



Fire Safety Policy

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1. Purpose

- 1.1. This policy sets out Hull Churches Housing Association Limited's (the Association/HCHA) approach to fire safety governance and compliance, ensuring suitable and sufficient fire risk assessments inform proportionate controls; buildings, fire safety systems and escape routes remain effective; tenants and staff receive clear and accessible fire safety information; tenants requiring additional support are identified and appropriately supported; and fire safety performance is monitored, deficiencies addressed according to risk, and assurance provided to the Board.

2. Scope

- 2.1. This policy applies to all homes, communal areas, offices, stores and other premises owned, managed, occupied or controlled by HCHA, including general-needs housing, supported or sheltered housing where care is not provided and low-rise blocks of flats. It applies to employees, board members, agency workers, contractors and consultants.

3. Policy Statement

- 3.1. HCHA is committed to protecting tenants, visitors, employees, contractors and others from fire. We will take a proportionate, risk-based approach to preventing fire, limiting fire and smoke spread, providing safe means of escape, maintaining fire safety measures and supporting an effective emergency response. We will comply with applicable law and recognised guidance, learn from incidents and near misses, and make timely, evidence-based investment decisions.
- 3.2. The absence of high-rise buildings does not reduce our commitment. Controls will reflect each building's design, height, occupancy, tenant needs, tenure and fire risk assessment. Life safety takes priority over property protection, and no person will be disadvantaged in accessing fire safety information or assistance.

4. Legal and Regulatory Framework

- 4.1. HCHA will comply with applicable requirements, including the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety Act 2021, the Fire Safety (England) Regulations 2022, the Housing Act 2004 and associated Housing Health and Safety Rating System, relevant building regulations, health and safety legislation, and requirements arising from section 156 of the Building Safety Act 2022. We will have regard to current statutory guidance, including Making your small block of flats safe from fire where buildings fall within its scope, and other appropriate guidance for purpose-built flats or sleeping accommodation.
- 4.2. Applicable duties vary by premises. The Fire Safety Order generally applies to workplaces and to common parts of buildings containing two or more domestic premises; the building structure, external walls and flat entrance doors opening onto common parts must be considered where relevant. We will obtain competent legal or technical advice where requirements are uncertain.

5. Roles and Responsibilities

5.1. The following roles have key responsibilities

- Board: Retains overall accountability. It will approve this policy, ensure adequate resources and competent advice, define risk appetite, scrutinise performance and receive assurance on material risks, serious incidents, overdue high-risk actions and regulatory engagement.
- Chief Executive and executive team: The chief executive will ensure this policy is implemented. The executive team will integrate fire safety with asset, housing, development, procurement, business continuity and health and safety decisions, and escalate material concerns promptly.
- Staff and contractors: will implement local controls and close assigned actions. Employees must follow procedures, keep escape routes clear, report defects or hazards and complete required training. Contractors must be competent, follow site controls, protect fire compartmentation and systems, manage hot work and provide accurate completion and certification records. Procurement and contract management will include proportionate fire safety requirements and verification.
- Responsible person and competent support: HCHA will identify and record the responsible person for each relevant premises and appoint competent people to assist. Responsibilities, authority, deputising arrangements and interfaces with other dutyholders will be documented. Consultants may advise or carry out work, but organisational accountability will not be transferred.
- Tenants and Residents: Are expected to follow the fire action for their building, avoid obstructing communal areas or interfering with fire safety equipment, use electrical appliances and charging equipment safely, permit access where legally required, and report defects or concerns promptly. We will explain these expectations clearly and act fairly where breaches create risk.

6. Fire risk assessment and action management

6.1. HCHA will:

- Maintain a complete premises and building register showing ownership, use, height, storeys, tenure, responsible person, assessment status, evacuation strategy and key fire safety features.
- Ensure every relevant premises has a suitable and sufficient fire risk assessment completed by a competent assessor and recorded in full.
- Assess hazards, people at risk, means of escape, detection and warning, compartmentation, structure and external walls, flat entrance doors, firefighting facilities, emergency lighting, signage and management arrangements as applicable.
- Review assessments at planned intervals determined by risk and without delay after material alterations, change of use or occupancy, serious incident, significant defect, evidence that controls may be ineffective, or relevant legal or guidance change.
- Record actions with risk rating, owner, due date and evidence of closure. Immediate or intolerable risks will be controlled at once, including temporary measures, decant or restriction of use where necessary.

- Use a documented escalation process for overdue or disputed actions and independently verify closure where the risk or complexity warrants it.

