ensuring full alignment with statutory duties under the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety Act 2021, the Fire Safety (England) Regulations 2022, the Building Safety Act 2022, the Higher-Risk Buildings (England) Regulations 2023, and all other relevant legislation, regulations, and approved codes of practice. Further detail on the applicable regulatory framework is provided in Sections 3 and 4 of this policy.

The objective the Fire & Building Safety Policy is to:

- **Ensure legal compliance** with all relevant legislation, regulations, standards, and recognised best practice.
- **Manage identified risks** through robust assessment, prioritisation, and timely implementation of mitigation measures.
- **Develop and maintain supporting frameworks** (policies, procedures, strategies) to continually strengthen the management of building and fire safety risks.
- **Define clear lines of accountability** across Accent, appointing appropriate principal / accountable persons for the governance, oversight, and operational delivery of fire and building safety responsibilities.
- **Maintain accurate records and quality assurance systems** to evidence compliance and support continuous improvement.
- **Agree and monitor key performance indicators (KPIs)** for fire and building safety in partnership with the Board, Senior Leadership Team and Executives.

2. Scope

This policy applies to all buildings under Accent responsibility both owned and managed, across all building tenure types. It governs all activities undertaken by Accent or on Accent's behalf in relation to building safety and fire safety.

2.1 Building Safety (Higher-Risk Buildings)

- Under the Building Safety Act 2022, a higher-risk building is defined *as a structure that is 18 metres or more in height, or has at least 7 storeys, and contains at least two residential dwellings.*
- Based on this definition, Accent is currently the freehold owner (and Principal Accountable Person) of A **two buildings** within scope of the higher-risk building regime:

Scheme	Storeys	Height (m)
Alexander House, 1-52 Station Road, Aldershot, GU11 1BG	9	28.1
Stafford House, Station Road, Aldershot, GU11 1BA	6	18.5

In addition to the above buildings, Accent also manage a further block on behalf of Runnymede Council where we are defined as the 'Accountable Person'.

Scheme	Storeys	Height (m)
Block C, Corn Merchant House, Station Road, Egham, TW20 9FE	7	21.3

2.2 Fire Safety (Buildings Over 11m)

The **Fire Safety (England) Regulations 2022** place additional duties on all residential buildings **over 11 metres in height** containing **two or more domestic dwellings**.

Accent currently has **three buildings** within this scope:

Scheme	Storeys	Height (m)
Whitley Court, 17 Grosvenor Road, Aldershot, GU11 1DL	5	16.0
Holmfield Court, 102-106 Thronton Road, Bradford, BD1 2DW	4	13.8
Block A, Corn Merchant House, Station Road, Egham, TW20 9FE	5	13.5

3. Obligations

Accent has a legal duty to ensure the safety of all relevant persons by complying with applicable fire and building safety legislation. The key statutory frameworks and Accent's corresponding obligations are summarised below.

Legislation	Key Obligations
Regulatory Reform (Fire Safety) Order 2005 (FSO)	The FSO places duties on the Responsible Person to ensure that all buildings under Accent's area of responsibility meet the required fire safety standards. **Key obligations include:** • To take a risk-based approach to fire safety by ensuring a suitable and sufficient fire risk assessment is carried out and kept under review. • Reducing risk to as low as reasonably practicable by identifying deficiencies and implementing appropriate passive and active fire precautions as mitigation. • Maintain these measures in efficient working order through inspection, testing and maintenance regimes. • Implement and manage fire safety arrangements including procedures, evacuation strategy, and coordination with other duty holders. • providing all relevant persons with appropriate fire safety information and instructions. • ensuring staff receive suitable sufficient training. • Establish and maintain records as required, while ensuring a continuous process of monitoring, review, and improvement of fire safety measures to minimise risk to all relevant persons within buildings under Accent's control."
Fire Safety Act 2021(FSA)	The FSA clarifies that the FSO applies to any building with two or more domestic premises and with a shared common area (internal or external), and explicitly extends the scope to include: • The structure and external walls, including cladding, balconies, windows, and external doors. • All doors within an in-scope building, including flat entrance doors opening onto common areas.

