

## Fire Safety Policy (Landlord Compliance)

Policy Owner	Andy Kennedy, Assistant Director of Building & Customer Safety
This policy is applicable to	All Companies within the Group
Approved by	Group Board
Date approved	27 <sup>th</sup> January 2022
Frequency of review	Annually
Date of next review	November 2026
Implementation date	27 <sup>th</sup> January 2022
Key related documents (policy, procedure, customer literature)	All compliance documents.
Sources of best practice or guidance used in developing this policy	See section 2

### Version control

Version number (see note 1)	7	Author of Policy	Kath Heard Principal Surveyor – February 2018
		Re-written by	Patricia Carr Group Health and Safety Manager - 2021
Equality Impact Analysis (see note 2)	Initial/Full	Equality Analysis Date	18 August 2021
Privacy Impact Analysis (see note 2)	Initial/Full	Privacy Analysis Date	18 August 2021

### Document change history

Version	Date	
2	March 2019	Cover, 1.0, 4.0.
3	Aug 2021	Cover, 1.0, 4.0, 5.0, 6.0, And make specific that the Policy also applies to YHA.
4	January 2023	Cover page, 2.0, 4.0, 5.0 and remove inclusion of YHA and include all subsidiary companies.
5	February 2024	Remove reference to YHA and replace with all subsidiary companies. Include new legislation under the Fire Safety Regulations 2021, the Fire Safety (England) Regulations) 2022 and the Building Safety Act 2022
6	August 2024	Amended to include reference to our Approach to Vulnerability Policy
7	Nov 2025	Reference to use of C365, Awaab's Law and BS9792 added. Removal of Glossary of Terms section as they are included within the policy.

		Amended Section 5. Monitoring to ensure alignment with the Management Plan (roles and responsibilities)
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<b>Consultation</b>	
Consultation Group (if applicable)	Date of Consultation (if applicable)
Staff	Not applicable
Union(s)	Not applicable
Customers	Not Applicable
Human Resources / Organisation Development	Not applicable
Health and Safety Working Group	
Other stakeholder – Building & Customer Safety Working Group	October 2025

<b>Risk policy is designed to control</b>
To comply with all regulatory and legislative requirements plus ensure the safety of staff and customers.

## 1.0 Objectives of the Policy

Karbon Homes and its subsidiary companies (hereby known as the Group) are regulated by the Regulator of Social Housing, and has responsibility for discharging the landlord obligations surrounding fire safety. We are also required to undertake a monitoring role to ensure that we can demonstrate a validated landlord compliance position, thereby leading to Karbon Homes being overall compliant with legislative and regulatory requirements.

The objectives of this policy are detailed below;

- To ensure we provide a safe environment for customers, colleagues and third parties to live and/or work.
- Establish the key principles that the Group will utilise to ensure fire safety across across the Karbon Homes Group.
- To ensure that all new buildings and refurbishments comply with the Building Regulations 2010 (as amended) (Approved Document B, volumes 1&2).
- Ensure compliance with the The Regulatory Reform Fire Safety Order 2005, Building Safety Act 2022, Fire Safety Act 2021 and Fire Safety (England) Regulations 2022.
- To provide clear lines of responsibility for the management of fire safety.
- To provide a commitment to customers who are affected by fire safety and communicate and raise awareness regarding the key issues.

- To provide a timetable for the review of the Fire Safety policy and Fire Management Plan.

This document will be stored in the Karbon Homes SharePoint for internal stakeholders and will be available to view by external stakeholders via the Karbon Homes and 54North Homes' websites.

