



# NLM Housing Association

## Fire Safety Policy

<b>Version:</b>	3.5
<b>Policy Owner:</b>	Assets Director
<b>Approved by:</b>	Board
<b>Date approved:</b>	January 2026
<b>Date Issued:</b>	January 2026
<b>Date of Review:</b>	January 2029

# Contents

1	Introduction .....	3
2	Policy Scope .....	3
3	Definitions and legislation .....	4
4	Roles and Responsibilities.....	4
5	Our commitments .....	6
6	Fire Risk Assessment Frequency and Remedial Action Timescales .....	8
7	Fire Safety Incident Reporting .....	10
8	Evacuation.....	10
9	Fire Door Inspections.....	12
10	Remedial Actions.....	12
11	Testing and Maintenance of Fire Safety and Equipment, Gas Installations and Electrical Installations.....	12
12	Domestic Smoke/Heat Detection .....	13
13	Repairs and Maintenance Activity.....	14
14	Planned and Major Works .....	14
15	Fire Evacuation Strategy .....	16
16	Certification & Documentation .....	16
17	Communication with stakeholders .....	17
18	Monitoring and Assurance .....	18
19	Competence .....	19
20	Consultation.....	20
21	Equality and Diversity .....	21
22	Summary: How NLM Ensures Compliance:.....	21
23	Policy Review .....	21

## 1 Introduction

- 1.1 The Fire Safety Act 2021 was introduced in response to the Grenfell Tower tragedy, aiming to close gaps in fire safety management for multi-occupied residential buildings.
- 1.2 It expands the scope of fire risk assessments, clarifies responsibilities, strengthens enforcement, and introduces new requirements for inspections, information sharing, and resident communication.
- 1.3 These changes ensure that fire risks are more comprehensively managed and that responsible persons are held to higher standards of accountability
- 1.4 At NLM Housing Association we are committed to ensuring that our residents' homes, our offices and commercial properties are safe and secure places in which to live and work.
- 1.5 This policy supports us to ensure that we meet our obligations as a landlord and employer and seeks to provide assurance that fire safety is appropriately managed. We aim to ensure so far as reasonably practicable that our residents, employees and the general public, are not exposed to any risks to their health or safety and wellbeing from fire.
- 1.6 This policy applies to all residential and commercial properties owned and managed by NLM housing association.
- 1.7 When we use the terms 'we', 'our' and 'us' we mean NLM Housing Association.
- 1.8 The management of fire safety is an ongoing process. Standards will be kept under constant review and the impetus for improvement maintained.

## 2 Policy Scope

- 2.1 NLM is committed to fulfilling its obligations under the Regulatory Reform Fire Safety Order 2005 legislation with regard to fire Safety. Fire Safety Policy details how NLM will manage fire safety in its premises and during work activities in order to comply with the relevant legislation and guidance. The ultimate aim of the Policy is to preserve life in the event of a fire by:
  - Ensuring that tenants, employees, members of the public and contractors are safe as part of a stay put or delayed evacuation strategy or evacuated safely from a building in the event of a fire.
  - Enhance the life safety of fire fighters who may need to enter a building during or after the evacuation of occupants.
  - NLM will take all measures reasonably practicable to prevent or minimise the risk of fire through the undertaking of a fire risk assessment.

- 2.2 The protection of property will be dealt with on an individual property basis and, where necessary, appropriate property protection bodies will be consulted.

### **3 Definitions and legislation**

- 3.1 Regulatory Reform (Fire Safety) Order 2005 (RRFSO) – a statutory instrument applicable in England and Wales. The Order places the responsibility on individuals within an organisation to carry out risk assessments to identify, manage and reduce the risk of fire.
- 3.2 Fire Safety Act 2021 – arose out of the 2017 Grenfell Tower fire and relates to fire safety in buildings in England and Wales with two or more domestic residences and is designed to supplement the RRFSO.
- 3.3 Responsible Person - a person (or organisation) that has control of a building, or a degree of control. In reference to fire, they are who is responsible for ensuring measures are in place to identify, manage, and mitigate risks associated with fire.
- 3.4 Fire Risk Assessment (FRA) - A building assessment that identifies any fire hazards, evaluates the risk of those hazards, and recommends action that should be taken to remove, reduce or manage the risk.

