Title:	Fire Safety Policy
Issue Date:	June 2026
Effective Date:	Immediately
Document Owner:	Rob Collingridge
Post of Document Owner:	Director of Property services
Date Approved by EMT:	TBC
Date Approved by Board:	10th August 2026
Version number	4
Date of Next Review	June 2027 (to reflect any changes in Legislation)

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1. Introduction

1.1 As a landlord, WPH is responsible for carrying out fire risk assessments and taking action to identify, manage, and mitigate risks associated with fire within the common areas of buildings we own and manage.

1.2 We have a duty to take general fire precaution measures to ensure, as far as is reasonably practicable, the safety of the people on our premises and in the immediate vicinity.

1.4 The key objective of this policy is to ensure that our Board, Senior Leadership Team, Management Team, employees, contractors and tenants are clear on our legal and regulatory fire safety obligations. This policy provides the framework our staff and partners will operate within to meet these obligations

1.5 In particular, this policy contributes to the 3 objectives in the corporate plan:

- Our Homes
- Our Services
- Our organisation

2.0 Scope

2.1 This policy applies to housing assets which are owned and managed by Womens Pioneer Housing and Womens Pioneer Homes. This includes domestic properties, communal areas of such properties and Older Women's Schemes.

2.2 The policy is relevant to all our employees, tenants, contractors, stakeholders, and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.

2.3 The policy should be used by all to ensure they understand the obligations placed upon WPH to maintain a safe environment for tenants and employees, within the home of each resident, and within all common areas of buildings and other properties we own and manage. Adherence to this policy is mandatory

3.0 Roles and Responsibilities

3.1 WPH is the 'Responsible Person' for the purposes of the key fire safety legislation because we own and manage homes and buildings where tenants and leaseholders live. This key legislation is the Regulatory Reform (Fire Safety) Order 2005, and the Responsible Person is the duty holder.

3.2 The Chief Executive has strategic responsibility for the management of fire safety, ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.

3.3 The Director of Property & Estate Services has operational responsibility for the management of fire safety and will be responsible for overseeing the delivery of these programmes.

The Compliance Lead will:

- Implement the fire safety management system and ensure its effectiveness.
- Ensure that all FRA and FRA Actions are completed within a timely manner
- Ensure that notices and advice issued by the Fire Brigade are responded to in a timely manner.
- Ensure that mandatory reporting procedures are in place and that we notify the Building Safety regulator in the event of a Mandatory reporting incident in our HRB (High Rise Buildings).
- Ensure that the relevant staff are adequately trained and competent to carry out their duties regarding fire safety.
- Co-ordinate such work with the Scheme Managers/ECOs or other authorised person to Liaise with the Fire Brigade on repair and maintenance matters relevant to fire safety.
- Seek advice from specialist competent consultants where necessary
- Advise on the implementation of fire safety legislation and other guidance relevant to premises and building maintenance issues.
- Escalate high risk issues, including Mandatory reporting to the BSC to the CEO, Chair of the Board, SMT, EMT & if applicable the ECO's & Scheme manager if the location is a OWS within 4 hours.
- Ensure that the contractors delivering a service or repair to fire safety systems are competent and effectively managed

3.4 It will be the responsibility of the Estates Compliance Officer (ECO) to

- Monitor the communal areas for fire safety issues following a schedule of monthly visits to building within their patch and inform the Health, Safety and Compliance Manager and/or Housing Manager of any arising issues.
- Carry out periodic fire safety checks on all communal areas. Ensure that all fire safety devices and equipment is in place and is fully operational, carry out statutory tests within the communal areas and record information in QL, C365 and logbook
- Report faults with fire safety equipment and cases of non-compliance to the Health, Safety and Compliance Manager.