## **2.0 Compliance with Regulatory Standards and Legal Obligations**

This policy operates within the context of regulatory legal frameworks, guidance sources and British Standards as follows;

- The Fire Safety Act 2021
- The Fire Safety (England) Regulations 2022
- The Building Safety Act 2022
- Smoke and Carbon Monoxide Alarm (England) Regulations 2022
- Regulatory Reform (Fire Safety) Order 2005
- Guidance information published by Department for Communities and Local Government (CLG), (Local Authorities Coordinators of Regulatory Services) (LACORS) and the Local Government Association (LGA)
- The Health and Safety at Work etc. Act (1974).
- Management of Health and Safety at Work Regulations 1999
- Housing Act 2004
- Housing Health and Safety Rating System Regulations 2005
- Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002
- Furniture and Furnishings (Fire Safety) Regulations 1988
- Smoke Detectors Act 1991
- IET Wiring Regulations (18<sup>th</sup> Edition) – BS7671
- Gas Safety (Installation and Use) Regulations 1998
- Electrical Equipment (Safety) Regulations 1994
- Landlord and Tenant Act 1985
- Equality Act 2010
- Building Regulations 2010 (as amended) Approved Document B (Fire safety) – Volume 1: Dwellings , and all relevant British Standards.
- Building Regulations 2010 (as amended) Approved Document B (Fire Safety) – Volume 2: Buildings other than dwellings
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- Communities and Local Government Fire Safety Guides  
<https://www.gov.uk/government/collections/fire-safety-guidance>  
Offices and shops Fire Safety Guide  
Sleeping accommodation Fire Safety Guide
- The Regulatory Framework for Social Housing
- BS 5839 – Fire detection and alarm systems
- BS 5266 – Emergency lighting provision
- BS 8214 – Fire doors
- BS 5306 – Fire extinguishers
- BS 5499 – Fire safety signs
- BS 9990:2015 – Dry risers

- BS/EN 16550:2010 – Fire dampers
- BS/EN 12101 – Smoke vent systems
- BS 9251 – Sprinkler systems for domestic and residential occupancies.
- The Social Housing Regulation Act 2023, including Awaab's Law
- BS9792:2025 Fire Risk Assessment. Housing. Code of Practice.

The Regulatory Reform (Fire Safety) Order 2005 (RRFSO) applies to the common parts of all properties providing accommodation in the form of flats or maisonettes for general needs, older persons and supported housing and the requirements for managing fire safety varies depending upon the risk. The scope of RRFSO further extended by the Fire Safety Act 2021 to include structure, external walls and flat entrance doors in common parts.

In order to deliver these objectives the Group will have regard to the duties imposed by the RRFSO by nominating a competent person(s) to undertake suitable and sufficient Fire Risk Assessments in the communal parts of all properties or properties which are places of work in order to;

- Identify the hazards within all owned or managed premises
- Consider who may be especially at risk.
- Evaluate and eliminate or reduce the risk from fire as far as is reasonably practical and provide general fire precautions to deal with any residual risk
- Undertake regular reviews.

Additionally, for those existing occupied buildings identified as falling in-scope of the Building Safety Act 2022 meeting the definition of a higher-risk building being those at least 7 storeys or 18 metres in height and containing at least two residential units, we will ensure that we meet all requirements of Part 4 of the BSA 2022 and all supporting secondary legislation and guidance including ensuring the following:

- Making provision for the registration of higher-risk buildings
- Making provision for the application for building assessment certificates including provision of a relevant safety case report
- Making provision for the assessment and management of all defined building safety risks to take all reasonable steps to reduce risk
- Making provision for the keeping and giving of information and documents to the Building Safety Regulator, other accountable persons, residents and others.
- Making provisions about engagement with residents requiring a residents' engagement strategy and provision of a complaints system

It is essential we ensure customers, residents, employees, contractors and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our legal responsibilities may result in prosecution, financial penalties, enforcement notices, downgrading by the Regulator of Social Housing, reputational damage and loss of confidence by stakeholders.

### **3.0 Scope**

This policy relates to offices, general needs housing, supported housing, sheltered housing, and other rented properties owned by the Group, communal areas including leaseholders/shared ownership, other rented housing managed by the Group on behalf of a third party, remote plant and garages (unless other parties are explicitly specified for statutory responsibility in any lease or management agreement or through legislation.)