### **4 Roles and Responsibilities**

In order to ensure that the objectives of the Fire Safety Policy are fulfilled, the organisational arrangements are as follows:

- 4.1 The Board ensures staff, partners, residents and the general public are protected from fire risk. In order to achieve this, the Board will review this Policy on every three years and analyse annual performance reports to ensure that issues of significant risk are actioned appropriately.
- 4.2 Chief Executive - The Chief Executive will ensure that adequate resources are available to meet the requirements of fire safety legislation and guidance, and that all liability (embracing statutory and business needs) is covered by insurance.
- 4.3 Assets Director – Assets director is deemed to be the responsible person. He is ultimately responsible for the implementation of this Policy at all levels of the organisation to meet the requirements of the Regulatory Reform (Fire Safety) Order 2005 and other relevant legislation and guidance.
- 4.4 Executive Management Team - Executive Management Team is attended by departmental heads and chaired by the Chief Executive. The executive team will ensure there is the provision of adequate human and financial resources to implement the policy. Meetings will take place on a quarterly basis and the team will review:

- Updates in legislation and related guidance.
  - Fire incidents and false alarms, including patterns and trends.
  - Contact with enforcing authorities.
  - Feedback from the fire risk assessments.
  - Feedback from fire investigations.
  - Results of fire safety related audits and inspections.
  - Fire safety related training delivered.
- 4.5 Fire related objectives. - Further advice from relevant bodies, for example fire risk assessors, insurers, architects and fire safety provision engineers, will be sought as and when necessary.
- 4.6 Compliance Officer - Compliance Officer is responsible for providing guidance to employees to ensure that the requirements of this Policy are implemented at all levels of the association and will:
- Respond to any reported fire safety related concerns from employees at all levels of the association to ensure appropriate action is taken and that they are monitored and reviewed.
  - Develop a fire safety training programme for employees and ensure suitable records are retained.
  - Ensure fire safety related incidents are investigated to identify the immediate, root and underlying causes and, where possible, implement measures to prevent recurrence.
  - Maintain a current understanding of fire safety legislation, codes of practice and industry standards.
  - Ensure that all fire risk assessments are reviewed at regular intervals and distributed to relevant employees.
  - Allocate actions identified within fire risk assessments to the relevant employees and identify a timescale for completion.
  - Consider recommendations identified within fire risk assessments, allocate related actions to the relevant employees and identify a timescale for completion.
- 4.7 Assets Director – Assets Director is responsible for ensuring that fire safety works assigned to employees/contractors within the Compliance and Maintenance Team are allocated appropriately, completed to the relevant standards and within the timescales given and post inspected.
- 4.7.1 Assets Director is also responsible for the management of fire safety systems, equipment and installations and will ensure that:
- Emergency escape lighting is serviced by a competent and suitably qualified contractor in accordance with the standard to which it conforms and maintained in a safe and operational condition.

- Fire alarm systems are serviced by a competent and suitably qualified contractor in accordance with the standard to which it conforms and maintained in a safe and operational condition.
- Firefighting equipment, systems and fixed installations are serviced by a competent and suitably qualified contractor in accordance with the standard to which they conform and maintained in a safe and operational condition.
- Appropriate records are kept of the servicing and maintenance of fire safety systems, equipment and installations and internal systems.
- All statutory records, registers and other documents concerning the provision, installation, inspection, testing and maintenance of plant and equipment are kept in accordance with relevant legislation.
- Maintain Life Cycle costing on Fire Safety Systems.

4.8 Assets Director is responsible for managing all fire safety maintenance works and will ensure that:

- Contractors appointed are competent, suitably qualified and can demonstrate their ability to meet all statutory requirements.
- All fire safety works are adequately monitored, controlled and post inspected by staff.
- Fire safety works are completed in a timely manner and prioritised based on risk.
- Records are kept with details of the fire safety works completed and the internal systems are updated with relevant details.

4.9 All employees have a duty to co-operate with the Fire Safety Policy by:

- Adhering to fire safety related training, instruction, information and supervision, including this Policy and the Fire Risk Management Procedure.
- Working safely, taking reasonable care of their workplace.
- Not interfering with, misusing or wilfully damaging anything provided by the association in the interests of fire safety.
- Reporting incidents that have led to or may lead to a fire.