4.0 Links to other policies

4.1 This policy compliments the WPH Compliance Policy.

5. Legislation and Guidance

5.1 In preparing this document, the following legislation and guidance has been referred to:

- Health and Safety at Work Act (1974)
- Regulatory Reform (Fire Safety Order) 2005
- Fire Safety Act 2021
- Housing Act 2004 (Part 1)
- LACORS Housing Fire Safety guide (2009)
- Fire Safety in Purpose Built Blocks (2011)
- Fire Safety: Fire Risk Assessments Sleeping Accommodation Guide

- Fire safety in Specialized housing (2017)
- The Regulator of Social Housing Home Standard
- The Building Safety Act 2022

6.0 WPH Structure

6.1 Chief Executive - Overall responsibility for all Health & Safety Matters

6.2 Director of Property & Estate Services will act as a deputy to the Chief Executive and ensure:

- The Fire Safety Policy is implemented
- The nominated persons in those buildings to carry out the statutory fire safety checks/tests and record actions in WPH systems C365 and Dynamics.
- That nominated persons undertake any training deemed necessary to ensure they are competent to carry out their duties regarding fire safety.
- Nominated Persons implement and monitor the fire safety management system including the Fire Risk Assessments and Fire Action Plans.
- The appointment of duty holders and nominated persons in each building and to ensure that staff know and understand their duties in relation to fire safety.
- The Nominated person to Act as the principle accountable person.

6.3 Compliance Lead – Accountable Person for FRA and FRA Actions and will

- Ensure that all FRA and FRA Actions are completed within a timely manner
- Implement the fire safety management system and ensure its effectiveness.
- Ensure that notices and advice issued by the Fire Brigade are responded to in a timely manner.
- Ensure that staff under their control are adequately trained and competent to carry out their duties regarding fire safety.
- Co-ordinate such work with the Scheme Managers/ECOs or other authorised person to Liaise with the Fire Brigade on repair and maintenance matters relevant to fire safety.
- Seek advice from the Specialist Fire Risk Assessor or other competent persons.
- Receive reports from contractors and consultants and report the significant findings of such to relevant persons.
- Advise on the implementation of fire safety legislation and other guidance relevant to premises and building maintenance issues.

6.4 It will be the responsibility of the Senior Estates and Estates Compliance Officer (ECO) and Scheme Managers to:

- Monitor the communal areas for fire safety issues and inform the Compliance Lead, Housing Manager or in the event of a High risk action escalates immediately to the Director of Property Service of any arising issues.
- Carry out periodic fire safety checks on all communal areas. Ensure that all fire safety devices and equipment is in place and is fully operational, carry out

statutory tests within the communal areas and record information in C365, Dynamics and logbooks
- Report faults with fire safety equipment and cases of non-compliance to the Compliance lead in accordance with legislative requirements.

7. Fire Risk Assessments

7.1 There are 4 types of Fire risk assessments

- Type 1 – Common parts (non-destructive)
- Type 2 – Common Parts (destructive)
- Type 3 – Common Parts and flats (non-destructive)
- Type 4 – Common parts and flats (destructive)

7.2 WPH previously instructed Type 3 Fire Risk Assessments (FRAs), which involved inspecting the interior of every flat within each premises. This approach went beyond legal requirements and required the risk assessor to have full access to every flat to complete the assessment. Moving forward, WPH will transition to Type 1 FRAs, which will focus on assessing communal areas of building plus checking the flat front entrance doors and any doors within communal areas. If either the fire risk assessor or WPH identifies a safety concern that warrants a full FRA inside a flat, this will be instructed accordingly as a request for a type 3 FRA to be conducted or a type 4 if necessary

7.3 It was also previously WPH policy for every general needs building to be visited on a three year cycle. This will now be adjusted to align with the frequency recommended by the fire risk assessor, taking into consideration the overall risk rating of each building.

For Older Women's schemes, these will continue to be assessed annually unless an assessor recommends a more frequent inspection.

WPH is committed to maintaining a portfolio with no high or substantial risk buildings. If a building is assessed as high or substantial risk, immediate action will be taken to address the required FRA actions. A follow up FRA will be instructed within 3 to 6 months to ensure the appropriate actions have been completed and that the risk level has been reduced to an acceptable level.

