



Directorate of Place

Fire Safety Policy

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Introduction and Objectives

1.1 London Borough of Hillingdon (LBH) is responsible for carrying out fire risk assessments (FRAs) and taking action to identify, manage and mitigate risks associated with fire within the communal areas 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.

1.3 The objective of this policy is to ensure that Cabinet, Senior Management Team (SMT), employees, partners, tenants and leaseholders 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.

1.4 This policy forms part of our wider organisational commitment to a strong health and safety culture (see our General Health and Safety Policy and Fire Standards). It will be saved on our shared drive and distributed to all relevant members of staff.

2.0 Scope

- The housing assets which are owned by the Housing Revenue Account (HRA) and any which are leased by the Council and managed as social housing stock. This includes domestic properties (houses and flats), communal areas of any blocks containing such properties, and sheltered and supported housing schemes and associated offices/communal spaces.
- Any commercial premises which are owned by LBH.
- Any depots, operational and commercial buildings owned and/or managed by LBH.

2.2 This policy is relevant to all 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 understand the obligations placed upon LBH to maintain a safe environment for tenants and employees, within the home of each resident, and within all communal areas of buildings and other properties we own and manage. Adherence to this policy is mandatory.

3.0 Roles and Responsibilities

The key legislation is the Regulatory Reform (Fire Safety) Order 2005 (FSO). LBH is the Responsible Person. Under the Building Safety Act 2022, the Director of Place is the Principal Accountable Person (PAP).

3.1 LBH is the Responsible Person for the purposes of the FSO because we own and manage homes and buildings where tenants and leaseholders live.

3.2 LBH Cabinet has overall governance responsibility for ensuring this policy is fully implemented and compliant with legislation and regulatory standards. The Director of Place will approve this policy and review it every two years (or sooner if legislation/regulation changes).

3.3 For assurance that this policy is operating effectively in practice, Cabinet will receive regular updates on implementation, performance and any non-compliance.

3.4 SMT will receive monthly performance reports and ensure compliance is being achieved. They will be notified of any non-compliance issues identified.

3.5 The Director of Place (PAP) has strategic responsibility for the management of fire safety and ensuring compliance is achieved and maintained, and will oversee the implementation of this policy.

3.6 The Building Safety Fire Manager has operational responsibility for the management of fire safety and will oversee programme delivery.

3.7 Housing teams will provide support where gaining access to properties is difficult.

4.0 Legislation, Guidance and Regulatory Standards

4.1 Legislation - The principal legislation applicable to this policy includes:

- Regulatory Reform (Fire Safety) Order 2005 (FSO).
- Fire Safety Act 2021 (in force from 16 May 2022) – clarifies scope of the FSO to structure, external walls and flat entrance doors.
- Fire Safety (England) Regulations 2022 (in force from 23 January 2023).
- Building Safety Act 2022 (phased implementation from April 2023 onwards).
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 (in force from 1 October 2022).

4.1A Legislative updates (**last 12 months**) incorporated into this policy:

- Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 – in force 6 April 2026. Introduces statutory requirements for identifying relevant residents, conducting Person-Centred Fire Risk Assessments (PCFRA), preparing PEEPs and Emergency Evacuation Statements for specified residential buildings ($\geq 18\text{m}$ or ≥ 7 storeys, or $>11\text{m}$ with simultaneous evacuation).
- Approved Document B (Fire Safety) – 2026 amendments effective 30 September 2026, including second staircases for new residential buildings above 18m and provisions for evacuation lifts (plus 2025 amendments confirming sprinklers in all new care homes and the withdrawal of BS 476 national classes in favour of BS EN 13501).
- Transition to EN standards – accelerated move away from BS 476 to BS EN 13501 (reaction to fire) and BS EN 1634-1 (fire resistance of doorsets).
- Competency – strengthened competence expectations for fire risk assessors (clearer qualification/competency criteria and enforcement).
- Digital records – move to digital fire safety information and resident access for multi-occupied residential buildings (golden thread alignment).
- Environmental – phase out of AFFF foam extinguishers by July 2025.

4.2 This policy also operates within the context of additional legislation, industry guidance and government policy direction (see Appendix 1).

4.3 Regulatory Standards – We will comply with the Regulator of Social Housing’s regulatory framework and consumer standards (updated April 2024).

4.4 Sanctions – Failure to discharge responsibilities may lead to enforcement by the Health and Safety Executive, Fire and Rescue Service or the Regulator of Social Housing, and potential criminal or civil sanctions.

