

Housing and Safer Communities Policy



Division – Repairs and Investment

Policy Title: - Fire Safety Policy

Policy Reference – DHSC-REP-FSAG-POL-01. v4

Document Owner – Building and Fire Safety Manager

Review	Version 4 – 16/03/2026
	Effective date: March 2021
	Review and Update <ul style="list-style-type: none"> • Review November 2025 • Next Review due March 2027
	Approved by: - Compliance Operational Group – 19 th November 2025 Compliance Safety Panel – 21 st November 2025 Landlords Compliance Group – 16 th January 2026 Reports Panel: - Director of Housing and Safer Communities – 16 th March 2026

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1.0 Policy Objective

- 1.1 The Royal Borough of Greenwich (the council) are committed to ensuring that residents homes, offices and communal areas are safe and secure places to live and work. The Housing and Safer Communities Directorate (HSC) within the council have a responsibility for properties that fall within the Housing Revenue Account (HRA) and temporary accommodation within the General Fund (GF).
- 1.2 The Housing and Homelessness Strategy 2021-2026 sets out the overarching principles and key aims for the council's housing services for the provision of safe, secure, and affordable homes. This is divided into five key strands of which this policy sits within: -
- Strand 1 - Ensuring the supply of high-quality homes and
 - Strand 4 – Safe and sustainable homes for all.
- 1.3 This policy sets out local arrangements that are in place by HSC and how we intend to meet our legislative and other obligations as a landlord, employer and client providing assurances that fire safety is appropriately managed. We aim to ensure that our residents, employees, contractors, and the public are not exposed to any risk that may impact their health, safety, and wellbeing.
- 1.4 This policy does not replace the any corporate policy or arrangement in relation to fire safety but provides additional assurances where risk may cause harm to persons in residential properties owned and managed by HSC.
- 1.5 This policy sets out how HSC will ensure that fire safety is correctly managed and maintained in line with current legislation.

2.0 Context

- 2.1 The Regulatory Reform (Fire Safety) Order 2005 and other fire related legislation requires the council to act as the 'responsible person' on all premises under its control. Section 4 of this policy outlines the principal legislation governing this policy.
- 2.3 In compliance with legislation HSC are required to implement general fire precautions, to ensure that fire risk assessments are undertaken and implement any control measures suggested in premises owned, managed, or controlled by HSC.
- 2.4 In addition, HSC will comply with the promotion of fire safety processes ensuring that residents, employees, and contractors are fully informed of such measures and are aware of what action is required in case of any fire within a property or a block.
- 2.5 HSC takes the health, safety and wellbeing of its employees and residents seriously. It is our policy to exceed, where possible, the minimum health and safety requirements of the law.
- 2.6 Executive responsibility for fire safety lies with the Chief Executive who is deemed to be the principal 'Responsible Person' for the council as identified in the Regulatory Reform (Fire Safety) Order 2005 or the 'Accountable Person' outlined in the Building Safety Act 2022. These duties have been delegated to the senior administrative officers, the Director

of Housing & Safer Communities and Senior Assistant Director for Repairs & Investment division to assist in the delivery and implementation of this policy.

- 2.7 The Senior Assistant Director of Repairs and Investment and the Head of Landlord Risk and Compliance are responsible for the appointment of a competent person, who will be known as the Fire Safety Delivery Manager for the effective management of fire safety and where appropriate to escalate issues to the Head of Landlord Risk and Compliance. The main competencies for the Fire Safety Delivery Manager role will be identified in the posts Person Specification.
- 2.8 The Director of Housing and Safer Communities is responsible to the councils Chief Executive and the council's Cabinet Members for ensuring the effective delivery, implementation and compliance of this policy. Implementation, compliance of and adherence to this policy will be monitored by the council cabinet members.
- 2.9 In addition, all HSC managers and supervisors have duties as the 'Nominated Person' to the extent to which they have control of the buildings, and the activities operating within them.
- 2.10 HSC's Landlords Assurance Framework maps out the governance regime for both officers and cabinet members to ensure HSC meets its regulatory obligations by being visible and accountable for resident safety and the delivery of improvements. The Audit and Risk Management Panel within the framework will be responsible for ensuring that the council's cabinet members receive the assurances it requires.
- 2.11 HSC will have relevant procedures in place for the management of all its domestic and non-domestic dwellings, which provide guidance and a robust consistent approach for the safe management of risk regarding fire safety.
- 2.12 The competent persons for fire safety in HSC is the Building and Fire Safety Manager will have responsibility for the effective management and control of fire safety and where appropriate to report and escalate issues to the Head of Landlord Risk and Compliance.
- 2.13 The competent person, Building and Fire Safety Manager, must be trained to at least National Examination Board in Occupational Safety and Health (NEBOSH Fire) and have fire safety management experience.
- 2.14 Employees who have an identified role in undertaking fire safety procedures and preventative measures will receive fire safety training appropriate to their role.
- 2.15 All current new managers, supervisors and employees, who have a role related to fire safety must undertake mandatory Fire Awareness Training and attend an annual refresher course thereafter.