7. Fire prevention and protection

7.1. Controls will be recommended from the fire risk assessment and building design. We will:

- Manage ignition sources, combustible materials, refuse, storage, smoking, arson risk, electrical safety and hot work.
- Keep communal escape routes available, adequately lit, signed where required and free from unacceptable obstruction or combustible storage.
- Maintain suitable fire detection and alarm arrangements, emergency lighting, fire doors, compartmentation, smoke control, firefighting equipment and other measures where provided.
- Operate inspection, testing and servicing programmes based on legislation, risk assessment, manufacturer instructions and relevant standards, with defects prioritised by risk.
- Control penetrations and alterations through permit, survey and quality-assurance arrangements; reinstate fire-stopping promptly and retain evidence.
- Assess fire safety before acquisition, disposal, refurbishment, change of use, development or major repair, and ensure required information is handed over into asset records.
- Manage lithium-ion battery and mobility-device charging risks proportionately, avoiding charging or storage that compromises escape routes.

8. Evacuation & Emergency Arrangements

8.1. Each building will have an evacuation strategy appropriate to its design and assessment; we will not apply a blanket strategy across the portfolio. Fire action notices and resident information will be consistent with that strategy. Staff and contractors must call 999 for a fire or immediate threat and must not enter or re-enter a dangerous area.

8.2. Emergency plans will address alarm raising, evacuation or stay-put actions as applicable, assembly and accountability for staffed premises, liaison with the fire and rescue service, access arrangements, utility isolation where safe, temporary failure of critical measures, alternative accommodation and business continuity. Exercises or drills will be undertaken where appropriate to the premises and occupancy, with learning recorded.

9. Tenants requiring additional support

- 9.1. HCHA will provide a confidential, accessible route for residents to tell us about factors that may affect their ability to understand warnings, respond or evacuate. We will consider reasonable, person-centred and proportionate measures with the resident and, where appropriate and lawful, relevant agencies or the fire and rescue service. Information will be kept accurate, secure, limited to those who need it and reviewed when circumstances change. We will not assume needs solely from age, disability or tenure.

10. Tenant engagement and information

- 10.1. We will give residents clear, relevant information when they move in and at suitable intervals thereafter, including how to report a fire, the evacuation strategy, the importance of fire doors, safe use of common areas, prevention measures and how to report concerns. Information will be available in accessible formats and alternative languages where reasonably required
- 10.2. We will consult tenants on significant changes affecting fire safety, explain decisions and outcomes, acknowledge concerns promptly and protect residents from unfair treatment for raising safety issues.

11. Information, records and data quality

- 11.1. We will maintain an auditable fire safety record for each relevant premises, including assessments, plans, inspections, tests, defects, actions, remedial works, certificates, resident communications, incidents, competencies and handover information. Records will be controlled, retrievable, retained in line with the retention schedule and protected under data-protection requirements. Material gaps or conflicting data will be treated as risks and corrected promptly.

12. Competence, training and awareness

- 12.1. Roles with fire safety responsibilities will have defined competence requirements. Appointment and supervision will consider knowledge, training, experience, skills, behaviours, limitations and the complexity of the work. Board members, staff, and relevant contractors will receive proportionate induction and refresher training. Competence will be checked before appointment and monitored through quality review, supervision and continuing development.

13. Incidents, reporting and learning

- 13.1. All fires, fire alarm activations, dangerous occurrences, significant defects and near misses will be recorded, triaged and investigated proportionately. We will provide emergency support, preserve evidence, make statutory and regulatory notifications where required,

cooperate with enforcing authorities, identify root causes and share learning. Serious incidents and material control failures will be escalated immediately.

14. Performance, assurance and oversight

14.1. Management information will be proportionate to the portfolio and include, as applicable:

- Coverage and currency of fire risk assessments.
- Actions by risk rating, due date and age, including overdue high-risk actions.
- Inspection, testing and servicing compliance and outstanding critical defects.
- Fire-door, compartmentation and communal-area findings.
- Fires, alarm activations, near misses, causes, injuries and learning.
- Resident communications, concerns and completion of agreed support measures.
- Contractor and assessor quality, data quality and regulatory interactions.

14.2. Operational teams will review performance regularly; the executive team and Board will receive risk-based reports at agreed intervals.

Assurance will combine management checks and independent specialist review. Significant gaps will have documented recovery plans and enhanced oversight.

15. Non-compliance and enforcement

15.1. Actual or suspected non-compliance will be reported promptly to the executive team. We will act according to risk, notify affected people, cooperate with enforcing authorities and provide accurate information. Deliberate interference with safety measures or repeated unsafe behaviour will be addressed under relevant tenancy, employment or contractual arrangements, with support and proportionality considered before enforcement.

16. Equality, accessibility and data protection

16.1. We will assess the equality impacts of this policy and make reasonable adjustments. Communication and engagement will be designed for differing literacy, language, sensory, cognitive and digital needs. Personal information about support needs will be processed lawfully, fairly, securely and only for defined safety purposes.

17. Review

17.1. This policy will be reviewed at least every three years and earlier following significant legal or regulatory change, a serious incident, material change to the portfolio or operating model, audit findings, or evidence that the policy is not effective.