## **5 Our commitments**

5.1 We will meet our fire safety obligations and protect our residents, staff and visitors from risks to health and safety from fire by:

- Understanding and complying with legislative requirements and best
- Using competent, skilled and well-trained staff
- Providing staff with training at a level appropriate to their role

- Briefing residents, staff and contractors about emergency evacuation procedures
- Knowing our properties and our activities and maintaining accurate asset information
- Maintaining an operational risk management approach
- Providing suitable, sufficient and risk-appropriate precautions
- Conducting ongoing and continuous risk assessment activities
- Undertaking tasks and actions noted in FRAs within the appropriate timescales, and having an action plan in place to ensure such works are completed.
- Maintaining and servicing our fire safety assets
- Delivering remedial works and supplementary testing as required by the competent person.
- Where others manage and operate our properties, checking their level of compliance and requesting evidence of the same (i.e., copies of FRAs)
- Maintaining accurate records and data through meridian Compliance Scheme.
- Regularly reporting on our compliance performance to our Customer Safety Committee and Board
- Monitoring and challenging our own performance, seeking independent assurance and challenge through our internal and external audit procedures.
- Engaging openly and proactively with the Regulator of Social Housing and other stakeholders
- For multi-storey and multi-occupied residential buildings owned by NLM, undertake investigations into the external wall systems and fire doors, in order to determine whether they represent a risk to the health and safety of residents.
- We will respond appropriately to meet the needs of residents who inform us they have a disability such as a hearing impairment and install appropriate equipment to ensure they are alerted in the event of a fire and can evacuate safely.
- All residential properties will receive appropriate gas and electrical safety checks.
- Where furniture is provided, whether in common areas or as part of a furnished tenancy, furniture will be fire retardant in compliance with the Furniture and Furnishings (Fire) (Safety) Regulations 1988.

5.2 When fire safety works are being carried out (for example, remedial works, actions resulting from a fire risk assessment or from primary authority visits) there may be additional fire safety regulations that employees, residents, contractors and other parties may need to comply with. NLM, as the Responsible Person under the Regulatory Reform (Fire Safety) Order 2005 will:

- Carry out a fire risk assessment of the premises and review it regularly, in accordance with the recommendations in the fire risk assessment for each property.
- Tell residents and employees or their representatives about the risks identified and carry out remedial action to remove those risks so far as reasonably practicable.
- Put in place, and maintain, appropriate fire safety and mitigation measures.
- Plan for an emergency.
- Provide employees and residents with information and fire safety instructions, where required.
- Carry out more in-depth assessments of all blocks in a risk-based plan for high-risk blocks, extra care schemes, sheltered schemes, homes in multiple occupation and other buildings where a greater risk is identified.

## **6 Fire Risk Assessment Frequency and Remedial Action Timescales**

NLM Housing Association is committed to maintaining the highest standards of fire safety across its property portfolio. To ensure ongoing compliance and the safety of residents, staff, and visitors, we will carry out Fire Risk Assessments (FRAs) for all high-rise buildings (HRBs) at least every 12 months, and for all other buildings every 2 years.

Any remedial actions identified during an FRA will be addressed according to the following timescales: (1) Items presenting imminent danger or classified as intolerable will be actioned within 24 hours; (2) Priority 1 actions will be completed within 1 month; (3) Priority 2 actions will be completed within 3 to 6 months; and (4) Priority 3 actions will be completed within 6 to 12 months( refer to Table 1 below)

This approach ensures that fire safety risks are managed promptly and proportionately, safeguarding all building users and supporting our commitment to continuous improvement in fire safety management.

6.1 Table 1: FRA Re-assessment Time Scales

FRA Re-Assessment Matrix			Risk Rating				
			Intolerable	Substantial	Moderate	Tolerable	Trivial
General Needs	Purpose Built	Low Rise	Annually	Annually	Every 3 years	Every 3 years	Every 3 years
		Medium Rise	Annually	Annually	Every 2 years	Every 2 years	Every 2 years
		High Rise	Annually	Annually	Annually	Annually	Annually
	Street Conversion	Low Rise	Annually	Annually	Every 3 years	Every 3 years	Every 3 years
		Medium Rise	Annually	Annually	Every 2 years	Every 2 years	Every 2 years
		High Rise	Annually	Annually	Annually	Annually	Annually
Sheltered	Purpose Built	Low Rise	Annually	Annually	Annually	Annually	Annually
		Medium Rise	Annually	Annually	Annually	Annually	Annually
		High Rise	Annually	Annually	Annually	Annually	Annually

