

FIRE SAFETY POLICY

Fire Safety Policy

Responsible Officer	Group Assistant Director of Building & Customer Safety
This policy is applicable to	Karbon Group
Policy version	8
Date this version implemented	30 September 2026
Date of next review	30 September 2027

Policy Statement

Karbon Homes Group is committed to ensuring the safety of our customers, colleagues, contractors, visitors, and all others who may be affected by our activities. We recognise our responsibilities as a landlord and employer to manage fire safety effectively and to comply with all relevant legislative, regulatory, and best practice requirements.

We will maintain a proactive approach to identifying, assessing, and managing fire risks across our homes, communal areas, workplaces, and other premises within our control. Through effective governance, robust fire risk assessment programmes, regular inspection and maintenance of fire safety systems, and continuous monitoring of performance, we will seek to minimise the risk of fire and protect life, property, and business continuity.

We are committed to meeting the requirements of the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety Act 2021, the Fire Safety (England) Regulations 2022, the Building Safety Act 2022, and all other applicable legislation and standards. We will work collaboratively with residents, employees, contractors, regulators, and emergency services to promote a positive fire safety culture and support continuous improvement in fire safety management across the Group.

Through this policy and the supporting Fire Safety Management Plan, Karbon Homes Group demonstrates its commitment to maintaining compliance, providing assurance to stakeholders, and delivering safe homes and workplaces for the communities we serve.

Risk the policy is designed to control

Principle Risk: 1. Health and Safety

Description: Risk of failure by the Group to take all reasonable health and safety measures leading to serious injury or loss of life.

Key performance measures

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Commentary will be provided for any properties overdue or out of date including proposed actions and estimated completion date to bring them back into a compliant situation.

Abbreviations

FRA – Fire Risk Assessment

Policy Detail

1.0 Purpose of policy

- 1.1 The purpose of this policy is to set out Karbon Homes and its subsidiary companies (hereby known as the Group) commitment to managing fire safety risks, protecting customers, colleagues, contractors and visitors, and ensuring compliance with all relevant fire safety legislation, regulations and best practice standards. The policy establishes the principles, responsibilities and arrangements for the effective management of fire safety across all properties owned, managed or occupied by the Group.

2.0 Objectives of the Policy

- 2.1 Karbon 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 Group 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 the 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 Regulatory Reform Fire Safety Order 2005 (RRFSO), 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 Group SharePoint site for internal stakeholders and will be available to view by external stakeholders via the Karbon and 54North websites.

3.0 Policy scope

- 3.1 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.)
- 3.2 Where properties are managed on behalf of external property owner's the statutory responsibility will be detailed in the lease or management agreement.
- 3.2 This policy must always be read in conjunction with the Fire Safety Management Plan.
- 3.2 The Group will work with other Responsible Persons to ensure that all properties within its control (whether owned or managed) have a robust Fire Risk Assessment (FRA) in place.
- 3.3 FRA's will be renewed on a one-, two-or three-year cycle depending upon the assessment of risk to the property with internal reviews carried in accordance with Fire Safety Management Plan. FRA's will be undertaken in accordance with the RRFSo.
- 3.4 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 where it is the Group's responsibility to do so. The procedures are detailed in the Fire Safety Management Plan.
- 3.5 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

- 3.6 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 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.
- 3.7 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.
- 3.8 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.
- 3.9 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
- 3.10 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.

4.0 Customer Vulnerabilities

- 4.1 This policy is applied in line with our Customers in Vulnerable Circumstances Policy. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services.
- 4.2 We will support people in vulnerable circumstances to help us 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 in vulnerable circumstances and to ensure we meet our statutory and regulatory requirements as a social landlord.
- 4.3 Policies and key information are made available on our websites.

5.0 Monitoring

- 5.1 **Group Boards** - Ultimate responsibility for compliance with the Regulations lies with the Karbon Group Board who will act as the 'Duty Holder' and are 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 Group properties at any time are not or have not been compromised.

