



## HOUSING POLICY



LONDON BOROUGH OF  
**HARROW**

# Fire Policy

Version control	
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### 1. Purpose

This policy details the London Borough of Harrow's approach to the completion of suitable and sufficient Fire Risk Assessments (FRAs) and subsequent fire risk remedial actions.

This policy demonstrates that we have measures in place to identify, manage, and mitigate risks associated with fire. It will also demonstrate how we fulfil our duties under the Regulatory Reform Fire Safety Order 2005, Fire Safety Act 2021 and other relevant codes of practice and good practice guidance.

We have consulted all parties below and considered their feedback when drafting this policy:

- Head of Corporate Health & Safety
- Director of Housing
- Assistant Director Homes
- Housing Improvement Board
- Head of Housing Investment
- Fire Safety Assessor

## 2. Scope

The Regulatory Reform (Fire Safety) Order 2005 places a duty on the London Borough of Harrow (LBH) to carry out Fire Risk Assessments to all buildings where the Regulatory Reform Fire Safety Order applies, and LBH is the appointed Responsible Person for fire safety. This includes commercial buildings such as offices, houses of multiple occupation, the common areas of blocks of flats or maisonettes and specialised housing such as sheltered schemes. It does not apply to single family dwellings, which includes the habitable parts of a building such as a flat.

Where properties are managed by third parties such as Managing Agents the management of Fire Safety will fall under the scope of this policy only if stated in the terms of the management agreement.

## 3. Definitions

**We/ Our/ Us:** Refers to The London Borough of Harrow (or 'Harrow').

**Fire Safety Management Plan (FSMP)** - The Fire Safety Management Plan sets out how fire safety is managed within our buildings. Where the policy details the why and what, the management plan establishes how we keep people safe from fire and ensure compliance with the relevant legislations such as the Regulatory Reform (Fire Safety) Order 2005.

**Fire Risk Assessment (FRA)** -. This is an assessment of a building 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.



There are different 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.

**Regulatory Reform (Fire Safety) Order 2005 (RRFSO)** - This 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.

**Responsible Person** – Is a person or organisation that has control of a building or a degree of control. In reference to fire safety, they are responsible for ensuring measures are in place to identify, manage, and mitigate risks associated with fire.

**Significant finding** - These are findings that the assessor has identified as being a breach of current legislation and action is required to ensure legislative compliance.

## 4. Objective

Our objective is to have measures in place to ensure suitable and sufficient Fire Risk Assessments are completed and that subsequent fire risk remedial actions are appropriately managed. These actions and measures demonstrate our commitment to ensuring a safe environment where residents can live and staff can work, as well as satisfying our regulatory obligations.

## 5. Commitments

London Borough of Harrow has committed to the following actions to ensure the safety of residents, customers and staff.

### Fire Risk Assessments

Each building where we have a duty under the Regulatory Reform (Fire Safety) Order 2005, will regularly have a Type 1 Fire Risk Assessment carried out. This is the minimum legislative requirement. It will include an assessment of the common areas of the building but wherever possible, this will include the flat front entrance door, communal doors and smoke control of the common areas.

The Regulatory Reform (Fire Safety) Order 2005 states that Fire Risk Assessments must be reviewed regularly to ensure they remain up to date. There is however no

defined review period. The risk assessor, in line with Local Government Association guidance has recommended a 1-5 year programme:

- Carry out FRA of all blocks over 4 storeys every 12 months.
- Carry out FRA of our sheltered blocks every 24 months.
- Carry out FRA of all community halls every 24 months.
- Carry out FRA of our 4 storey blocks every 36 months.
- Carry out FRA of all blocks of 3 storeys every 48 months.
- Carry out FRA of all blocks of 2 storeys every 60 months.
- Carry out FRA of all street properties every 60 months.

The current review period for each building has been determined via:

- Building configuration.
- Building use/occupancy profile.
- Presence of vulnerable customers.
- Building construction type and materials used.
- Presence of active and passive fire protection measures.

A Fire Risk Assessment will also be reviewed in the following circumstances:

- Re-categorisation of the scheme or property.
- Agreed revisions to fire risk methodology.
- A significant change to the property, including its structure or any special, technical, and organisational measures.
- A near miss or fire within the property, giving reason to suspect that the Fire Risk Assessment is no longer valid. Change of use of the property.