6.2 Table 2 - FRA Time Scales

Remedial Priority	Description	Completion Timescale	Example
<b>Imminent Danger/ Intolerable</b>	Immediate risk to life or safety	24 Hours	Blocked fire escape route, faulty fire alarm system, or missing fire doors
<b>Priority 1</b>	High priority actions	1 Month	Damaged emergency lighting, defective smoke detectors, or fire doors not closing properly
<b>Priority 2</b>	Medium priority actions	3 to 6 Months	Incomplete fire signage, minor compartmentation issues, or worn fire door seals
<b>Priority 3</b>	Lower priority actions	6 to 12 Months	Updating fire safety documentation, repainting fire exit markings, or replacing outdated fire safety notices

These examples illustrate the types of issues that might be identified during an FRA and the urgency with which they must be addressed, ensuring fire safety risks are managed promptly and proportionately.

## **7 Fire Safety Incident Reporting**

- 7.1 NLM Housing Association is committed to ensuring that all fire safety incidents, near misses, and concerns are reported, investigated, and addressed promptly to maintain a safe environment for residents, staff, and visitors.
- 7.2 All employees have a duty to report any incidents that have led to, or may lead to, a fire, as well as any fire safety concerns or hazards they observe.
- 7.3 Reported incidents will be investigated by the Compliance Manager to identify immediate, root, and underlying causes, and measures will be implemented to prevent recurrence.
- 7.4 The outcomes of investigations, along with any remedial actions taken, will be documented and monitored to ensure effectiveness. Fire safety-related occurrences, including reported fires and near misses, will be recorded and reported to the Board and relevant regulatory bodies as part of ongoing monitoring and assurance activities.
- 7.5 This approach supports NLM continuous improvement in fire safety management and ensures compliance with all relevant legislation and best practice guidance.
- 7.6 NLM will undertake suitable and sufficient FRAs in accordance with the Regulatory Reform (Fire Safety) Order 2005 and record the significant findings. Undertake recommended remedial work within the timescales set by the Competent Person who completed the FRA.
- 7.7 NLM will undertake new FRAs in line with the recommendations in the FRA. FRAs will be renewed on or before the date recommended by the Competent Person undertaking the previous assessment.
- 7.8 Review 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.
  - Works affecting the means of escape or alarm systems.
  - Structural or material changes to the building or its use.
  - Changes in legislation (or significant changes to guidance).
  - Changes to the building's fire strategy
  - Resident issues identified in person centred RA which would be relevant to the building? E.g., resident who is unable to self-evacuate where the escape strategy is simultaneous evacuation.

## **8 Evacuation**

Ensure each building has an evacuation strategy stated clearly within the FRA. The evacuation strategy will be agreed with the competent person undertaking the FRA, however as a general guide:

#### 8.1 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 generally have a 'total 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').

#### 8.2 Commercial accommodation and community premises

All premises to have a 'total evacuation' policy. All occupants to evacuate in the event of fire or once the fire alarm sounds.

#### 8.3 Assisted Evacuation

For commercial, community and non-residential premises it is the responsibility of each employee to inform their line manager of any physical or sensory impairment he/she may have, including temporary impairment, which may affect how they evacuate the premises. We will be proactive in becoming aware of people who may need assistance to escape in the event of a fire.

#### 8.4 In residential premises:

- General Needs - where practicable and should assistance be requested; We will provide advice and guidance to assist residents in developing their own means of escape plan in general needs premises. This will not involve the assistance of staff in the evacuation.
- Specialist Housing – assessment of individuals will be made by appropriate staff. This will involve detailed and up-to-date records of occupants; in some buildings they will require person centred fire risk assessments (PCFRAs). 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.
- Where appropriate provide equipment to aid evacuation which should only be used by appropriately qualified or trained persons e.g., the Fire and Rescue Service.
- Personal Evacuation Plans (PEEPs) will be identified for those who have sight, mobility, hearing or cognitive impairments or any other relevant circumstances.

#### 8.5 Evacuation Drills

Evacuation drills will be carried out in all non-residential buildings. This will be determined by the FRA. In non-residential buildings We will endeavour to conduct drills twice annually. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.