Legislation	Key Obligations
Fire Safety (England) Regulations 2022 (FSER)	The FSER introduce additional duties for buildings containing two or more domestic dwellings. **General duties (all multi occupied residential buildings):** • Provide residents with fire safety instructions relevant to their building. • Provide residents with information on the importance and function of fire doors. **Additional duties for buildings over 11m:** • Undertake quarterly checks of communal fire doors. • Undertake annual checks of flat entrance doors opening onto common areas. **Additional duties for buildings 18m+ or 7 storeys and above:** • Provide and maintain a Premises Information Box accessible to the Fire and Rescue Service (FRS). • Supply the local FRS with building plans and other required information. • Install compliant wayfinding signage. • Undertake monthly checks of lifts intended for FRS use. • Notify the FRS of defects to firefighting or evacuation lifts that cannot be rectified within 24 hours. •
Building Safety Act 2022 (BSA)	The BSA introduces a new regulatory framework for *higher-risk buildings* (18m+ or 7 storeys and above, with at least two residential units) and establishes the Regulator of Building Safety. **Key obligations(where an entity is a relevant dutyholder) include:** • Preparing, maintaining, and regularly reviewing Building Safety Cases for each higher-risk building. • Conducting and recording regular building safety assessments. • Managing building safety risks • Evidencing and maintaining the structural integrity of each higher-risk building.

Legislation	Key Obligations
	• Developing and implementing a resident engagement strategy for building safety. • Completing mandatory occurrence reporting to the Regulator. • Applying for a Building Assessment Certificate when invited by the Building Safety Regulator. • Keeping prescribed information up to date
Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 (RPEEPs)	Residential Personal Emergency Evacuation Plans (PEEPs) were introduced to support residents who may be unable to evacuate independently during an emergency in qualifying buildings (18m+ or 7 storeys or 11m+ with simultaneous evacuation strategy). Key obligations include: • Identify customers who may require additional assistance in the event of an emergency. • Provide Suitable Plans ensuring PEEPs are in place where reasonably practicable and tailored to individual needs. • Align PEEPs with the buildings fire strategy: (e.g. stay put or simultaneous evacuation). • Supply appropriate equipment and staffing arrangements to support safe evacuation.

4. References

Accent are committed to ensuring our customer's homes and the buildings they live in, remain safe and fit for purpose. In achieving this, we will comply with all relevant legislation and regulations.

The following list sets out the main statutory, non-statutory and legislative compliance requirements for the overarching Fire & Building Safety Policy:

- The Health and Safety at Work Act 1974
- The Regulatory Reform (Fire Safety) Order 2005 England and Wales (RRO)
- The Fire Safety (England) Regulations 2022
- Building Safety Act 2022
- The Fire Safety Act 2021
- The Management of Health and Safety at Work Regulations 1999
- Landlord and Tenant Act 1985 (s.11)
- The Housing Act 2004

- Defective Premises Act 1972
- The Construction (Design and Management) Regulations 2015
- Planning & Building Regulations
- Environmental Protection Act
- The Gas Safety (Installation and Use) Regulations 1998 (GSIUR)as amended by the Gas Safety (Installation and use) (Amendment) Regulations 2018
- Gas Safety (Management) Regulations 1996
- The Electricity at Work Regulations (Act) 1992
- BS7671: The Wiring Regulations – 18th Edition
- BS EN/IEC 62305: Protection against lightning
- HSG107 – Maintenance of Portable Electrical Equipment
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
- Provision and Use of Work Equipment Regulations 1998 (PUWER)

Associated documents

- Contract Management Policy
- Access Policy
- Customer Safety Policy
- Fire & Building Safety Procedure
- Customer Support & Inclusion Policy
- Temporary & Emergency Relocation Policy
- Complaints Policy

5. Requirements

To ensure Accent fulfils its statutory and non-statutory legal obligations and to ensure our customers are safe within their homes and buildings, the following ways of working have been implemented to enable the successful delivery of the Fire & Building Safety Policy:

Customer & Building Safety Team

Both the Customer Safety Team and the Fire Safety Team operate as distinct specialist functions within the Asset and Compliance Directorate. Each team holds defined responsibilities for statutory compliance within its respective discipline, supported by dedicated professional and administrative resources. The Customer Safety Team oversees compliance relating to gas, mechanical and electrical safety, water hygiene, and asbestos management, while the Fire Safety Team maintains oversight of all fire safety obligations, including fire risk management and regulatory adherence. Strategic direction and assurance for both functions are provided through the Asset and Compliance governance framework to ensure consistent, organisation wide compliance with all relevant legislation and standards.

