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1. Statement of intent

Lewisham Council believes that ensuring the fire safety of its residents, staff and visitors is essential to our success and supports our efforts to provide safe, quality homes, deliver efficient services and enhance life chances.

We are committed to:

1. Preventing fire related incidents.
2. Assessing and controlling the risks from fires that arise from our activities.
3. Providing a safe working environment with safe working methods and equipment.
4. Providing effective fire safety information, instruction, and training where appropriate.
5. Regularly communicating with our residents and employees on fire safety matters.
6. Monitoring and reviewing our fire safety systems and prevention measures to ensure their effectiveness, and to contribute to an improvement culture.
7. Ensuring adequate resources are made available for fire safety matters so far as reasonably practicable.
8. Compliance with statutory requirements, as a minimum, whilst working towards accepted best practice wherever we reasonably can.

We have previously voluntarily¹ submitted to external assessment of our fire risk management system, and have as a result designed our fire risk management system to exceed statutory requirements and meet a more stretching standard, in order to be able to assure our residents, staff and partners of our full commitment to prioritising matters of fire safety.

¹ During 2021-23 the fire risk management system for the Council's ALMO Lewisham Homes was scrutinised and accredited against the British Standard (BS9997: 2019)



2. Purpose and context

- 2.1 This policy aims to establish how fire safety in our residential properties will be managed and communicated by Lewisham Council. It confirms that we have staff in place who have been assigned specific duties and responsibilities, and that we have robust procedures to deliver the policy requirements.
- 2.2 Each year there are over 50,000 fires in dwellings in the UK which result in thousands of serious injuries and hundreds of fatalities. In many cases fires can be prevented and the fatalities/injuries avoided, by having a sound fire risk management approach which starts with a robust fire safety policy.
- 2.3 When reviewing our Fire Safety policy and associated documents we have taken into account the recommendations from Dame Judith Hackitt's report as well as findings from the Grenfell Tower Inquiry. We have also based our approach upon the 'Golden Thread' approach to building management – including standard-setting, validation, monitoring, checking and correcting, directing and guiding. We will continue to review and adjust this policy and associated documents in line with emerging legislation and good practice, including the Building Safety Act.
- 2.4 This policy applies to residential buildings owned by Lewisham Council and directly managed by its Housing Service, as well as to new homes we are developing that we will directly manage.

3. Accountability and responsibilities

- 3.1 The CEO is deemed to be the 'Responsible Person' as defined by the Regulatory Reform (Fire Safety) Order 2005, as well as the Principle Accountable Person (PAP) under the Building Safety Act. Whilst the CEO has overall accountability for the management of all aspects of health and safety including the management of fire risk, the day-to-day implementation of this policy is delegated to the Director of Housing Quality and Investment, who acts as the main duty holder.
- 3.2 The Fire Risk Manager is designated as the lead competent person on all day-to-day fire safety related issues, and reports to the Head of Compliance. The Fire Contracts Manager also reports to the Head of Compliance, and is responsible for the contractual arrangements, compliance for all active fire safety systems, and the Fire Risk Assessment contract.
- 3.3 The Head of Building Safety, and the Head of Compliance report directly to the Director of Housing Quality and Investment, providing advice and updates on building and fire safety related matters. The Head of Building Safety is responsible for maintaining an oversight of Building Safety related matters in properties of 7 storeys or 18m and above.

Note: Having the same reporting lines enables the Head of Building Safety and the Head of Compliance to ensure a joined-up approach to overall building safety.

- 3.4 These roles are part of our well-established building and fire safety arrangements. The collective qualifications and experience of these roles provide the organisation with professional building safety and fire safety advice and competencies. The teams lead



on all aspects of Housing Services building safety and fire related work.

- 3.5 We will ensure that staff and contractors within or used by Housing Services are inducted for safe working practices, and those carrying out maintenance on fire safety systems are fully qualified to do so.
- 3.6 Where Lewisham Council is identified as the 'Responsible Person' it will cooperate with other duty holders to ensure that the necessary standard of fire safety is maintained or exceeded throughout the premises. Where we share responsibilities with other duty holders, accountability will be discharged in collaboration with the responsible parties.