All relevant new staff to the organisation will be instructed in the fire evacuation procedure on induction.

## 8.6 Further Investigations

We will proactively undertake further investigations to the buildings for which it is responsible, where required. This may include but is not limited to investigations into external wall systems, balconies, compartmentation, and fire doors. Such further investigations will be recommended by the FRA, the fire and rescue service or initiated where We is not satisfied it has appropriate assurance around the design, installation, or maintenance of a building component. As a result of emerging guidance and the size of the NLM portfolio, there is likely to be numerous further investigations required. We will maintain a time-bound programme of these investigations prioritised by building risk profile.

## 9 Fire Door Inspections

We will undertake the requisite number of inspections under the RRF50. Fire doors will be sample inspected as part of the FRA process, during site visits and at regular intervals as recommended within the FRA.

## 10 Remedial Actions

10.1 All remedial actions arising from the FRA or further investigations shall have clear completion targets agreed by the FRA assessor undertaking the FRA or agreed timescales set by NLM in accordance with sector Practices and in agreement with Fire Risk Assessor. Any proposed changes to the agreed completion targets will be documented, agreed by a Fire Risk Assessor, and proposed to the Committee for approval. The decision will be recorded and reported within the Key Performance Indicators (KPIs) to ensure clear visibility.

10.2 All fire safety remedial work should be carried out in accordance with the relevant British Standard, approved code of practice or associated good practice guidance. Any contractors undertaking specialist fire safety remedial works should be third party accredited.

10.3 The fire risk will be reviewed regularly from the time of FRA completion until remedial works have been completed.

10.4 Large remediation programmes following further investigations may be monitored as distinct projects outside of general remedial actions.

## 11 Testing and Maintenance of Fire Safety and Equipment, Gas Installations and Electrical Installations

- 11.1 All fire safety equipment within the scope of this policy will be tested and maintained in accordance with regulatory and statutory requirements and considering manufacturer's requirements. This will include the completion of all essential remedial works requirements identified during the testing/maintenance activity.
- 11.2 We shall ensure that all assets have a satisfactory Electrical Installation Condition Report (EICR) in accordance with the Electrical Safety Policy.
- 11.3 We shall ensure that gas installations are maintained in accordance with the Gas Safety Policy including the completion of Landlord Gas Safety Records (LGSR) where appropriate.
- 11.4 All repairs to fire safety equipment and gas and electrical installations will be undertaken in accordance with the relevant policy.
- 11.5 In some cases, electrical and gas safety inspections relating to the dwelling will be the responsibility of a Shared Owner or Leaseholder. We will write to the residents periodically to remind them of the importance of them undertaking gas safety inspections within their property. This is detailed in the communication section of this policy. Where an FRA indicates that NLM should seek evidence, we will request this.

## **12 Domestic Smoke/Heat Detection**

- 12.1 Ensure that all dwellings owned by NLM (excluding leasehold and shared ownership) will have working mains powered smoke/heat alarms installed (or battery powered smoke alarms as an interim measure until mains powered can be installed). Maintain a programme of upgrading to mains powered with standby battery systems across all properties over the next 5 years as part of the EICR programme.
- 12.2 Check smoke detection annually as part of the heating servicing contract or, where properties are not part of heating contracts, through other cyclical maintenance contracts.

## **13 Repairs and Maintenance Activity**

- 13.1 There is a risk that repairs, and maintenance activity unwittingly impacts fire safety. Owing to the volume and nature of repairs works it is not practicable to undertake specific risk assessments of all jobs. We will manage this risk by ensuring that all contractors must obtain prior permission before working on any of its properties, and that R&M contractors (internal and external) have a general awareness of fire safety to inform dynamic risk assessment when undertaking responsive repairs that may have an impact on fire safety.
- 13.2 Repairs will be carried out in accordance with the relevant British Standard, Approved Code of Practice or associated good practice guidance and by third party accredited contractors where required. Any contractors (internal or external) undertaking hot works as part of repairs activity must have an approved hot works procedure. This should include avoidance of hot work unless no alternative method is feasible.
- 13.3 The Contracts Register will identify if a contractor has such a procedure and is permitted to undertake such works. Certain buildings may be assigned as permit to work areas to manage the work to a particular element, area, or of a certain type. We will review the need for the operation of a permit to work scheme for a specific property on FWEF a scheme-by-scheme basis.

