



Places to live. Space to grow.

Fire Safety Policy

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1 Introduction and Purpose

- 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 checks, 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 We follow the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety Act 2021, and the Building Safety Act 2022. 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 FSO brought in changes after the Grenfell tragedy, now reflected in the Fire Safety (England) Regulations 2022.
- 1.3 We carry out a fire risk assessment whenever we're the responsible person and a building has communal areas. Usually, we do a type 3 FRA, unless a different type is more suitable, as decided by a competent fire risk assessor (PAS79 compliant). All FRAs will include the latest requirements, and we'll make sure any actions identified are completed on time.
- 1.4 If a building or its residents are at higher risk, the Building Safety Manager may decide a type 4 FRA is needed.
- 1.5 We'll always put in place any fire safety measures identified by the FRA and track them through to completion.

2 Roles and Responsibilities

- 2.1 West Kent is the duty holder and responsible person for fire safety.
- 2.2 Our Board oversees the policy and ensures we meet all legal and regulatory standards.
- 2.3 The Executive Team (ET) reviews compliance dashboard reports on FRAs and is notified of any issues, deciding on actions and monitoring follow-up.
- 2.4 The Director of Property and Asset Management leads on managing FRAs.
- 2.5 The Head of Property Services oversees any remedial works and the maintenance of fire safety equipment.
- 2.6 The Head of Strategic Asset Management reports on compliance and keeps FRA data up to date. They also make sure we have a competent Building Safety Manager (with a NEBOSH fire safety qualification or similar) and a Compliance Coordinator. Ongoing professional development is essential.
- 2.7 The Building Safety Manager ensures we comply with fire safety requirements and manages the FRA programme. This role identifies high-risk buildings, ensures safety cases are in place, and advises on improvements.
- 2.8 The Compliance Coordinator manages third-party quality control for FRAs, escalates issues, and ensures fire actions are completed on time.

- 2.9 Housing teams and the Community Safety Team help with hard-to-access properties, support legal processes, and carry out fire door inspections after training.
- 2.10 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.
- 2.11 Appendix 1 sets out all roles and responsibilities, including three lines of defence for each compliance area.
- 2.12 Fire Risk Assessors are appointed to carry out FRAs and fire door checks. They must be registered with a recognised scheme or hold a NEBOSH fire safety certificate.
- 2.13 All staff must follow fire safety procedures, report issues, look out for hazards, and complete fire action items promptly.

3 Regulation

- 3.1 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.
- 3.2 Key legislation includes:
- The Regulatory Reform (Fire Safety) Order 2005
 - Fire Safety Act 2021
 - Building Safety Act 2022
- 3.3 These laws require us to take all reasonable steps to keep people safe from fire in our buildings and nearby areas. We are the 'responsible person' because we own and manage homes for tenants and leaseholders.
- 3.4 Other relevant legislation and standards are listed at the end of this policy.

4 Policy Statement

- 4.1 We review and update our Fire Safety Policy every two years.
- 4.2 **For all our domestic properties:**
- Follow our incident reporting procedures for all fires, as per our Health and Safety incident procedure. This will be led by the Building Safety Manager.
 - We follow our incident reporting procedures for all fires, led by the Building Safety Manager.
 - Every home has a battery-powered smoke alarm with sealed-for-life batteries.
 - Homes with gas appliances have a battery-powered CO detector with sealed-for-life batteries, meeting British Standard BS 5029-1 where possible.
 - We assess each building and tenant's needs to decide if other alarms are needed, aiming to meet British Standard BS 5839-6.

- Our standard for existing buildings is F1 grade sealed battery interlinked detection. New buildings have D1 grade hard-wired interlinked detection with sealed battery units. We never lower the standard.
- Detection systems cover escape routes and high-risk areas (LD2 category).
- During gas, electric, and stock inspections, operatives check alarms and replace or order replacements as needed.
- Contractors must ensure their work does not reduce fire safety.
- All new builds meet fire safety standards, with the Asset Team reviewing Health and Safety documents before completion.