WPH with the creation of 2 new buildings of which are now over 18 meters in height and various other buildings that although are over 11 meters do not exceed 18m, WPH classifies those as Relevant High and medium Rise buildings.

7.4 When major works are being carried out or there has been a significant change in the risk profile due to changes of tenancies, a new FRA will be carried out.

7.5 The Fire Risk Assessment will be carried out by a suitably qualified person.

7.6 All actions identified within the FRA will be recorded on the compliance management system and works completed within the required timescales indicated by either the fire risk assessor or the Legislative guidelines for High, Medium and Low risk actions.

7.7 FRA's will be stored on the appropriate housing management system (e.g. C365 & Dynamics) in use at WPH.

7.8 In compliance with Regulation 10 of the Fire Safety Regulations 2022, all buildings over 11 meters in height will have their communal fire doors (including doors to electrical cupboards and any doors within communal areas) inspected quarterly by an ECO if trained to do so, or an approved Contractor of whom is currently certified to conduct these checks. Flat front entrance doors will be checked annually utilising the same criteria. Records of these inspections will be maintained and reviewed by the Compliance Lead, along with 3rd party auditing utilising our contractors' external auditors. Any necessary remedial actions will be assigned to the ECOs and they along with the Compliance Lead will be responsible for monitoring the completion of these actions.

8. Fire Safety Procedure

8.1 With the exception of a very few blocks and recent extensions and new Build developments, WPH properties were built or converted prior to the 1991 Building Regulations. They were not originally constructed as flats and as such the most appropriate guidance in relation to fire safety is the LACORS guide.

8.2 Consequently, in line with the guide, all but our Brooke House and Wood Lane properties, identified as Brooke House and Wood Lane, have a simultaneous evacuation procedure. We will ensure we have adequate active fire safety systems installed to support this approach. Our buildings with the exception of Brooke House and Wood Lane do not currently allow for 'stay put' fire evacuation policy and this is unlikely to be able to be changed.

8.3 In addition, in line with the Building Safety Act, we will introduce a process of checking all flat entry and communal doors at least annually in general needs buildings and quarterly in sheltered schemes and any properties over 18 metres. Of which we will assess High, Medium and Low risk actions and mitigate those actions in line with current legislative guidelines.

9. Communication

9.1 A fire action plan will be provided to all new tenants, leaseholders and any other properties that WPH are the Building owner as part of their sign up pack. All existing tenants and leaseholders will be provided with a fire action plan as part of the annual review.

9.2 A Fire Action Notice will be displayed adjacent to all fire alarm call points within the communal areas to advise contractors and visitors of the action that they should take in the event of a fire.

9.3 We will identify those tenants who may struggle to understand written English and arrange for fire action instructions to be communicated in a more appropriate way.

9.4 All contractors will be provided with a Contractors Code of Conduct that outlines additional requirements.

9.5 Articles will be included within Pioneer Press reminding residents of the risks from fire and how to mitigate them.

10.0 Vulnerable tenants

10.1 Person Centred Fire Risk Assessments (PCFRA)

A Person Centred Fire Risk assessment will be carried out on all older women's housing tenants and any other tenants considered to be vulnerable. For the purposes of this procedure in buildings that are below 18m, by 'vulnerable' we mean having reduced ability to comply with fire safety and evacuation procedures, either due to physical or mental ill-health.

This risk assessment will review any fire risks within the dwelling as well as tenant lifestyle. A record of the PCFRA will be kept on Dynamics and any actions arising recorded. Any identifiable risks that have been identified under a PCFR are to be bought to the attention of the PAP (Principle Accountable person) and the compliance lead, of whom will ensure the Golden Thread of information is maintained.

For buildings over 18m of which WPH have 2, identified as Brooke House and Wood Lane, although not a legal requirement and with the consent of the incumbent resident, WPH will undertake a PCFRA on all new residential sign up's. Any identifiable risks that have been identified under a PCFR are to be bought to the attention of the PAP (Principle Accountable person) and the compliance lead, of whom will ensure the Golden Thread of information is maintained.