## **14 Planned and Major Works**

- 14.1 Planned maintenance or upgrade programmes commissioned by NLM to buildings that require an FRA will be subject to a risk assessment by a competent person to consider their impact on fire safety. Works programmes are likely to fall into one of three categories:
1. (High priority) Works subject to planning permission and/or Building Regulations approval.
  2. Works not subject to the Building Regulations (including those covered by the Building Regulations but delivered by under a Competent Person scheme) but where there is a foreseeable impact on fire safety.
  3. (Low priority) Works not subject to the Building Regulations where there is no foreseeable impact on fire safety.

Works will only be in category 3 if a Competent Person has reviewed the proposed works and formally agreed that there is no foreseeable impact on fire safety.

- 14.2 For all other works, NLM will ensure that prior to works commencing a competent person will:
- Review the proposed work against the fire risk assessment and any Building Safety Case.

- Ensure anyone appointed to undertake design or construction activities can demonstrate the necessary competence to discharge their responsibilities relating to fire safety. This will include duty holders identified in the Construction (Design and Management) Regulations 2015 (the Client, the Principal Designer, the Principal Contractor, designers, and contractors).
- Request reasonable assurance that duty holders have demonstrated that resident safety can be assured during the works or that a suitable decanting strategy is in place.
- Engage with residents on fire safety matters that affect them.
- Request reasonable assurance that duty holders have complied with the building regulations in relation to fire safety where required.
- Request reasonable assurance that there is an appropriate site inspection and sign-off programme in place for the stages of the work.

During the project and at its conclusion, we will make any updates to the FRA, Building Safety Case, or other key fire safety information as required.

#### 14.3 Types of FRAs that can be undertaken:

- Type 1 – minimum legislative requirement. Considers the common areas only.
- Type 2 – A Type 1 FRA with the addition of a destructive inspection in common areas.
- Type 3 – Common areas with the addition of an inspection of a sample of flats.
- Type 4 - A Type 3 FRA with the addition of a destructive inspection in common areas and flats.

#### 14.4 Resident Commissioned Works

14.4.1 We will maintain a consent process for any resident commissioned works. In buildings that are subject to an FRA, the proposed work will be evaluated by a Competent Person to consider if there is a foreseeable impact in relation to fire safety.

14.4.2 Approval will not be unreasonably withheld although consent may be refused, or conditions imposed where appropriate.

14.4.3 Where unauthorised work with the potential to impact fire safety is discovered, we will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident.

#### 14.5 NLM Management will:

- Prohibit the storage of any items in communal areas and escape routes without 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 FSMP to enforce the above.

- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).
- Enforce resident responsibilities where required considering a balance of individual residents' rights with the need for effective, timely action where there is a risk to the safety of other residents.

#### 14.6 Building Safety System Reforms

This document is written at a time of change in relation building safety management. The Building Safety Case File (requirement under the Building Safety Act 2022) is likely to be at the heart of the new approach to evidencing the safety of buildings that fall within the scope of the new regulations.

The Safety Case will provide evidence and demonstrate and identified all hazards, and evaluated the risks, decided on and implemented control and mitigation measures and has an ongoing process in place for monitoring. This is consistent with the approach that should be undertaken for FRAs under the Fire Safety Order and other commitments made in this policy.

### **15 Fire Evacuation Strategy**

As part of the FRA the risk assessor will review and confirm the appropriate fire evacuation strategy for the building, which in most cases will either be Stay Put, Full/Simultaneous Evacuation or Progressive Horizontal Evacuation. NLM will ensure that:

- Within each building a Fire Action Notice is displayed which details to residents what to do in the event of fire, should one occur in either their property or within the communal area.
- Every resident has been informed of the evacuation strategy for their building and had the opportunity to make NLM aware should they not understand the strategy or feel they would be unable to follow the guidance should a fire occur.
- All new residents are informed of the evacuation strategy upon start of tenancy.
- All residents are appropriately informed should there be a permanent or temporary change to the evacuation strategy.

### **16 Certification & Documentation**

16.1 NLM shall keep appropriate and up to date records and certification relating to the completion of FRAs and associated fire risk remedial actions. The records that are to be kept shall include (but are not limited to)

16.2 An up-to-date list of properties and buildings that require an FRA including previous completion dates and next due dates.