5.0 Obligations

5.1 Regulatory Reform (Fire Safety) Order 2005 (FSO) – As the Responsible Person, LBH will:

- Carry out and keep up to date suitable and sufficient FRAs for premises in scope, considering the whole building context (including residential units where relevant to common parts).
- Identify people especially at risk.
- Implement all necessary general fire precautions and measures identified by FRAs to remove or reduce risks.
- Maintain a suitable system of maintenance and appoint competent persons to carry out procedures.
- Review FRAs periodically and following triggers such as incidents, significant changes or refurbishment.

5.2 Fire Safety Act 2021 – We recognise the clarified scope covering structure/external walls and flat entrance doors and ensure our FRAs address these.

5.3 Fire Safety (England) Regulations 2022 – We will: provide tenants with fire safety instructions and information on fire doors; complete quarterly communal fire door checks and annual flat entrance door checks for buildings over 11m; and comply with all other applicable duties.

5.4 Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 (in force 6 April 2026) – For specified residential buildings ($\geq 18\text{m}$ or ≥ 7 storeys, or $> 11\text{m}$ with simultaneous evacuation): we will identify relevant residents; offer and conduct PCFRAs; prepare PEEPs and Emergency Evacuation Statements; maintain secure information; and share necessary information with the Fire & Rescue Service.

5.5 Building Safety Act 2022 – We will record FRAs and fire safety arrangements in full; appoint competent assessors and record their identity; coordinate duties with other Accountable Persons; and provide relevant fire safety information to residents of multi-occupied buildings.

5.6 Approved Document B (2026/2025) – For new LBH developments and major refurbishments we will plan for second staircases where applicable ($> 18\text{m}$), evacuation lifts in tall buildings, sprinklers in all new care homes, and adopt EN classification for products and systems.

5.7 Product & environmental obligations – We will specify, procure and maintain products to EN 13501/EN 1634-1 as relevant and ensure legacy AFFF extinguishers are removed/replaced.

5.8 Competency and digital information – We will only appoint demonstrably competent assessors and maintain digital records forming part of the golden thread of safety information.

6.0 Statement of Intent

6.1 We acknowledge and accept our responsibilities under the FSO (as amended) and will maintain demonstrable compliance, as outlined in section 5

6.2 While LBH has no occupied higher-risk buildings (HRBs) >18m, we will apply PAP principles from the Building Safety Act to our highest risk stock, i.e. sheltered and specialised housing, and to any building >11m where simultaneous evacuation is in place.

6.3 All FRAs were reviewed in 2024 and are maintained within risk-based cycles. We will ensure FRAs remain compliant with PAS 79-1/79-2:2020 and reflect ADB 2026/2025 changes, fire door EN standards and external wall considerations.

6.4 We will maintain robust processes to implement control measures arising from FRAs and other inspections.

6.5 Evacuation strategies will be set building-by-building by competent assessors, with London Fire Brigade (LFB) consultation as appropriate. Where full evacuation is in place we will implement risk-reduction programmes aiming for safer, proportionate strategies.

6.6 We will comply with the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 via planned programmes and at annual gas safety checks and at void stage.

6.7 Where residents have impairments, we will complete PCFRAs (with consent) and implement reasonable measures. For specified buildings, we will implement statutory PEEPs and Emergency Evacuation Statements (from April 2026) and make information available to LFB.

6.8 We will consider suitability of homes offered at letting with regard to fire safety and evacuation needs.

6.9 We will collaborate with LFB, including information sharing, FRA review and staff training where appropriate, and promote Home Fire Safety visits to eligible tenants.

6.10 We will operate robust access processes to complete essential inspections, servicing and remedial works, including escalation and legal remedies where necessary, while safeguarding residents (e.g., hoarding, vulnerability).

6.11 We will maintain strong contract management arrangements, including SLAs, performance meetings and annual insurance evidence.

6.12 We will manage immediately dangerous situations through a defined escalation and make-safe process.

6.13 We will adopt a sterile communal area approach in general needs blocks and a managed approach in sheltered accommodation.

6.14 We will prohibit storage/charging of mobility scooters, e- scooters and e- bikes in internal communal areas; provide managed charging/parking solutions where feasible and safe.

6.15 We will prohibit barbeques on balconies, in internal communal areas and within two metres of boundary fences or flammable structures; external communal barbeques must be raised off the ground and attended at all times.

6.16 We will maintain a corporate fire safety risk assessment for management and operations, setting out key risks and mitigations.

6.17 We will ensure Construction Phase Plans (CDM 2015) for repairs, voids, component replacement and refurbishments are in place and reviewed annually.

6.18 We will complete DSEAR risk assessments for workplaces/plant/boiler rooms within scope.

6.19 We will record and act upon fire safety near misses and manage all RIDDOR notifications with lessons learned to prevent recurrence.