10.2 Fixed & Portable misting systems

Portable misting systems are provided to tenants who have been assessed as unable to self-evacuate in the event of an emergency and where no other suitable accommodation is available. These systems are installed in the tenant's most frequently used room and are designed to release a fine water mist, offering temporary fire protection until the fire brigade arrives to carry out a rescue.

As part of our new Build Developments Brooke House and Wood Lane have fixed misting systems installed.

All systems must be maintained in accordance with the manufacturer's instructions. Maintenance certificates must be uploaded to Dynamics & C365 and will be monitored by the Compliance lead to ensure 100% compliance.

Each building's Secure Information Box must contain the tenant's Person-Centred Fire Risk Assessment (PCFRA), along with details of the installed misting system. Additionally, the London Fire Brigade must be notified of the location of all Fixed and Portable misting systems and the addresses of all tenants who are unable to self-evacuate.

Ultimately, if a tenant is unable to self-evacuate, they should not reside in a building that operates under a 'Get Out' evacuation policy unless in the instances of Brooke House and Wood Lane that have specific measures that allow for a “Stay Put” Strategy in specific properties. In such cases, relocation to more appropriate accommodation with suitable support should be considered if the existing building does not enable the required usage.

10.3 Warden call systems

The process for commissioning our sheltered properties to ensure they link to our new wireless fire alarm system from Electro Detectors Ltd (Zerio Plus) to all properties require final connections from our new interface units. As part of this process, we are removing any existing panels that would be connected to the old fire alarm system via BMS panels or Gas solenoids systems on location.

WPH will install these devices in a suitable location, and our approved engineers will then trigger the system’s to check the interfaces are working as per the manufactures guidelines and functionality has been restored and tested. A system restart will be conducted in each instance to ensure that the systems remain compliant and operational restoration has been completed.

11. High Rise Buildings

WPH is committed to ensuring the safety of residents, visitors, employees, and contractors by maintaining high standards of fire safety across our high Rise residential buildings.

We will undertake regular fire risk assessments, implement and monitor appropriate control measures, and maintain all fire safety systems and equipment in accordance with statutory requirements, relevant guidance, and industry best practice.

This includes, but is not limited to, fire detection and alarm systems, emergency lighting, fire doors, smoke control systems, firefighting equipment, and means of escape.

Communal escape routes will be kept clear and accessible, and residents will be provided with appropriate fire safety information, including emergency evacuation procedures where applicable. In instances where digital media applications can be utilised WPH will ensure that the content is up to date and provides assurance to our residents on elements of High Rise Residential Buildings.

WPH will monitor compliance with applicable fire safety legislation and regulatory requirements and will work collaboratively with residents, contractors, enforcing authorities, and other departmental leads to continuously improve fire safety performance. Through these measures WPH will seek to foster a positive fire safety culture and ensure that fire risks are effectively identified, managed, and mitigated across its High Rise residential properties.

12. Resident Engagement

12.1 We actively engage with residents when fire safety works are planned Any residents who have concerns about the fire safety measures within their building or flat, are encouraged to raise these concerns with WPH.

WPH will work proactively with residents, the relevant authorities including the London Fire Brigade to identify and address fire safety risks, promote fire prevention, and ensure compliance with all relevant fire safety legislation and regulatory standards.

Clear fire safety information will be provided to residents, and appropriate arrangements will be established for communication, consultation, training, and emergency procedures.

13.0 Mandatory incident reporting – Building Safety Regulator. (BSR)

WPH shall ensure that all fire safety incidents, structural safety incidents, and other prescribed occurrences relating to High Rise Residential Buildings are reported, investigated, and managed in accordance with the applicable legislation and regulatory requirements.