- All fire hazards identified in the FRA including the category and risk rating along with the fire risk assessors recommended action and the timescale for completion.

- The action taken to address hazards- including completion date, details of who the action was completed by the action taken and photographic evidence.
- Relevant certification to evidence the work undertaken, e.g., fire door installation certificates, fire alarm, emergency lighting and AOV commissioning certificates, electrical installation/minor works certificates.
- Written justification/reason for any decision to not fully execute the recommendation of the risk assessor or to execute a different course of action.
- Fire Action Plans and Evacuation strategies.

16.3 All FRAs and any relevant certification to evidence the work undertaken documentation will be saved against the property/building within Meridian/SDM Housing Software.

## **17 Communication with stakeholders**

NLM Housing Association is committed to fostering a culture of fire safety awareness through clear, proactive, and ongoing communication with all stakeholders. Residents are regularly informed about fire safety measures, emergency procedures, and the importance of compliance through a variety of channels, including the website, newsletters, leaflets, and signage within buildings.

### 17.1 Residents

NLM will encourage fire safety by the following actions:

- Provide a copy of an FRA or evidence of fire equipment servicing to a relevant resident within 28 days when reasonably requested to do so.
- Inform residents of the importance of fire safety on a regular basis, through the provision of information via website, newsletters, leaflets, and information at sign-up.
- Maintain a clear approach to gaining access to carry out surveys and undertake works and be clear that enforcement action may be taken when it is necessary to do so.
- Communicate with residents through appropriate 'Fire Action' signage.
- Maintain a clear complaints process and monitor and record complaints that indicate a risk to a fire safety.
- Communicate with Leaseholders and Shared Owners annually to remind them of the importance of undertaking periodic electrical and gas safety checks.

### 17.2 Staff

NLM will communicate with staff through induction training, fire drills, appropriate signage, and the online communication.

### 17.3 Other Responsible Persons

NLM will comply fully with Article 22 of the RRFSO and ensure that where NLM are considered jointly responsible for a property or common area, it will share its FRA with other relevant parties, and co-operate with them so far as is practicable to ensure the safety of relevant persons.

#### 17.4 Fire and Rescue Service

NLM will engage in a regime of regular and proactive communication with the Fire and Rescue Service to ensure good lines of communication and operational familiarity.

#### 17.5 Building Safety Regulator

NLM will maintain communication with the Building Safety Regulator. This will include reporting of mandatory and voluntary occurrences where required once this scheme is established.

## **18 Monitoring and Assurance**

### 18.1 Monitoring

The following Performance Indicators (PIs) and Key performance Indicators (KPIs) will be reported to NLM Board at Quarterly frequencies:

- Buildings with a valid FRA renewed within its due date as a percentage of total buildings requiring an FRA.
- Remedial actions that are overdue
- Buildings with no outstanding and overdue remedial actions as a percentage of total buildings subject to an FRA.
- Buildings with fire safety systems/equipment present where all systems/equipment has been tested/maintained in accordance with this policy as a percentage of total buildings with fire safety systems/equipment.
- Number of notices received by the Fire and Rescue Services in the reporting period.
- Number of notices from the Fire and Rescue Service that are overdue as a percentage of total outstanding notices.
- Number of safety occurrences - including any reported fires and fire safety related occurrence reporting (e.g., to the HSE or Regulator) during the reporting period.

18.1.1 These PIs or KPIs will be reviewed periodically by the Compliance Officer and additional/amended measures may be recommended.

18.1.2 Where appropriate, KPIs will include the total number of actions or buildings required and the total number within target as well as percentage figure.

18.1.3 Commentary will be provided for any properties or actions out of date to include the date they became overdue, days overdue, and the action proposed to bring them back into a compliant position. To provide additional context, commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

## 18.2 Assurance

The following assurance activity will be undertaken:

- Internal checking independent of the Operational Teams to provide additional assurance around the accuracy of data and reporting. The approach will be documented within the Data Management Protocol and will include sample testing of the accuracy of data and the operation of controls. The outcomes will be reported to the HSC.
- Internal audit to provide independent assurance on the operation and effectiveness of controls. Frequency agreed as part of the Internal Audit Programme and reported to Audit and Risk Committee.
- Works based quality assurance to test the quality of work delivered. This will be at levels detailed within the FSMP and reported to HSC.