6.20 We will ensure removal of legacy AFFF foam extinguishers from LBH premises and replace with compliant alternatives as part of our environmental stewardship.

7.0 Programmes

7.1 FRAs – All communal blocks and other properties with communal areas that we own/manage will have an FRA where legally required.

7.2 FRA review cycles – Risk-based and building-specific, between 1 and 4 years. Higher-risk/sheltered buildings reviewed annually. Triggers include fire incidents, changes in use/occupancy, refurbishments, legislative changes or independent audit findings.

7.3 FRA types – All buildings will have a Type 1 FRA as standard. Compartmentation surveys will be carried out for all sheltered housing units (SHUs) and general needs blocks with communal spaces.

7.4 New build/acquisitions – Pre-occupation FRA prior to first occupation; post-occupation FRA within 3 months of first resident moving in.

7.5 Third-party managed stock – We will obtain FRAs and evidence of completed actions. Where not provided, we will commission the FRA, recharge costs and require completion of actions.

7.6 Fire door checks – Quarterly communal fire door checks and annual flat entrance door checks for buildings $\geq 11\text{m}$. For low/medium-rise blocks, we will complete annual fire door inspections. We will align inspection and product standards to EN 1634-1 and related guidance.

7.7 External Wall Fire Risk Appraisals (EWFRA) – For other blocks/properties with two or more dwellings but no communal areas, we will complete a one-off FRA/EWFRA as appropriate.

7.8 Servicing, maintenance and testing – We will service and test fire detection, prevention and firefighting systems/equipment in accordance with British/EN Standards and manufacturer

recommendations, including alarms, emergency lighting, AOVs, sprinklers (where present), dry/wet risers, smoke control and extinguishers (AFFF removed).

7.9 Risk-based inspections – We operate a risk-based property inspection approach (implemented August 2024) and review methodology annually. Inspections will audit that required management actions are taking place, that evacuation information is current, and that digital records are up to date.

7.10 Residential evacuation planning (from April 2026) – For specified buildings we will maintain registers of relevant residents, PCFRAs, PEEPs, Emergency Evacuation Statements and information sharing with LFB.

8.0 Follow-up Work

8.1 We will implement all general fire precaution measures identified by FRAs in accordance with the following priorities and timescales:

- Intolerable risk – within 24 hours.
- High risk – within 1 month.
- Medium risk – within 3 months.
- Low risk – within 6 months or via planned programme within 12 months.

8.2 We will manage follow-up works from fire door audits and servicing/maintenance checks and maintain digital evidence trails of completion.

9.0 Data and Records

9.1 We will maintain a core asset register of all properties we own or manage (within scope) setting out which properties require an FRA and which require servicing/maintenance (e.g., alarms, emergency lighting, detection).

9.2 We will operate robust change control for acquisitions/disposals to ensure properties are not omitted from programmes.

9.3 We will hold inspection dates, FRAs, FRA actions and servicing records against all properties on each programme within LBH's compliance system and maintain a digital safety file (golden thread).

9.4 We will keep records and data for the duration we own/manage the property/in line with our retention policy, with appropriate security and data protection controls. Residents will be provided with online access to resident-friendly FRA summaries and, upon request, full FRAs subject to data protection considerations.

10.0 Resident Engagement

10.1 We will maintain a resident engagement strategy to support understanding of fire safety, advise on keeping safe, and encourage reporting of concerns.

10.2 We will engage proactively with vulnerable and hard-to-reach tenants and provide clear, transparent information via publications and our website.

10.3 Residents will have online access to resident-friendly FRA summaries. For specified buildings from April 2026, we will engage residents in PCFRAs and PEEPs, provide emergency evacuation statements and explain information sharing with LFB.

11.0 Competent Persons

11.1 The Building Safety Advisor will hold the NEBOSH National Certificate in Fire Safety and Risk Management (or equivalent) or Level 4 VRQ Diploma in Asset and Building Management (or equivalent). If not already held, it will be obtained within 12 months of policy approval.

11.2 Only suitably competent contractors, fire risk assessors and fire engineers will undertake FRAs or works to fire safety equipment, systems and installations. We expect third-party certification (e.g., BAFE), professional membership (e.g., IFSM/IFE), and qualifications meeting current competency frameworks. Those carrying out FRAs must have demonstrable skills, knowledge, experience and behaviours commensurate with scope and complexity.

11.3 Only suitably competent fire safety consultants and contractors will provide third-party technical quality assurance checks.

11.4 We will check contractors' qualifications/accreditations at procurement and annually thereafter, and evidence checks appropriately. Contractors working on fire doors must be accredited under BM TRADA (or equivalent).