## **4.0 Policy Detail**

This policy must always be read in conjunction with the Fire Safety Management Plan.

The Group will work with other Responsible Persons to ensure that all properties within its control (whether owned or managed) have a robust FRA in place.

FRA's will be renewed on a one, two or three year cycle depending upon the assessment of risk to the property with annual internal review. FRA's will be undertaken in accordance with the RRFSO.

The Group will ensure, so far as reasonably practicable, that any equipment provided in connection with assuring fire safety (including, but not limited to, fire alarms, smoke alarms, emergency lighting, fire precautions and fire-fighting equipment) is maintained in an effective working order and repaired, maintained and serviced to British standards and in accordance with the manufacturer's recommendations. The procedures are detailed in the Fire Safety Management Plan.

Fire risk assessments shall be undertaken in accordance with the Fire Safety Management Plan which will identify the relevant property types/tenure and frequency of inspections.

## **Fire Safety Commitments**

The Group will work within the following commitments;

- We will ensure compliance with the requirements of all applicable fire safety legislation including the Building Safety Act 2022 and the Regulatory Reform (Fire Safety) Order 2005 (RRFSO) and undertake FRA's of all relevant accommodation we own, manage or occupy in accordance with the frequencies set out in the Fire Safety Management Plan. Risks will be identified and appropriate measures will be introduced to minimise the risk to life and property from fire.
- Positive relationships will be maintained with local fire authorities and local authorities and we will nominate key persons within the Group to meet with the local fire authority when required.
- We will undertake a fire investigation following all fires and hold a register of all fires to understand trends and introduce improvements where fire risks can be reduced. A fire in a communal block will trigger a new FRA.
- Evacuation plans will be tested by carrying out a practiced evacuation twice annually in Karbon and 54North offices.
- We will provide alternative accommodation should customers be required to temporarily vacate their property following a fire.

- The Group will operate a Building and Customer Safety Working Group made up of colleagues across the business. This group will meet at least quarterly to discuss key operational and strategic topics.
- Fire / Building Safety will be a standing agenda item at the Corporate Health and Safety Working Group.
- All activities will be subject to compliance with the General Data Protection Regulations 2018.

## Property Classification

- All Group properties subject to the requirements of the RRFSO and/or where a FRA is required to be completed or not will be held within the housing management system (Karbon) or C365 (54North).

## Record Keeping

- All records relating to this service shall be kept for a minimum of 6 years.
- FRA's, fire safety related certificates and any associated records will be held in an electronic document management system and shall be made available to customer(s) where required.
- A bespoke compliance software solution (C365) will be utilised to retrieve and hold details of the rectification works identified in each FRA at property level. This will enable the creation of reports and workflows which will be used to manage the delivery of rectification works.
- When a property status is changed or is new to the asset database each property will be assessed to determine whether or not an FRA is required. This requirement will include;
  - New Property Acquisitions,
  - New Build,
  - Refurbishment/remodelling schemes,
  - Alterations to tenure, significant change of use or changes in the occupancy, e.g. supported housing blocks created within domestic properties.

## 5.0 Monitoring

**Karbon Homes Board** - Ultimate responsibility for compliance with the Regulations lies with the Karbon Homes Board who will act as the 'Duty Holder' and is accountable for ensuring the implementation of this policy. The Board has final approval of budget requirements to meet delivery.

The Board, through review of performance will receive assurance that the Regulations are being fully complied with; the safety of staff, colleagues, customers, and the wider general public who may be within the vicinity of Karbon Homes properties at any time are not or have not been compromised.

In respect of The Building Safety Act, 2022 the roles of both Accountable Person and Principal Accountable Person who will hold legally responsible for our higher-risk buildings as defined by the Act will be Karbon Homes as a corporate entity.

In respect of the Regulatory Reform (Fire Safety) Order 2005 the role of 'Responsible Person' will be Karbon Homes as a corporate entity.