## 19 Competence

19.1 It is not possible to succinctly define competence requirements for all roles and activities outlined in this Policy. In many areas, competence will be assessed based on skills, knowledge and experience as opposed to a single qualification or standard. As defined above, NLM has a system of Directors evaluating competence within their areas of responsibility and Competent Person(s) are required to highlight the limits of the competence.

19.2 However, owing to the initial importance of the FRA in NLM's approach and the need to for us to have access to overarching fire safety advice, we will:

- Ensure that FRAs are undertaken by BAFE SP205-1 accredited organisations and all FRAs are subject to validation.
- Appoint an external Competent Person to provide retained support and advice in relation to fire safety. This will be or include access to a Chartered Fire Engineer and experienced Fire Risk Assessor – with experience on complex residential properties – who is listed on an approved register.

19.3 Specific areas of competence relating to risk assessment, servicing and maintenance activity are listed within the FSMP along with a procedure outlining the reasonable steps NLM will take to ensure the competence of those carrying out work who are not under its direct control.

## 19.4 Staff Training for Fire Safety

- NLM Housing Association recognises that the competence and preparedness of staff are essential to effective fire safety management.

- All staff will receive fire safety training appropriate to their role, ensuring they are equipped with the knowledge and skills necessary to fulfil their responsibilities under this policy.
- Training will cover fire prevention, emergency procedures, the use of fire safety equipment, and the importance of adhering to fire safety protocols.
- Induction training for new staff will include instruction on fire evacuation procedures, and regular refresher sessions will be provided to maintain awareness and competence.
- The Compliance Manager will develop and maintain a fire safety training programme, ensuring that suitable records are retained and that all training is kept up to date in line with legislative requirements and best practice.
- Staff will also be briefed on any changes to fire safety procedures or legislation as they arise, and participation in fire drills and other practical exercises will be required to reinforce learning and preparedness

### 19.5 Fire Safety Audits

- NLM Housing Association is committed to maintaining robust fire safety standards through regular and systematic fire safety audits. These audits are designed to independently assess compliance with fire safety legislation, internal policies, and best practice guidance.
- Fire safety audits will be conducted at scheduled at 2 yearly intervals and may also be initiated following significant incidents, changes in legislation, or as part of ongoing assurance activities.
- The audits will review the effectiveness of NLM fire safety management systems, the adequacy of fire risk assessments, the completion of remedial actions, and the maintenance of fire safety equipment and records.
- Findings from fire safety audits will be documented, with recommendations and action plans developed to address any identified deficiencies.
- Audit outcomes will be reported to the Chief Executive and the Board, ensuring transparency and continuous improvement in fire safety management.
- Where necessary, follow-up audits will be conducted to verify that corrective actions have been implemented and sustained.

## 20 Consultation

This Policy is based on legislative and regulatory requirements and as such consultation with customers has not taken place. There has been consultation with Teams within NLM.

## **21 Equality and Diversity**

21.1 This Policy will be applied in a way which ensures equality of treatment for all customers without discrimination, or victimisation on account of any protected characteristic as defined within the Equality Act 2010. In drafting this policy NLM has had regard to its public sector equality duties under s149 of the Equality Act 2010, namely the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

21.2 The policy pays regard to diversities around access to and delivery of any services. On request NLM will provide translations of all its documents, policies and procedures in various languages and formats including computer disc, large print, and tape.

## **22 Summary: How NLM Ensures Compliance:**

- Conducting FRAs for high-rise buildings every 12 months and for all other buildings every 2 years, with remedial actions completed within strict timescales based on risk level.
- Maintaining up-to-date records and certifications for all fire safety systems, equipment, and remedial works.
- Managing all remedial works in accordance with strict time scale set out in Table 2 of this Policy.
- Providing staff training and regular fire safety audits to ensure ongoing competence and adherence to best practice.
- Communicating fire safety information and procedures to residents, staff, and stakeholders, and engaging with regulatory bodies as required. Reviewing and updating the policy in response to legislative changes, incidents, or best practice developments.

## **23 Policy Review**

The Policy will be reviewed upon any change to legislation or major guidance documentation, and at least every 3 years (or earlier if deemed necessary through the Monitoring and Assurance Process).