The Fire Safety function is further strengthened by a team of experienced Fire and Safety Assessors, who operate regionally but are managed centrally by the Fire Safety Manager. Their responsibilities include:

- Ensuring Accents fire safety obligations are met, ensuring customers are safe within their homes and buildings.
- Working closely with Customer Safety colleagues to deliver servicing, inspections, and remedial actions.
- Managing regional delivery (with some national contracts) to meet core Key Performance Indicators (KPIs) and compliance requirements.

The Customer Safety Team is led by the Customer Safety Manager, who works alongside the Head of Health, Safety and Facilities to ensure the safety of both colleagues and customers.

Working in partnership with this team, the Assistant Director of Building Safety and Compliance holds responsibility for Building Safety Act compliance, including:

- Leading on Building Safety Cases.
- Coordinating resident engagement on building safety.
- Ensuring ongoing compliance with the Building Safety Regulator's requirements.

Colleagues

Accent colleagues across all regions play a vital role in maintaining customer and building safety. Regional teams:

- Use their local knowledge to support access for servicing, inspections, and remedial works.
- Work collaboratively with Customer and Fire Safety colleagues to resolve access challenges.
- Follow established policies and procedures to ensure timely and compliant delivery of safety activities.
- Colleagues maintain appropriate knowledge, and competence relevant to their role.

This collaborative approach ensures that safety responsibilities are understood and embedded across the organisation.

Customers

Accent is committed to ensuring customers understand their responsibilities in relation to fire and building safety, including:

- Granting access for essential servicing, inspections, and remedial works.
- Reporting repairs and safety concerns promptly.

To maintain compliance, Accent will follow robust processes around access, in line with our Access Policy. Every effort will be made to engage with customers who fail to engage with efforts to manage building and fire safety, and where behaviour of a customer is negatively impacting the safety of buildings, legal advice will be sought to ensure the safety of the communities we operate in.

Customers also play an important role in shaping safety decisions, which is outlined in our Customer Charter. Accent will:

- Provide clear, accessible communication on relevant safety matters.
- Ensure customers have opportunities to share their views.
- Actively listen and incorporate customer feedback into safety-related decisions and improvements.

6. Fire Safety

Fire safety is delivered through the Asset and Compliance Directorate, which includes six Fire and Safety Assessors, one specialist Project Manager (covering Fire and Building Safety), one fire safety Co-ordinator and is led by the Fire Safety Manger.

The Fire and Safety Assessors operate regionally. Their role is to ensure relevant persons remain safe within their homes and buildings, working closely with the wider business to deliver inspections, servicing and remedial actions.

The Responsible Person for fire safety under the Regulatory Reform (Fire Safety) Order 2005 is Accent Housing Ltd.

To fulfil its statutory and non-statutory obligations, Accent implement the following measures:

Fire Risk Assessments (FRA's)

Accent will undertake, as a minimum, a Type 1 Fire Risk Assessment for all buildings owned, managed, or otherwise under its control that fall within the scope of the Regulatory Reform (Fire Safety) Order 2005.

A property initially classified as Type 1 may be reclassified as Type 2, 3 or 4 where the level of fire compartmentation risk, the extent of potential defects, or the lack of sufficient evidence to demonstrate that effective compartmentation is in place indicates a higher level of risk.

This may include instances where compartment walls or floors cannot be verified, fire-stopping is missing or defective, service penetrations are inadequately sealed, or the condition and continuity of compartmentation cannot be confirmed through available records or inspection.

Where uncertainty exists, or there is evidence of deterioration, damage or non-compliance, the property should be subject to further assessment to establish the extent and severity of the risk. The classification should be reviewed and escalated in accordance with the Housing Association's fire risk assessment methodology, taking account of the likelihood of fire and smoke spread, the potential consequences for residents, and the adequacy of supporting evidence.

Any change in classification will be documented, with appropriate recommendations, remedial actions and timescales identified to ensure risks are managed effectively and resident safety remains the priority.

FRAs will be:

- Completed by competent and experienced persons.
- Conducted in accordance with BS 9792
- Supported by reasonable attempts to access 10% of domestic dwellings within the building.