3.0 Key Policy Points

- 3.1 HSC will comply with all relevant legislation to meet our fire safety obligations to protect our residents, employees, contractors, and visitors from any risk to health and safety from fire.

3.2 Management of Fire Safety Duties

HSC will work with the Building Safety Regulator and London Fire Brigade Enforcement Team and ensure the following general fire precautions are implemented by: -

- appointing a competent and appropriately qualified person to lead the management of fire safety and ensure compliance is achieved and maintained.
- registering our high-risk buildings with the Building Safety Regulator.
- preparing and submitting Building Safety Cases to the Health and Safety Executive.
- implementing all necessary fire precautions and any other preventive best practice measures identified during fire risk assessment and reviews.
- ensuring electric intake and riser cupboards are not used for storage of any materials.
- providing, servicing, and maintaining passive and active fire protection within relevant buildings and homes.
- providing fire safety training to employees and refreshing this knowledge regularly.
- undertake fire risk assessments for all relevant buildings as required.
- review fire risk assessments within appropriate timescales fitting to the premises.
- complete any actions identified as a result of the fire risk assessments within approved time frames.
- ensuring all residential properties receive appropriate gas, electrical safety checks and any other relevant safety checks.
- engaging openly and proactively with regulators and stakeholders.
- carry out post inspections to monitor the quality of works undertaken.
- ensure an appropriate programme of improvement is in place to maintain the safety of stock and to keep resident safe in their homes.

3.3 Management of Fire Risk Assessment

HSC approach to the management of fire risk assessment is to: -

- employ and commission competent persons, contractors, and engineers to undertake fire risk assessments and works related to fire safety, equipment, systems, and installation.
- carry out scheduled fire risk assessment for relevant properties no later than their review date.
- the FRA for a building will be reviewed in the event of: -
 - a fire,
 - change in building use,
 - change in working practices that may affect fire safety,
 - following refurbishment works, or
 - if required following an independent fire safety audit.
- categorise the level of risk associated with building features, geometrics, occupancy type and means of escape and the frequency of which a fire risk assessment is undertaken, see figure 1 for Categories.
- have processes in place to record and action findings identified in the fire risk assessment. Actions will be rectified within a defined period, see figure 2 for the priority levels and target timescales that HSC use to priorities and manage performance.
- ensure such actions have been completed.
- work with other council departments to carry out combined Fire Risk Assessments e.g. purpose built and converted street properties with commercial units below.

- have processes in place to gain access to residents' homes to undertake essential fire safety related inspections and remedial works.
- cooperate with Responsible Persons in other organisations where there is a shared interest in a building.

3.4 Fire Assessment Risk Rating

As part of the FRA, the building will be given a Risk Rating of one of the following: -

- Trivial** No action is required.
- Tolerable** No major additional fire precautions required. However, there might be a need for reasonably practicable improvements that involve minor or limited cost.
- Moderate** It is essential that efforts are made to reduce risk. Risk reduction measures, which should take cost into account, should be implemented within a defined period. Where moderate risk is associated with consequences that constitute extreme harm, the further assessment might be required to establish more precisely the likelihood of harm as a basis for determining the priority for improved control measures.
- Substantial** Considerable resources might have to be allocated to reduce the risk. If the building is occupied, urgent action should be taken to reduce the risk while a permanent solution to the risk is put in place.
- Intolerable** Premises (or relevant area) should not be occupied until the risk is reduced.