4. Fire prevention and risk management

- 4.1 We will work with staff and residents to help prevent fires. This involves assessing and dealing with risk and includes but is not limited to:
 - a) Training key staff in fire safety awareness and their role in fire prevention
 - b) Communicating with tenants and leaseholders on the importance of fire safety and how they can contribute to a safer environment
 - c) Carrying out regular checks to the common parts of our residential buildings to ensure escape routes are kept free of combustible materials, ignition sources and obstructions
 - d) Removing items from communal areas - as set out in the 'Clear Corridors' policy
 - e) Taking enforcement action on residents/leaseholders for actions that impact on fire safety
 - f) Ensuring fire doors are fire-resistant and self-closing where required.

4.2 Fire precautions

4.2.1 These are precautions to reduce the likelihood of a fire occurring in a building and preventing its spread if a fire does occur. They are there to protect people, buildings, and their contents from damage. They are generally divided into active or passive precautions.

4.2.2 Passive fire precautions include things like the construction and layout of a building, and clear signage. Active fire precautions are those that would be activated in a fire and include things like smoke detection, alarms, sprinklers, emergency lighting and fire-fighting equipment.

Note: We do not provide fire extinguishers to the communal areas of properties where we do not have a 24/7 presence of staff trained to use them. In the event of fire residents should follow the emergency plan (See 5.2).

4.2.3 Where we identify a tenanted property without a working smoke alarm and carbon monoxide alarm (where there is gas), we will act to supply and fit them as soon as practicable in line with the Smoke and Carbon Monoxide England Regulation 2022.

4.2.4 Fire precautions will be subject to inspections and maintenance regimes, based on manufacturers' guidance or as required by a fire risk assessment, to ensure they remain fit for purpose and functional.

4.2.5 We will maintain fire safety systems and equipment in line with legislation and good practice. These include:



- Fire detection and warning systems
- Emergency lighting
- Firefighting facilities
- Emergency routes and exits, escape doors etc.
- Fire safety signs and notices
- Premises information boxes
- Sprinkler systems
- Portable Suppression Systems
- Wet and Dry Rising Mains
- Permanent and Automatic Opening Vents
- Portable electrical appliances (PAT) and premises installation testing (5 yearly)
- Gas testing/certification if relevant

4.3 Risk Assessments

Lewisham Council will undertake, and keep under review, fire risk assessments (FRA) for all eligible premises that fall under this policy. The FRA process will be provided by competent fire risk assessors. We will hold a current, suitable, and sufficient (Type 1) FRAs for all buildings with internal common parts and workplaces. These will be carried out and reviewed regularly. We will act on any identified risk in line with agreed timescales. (For Person Centred Fire Risk Assessments see 5.5.3).

4.4 Incidents

In the event of a fire incident, we will arrange for a prompt investigation into the cause and circumstances, liaising with London Fire Brigade (LFB) as required. In the event of a major injury or fatality, the premises will remain isolated and secured until the relevant authority has completed their investigations.

4.5 Emergency planning

Each building will have a suitable Fire Action Notice prominently displayed in the building. This contains information regarding the actions that occupants of the building should take in the event of a fire. Residents should familiarise themselves, their household, and visitors with the Fire Action Notice for their building.

5. Resident cooperation

5.1 Lewisham Council manage residential buildings that will not usually have a permanent staff presence, or a waking watch. As well as the systems and processes we have in place to prevent, detect, and reduce the risk of fire spread, we also rely on residents to play their part in being fire-vigilant and in helping us to maintain a fire-safe environment. Though not exhaustive we have included some key actions in this section where we believe resident cooperation will reduce fire-related risk.