12.0 Training

12.1 We will deliver training on this policy and supporting procedures, including team briefings; basic fire safety awareness for all relevant staff; and role-specific training for those delivering FRAs, fire safety programmes, planned maintenance and repairs. All training will be recorded.

12.2 Annual refresher training will be completed. Contractors will complete induction and ongoing competence training relevant to their tasks.

13.0 Performance Reporting

We will report key performance indicator (KPI) measures for fire safety monthly to SMT and quarterly to Cabinet. As a minimum, we will report:

Data – totals of: communal properties; properties on the FRA programme; properties with/without valid FRAs; those due within 30 days; completed/in-time/overdue actions (split by priority).

Narrative – explanation of current position, corrective action required, anticipated impact and progress with follow-up works.

In addition: compliance with servicing/maintenance programmes; number of RIDDOR notifications; enforcement notices from Fire & Rescue or other bodies; property fire incidents/trends to target awareness campaigns.

14.0 Quality Assurance

14.1 We will ensure a programme of external quality assurance audits of FRAs (field and desktop) on a five per cent sample basis.

14.2 We will carry out regular property inspections to audit completion of required management actions.

14.3 We will carry out an independent audit of fire safety at least every two years to test compliance with legal/regulatory obligations and identify non-compliance for correction.

15.0 Significant Non-Compliance and Escalation

15.1 Significant non-compliance is any incident which could result in a material breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported/escalated as soon as possible and no later than 24 hours after the incident or awareness.

15.2 Operational non-compliance will be reported to the Building Fire Safety Manager in the first instance, who will agree corrective action with the Director of Place. The Director of Place will report details to SMT.

15.3 In serious cases, SMT will consider notifications to the Regulator of Social Housing or HSE as required. In such instances, the issue will also be reported to Cabinet.

16.0 Glossary

BAFE: Independent register of third-party certified fire safety service providers.

BM TRADA: UKAS-accredited certification body for manufacturing, installation and maintenance services for fire doors and fire stopping.

FRA: Fire Risk Assessment – systematic evaluation of fire hazards, likelihood and consequences.

FRA types: Type 1 (common parts, non-destructive); Type 2 (common parts, destructive sample); Type 3 (common parts and sample flats, non-destructive); Type 4 (common parts and flats, destructive).

IFSM: Institute of Fire Safety Managers.

PAS 79: BSI specifications for FRA recording (PAS 79-1:2020 non-domestic; PAS 79-2:2020 housing).

PCFRA: Person-Centred Fire Risk Assessment – identifies residents at higher risk in their own accommodation.

PEEP: Personal Emergency Evacuation Plan – bespoke escape plan for individuals who may not self-evacuate unaided or in time.

UKAS: National Accreditation Body for the United Kingdom.

ADB: Approved Document B (Fire Safety) statutory guidance to Building Regulations for England.

EN 13501 / EN 1634-1: European standards for reaction to fire and fire resistance of doorsets respectively.

AFFF: Aqueous Film Forming Foam – foam extinguishant being phased out for environmental reasons.

Appendix 1 – Additional Legislation, Guidance and Policy

Direction

Legislation:

- Health and Safety at Work etc. Act 1974
- Occupiers' Liability Act 1984
- Furniture and Furnishings (Fire) (Safety) Regulations 1988
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Gas Safety (Installation and Use) Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR)
- Defective Premises Act 1972
- Housing Act 2004
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- Management of Houses in Multiple Occupation (England) Regulations 2006

- Building Act 1984
- Building Regulations 2010 and Approved Document B (including 2025 and 2026 amendments)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Electrical Equipment (Safety) Regulations 2016
- Data Protection Act 2018
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 (in force 6 April 2026)

Guidance:

- Housing – Fire Safety (LACORS), 2008
- Fire safety in purpose-built blocks of flats (Home Office/NFCC) – pending revision; still contains relevant information
- Fire Safety in Specialised Housing (NFCC), 2017
- HHSRS Operating Guidance (MHCLG), 2006 and Addendum on fire/cladding (2018)
- Simultaneous Evacuation Guidance (NFCC), 2020
- Residential PEEPs guidance and toolkit (GOV.UK, 2025)

Policy direction / Competence:

- Fire Sector Federation – A National Framework for Fire Risk Assessor Competency (2020)
- Fire Sector Federation – Guide to Choosing a Competent Fire Risk Assessor (2020)
- Setting the Bar: A new competence regime for building a safer future (2020)
- Building a Safer Future reports and Grenfell Tower Inquiry recommendations

Version History

Version	Date	Author	Rationale
1.0	16/04/2024	M.Emmett	Sign-off
2.0	06/05/2025	M.Emmett	Update
3.0	21/02/2026	M.Emmett	2026 refresh; integration of 2025–2026 legislative updates; depth and formatting improvements