Any incident that has the potential to affect the safety of residents, visitors, employees, contractors, or the integrity of the building shall be reported immediately through WPH's incident reporting procedures. This includes, but is not limited to:

- Fires and significant fire-related events.
- Failure or malfunction of fire safety systems or equipment.
- Structural defects or failures that may affect building safety.
- Defects in fire compartmentation, fire doors, means of escape, or smoke control systems.
- Dangerous occurrences, near misses, and any event presenting a significant risk to life safety.
- Any reportable occurrence as defined by relevant Building Safety Legislation and regulatory guidance.

All reported incidents shall be subject to a proportionate investigation to identify root causes, required corrective actions, and opportunities for continuous improvement. Where required by law, incidents shall be reported to the relevant enforcing authority, regulator, fire and rescue service, or other statutory body within the prescribed timescales.

WPH shall maintain accurate records of all incidents, investigations, findings, actions taken, and notifications made to regulatory bodies. Lessons learned from incidents and near misses shall be communicated appropriately and used to strengthen WPH's approach to Building and Fire Safety management.

14.0 Finance

14.1 Where actions are required as a result of the FRA, door surveys or remedial works as outlined with a change of legislation, finance will be made available to carry out the works within the required timescales. An annual or immediate emergency budget will be agreed by SMT in the first instance, and if required and further budgetary assistance is required confirmation from the Board, any

significant over-spend will be reported in accordance with the Financial procedures.

15. Training

15.1 Appropriate fire safety training will be provided to all employees. This will be provided initially as part of the induction for new employees and on being exposed to new or increased risks as a result of a change of role; new legislation or the introduction of new technology etc.

15.2 For employees directly involved with fire safety in both offices and housing premises, additional training will be provided suitable for the role and responsibilities. The training will be repeated periodically where appropriate or where a change to legislation determines.

16. Maintenance

16.1 All maintenance carried out in the active fire protection systems will be carried out by suitably qualified contractors only. The frequency of servicing will be as follows, however this maybe amended to a shortened servicing period if this invalidates any potential warranties that have been provided as part of new installations.

- Communal Fire detection and alarm systems – quarterly (plus a weekly alarm test in sheltered schemes and offices.).
- Individual domestic alarms – annually.
- Emergency lighting – quarterly.
- Fire extinguishers – annually.
- Dry Risers – six monthly.
- Automatic opening vents – 6 monthly.

Records of all inspections, tests, servicing, defects, corrective actions, and maintenance activities shall be maintained and retained in accordance with the WPH's procedures and stored in C365 & Dynamics. Any defects identified shall be assessed, prioritised and completed within the appropriate timescales to ensure the continued effectiveness of fire safety measures, safety of our residents and any of building users and the data will be interrogated and reported on periodically and in accordance with our Legal and statutory requirements.

17.0 Fire Drills

17.1 Fire drills will be carried out every six months in sheltered schemes and offices. These will be recorded within a fire safety logbook.

Fire drills in all of our residential properties shall be undertaken at a frequency determined by the Fire Risk Assessment (FRA) and the nature of the property.

As a minimum, fire drills for WPH employees shall be conducted annually. In High Rise residential buildings, resident evacuation drills will be considered in accordance with the building's fire strategy, fire risk assessment, and applicable regulatory guidance.

Where a stay-put strategy applies, resident fire drills will not normally be undertaken; However, residents will be provided with clear fire safety information and guidance on the actions to take in the event of a fire. This information will be reviewed continuously and changed is necessary to comply with any changes in legislation.

18.0. Liaison with London Fire Brigade

WPH is committed to working in close partnership with the London Fire Brigade to ensure the highest standards of fire safety across all our properties. We actively share relevant information, including details of vulnerable residents and high-risk buildings, and seek their guidance on fire prevention, emergency response planning, and continuous improvement of our fire safety measures.

19.0 Equality and Diversity

19.1 WPH will ensure that this policy is applied fairly and consistently. We will not directly or indirectly discriminate against any person or group of people in line with our Equality and Diversity Policy. We will act sensitively towards the diverse needs of individuals and communities and will take positive action or make reasonable adjustments where appropriate.