- 5.2 **Group Customer Committee** - Will receive quarterly reports and ensure regulatory landlord compliance. They will report to Karbon Homes Board quarterly 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.
- 5.3 **54North Homes' Board** will receive the minutes of each Group Customer Committee meeting and an update from the 54N Board member representative to the Group Customer Committee.
- 5.4 **The Group Chief Executive** - Will retain the overall responsibility for consistent monitoring of the management plan, in order to effectively comply with the regulatory standards.
- 5.5 **Karbon Homes' Corporate 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.
- 5.6 **The Building and Customer Safety Working Group** - Has oversight of the operational and strategic delivery of all fire safety related work across the Group 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.

- 5.7 **Group Assistant Director of Building & Customer Safety (Property Delivery Lead)** - To lead on the revision of the associated policy and management plan documentation across the Group.
- 5.8 To ensure the operational delivery of fire safety and remedial work programme and will aim to ensure compliance with the Group policy, management plan and compliance with the Regulations.
- 5.9 Ensuring fire risk assessment work programmes are in place and monitored in areas for which they are responsible.
- 5.10 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 Group as a corporate entity.
- 5.11 In respect of the Regulatory Reform (Fire Safety) Order 2005 the role of 'Responsible Person' will be Karbon Homes Group as a corporate entity.
- 5.12 **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.
- 5.13 Take lead in managing day-to-day building safety issues in our higher-risk buildings.
- 5.14 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.
- 5.15 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.
- 5.16 Take proactive lead within the Group to understand the demands and impact of all emerging and new legislation, guidance and best practice relating to building safety.
- 5.17 **Head of 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.
- 5.18 The roles and responsibilities for operational roles are detailed within the Management Plan.
- 5.19 This service area will be included within the annual Internal Audit programme which will review in particular adherence to process, data and record keeping.

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

6.0 Equality and Diversity

- 6.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 6.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 6.3 If you would like this or any other policies in a different language or format, please contact inclusion@karbonhomes.co.uk.

7.0 Data Protection and Privacy

- 7.1 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, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.

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Approved by	KMT
Date approved	March 2018
Frequency of review	Annually
Last reviewed by	Group Assistant Director Building & Customer Safety
Date of last review	30 September 2026
Key related documents (policy, procedure, customer literature)	Fire Safety Management Plan Fire Safety Plan EQIA Health & Safety Policy Repairs and Maintenance Policy Gas Safety Policy Hoarding Policy Property Condition Policy Abandoned Properties Policy Damp & Mould Policy Fire Safety Policy
Sources of best practice or guidance used in developing this policy	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 (RRFSO) • 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 (18th 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.
Author of this policy version	Group AD Building & Customer Safety

Document change history		
Version	Date	Changed sections
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)
8	Sept 2026	De-minimus changes Policy updated to Group format for STAIRS

Equality Impact Assessment

Include below the dates/outcomes from most recent EIA

Equality Impact Assessment (EQIA)	EQIA Date:18 August 2021 and reviewed Jan 2024 Initial Assessment
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Consultation

Consultation Group	Needs to be consulted when ...	Date of Consultation
Colleague Forum	Where a new policy or major policy change affects colleagues	
Unions	Where a new policy or major policy change affects colleagues	
Customers (including customers of subsidiaries)	Where a new policy or major policy change affects customers	
54North colleagues	To agree any wording needed in the policy to reflect differences in 54North structure and processes	
Inclusion and Belonging	An updated EQIA must be completed every time there is a new version of the policy	
Data Protection	The Data Protection team must be consulted every time there is a new version of the policy as an updated DPIA may be required.	
Legal	For all new policies or major policy changes to consider if there are any legal implications and check if a legal review or advice is required	
Corporate Health and Safety Group	For health and safety policies	
KLT	Approves minor changes. (Circulate to KLT major policy changes/ new policies for awareness and any feedback)	
Exec Team	Approves major changes to non-key policies. (Circulate to Exec major policy changes/ new policies for awareness and any feedback)	
Board Committees	Scrutinise new key policies or major changes to key policies in their areas. Approve specific key policies outlined in Group Delegatory Framework.	

Subsidiary boards	Review and agree adoption of any new policies/major key policy changes going to Group Board	
Group Board	Approve new key policies and major changes to key policies	