



Places to live. Space to grow.

Fire Safety Policy

Contents

Where to find the information you need

Introduction and policy purpose	1
Policy statement	2
Major Works to High Risk 1	3
Garages, Sheds and Outbuildings	4
Roles and Responsibilities	5
Record Keeping	6
Regulation	7
Reporting	8
Consultation	9
Communication	10
Review	11

1 Introduction: the purpose of this policy

- 1.1 At West Kent, we're committed to keeping everyone safe from fire. This policy explains our legal and regulatory responsibilities for fire safety, including fire risk assessments (FRAs), fire door inspections (FDI), and how we manage and reduce fire risks. It applies to all staff, residents, contractors, and anyone who works in, visits, or is affected by our buildings or services.
- 1.2 The Fire Safety Act 2021 makes it clear that all FRAs must cover the building's structure, external walls, and flat entrance doors. Article 24 of the Fire Safety Order brought in changes after the Grenfell tragedy, now reflected in the Fire Safety (England) Regulations 2022.
- 1.3 Fire risk assessments will be proportionate and risk based. In most cases the requirement will be a Type 3 (intrusive assessment of communal areas and sample of flats), unless a more intrusive assessment is justified by risk.
- 1.4 If a building or its residents are at higher risk, the Building Safety Manager may decide a type 4 FRA is needed which is more intrusive.
- 1.5 We'll always put in place any fire safety measures identified by the FRA and track them through to completion.
- 1.6 This policy also sets out West Kent's approach to Residential Personal Emergency Evacuation Plans (rPEEPs), in line with the Fire Safety (Residential Evacuation Plans (England) Regulations. These arrangements are designed to support residents who have difficulty self-evacuating in a fire, using a person centered, consent-based approach that is proportionate to risk and integrated with fire risk assessments and evacuation strategies.

2 Policy Statement

- 2.1 For all our domestic properties we will follow our Health and Safety Incident and Accident reporting procedures for all fires. This will be led and monitored by the Building Safety Manager.
- 2.2 Every home will have a smoke alarm; a minimum standard will be a battery-powered smoke alarm with sealed-for-life batteries.
- 2.3 Homes with a fixed combustion appliance, including gas appliances will have Carbon Monoxide (CO) detector, as a minimum standard battery-powered with sealed-for-life batteries meeting current British Standards.
- 2.4 We assess each building and tenant's needs to decide if other alarms are needed, aiming to meet current British Standards.

- 2.5 Our standard for existing buildings is Grade F1 which consists of a sealed battery interlinked detection. New buildings have Grade D1 which is hard-wired mains power interlinked detection with sealed battery units. We will never lower the standard.
- 2.6 We will have Category LD2 Detection systems which cover escape routes and high-risk areas.
- 2.7 Our High risk and medium risk buildings as well as older person schemes will be Grade D1 with mains powered detectors and Category LD1 which covers all areas where a fire could start.
- 2.8 During gas, electric, and stock inspections, operatives will check alarms and replace on-site where a battery detector is present or raise an order for replacement/repair for hard-wired systems as needed.
- 2.9 Contractors must ensure their work does not reduce fire safety.
- 2.10 All new builds will meet fire safety standards, with the Building Safety Manager reviewing Health and Safety documents before completion.
- 2.11 For our Communal and Commercial assets, we will categorise blocks as High Risk 1 and 2, Medium, or Low Risk:
- High Risk 1: Blocks over 18 meters or over or at least seven stories, with at least two residential units
 - High Risk 2: Extra Care Properties managed by West Kent or Houses of Multiple Occupancy (HMO's)
 - High Risk 2: KEHFA: Extra Care Properties under Private Finance Initiative (PFI) agreements where schemes are managed by others
 - Medium: Blocks 11m–18m or supported schemes
 - Low: All other blocks.
 - Medium and Low-risk blocks have FRAs every three years or as recommended.
 - High-risk and KEHFA blocks have yearly FRAs or as recommended. New FRAs are done after major works or changes.
 - FRAs are also carried out after any fire-related incident or major works.
- 2.12 For blocks managed by others, we report compliance and seek FRA evidence, involving Kent Fire and Rescue as escalation if needed.
- 2.13 We act on all FRA follow-up works within set timescales:
- Intolerable (High risk): within 24 hours.

- Substantial (Medium risk): within 3 months.
- Moderate (Low risk): within 1 year.
- Tolerable: no action needed.