Fig I - Categories

Designation	Description of Building	Fire Risk Assessment Frequency
HRBs (Higher Risk Buildings)	Buildings > 7 storeys or over 18 Metres tall at the highest finished floor level (FFL) As identified in the Building Safety Act 2022	Annual
Other High-Risk Buildings	Buildings used as Sheltered, Supported or Temporary Accommodation. Converted Street Properties (MAPS) or any other building deemed as presenting a higher risk by HSCs competent person	Annual
Medium Rise Buildings	Any building not in the above two categories which are between 11 and 17.99 metres tall at the highest FFL.	Three Yearly
Low Rise Buildings	Any building not in the above categories which are lower than 11 metres tall at the highest FFL	Three Yearly

Fig 2 – Prioritisation of FRA Actions

Assessment	Risk Level	Description	Target timescale for completion
Tolerable	Low	Actions should be implemented as soon as is practical when the opportunity arises within the target timescale	Within 24 months
Moderate	Medium	Actions present a lower overall risk and may be more complicated or require a greater degree of planning	Within six months or until the risk has been reduced to a tolerable level until the defect can be rectified
Substantial	High	Action must be completed as soon as is reasonably possible.	Within three months
Intolerable	Significant	Action must be completed immediately. Interim measures will be required if the action cannot be completed immediately	Should not be occupied until risk is reduced through interim measures or completion of the action

3.5 Management and Provision of Fire Safety Equipment

As part of the policy, HSC will regularly test, maintain and service all fire detection and firefighting equipment to include but not limited to: -

- Fire alarms - red break glass units, smoke detectors, heat detectors, CO2 detectors,
- Automatic Openable Vents (AOV)
- Fire extinguishers
- Dry Risers (a wet & dry test, no more than 6 months apart)
- Fire Suppression systems as installed
- Emergency lighting
- Fire doors in buildings over 11 meters (annually for flat entrance doors and quarterly for communal doors)

3.6 Monthly inspections will take place on all essential fire safety equipment and where critical equipment is out of service and likely to remain so for over 24 hours, HSC will inform the London Fire Brigade as required by the Fire Safety (England) Regulations 2022

3.7 Critical equipment includes: -

- rising mains
- smoke control systems
- fire suppression systems
- fire detection and fire alarm systems, including any systems linked to other fire safety equipment, such as smoke control systems
- evacuation alert systems (a visual check of the control and indicating equipment, but not testing of the system)

- automatic door opening or closing systems linked to fire detection and fire alarm systems
- all lifts that are intended for use by firefighters. and evacuation lifts that are provided for the evacuation of disabled people in the event of fire.

3.8 Contract Management

In line with the councils Procurement Policy and Procedure, HSC will procure suitably qualified contractors to carry out necessary fire safety works and inspections, ensuring: -

- accreditation certificates are verified with the appropriate body prior to appointment.
- conduct regular meetings with contractors to review contract goals and monitor performance as part of their contractual obligations.
- carryout 10% post inspections to monitor the quality of work.
- control work through appropriate processes to ensure that no intrusive work take place in any premises unless a suitable survey or assessment has taken place and been adequately communicated and understood by everyone involved in the works, including residents.
- all required actions to mitigate the risk of fire and the potential of fire spreading.
- all reasonable actions are taken to ensure that appropriate building materials are being used which comply with current Building Regulations and British Standards and where appropriate are supported by primary test evidence.

3.9 Resident Responsibilities

Residents to proactively work in partnership with HSC to help keep them safe from the risk arising from fire by: -

- allowing access for our contractors or in house team to complete any safety inspections.
- allowing our contractors to complete any remedial works required to ensure your home remains safe.
- not to compromise the fire safety system of their home or communal areas.
- reporting any safety concerns to HSC at the earliest opportunity.

3.10 Awareness and Communication of Fire Safety

HSC will protect residents, employees and contractors to ensure: -

- information about fire safety, prevention and protection measures is made available to resident, employees, and contractors via fire engagement.
- residents are informed about fire safety when they move in, including the fire safety instruction which is located by the entrance to each block.
- residents are advised of the fire safety aspects of fire doors and not to prop fire doors open.
- employees receive fire safety related training on employment induction and wherever necessary subject to any position they hold and is to be recorded when completed.
- agreements are in place with contractors to ensure all relevant residents and employees are aware of the extent of works being undertaken, access controls are secured so that the safety of residents are not endangered.