4.3 **For our non-domestic properties:**

- We categorise blocks as High, Medium, or Low Risk:
 - High Risk 1: Blocks over 18m
 - High Risk 2: Extra Care Properties managed by West Kent
 - KEHFA: Extra Care Properties in the PFI scheme managed by others
 - Medium: Blocks 11m–18m or supported schemes
 - Low: All other blocks
- Medium and low-risk blocks have FRAs every three years.
- High-risk and KEHFA blocks have yearly FRAs. New FRAs are done after major works or changes.
- FRAs are also carried out after any fire-related incident.
- For blocks managed by others, we report compliance and seek FRA evidence, involving Kent Fire and Rescue if needed.
- 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.
- Buildings over 18m must have:
 - KFR building plans and external wall details.
 - Monthly checks of lifts and 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
- Fire door inspections are done quarterly for communal doors and annually for flat entrance doors in high and medium-risk buildings.
- We prioritise fire door actions using our risk tool.
- All fire detection, prevention, and firefighting systems are serviced and maintained.
- Evacuation strategies are in place and shared with residents.
- FRAs are reviewed after a fire, or if building use or working practices change.
- We have a Resident Engagement Strategy, especially for buildings over 18m, and communicate fire procedures and the importance of fire doors to all residents annually and at sign-up.
- We record and act on near-miss reports.

- We follow our no-access process to ensure we can check homes, considering resident vulnerabilities.
- For residents in extra care, supported, or sheltered schemes, we complete Personal Emergency Evacuation Plans (PEEPs) and review them annually.
- For residents in blocks without on-site staff who raise concerns, we carry out Person-Centred Fire Risk Assessments (PCFRAs) annually.
- We communicate with staff, residents, and others about fire safety and prevention.
- We install and maintain fire detection and warning systems where needed.
- We keep escape routes safe and accessible.
- For properties we manage but don't own, we work with the responsible person to ensure fire safety.
- For properties we own on a full repairing lease, we are the responsible person unless the lease says otherwise. The lessee is responsible for maintenance and safety under their lease.
- For communal halls, we complete FRAs and inform users about health and safety requirements.
- For community hubs, shops, and warehouses, we complete FRAs and work with other responsible persons as needed.
- 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.

4.4 For our Garages:

Garage 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.

4.5 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.
- Outbuildings must be at the rear or side of the home and at least 2m from the building.

5 Record Keeping

5.1 We keep accurate records for all assets we own or manage, showing if an FRA is needed. New assets are added to our Housing and Asset Management system, including fire control records.

5.2 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.
- All PEEPs in our Housing and Asset System.

6 Reporting

- 6.1 We report performance monthly using our compliance dashboard, which tracks all compliance data. This includes whether FRAs are up to date and the number of outstanding or overdue actions.
- 6.2 The Executive Team reviews this dashboard monthly, and the Board reviews it quarterly. Any non-compliance is escalated by the Head of Strategic Asset Management to ensure action is taken.
- 6.3 All other fire compliance issues are included in the monthly report to the Executive Team and escalated to the Board if needed.
- 6.4 Any incident 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.
- 6.5 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.

7 Communication

- 7.1 Good communication is essential. We will:
 - Make sure all fire incidents follow our Health and Safety incident procedure.
 - Give tenants access to a user-friendly version of their block's FRA, with a cover letter explaining the content.
 - 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, such as keeping communal areas clear and advice on electric scooters.
 - Operate a zero-tolerance policy for items in communal areas in most accommodation, with a managed use system for elderly persons' accommodation.
 - Remind residents about the 'Stay Put' evacuation policy, unless the FRA says otherwise. Residents should leave if smoke or heat affects their home, if told by the fire service, or if in doubt.

8 Review

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

Legislation

- The Regulatory Reform (Fire Safety) Order 2005
- The Fire Safety Act 2021
- The Fire Safety (England) Regulations 2022
- The Building Safety Act 2022
- 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
- Ministry of Housing, Communities & Local Government (MHCLG): Advice for Building Owners of Multi-storey, Multi-occupied Residential Buildings (January 2020)
- National Fire Chief Council's Guidance (NFCC) - Fire Safety in Specialist Housing – May 2017, covers sheltered schemes, supported schemes and extra care schemes
- Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation 2018 – guidance for those with responsibility for ensuring fire safety in certain premises within sleeping accommodation in Scotland
- Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018)

Related documents

Health and Safety Incident Procedure