2.14 Buildings over 18m must have:

- Kent Fire and Rescue (KFR) building plans and external wall details.
- Monthly checks of lifts and other firefighting systems, with defects reported to KFR.
- Information boxes with relevant details.
- Wayfinding signage.
- Fire safety instructions and fire door information for residents.
- Registration with the new regulator, a safety case, and ongoing review with resident involvement.

2.15 For buildings below 11m, we will conduct Fire door inspections quarterly for communal doors. These will be completed by our Neighbourhood Housing officers (NHOs) using the checking system, which is limited to confirming doors open and close, that self-closing devices operate as intended, that there is no obvious damage to the door. All

2.16 NHO's are given training by West Kent's appointed fire safety consultants. These are not technical fire door inspections, and any concerns will have jobs raised for repair or are escalated to the Building Safety Manager for advice. These doors are also inspected as part of the 3 yearly FRA.

2.17 For all high-risk buildings, we will conduct Fire door inspections quarterly; these will be done by our external FRA/FDI contractor for communal doors and annually for flat entrance doors. Where access to flats is not available for fire door inspections, West Kent will inspect flat entrance doors from the communal side, in line with the Fire Safety Act 2021 and Fire Safety (England) Regulations 2022. This includes inspection of the door leaf, frame, glazing, and visible ironmongery, so far as reasonably practicable.

2.18 If any damage, defects, or concerns are identified during these inspections, they will be escalated immediately and appropriate action taken.

2.19 West Kent will take reasonable steps to obtain access for internal inspection, including advance notice and engagement with residents. Legal action is not routine but may be considered proportionately where persistent refusal creates a material fire safety risk.

2.20 We prioritise fire door actions using our risk ratings; intolerable and substantial risks are attended to within set timescales. Moderate risk actions timescales may be extended due to going onto the planned repair program.

- 2.21 All fire detection, prevention, and firefighting systems are serviced and maintained in line with required schedules.
- 2.22 Evacuation strategies are in place and shared with residents upon new tenancies and as part of our annual communication to all residents living in blocks.
- 2.23 We have a Resident Engagement Strategy, including buildings over 18 meters and over, and communicate fire procedures and the importance of fire doors to all residents annually and at sign-up.
- 2.24 We record and act on near-miss reports.
- 2.25 We follow our no-access process to ensure we can check homes, and carry out any fire safety works, considering resident vulnerabilities.
- 2.26 Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 come into force in April 2026. This will apply to all residential buildings that are at least 18 meters with two or more domestic premises or those that are 11m and above using simultaneous evacuation strategy. We will carry out Person Centered Fire Risk Assessments (PCFRA) and Residential Personal Emergency Evacuation Plans (rPEEPS) for all known residents with disabilities or impairments where consent is granted which will then be reviewed annually. This will be reported on and managed by our Housing Team.
- 2.27 For residents in extra care, supported, or sheltered schemes, we complete rPEEPs and PCFRA's and review them annually.
- 2.28 For residents in blocks without on-site staff, who raise concerns about any disability, we will carry out PCFRAs and rPEEPS, which will then be reviewed annually.
- 2.29 We will also prepare a Building Emergency Evacuation Plan in line with the Fire Safety (Residential Evacuation Plans) Regulations 2025. This will be saved centrally on West Kent's systems, and where appropriate shared with KFR and placed in the secure information box if one is present. This will include:
- A copy of instruction to residents on evacuation is sent annually
 - Details of residents with PCFR's/rPEEPS
 - Details of any other arrangements for evacuating the building.
- 2.30 This plan will be aligned to the FRA.
- 2.31 We communicate with staff, residents, and others about fire safety and prevention.
- 2.32 We install and maintain fire detection and warning systems where needed.
- 2.33 West Kent operates a zero-tolerance approach to items stored in communal areas and escape routes within blocks that are not staffed, to ensure these areas are always kept clear. Items such as e-cycles and e-scooters are not permitted under any circumstances in communal areas. Zero tolerance includes communal cupboards, however in

exceptional circumstances we may allow some items to be stored in cupboards, these cupboards will not house any electrical/auxiliary/gas services, they must be kept locked at all times, be accessible to our Housing Team to inspect at quarterly block inspections, such items permitted include:

- Push Scooters/bikes
- Prams
- Walking Frames
- Empty Suitcases.