- where residents in buildings with communal areas have been identified as having a disability/vulnerability such as hearing and/or sight impairment or mobility issues, will be contacted to ensure they are aware of procedures in case of an emergency. HSC will complete a Person-Centred Fire Risk Assessment (PCFRA) and where appropriate adaptations may be made based upon the risks identified.
- residents, employees, and contractors are aware of their responsibility in relation to fire risk and safety measures.
- the use of hot works will be minimised, and HSC will ensure that appropriate controls are in place for any such works which are necessary.

3.11 HSC will comply with the Fire Safety (England) Regulations 2022 and have an action plan in place to meet the provisions that apply to meet the requirements appropriate to the height of a building with a communal area.

3.12 Fire Safety Records

HSC will keep and maintain: -

- an accurate asset register of all buildings that requires a fire risk assessment.
- fire safety equipment, systems, and installations within each building.
- a register of any fire detection equipment provided within the building.
- a record of all relevant findings whilst carrying out the fire risk assessment.
- a record of all completed actions of the fire risk assessments, along with their findings and remedial works undertaken.
- accurate records of all testing, maintenance and servicing of fire equipment, systems, and installations.
- secure information boxes (also known as premises information or 'Gerda' boxes) with copies of appropriate information regarding the building construction, structural integrity and relevant resident PCFRA.
- records of employees attending relevant fire safety training.
- where required, appropriate information on the structure, construction type and make-up of the external walls of its buildings.

3.13 HSC will make available records of Fire Risk Assessments for residents, statutory bodies, and audit reviews.

3.14 HSC will work on its compliance to the Building Safety Act in the development of building safety cases and the gathering of information around the golden thread. Amongst other things, HSC will complete the registration of its Higher Risk Buildings (HRBS) and prepare Building Safety Cases and other information to support compliance with this legislation.

4.0 Legislation

4.1 The following legislation will affect this policy: -

- Defective Premises Act 1972
- Health and Safety at Work Act 1974
- Occupiers Liability Act 1984
- Building Act 1984
- Landlord and Tenant Act 1985

- Furniture and Furnishings (Fire Safety) Regulations 1988
- Secure Tenants of Local Authority (Right to Repair) Regulation 1994
- Health and Safety (Safety Signs and Signals) Regulation 1996
- Management of Health and Safety at Work Regulation 1999 (amended 2006)
- Personal Protective Equipment at Work Regulations 2002
- Housing Act 2004 (Housing Health and Safety Rating System)
- Regulatory Reform (Fire Safety) Order 2005 Supplemented by Fire Safety Act 2021
- The Control of Asbestos Regulations 2012
- The Construction (Design and Management) Regulation 2015 (CDM)
- Building Regulations 2010
- Homes (Fitness for Human Habitation) Act 2018
- The Charter for Social Housing for Residents (2020)
- Fire Safety Act 2021
- The Building Safety Act 2022
- Fire Safety (England) Regulation 2022
- Social Housing Regulation Act 2023

4.2 This list is not exhaustive but contains the main legal duties regarding fire safety.

4.3 HSC will comply with all relevant guidance and British Standards that underpin legislation.

4.4 This policy should be read in conjunction with relevant legislation as well as HSCs Fire Safety Management Plan and current established procedure.

5.0 Implementation and Performance Monitoring

5.1 The implementation of this policy will be carried out through employee training; briefings and a copy of this policy will be made available on the intranet for review.

5.2 Performance will be monitored and challenged through agreed performance indicators and will be reviewed at the following scheduled meetings: -

- Directorates Leadership Meeting (DMT)
- Landlord Compliance Group (LCG)
- Compliance Safety Panel (CSP)
- Compliance Operations Group (COG)
- Fire Safety Action Group (FSAG)

5.3 HSC will seek independent assurances through internal and external audit processes and publish results.

5.4 This policy will be reviewed annually at the Fire Safety Action Group or following a serious fire incident or any change in legislation prior to the scheduled review.

5.5 If during the review no amendments are required to the policy, it will be reported to the Compliance Operational Group, Compliance Safety Panel and Landlords Compliance Group meetings and minuted for audit purposes.