#### Fire hazards

Each Fire Risk Assessment will assess for fire hazards, evaluate the risk of those hazards, and advise on action that should be taken to remove, reduce or manage the risk, to ensure the safety of relevant persons and property.

Each hazard identified will be categorised by the risk assessors. The currently used categories are:

- **Significant Finding** – These are findings that the assessor has identified as being a breach of current legislation and action is required to ensure legislative compliance.
- **Recommendation** – These are findings the assessor has identified as not being a breach of legislation but issues they recommend we undertake to reduce the risk.
- **Comment** – These are findings that the assessor wants to bring to our attention for consideration.

Each Significant Finding is then assigned a Risk Rating, which is currently one of the following:

- Very High

- High
- Medium
- Low

The Risk Rating is determined by the risk assessor considering the likelihood of the hazard causing an outbreak of fire and the potential for that outbreak to cause harm to persons, property and business continuity.

The risk assessor will provide details of the action they believe needs to be taken to address the hazard and suggest further investigation, or that advice is sought from a fire engineer.

Upon completion of a Fire Risk Assessment, the assessor will consider all identified hazards and evaluated risks and determine an overall Risk Rating (i.e., High, Medium, Low) for the building, in terms of both risk to life and risk to property.

If the overall risk to life is deemed to be substantial or intolerable or any individual hazard is deemed to be intolerable. LBH will be informed immediately. We will then take appropriate urgent action to reduce the risk to moderate or tolerable or where this is not immediately possible, ensure interim measures are put in place to manage the risk.

#### Action to address fire hazards

Upon receipt of a Fire Risk Assessment steps will be taken to ensure necessary and appropriate action is taken to address significant findings. The Fire Risk Assessment will stipulate a timeframe along with the risk category. The timescale for the completion of significant findings will be based on the risk rating as follows:

<b>Risk Rating Classification</b>	<b>Time to Action</b>
Very High	Within 24 Hours
High	Within 1 month - Either mitigation or full resolution.
Medium	Within 3 months - Full resolution
Low	Within 6 months - Full resolution

Where action is required to be completed by a contractor, we will ensure only those competent to do so are appointed. For example, fire doors must only be installed by FIRAS (Fire Industry Accreditation Scheme) or BM Trada (British Martin Timber Research and Development Association) accredited installers.

Where completion of an action requires access to an individual tenants' home, this will be supported by the Housing Teams as required.

Where the Fire Risk Assessment recommends an assessment of the buildings cladding and/or balconies, this will be managed by the Building Safety Team.

All significant findings and actions recommended by the risk assessor will be evaluated. We will ensure that as far as is reasonably practicable, appropriate and

proportionate actions are undertaken to ensure the safety of residents, customers and staff. In doing so we will consider:

- The extent to which the risk can be eliminated, mitigated, or managed.
- The effectiveness of any controls that can reduce the risk.
- The cost-effectiveness of maintaining the control measures against the reduction in risk or the consequential benefit.

London Borough of Harrow will work towards ensuring that all Fire Risk Assessment recommendations and comments are also reviewed and considered, with the decision on the course of action fully documented.

#### Fire evacuation strategy

As part of the Fire Risk Assessment, the risk assessor will review and confirm the appropriate fire evacuation strategy for the building. In most cases this will be “stay put” but could include full simultaneous evacuation. We 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 have the opportunity to make us aware, should they not understand the strategy or feel they would be unable to follow the guidance should a fire occur.
- All residents are appropriately informed should there be a permanent or temporary change to the evacuation strategy.

#### Certification and documentation

London Borough of Harrow will keep appropriate and up to date records and certification relating to the completion of Fire Risk Assessments and associated fire risk remedial actions.

The records that are to be kept include (but are not limited to):

- An up-to-date list of properties and buildings that require a Fire Risk Assessment including previous completion dates and next due dates.
- Fire Risk Assessment.
- All fire hazards identified in the Fire Risk Assessment including:
  - The category and risk rating.
  - The fire risk assessors recommended action and the timescale for completion including completion date.
  - Details of who the action was completed by.
  - Details of 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 and 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
- The action taken to address hazards strategies.