The frequency of each fire risk assessment will be determined by the competent person undertaking the assessment, however as a minimum will be conducted in accordance with the below:

Higher-risk buildings and buildings over 11m in height or five stories and above.	Annually
Supported Housing, Independent Living Schemes and Houses of Multiple Occupation	Annually
Three and four Storey general needs buildings.	2 Yearly
Offices	2 Yearly
General needs blocks of less than three stories.	3 Yearly

Actions will be prioritised into 3 categories as follows:

Prioritisation	Timescale
High	1 Month
Medium	3 Months
Low	6 Months

All FRA actions will be recorded, monitored, and managed through internal systems, with monthly reporting to key stakeholders.

Evacuation Policies

Every premises under accent control is assessed and designated a suitable evacuation policy, the varying policies are outlined below:

Stay Put Policy

Where occupants remain inside their own units during a fire unless directly affected (e.g. by smoke, heat, or instructed by firefighters). The building is designed with fire-resistant compartments to contain the fire and prevent spread, allowing others to stay safely in place while emergency services deal with the incident.

Full Evacuation Policy

Full evacuation is a fire safety procedure where all occupants immediately leave the building when an alarm sounds. Everyone is required to exit via designated escape routes and assemble at a safe location, regardless of where the fire is.

Dual Evacuation

A dual evacuation system is used in specialised housing schemes where different approaches apply to different parts of the building. Residents in individual flats follow a stay put strategy, remaining safely inside their compartmented homes unless directly affected or instructed to leave. In contrast, the communal areas (such as corridors, lounges, and shared facilities) operate on a full evacuation basis, where anyone present must leave immediately when the fire alarm activates.

Accent will ensure that the relevant evacuation strategy is:

1. Clearly displayed in common areas.
2. Published on Accent's website for all applicable buildings.

Fire Detection – Communal Systems

Where required, communal fire detection systems will be installed and maintained in accordance with British Standards and manufacturer recommendations.

In buildings operating a Stay Put strategy, audible communal alarms will not be installed to avoid confusion inline with approved government guidance.

Fire Detection – Domestic Dwellings

Accent will provide:

- As a minimum, **LD3 hard-wired detection** in all domestic dwellings.
- Upgrades to **LD2** during void works or major electrical upgrades.

Annual testing will be undertaken wherever reasonably possible, delivered through the gas servicing programme and a standalone cyclical programme.

Accents Development teams will liaise with the Fire Safety Team to ensure that new developments meet the appropriate level of cover.

Firefighting Equipment and Fixed Installations

Accent will:

- Provide portable firefighting equipment where recommended by the FRA.
- Ensure all fixed and portable systems are maintained in line with legislation and manufacturer guidance.
- Notify the Fire and Rescue Service immediately where firefighting lifts or dry risers are unavailable and update the Premises Information Box accordingly.

Fire Doors

Accent will:

- Inspect flat entrance doors and communal fire doors in accordance with the **Fire Safety (England) Regulations 2022**.
- Ensure repairs and installations which are Accent's responsibility are carried out only by **competent and certified contractors**.
- Provide annual fire door safety information to all residents living in buildings with two or more domestic dwellings.

Emergency and Escape Lighting

Emergency lighting will be:

- Installed in accordance with regulations and best practice.
- Tested monthly (functional test) and annually (3-hour discharge test).
- Maintained and repaired by competent contractors.

Wayfinding, Signage and Notices

Accent will:

- Install wayfinding signage in all existing buildings over 18m or 7 storeys or new builds over 11m, in line with Approved Document B and the Fire Safety (England) Regulations 2022.
- Install fire action notices in corridors, entrance areas, and common parts.
- Ensure all signage complies with BS 5499 and the Health and Safety (Safety Signs and Signals) Regulations 1996.

Primary Authority Scheme (PAS)

Accent is a member of the Primary Authority Scheme with Merseyside Fire and Rescue Service. This partnership provides consistent regulatory advice across all local authority areas in which Accent operates and supports the implementation of new policies and procedures as legislation evolves.

7. Building Safety

The Assistant Director of Building Safety and Compliance is responsible for Building Safety within Accent. This includes leading on the development of building safety cases, customer engagement and overall compliance with the Building Safety Act and regulator.

To ensure Accent fulfils its statutory and non-statutory obligations and to ensure our customers are safe within their homes and buildings, Accent will take the following steps in relation Building Safety:

Registration of Higher Risk Buildings

Where Accent is the Principle Accountable Person, higher risk buildings in scope are registered with the Building Safety Regulator. Where Accent are an Accountable Person, we shall actively support the Principal Accountable Person with registering any building with the regulator.