5.2 All residents

- Do not remove, damage, alter or compromise systems or equipment that have been put in place to prevent fire, or reduce its spread. This includes not leaving communal fire doors open.
- Do not leave waste or other combustible items in communal areas (See the Clear Corridors policy).
- Promptly arrange and allow for access for all safety checks, repairs, and installations, including gas safety, smoke and carbon monoxide detection (See also Required Access policy)



- Become familiar with emergency plans for your building, building layout, exit points etc.
- Be fire aware – most fires start in home. Don't leave pans unattended. Be aware of how you use and position candles. Do not overload electrical circuits or use damaged leads or appliances. Check LFB's electrical [product recall lists](#) and register your appliances to stay updated on known issues. <https://www.registermyappliance.org.uk/>
- Where a private balcony forms part of your tenancy or lease, do not store dangerous or very flammable items there. Consider the risk of combustion or fire spread to the building.
- Ensure your household and visitors are following these safety measures.
- Gas cylinders must not on any account be used or stored anywhere in our buildings. Residents must remove these from the building immediately or contact their Building Safety Manager to arrange for their removal. (**Note:** Where there is no named Building Safety Manager the team can still facilitate this and can be contacted on: buildingsafety@lewisham.gov.uk)

5.3 Tenants

Tenants are reminded that breaching the terms of their tenancy agreement can result in our taking enforcement action that may lead to losing their home. For example: the secure tenancy agreement (sections 2.6, 2.7, 2.8, and 2.11) covers safety, rubbish, communal areas, and making alterations. (See also the Alterations and Improvements policy). Tenants are responsible for the conduct of members of their household and visitors.

5.4 Leaseholders and Shared Owners

5.4.1 Leaseholders and Shared Owners are reminded that their lease contains information relating to fire precautions, alterations, endangerment of the structure, and areas in common. Breaching the terms of the lease can result in enforcement action with associated costs, and which could limit the use of the property, or invalidate terms for insurance or a mortgage.

5.4.2 Permission for an alteration to a demised area will usually be subject to meeting a required standard – as in the case of a front entrance door. (For more information see the Alterations and Improvements policy). Where Leaseholders or Shared Owners' property has been identified as having a non-compliant fire door, whether through a fire risk assessment or ad-hoc inspection, we will inform them of their obligation that their door remains compliant.

5.4.3 Where a leaseholder lets out their property they have additional legal responsibilities as a landlord, such as providing smoke and carbon monoxide alarms, an annual gas safety check, and ensuring their tenants understand and comply with safety information for the building.

5.5 Residents at higher risk

5.5.1 We recognise that some residents may be at greater risk than others, of having a fire start in their property, or being able to safely exit in an emergency situation. Residents are encouraged to contact us to discuss arrangements or advice where the following apply for member of their household:

- A disability, impairment, or health condition, that could adversely affect a safe exit from the building if required in an emergency



- Advice and assistance for dealing with clutter and hoarding
- Other reasons or combinations of reasons that could increase a risk from fire (for example smoking and living with dementia).
- We would encourage our tenants and leaseholders to book a Home Fire Safety Visit with the London Fire Brigade: <https://www.london-fire.gov.uk/safety/the-home/book-a-home-fire-safety-visit/>
- We will also offer fire safety advice where requested.

5.5.2 We may also introduce additional or different safety advice based on a risk assessment of the main occupancy or usage of a building and/or additional shared facilities, such as we have in some sheltered accommodation or hostels. For example, we keep some information at an agreed location on site to help Fire and Rescue Services to locate where the most vulnerable may need assistance.

5.5.3 Where a resident is identified, including self-identification, as having a higher risk from fire, we will aim to carry out a Person Centred Fire Risk Assessment (PCFRA) to help consider what appropriate actions/control measures may need to be taken to reduce those risks to a reasonable level. This information will be held, where appropriate on the premises in a Premises Information Box (PIB), for the use of Fire Rescue Services in the event of an incident.

6. Monitoring and controls

- 6.1 Fire safety forms part of our assurance reporting. Appropriate risks will be fed into the Corporate Risk Register. Fire safety performance indicators will be reported regularly to the Housing Executive Team, together with any significant issues that arise.
- 6.2 We will monitor implementation of and compliance with this policy, via a program of audits and reviews. This will provide data to reflect the effectiveness of this policy, and to identify opportunities to further improve in our management of fire risk.
- 6.3 Building and Fire Safety matters are regularly considered and monitored across Lewisham Council by the means of a multi-service working group (See 9.5).