All Fire Risk Assessments and any relevant certification to evidence the work undertaken documentation will be saved against the property/building within C365.

#### Fire safety regulations 2022

As part of the requirements under these regulations all fire safety critical equipment will be inspected monthly. This is specifically for higher risk residential buildings for which LBH has responsibility. Fire safety critical equipment includes:

- Rising mains (i.e. Dry Riser)
- Smoke control systems
- Fire suppression systems
- Fire detection and fire alarm systems, including any systems linked to other fire safety equipment, such as smoke control systems evacuation alert systems (a visual check of the control and indicating equipment but not testing of the system).
- Automatic door opening or closing systems linked to fire detection and fire alarm systems.

We also undertake monthly routine checks of all lifts that are intended for use by firefighters and any evacuation lifts that are provided for the evacuation of disabled people in the event of fire.

In those buildings which are managed by the third party (currently Kinleigh Folkard and Hayward (KFH) manage Fielding House and Sharpe House) We will ensure all certification is received and stored on our compliance database C365.

#### Asset data and reconciliation

London Borough of Harrow will ensure an accurate record of the completion date, review period and due date of all Fire Risk Assessments with processes in place to ensure requests are issued to the risk assessors to allow sufficient time for completion before their due date.

Any new build developments that fall under the Regulatory Reform (Fire Safety) Order 2005 will be subject to a pre-occupancy assessment followed by a full Fire Risk Assessment upon occupation.

A reconciliation will be carried out at least every 6 months to ensure that all property divestments and acquisitions including new builds are reflected in the Fire Risk Assessment. Any changes to management agreement responsibilities also need to be appropriately reflected in the Fire Risk Assessment schedule.



There may be instances where the responsibility under the Regulatory Reform (Fire Safety) Order 2005 for the completion of the Fire Risk Assessment and remedial actions does not sit with LBH. However, we still retain some Landlord obligations, e.g., Private Sector Leasing (PSL). In these instances, we will ensure processes and procedures are in place to ensure that the third party is fully aware of their responsibilities under the Regulatory Reform (Fire Safety) Order 2005. Where there are communal areas, the landlord must demonstrate they undertake regular Fire Risk Assessments and inspections of fire safety installations. They must submit the completed inspection documentation to LBH.

### Fire doors

London Borough of Harrow currently has 5 buildings which are over 11m high. We undertake annual checks of flat entrance doors and quarterly checks of all fire doors in the common parts of these buildings. We record the findings of these inspections and ensure remediation identified in these checks is completed in a timely manner. We also provide relevant fire safety instructions to residents, including how to report a fire and any other instruction which sets out what a resident must do once a fire has occurred. This is based on the evacuation strategy for the building and includes relevant fire door information.

## 6. Responsibilities

The roles and responsibilities for key stakeholders across the LBH is detailed below. These are the roles and responsibilities specifically relating to the delivery of this policy. The Fire Safety Management Plan, which is currently being updated, will provide further details on the roles and responsibilities of all staff with day-to-day responsibility for fire safety.

**Managing Director of Paid Service as the Duty Holder** - Will need to ensure that resources are made available to allow the actions and measures detailed in this policy and any associated procedures will be delivered effectively. They are considered the “Responsible Person” for fire safety and have ultimate accountability for the implementation of this policy. However, the Duty Holder will discharge their responsibilities to the Director of Housing. The Managing Director of Paid Services will retain an oversight on progress and performance.

**Director of Housing as the Responsible Person** - Will work closely with the Building Safety & Compliance Manager to seek assurances that regulatory obligations and the policy measures are being adhered to. The Director of Housing must also ensure that services are delivered in line with budget.

**The Fire Safety Manager as the Deputy Responsible Person** – Will ensure that all Fire Risk Assessments are completed by their due date and that appropriate action (in line with the Regulatory Reform (Fire Safety) Order 2005, Fire Safety Act 2021 and other relevant codes of practice and good practice guidance) is taken to address Fire Risk Assessment recommendations. This will include ensuring that an audit trail of actions and decisions taken are fully documented. They will act as the organisations lead for Fire Safety providing technical advice and guidance to staff. Especially staff

who are involved in the delivery of maintenance and other works. The Deputy Responsible Person is also responsible for the following:

- The overall implementation and regular review of this policy to ensure that its objectives are achieved.
- Performance reporting to the Building Safety & Compliance Manager both in terms of the completion of Fire Risk Assessments and remedial actions.
- Ensuring that any compliance and health and safety related issues are brought to the attention of the Director of Housing.
- Providing regular updates on the service delivery against the budget.
- Maintaining an oversight of all open Fire Risk Assessment actions for buildings within the scope of the Building Safety Bill and any other buildings identified as higher risk.
- Ensuring that the Fire Risk Assessment actions are being taken in a timely manner.
- Leading on the completion of any External Wall Assessments or Fire Risk Appraisals of external walls.
- Sign off on decisions made to not fully execute the recommendation of a Fire Risk Assessment or to execute a different course of action.
- Ensure that Housing Management staff offer support with the Fire Risk Assessment access procedure. They will also ensure timely completion of any housing management remediations.

## 7. Legislation and regulations

Regulatory Reform (Fire Safety) Order 2005 (RRFSO) is 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. These take the form of a Fire Risk Assessment (FRA), which is 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.

It is a legal requirement as set out in article 9 of the Regulatory Reform (Fire Safety) Order 2005 that assessments should be reviewed as follows:

Any such assessment must be reviewed by the Responsible Person regularly to keep it up to date, particularly if:

- a) There is reason to suspect that it is no longer valid or
- b) There has been a significant change in the matters it relates to such as changes to the structure of the building.

This means that if any significant changes are made to the premises, whether or not they increase the potential risk of fire, an updated Fire Risk Assessment will need to be conducted. This could include not only structural changes to the building but also changes to the activities undertaken. It could also include a change of use or a change in the type of people or occupancy of the building.

The 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 Regulatory Reform (Fire Safety) Order 2005.

Fire Safety (England) Regulations 2022. These regulations made it a requirement in law for responsible persons of high-rise blocks of flats to provide information to Fire and Rescue Services to assist them to plan and if needed, provide an effective operational response.

#### Risk management

The risks of not following legislation and regulations associated to this policy are that LBH will not be compliant with the requirements of the Regulatory Reform (Fire Safety) Order 2005, Fire Safety Act 2021 and other relevant codes of practice leading to a potentially detrimental impact on the safety of residents, customers and staff. This may result in:

- Danger to the health and life of residents, staff, visitors, and members of the public.
- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974.
- Prosecution by the Fire and Rescue Service under the RRFSSO and/or Fire Safety Act 2021.
- Prosecution by the Local Authority under the Housing Act 2004.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.
- An enforcement Notice from the Regulator of Social Housing for a breach of the consumer standards detailed in the Social Housing Regulations Act 2023.
- Loss of confidence by stakeholders in the organisation.

## 8. Compliance and monitoring

The completion of Fire Risk Assessments in line with their due date, forms part of the Health and Safety of Customer's Homes balanced scorecard KPI. This is reported monthly to the Health and Safety Asset Board.

Sufficient Fire Safety awareness training will be maintained for all relevant employees and recorded on their HR Learning record. All staff involved with the

allocation, monitoring, and completion of Fire Risk Assessments and actions will need to maintain sufficient IT system training. This is currently C365 and Cx IT systems.

This policy will be communicated internally to staff via the Intranet. Key stakeholders and key staff where this policy has specific impact will be briefed individually or collectively as required. This policy will be available online and sent to any residents upon request.

Fire Risk Assessments may refer to individual flats inspected as part of the Fire Risk Assessment but will not record any personal information on the residents. All completed Fire Risk Assessments and actions will be recorded directly into the C365 compliance database. Details will be retained of communication with residents regarding the fire evacuation strategy for their building. Individual responses to these communications will be retained against the individual property record in CX. Subsequent assessments are made of individual residents regarding their ability to evacuate the building. These will be held securely and only be available to access by those that require it.

## 9. Review

This policy will be reviewed every two years or sooner if required by statutory regulations, best practice, emerging developments, or circumstances arising from reviews of other group wide policies. The policy will be reviewed by the Building Safety and Compliance Manager.

## 10. Equality and diversity

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, The London Borough of Harrow has considered 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.

The policy also considers diversities around access to and delivery of any services.

Upon request the London Borough of Harrow will provide translations of all its documents, policies and procedures in various languages.