- 2.34 In staffed schemes only, a managed use approach may be applied where appropriate. This allows limited, risk-assessed items to be present in communal areas, provided this does not compromise fire safety.
- 2.35 The managed use approach is subject to ongoing monitoring and may be withdrawn immediately where it is not adhered to, is abused, or where the risk profile of the building or residents changes. Any managed use arrangements will be documented, communicated to residents, and reviewed regularly as part of the Fire Risk Assessment process.
- 2.36 For properties we manage but don't own, we work with the responsible person to ensure fire safety.
- 2.37 For properties we own on a full repairing lease, we are the person responsible unless the lease says otherwise. The lessee is responsible for maintenance and safety under their lease.
- 2.38 For communal halls, we complete FRAs and inform users about health and safety requirements.
- 2.39 For community hubs, shops, and warehouses, we complete FRAs and work with other responsible persons as needed.
- 2.40 Where there are multiple responsible persons (e.g. commercial kitchens), all must carry out FRAs and manage fire safety. We cooperate with them when producing the overall FRA for the site.

3 Major Works to High Risk 1

- 3.1 The definition of Major works includes: cladding replacement, structural alterations, fire safety upgrades, M&E replacements, extensions/storey additions and Major refurbishment projects.
- 3.2 These works are subject to the following:

Pre Construction

- FRA review
- Fire Strategy review
- Construction Fire risk Assessment
- Building Safety Regulator engagement/Building Safety Regulator building control approval for in-scope High Risk Building works, including Gateway approvals where applicable
- Informing residents of major works, including any vulnerable resident arrangements.

During Construction

- Permit to work systems
- Hot works controls
- Temporary fire alarm arrangements
- Temporary evacuation arrangements
- Protection of escape routes
- Maintenance of compartmentation
- Housekeeping controls
- Contractor inductions and competence checks
- Daily monitoring of fire risk
- Continued information to residents on progress, temporary measures, delays
- Work with Fire and Rescue services

Completion

- Fire stopping inspections
- Certification and commissioning records
- Updated fire strategy
- Updated FRA
- Golden thread of information updates

- Resident communication

4 Garages, Sheds and Outbuildings

4.1 For our Garages, letting agreements set out what can and cannot be stored. Tenants must:

- Follow the agreement and all health and safety rules.
- Not store flammable or hazardous materials, rubbish, or perishable waste.
- Not store petrol except in a vehicle's tank, and not let petrol or oil enter drains.

4.2 For Sheds and Outbuildings:

- Tenants must get our permission before installing outbuildings.
- Outbuildings can't be used as living spaces or for electrical appliances.
- We don't allow electrical supply to outbuildings.
- Sheds and Outbuildings must be at the rear or side of the home and at least 2m from the building.

5 Roles and Responsibilities

5.1 West Kent is the responsible person for fire safety where it has control of the premises, or relevant common parts, subject to ownership, lease and management arrangements.

5.2 Our Board oversees the policy and ensures we meet all legal and regulatory standards.

5.3 The Executive Team (ET) and Communities and Housing (C&H) reviews the compliance dashboard reports on FRAs and FDI's and is notified of any issues, deciding on actions and monitoring follow-up.

5.4 The Director of Property and Asset Management leads on the strategic approach for Fire Safety and the management of this.

5.5 The Head of Repairs oversees any remedial repair works.

5.6 The Head of Planned works and Servicing oversees the maintenance and servicing of fire safety equipment, along with replacement when needed.

5.7 The Head of Strategic Asset Management reports on compliance and keeps FRA data up to date. They manage a competent Building Safety Manager (with a NEBOSH fire safety qualification or similar) and a Compliance Coordinator, ensuring that ongoing professional development is provided and identified during Professional Development Review meetings.

- 5.8 The Building Safety Manager ensures we comply with fire safety requirements and manages the FRA/FDI programme. This role identifies high-risk buildings, ensures safety cases are in place, and advises on improvements. They will ensure Fire Risk Assessors are appointed to carry out FRAs and fire door checks. They must be competent, experienced and have appropriate accreditation and professional registration, such as registered with a recognised scheme or hold a NEBOSH fire safety certificate.
- 5.9 The Compliance Coordinator manages third-party quality control for FRAs, escalates issues, and ensures fire actions are completed on time.
- 5.10 Housing teams and the Community Safety Team help with hard-to-access properties, support legal processes, and carry out fire door inspections after training.
- 5.11 For buildings we don't own, the freeholder is the Principal Accountable Person. West Kent is the Accountable Person as the leasehold landlord. For buildings over 18m, the Principal Accountable Person registers the building and submits the safety case. West Kent works with them to manage the building and keep residents safe.
- 5.12 Appendix 1 sets out all roles and responsibilities, including three lines of defense for each compliance area.
- 5.13 All staff must follow fire safety procedures, report issues, look out for hazards, and complete fire action items promptly.
- 5.14 West Kent will consider fire safety concerns, feedback and suggestions received from residents and visitors. This feedback will be used, where appropriate, to help identify hazards, improve fire safety arrangements, and support ongoing assurance.