Building Safety Case Reports

Building safety case reports will be developed and maintained for all high-rise buildings where Accent is the Principal Accountable Person. Where Accent are the Accountable Person for a building, we will ensure that the Principal Accountable Person has access to all relevant information where required to draft the Building Safety Case Report.

Mandatory Occurrence Reporting

Accent will maintain a mandatory occurrence reporting procedure, to allow people to report building safety incidents and risks that have caused, or if not remedied are likely to cause:

- the death of a significant number of people
- serious injury to a significant number of people

Building safety incidents and risks involve at least one of the following:

- structural failure of the building
- the spread of fire or smoke in the building

Where a building is undergoing construction or major works, it is the responsibility of the Principal Designer and Principal Contractor to submit mandatory occurrences. At all other times, it is the responsibility of the Principal Accountable Person.

Building Safety Engagement Strategy

Accent will implement a Building Safety Engagement Strategy for all higher risk buildings in scope of the regulations and where it is the Principal Accountable Person. Each strategy will contain information of how customers of higher risk buildings can:

- Report concerns around fire and building safety
- Complain to us about fire or building safety issues and the escalation through to the Building Safety Regulator
- Access information relating to their block.

Additionally, the engagement strategy will also detail the ways in which we will engage with Customers and how we will ensure we consider their individual needs across our diverse customer base.

8. Contract Management

Contractors are carefully selected through a robust procurement process, to ensure they have the correct skills, knowledge, experience and qualifications and a similar ethos to Accent to ensure they deliver our customer safety requirements in line with each specific policy and procedures.

Contractors will be selected, managed, and monitored in line with the Contract Management Procedure with the support of the Procurement Team.

9. Performance Monitoring

The effectiveness of the delivery and management of fire & building safety is monitored through Key Performance Indicators (KPIs).

KPI results are reported to the Senior Leadership Team and Board monthly as part of the Corporate Scorecard.

Fire and Building Safety is also reported quarterly at Accents Strategic Health and Safety Group, which is chaired by the Chief Executive Officer.

10. Quality Assurance

Undertaken both internally and externally, auditing provides independent assurance that ourselves and our contractors are delivering the standards expected to achieve compliance with all fire & building safety requirements. The results and findings are used to ensure we are continually striving to improve the service we deliver and the performance of our contractors.

11. Roles and Responsibilities

The ownership of this policy lies with the Executive Director of Assets and Compliance.

The Assistant Director of Building Safety & Compliance is accountable for the implementation and delivery of this policy and associated policies and procedures.

Managers and Leaders are responsible for ensuring colleagues are competent to undertake their roles, with support from the People Team.

The Customer Safety Manager and Fire Safety Manager are responsible for the day-to-day delivery and management of all compliance protocols relating to this policy, associated policies and procedures.

The Head of Health, Safety and Facilities will be responsible for advising key stakeholders on Accent's legal obligations and assist in the implementation and on-going review of this policy.

Accent colleagues have a duty to ensure they work in accordance with current safety legislation, and Accents policies and procedures to ensure the continued safety of both customers and themselves.

Contractors to undertake all customer safety requirements, as set out within this policy in line with legislation and regulatory requirements.

12. Policy Review

This section outlines:

- The frequency of policy reviews
- A commitment to communicating changes to stakeholders
- How the implementation of the policy will be monitored

For example: This policy will be reviewed every 2 years, or sooner if required by legislative, regulatory, or organisational changes. Due to the changing regulatory landscape surrounding this area, a health check will be undertaken every 12 months. Amendments will be communicated to all staff and relevant stakeholders.

The implementation of this policy will be monitored through quarterly reports to the Strategic Health and Safety Group.

13. Exceptions

Safety of customers and statutory compliance is Accents first priority, however there may be certain circumstances under which the terms of this policy may be reconsidered. Colleagues should be mindful of customer vulnerabilities and their specific needs. Extenuating circumstances will be assessed on a case-by-case basis and exceptions may be applied that require empathy and flexibility, to ensure that customers are treated fairly, compassionately and with respect.

14. Summary

This policy document acts to serve as a declaration of Accent's intent and commitment to uphold its statutory duty of care