7. Legislation and regulation

- 7.1 The primary legislation is the Health and Safety at Work etc. Act 1974 which imposes on us a general duty of care.
- 7.2 Specific legislation is The Regulatory Reform (Fire Safety) Order 2005 (the Order).
- 7.3 Other regulations which are applicable to this policy include but are not limited to:
- Fire Safety Act 2021
 - Fire Safety (England) Regulations 2022
 - Building Safety Act 2022
 - The Building Regulations 2019 incorporating 2020 amendments; Approved Document B (Fire Safety)
 - Housing Health and Safety Rating System 2005 (- Hazard 24: Fire)
 - The Furniture and Furnishings (Fire) (Safety) Regulations 1988
 - The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022



- 7.4 Legislation and regulation for this area is subject to further change. We will continue to review our approach in line with such changes, and we will also, where practicable, look to exceed requirements in the light of recognised guidance and good practice.

8. Equality, diversity, and inclusion

- 8.1 The safety of our residents and workforce is of the utmost importance. This policy has been written to protect all concerned, taking into account all protected characteristics. We have undertaken an equality assessment as part of the development and review of our Fire Safety Management system, which includes this document.
- 8.2 This policy explains that our fire risk assessment process is based on both a premises-centred and person-centred approach. It allows for us to manage risk differently where there are people that we believe may be more vulnerable to risk from fire (See section 5.5).
- 8.3 We will ensure that relevant information, including signage, is communicated in an accessible and understandable way with the aim of keeping people safe.

9. Communication and consultation

- 9.1 We have an annually updated Fire Safety Communications plan which helps to ensure that key messages continue to be communicated. This complements other building safety messaging such as the building specific communications plans being developed by the Building Safety team with residents of high-rise residential buildings.
- 9.2 This Fire Safety policy will be published on Lewisham Council's website. Fire safety messages, refreshers and updates will be communicated to residents through various media including signage, newsletters, website updates, letter-drops and face-to-face discussions.
- 9.3 New tenants will be given fire safety advice at their sign-up, and provided with a Fire Safety leaflet that gives advice and basic precautions. Likewise new leaseholders and Shared owners will be provided with relevant fire safety advice.
- 9.4 Where a resident has questions or concerns about the implementation of this policy, they should in the first instance contact the organisation via their Housing or Home Ownership Officer, or where in place their Building Safety Manager. Complaints will be handled in line with our Housing complaints policy and processes.
- 9.5 Fire safety is discussed and communicated within Housing Services as well as other relevant teams within Lewisham Council, through a Building and Fire Safety working group which meets regularly and contains key staff from departments across the organisation. This helps to ensure consistent messaging and a joined-up approach to safety matters. In addition, we highlight key information including policies and processes internally through a staff intranet, and through training and briefings as and where required.
- 9.6 We developed this policy with a resident audience in mind and have separated more strategic or technical procedural points into associated documents. Residents were consulted regarding this policy while it was in draft. The feedback centred on ensuring



we continue to communicate clearly and regularly. We will ensure this by updating and monitoring activity via a Fire Safety Communications Plan (See 9.1).

- 9.7 We will send out Fire Safety Instructions annually to all of our residents in line with the Fire Safety (England) Regulations 2022. The instructions will include importance of fire doors, how to report a fire and what to do once a fire has occurred in line with the evacuation strategy of their building.

10. Related policies

- 10.1 This policy works alongside other key health and safety management information. While not an exhaustive list, residents are also advised to check the following related policies also available on our website:

- Clear Corridors policy
- Required Access policy
- Gas Safety policy
- Breach of lease policy

To replace: Fire Safety policy 2022 (Lewisham Homes) Minor updates to reflect the return of landlord services previously managed by Lewisham Homes to Lewisham Council	
Date approved: 13/03/2024	Effective date: 13/03/2024
Next review: 13/03/2027	
Approved by: Lewisham Council's Housing Departmental Management Team	
Policy owner: Director of Housing Quality and Investment	