6 Record Keeping

- 6.1 We keep accurate records for all assets we own or manage, showing if an FRA is needed using control records. New assets are added to our Housing and Asset Management system, including fire control records.
- 6.2 We record:
- The date of each FRA, actions needed, target and completion dates, and responsible teams.
 - The date of each fire door inspection, actions, and completion dates.
 - All inspection evidence, photos, and completed works on our central system.
 - Details of servicing, maintenance, testing, and repair of fire safety equipment.
 - Secure information boxes for buildings over 18m, kept up to date as required by Regulation 4 of the Fire Safety (England) Regulation 2022.
 - Up-to-date insurance for consultants and contractors.

- All FRAs on our central storage system.
- All rPEEPs in our Housing System.

7 Regulation

7.1 We comply with all regulatory standards, including those set by the Regulator of Social Housing (RSH). Tenant Satisfaction Measures require us to check fire safety in our homes and report on the percentage of buildings with up-to-date FRAs.

7.2 Key legislation includes:

The Regulatory Reform (Fire Safety) Order 2005

Fire Safety Act 2021

The Fire Safety (England) Regulations 2022

Building Safety Act 2022

Fire Safety (Residential Evacuation Plans) England Regulations 2025

7.3 West Kent is the responsible person where it has control of the premises or relevant common parts, subject to ownership, lease and management arrangements.

7.4 Other relevant legislation and standards are listed below:

- Smoke and Carbon Monoxide Alarm Regulations
- Equality Act 2010
- UK GDPR
- The Social Housing (Regulation) Act 2023
- Housing Act 2004
- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006

- Gas Safety (Installation and Use) Regulations 1998
- The Furniture and Furnishings (Fire Safety) Regulations 1988
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Building Regulations 2010 (No: 2214): Approved Document B (Fire Safety) Volumes 1 and 2.
- Electrical Equipment (Safety) Regulations 2016
- Electricity at Work Regulations 1989
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- LACORS - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing
- Local Government Association: Fire safety in purpose-built blocks of flats
- Decent Homes Standard including HHSRS Operating Guidance - Housing Act 2004
- PAS 9980:2022
- National Fire Chief Council's Guidance (NFCC) - Fire Safety in Specialist Housing – May 2017, covers sheltered schemes, supported schemes and extra care schemes
- Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018)

8 Reporting

- 8.1 We report performance monthly using our compliance dashboard, which tracks all compliance data. This includes whether FRAs and FDI's are up to date and the number of outstanding or overdue actions and will be in line with the Tenant Satisfaction Measure of BS02- Fire safety checks. This measures the proportion of homes for which all required fire risk assessments have been carried out.
- 8.2 The Executive Team reviews this dashboard monthly, and then Communities and Housing (C&H) and Board reviews it quarterly. Any non-compliance is escalated by the Head of Strategic Asset Management to ensure action is taken.

- 8.3 All other fire compliance issues are included in the monthly report to the Executive Team and escalated to the Board if needed.
- 8.4 Any incident or near miss that could breach legislation or cause a health or safety risk is reported immediately to the Property and Asset Management Director, following our Health and Safety incident procedure.
- 8.5 If needed, the Board is notified to consider the implications and seek legal advice. West Kent will report any breach to the Regulator of Social Housing or other relevant bodies as required.

9 Consultation

- 9.1 The changes made to the compliance policies in this review have been sent to both OMT, the Health and Safety Committee, and the Executive Team for comment and feedback.
- 9.2 The compliance policies were consulted with our resident scrutiny panel in 2024. This fire safety Policy was reviewed by them again in 2026 as legislative changes effecting residents were made including PCFRA, rPEEPs and strengthening our Zero Tolerance approach in communal areas.

10 Communication

- 10.1 Good communication is essential. We will:
- Make sure all fire incidents follow our Health and Safety incident procedure.
 - Give residents access to their block's FRA when requested, with a cover letter explaining the content. Once available the resident portal is available we will also aim to provide this information on the portal.
 - Produce a resident involvement strategy for high-risk buildings.
 - Communicate with residents in blocks every year so they understand the fire evacuation strategy, what to do in a fire, and how to report issues.
 - Regularly share key fire safety messages via our website and Neighborhood newsletters.
 - Residents can contact our Customer Service Team via the regular telephone and email channels to ask questions, request accessible formats/copies of documentation, raise fire safety concerns.

11 Review

- 11.1 We will review this policy every two years, or sooner if there are changes in regulation or legislation.