**Karbon Homes Customer Committee** - Will receive quarterly reports and ensure regulatory landlord compliance. They will report to Karbon Homes Board 6 monthly and highlight any concerns that they may have in relation to the implementation of this policy and be responsible for ensuring that Karbon Homes will undertake any necessary remedial action to comply with the management plan/policy.

**54North Homes' Board** will receive an update to each meeting on the performance information noted below.

The reporting will include KPIs via the Compliance Scorecard which will include:

- % of Fire Risk Assessments completed
- % of Fire Risk Assessment reviews completed
- % of fire safety remedial works outstanding per building (High, Medium and Low)

Commentary will be provided for any properties overdue or out of date including proposed actions to bring them back into a compliant situation.

**Karbon Homes Chief Executive** - Will retain the overall responsibility for consistent monitoring of the management plan, in order to effectively comply with the regulatory standards.

**Karbon Homes Strategic Health, Safety and Welfare Group** - Provide the link between operational and strategic delivery, and Governance. This Group will have fire safety as a standard agenda item at meetings.

**The Building and Customer Safety Working Group** - Has oversight of the operational and strategic delivery of all fire safety related work across Karbon Homes with representation from teams across the organisation. The Group uses an action plan to track progress against topics raised. This Group also monitors outstanding FRA actions.

**Assistant Director of Building & Customer Safety (Property Delivery Lead)** - To lead on the revision of the associated policy and management plan documentation across Karbon Homes.

To ensure the operational delivery of fire safety and remedial work programme and will aim to ensure compliance with the Karbon Homes policy, management plan and compliance with the Regulations.

Ensuring fire risk assessment work programmes are in place and monitored in areas for which they are responsible.

**Building Safety Manager** - The Building Safety Manager will be specifically responsible for ensuring compliance with the Building Safety Act 2022 for all existing 'in-scope' buildings which are over 18 metres or 7-storeys in height.

Take lead in managing day-to-day building safety issues in our higher-risk buildings.

Take relevant role in ensuring compliance with the Building Safety Act 2022 for any new 'in-scope' buildings under construction which will be over 18 metres or 7-storeys in height.

Take lead on ensuring that all existing buildings which are over 18 metres or 7-storeys in height are compliant with the Fire Safety (England) Regulations 2022.

Take proactive lead within Karbon to understand the demands and impact of all emerging and new legislation, guidance and best practice relating to building safety.

**Head of Strategic Asset Management** - Is responsible for ensuring fire risk assessment programmes are in place, FRAs are in date and ensuring property services are aware of all active and passive fire safety related systems that are to be managed, maintained, serviced, replaced and repaired.

The roles and responsibilities for operational roles are detailed within the Management Plan.

This service area will be included within the annual Internal Audit programme which will review in particular adherence to process, data and record keeping.

Fire safety is a high-risk area and this policy will be reviewed on an annual basis.

## **6.0 Equality and Diversity**

This policy is implemented in line with the Group's Equality and Diversity Policy and associated legislation. Consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations.

This policy and associated documents are available in different languages and alternative formats where necessary.

## **7.0 Data Protection and Privacy**

We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation. This is clearly set out in the Data Protection Policy for the Karbon Homes Group which in association with the Data Protection Procedures must be followed throughout the operation of this policy.

## **8.0 Approach to Vulnerability Policy**

This policy is applied in line with Our Approach to Vulnerability Policy. Everyone matters.



We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services. We will offer support, reasonable adjustments, and adaptations to remove barriers. We will discuss with our customers what is reasonable and appropriate.

In delivering this service we may need to escalate a particular case – if we do then customer vulnerabilities will be considered as part of the decision-making process.

We will support people with vulnerabilities to deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people with vulnerabilities in the delivery of our services but also to ensure we meet our statutory and regulatory requirements as a social landlord.

Details are provided in the appropriate areas in this policy.

All our customer policies are available on our website.