



## Fire Safety Management Strategy 2015-2018

### Introduction

This strategy is a plan and method of approach to how Medway Council Housing Services (the council) will both continue to meet our statutory obligations under the Regulatory Reform (Fire Safety) Order 2005 (FRO) which is for communal areas and Housing Act (2004) for internal areas within flats and how we plan to address areas that are identified from Fire Risk Assessments (FRA) and other guidelines.

#### *The Housing Act 2004*

The Housing Act 2004 makes requirements regarding the condition of a broad spectrum of homes, including individual flats within a block and the common parts of that block. Assessment of the conditions within flats or the common areas is carried out by means of the Housing Health and Safety Rating System ('HHSRS') specified in the Act. This is to provide a means of identifying hazards and whether the consequent risk to people is acceptable. A total of 29 hazards, including the hazard of fire (hazard 24), must be considered in carrying out the HHSRS. To comply with the Housing Act, an assessment is carried out on each individual flat, rather than the entire block as a single building in order to identify any Category 1 (greater) or Category 2 (lesser) hazards. Further information of how we comply with this legislation is detailed under 'internal'.

#### *The Regulatory Reform (Fire Safety) Order 2005*

The principal fire safety legislation in England and Wales is the Regulatory Reform (Fire Safety) Order 2005, which revoked or repealed all, or parts of, over 100 earlier items of legislation and thus 'reformed' the earlier, very fragmented legal framework for fire safety.

The Regulatory Reform (Fire Safety) Order 2005 requires a 'responsible person' to be identified. The Responsible Person is defined as the employer, if the workplace is to any extent under his control. The main role of this person is to ensure that a 'suitable and sufficient' fire risk assessment is carried out. The common law principle of 'everyman's home being his castle' applies to council properties as to all other dwellings. Thus potential fire hazards within the confine of the individual home and the combustible materials there are not subject to fire safety legislation.

## Agenda Item 5: Fire Safety Management Strategy – Appendix A

Although the Regulatory Reform Order does not apply within individual homes (despite our good practice of undertaking FRAs when a property becomes void) it does apply to the common areas of blocks of flats and homes for independent living schemes which are addressed further under 'External' and 'Homes for Independent Living Schemes'.

The purpose of this strategy is to ensure that we have reasonably covered all risks identified from FRA's.

It must be recognised that it will not always be realistic nor risk proportionate to impose solutions from the current guidance retrospectively to existing buildings. For example where it occurs for the requirement of elements to be brought up to standard, following consultation, instead material improvements will be made to existing elements.

Therefore this strategy has been produced to balance the need to prioritise the most critical risks within a budget that the HRA business plan allows. The council has identified and prioritised works for the highest rising blocks with a high concentration of flats.

Current guidance has been used to set aspirational benchmarks against which to assess the adequacy of fire protection within existing blocks of flats, with an action plan on how we plan to achieve compliance with the council's benchmark standard for flats and common parts.

### **Objectives**

The objectives of this strategy are to:

- Ensure suitable resources are in place to prevent the cause and spread of fire and if/when they occur to minimise their impact within communal areas and individual properties
- Place primary importance on the life, safety and welfare of our residents and staff
- Following a FRA to have in place the effective planning, organisation, control, monitoring and review of the preventative and protective measures
- Protect the councils assets from the spread of fire and interruption of business
- Fulfill our legislative duties as landlord and 'responsible person'

### **Context**

As of April 2015 the council manages 3004 properties which include 286 Homes for Independent Living units and 200 leaseholder properties. Most of the buildings in the councils portfolio would be regarded as being 'low rise', that is to say of no more than three floors in height.

## Agenda Item 5: Fire Safety Management Strategy – Appendix A

Prior to February 2015 all of the council's stock was built to standards that pre-date current Building Regulations.

The profile of stock by dwelling type (built form) is:

<b>Property Type</b>	<b>Total</b>
Bungalow	227
Flat/Bedsit	1204
House	1287
Hfil	286
<b>Grand Total</b>	<b>3004</b>

The bedroom composition of the stock is:

<b>No Bedrooms</b>	<b>Total</b>
1 Bed	1050
2 Bed	1093
3 Bed	832
4 Bed	28
5 Bed	1
<b>Grand Total</b>	<b>3004</b>

The age profile of the stock is:

<b>Age Description</b>	<b>Total</b>
Pre 1919	37
1919 to 1944	433
1945 to 1964	1314
1965 to 1974	368
1975 to present	852
<b>Grand Total</b>	<b>3004</b>

In 2013 we consulted South Thames Gateway (STG), providers of the Councils joint venture Building Control Partnership to undertake Fire Risk Assessments (FRA) amongst our stock.

Since these FRA's we have progressed with a number of works and initiatives. Where applicable and prioritised, properties have benefitted from the following initiatives:

- √ The council maintains a record of 100% annual gas servicing and offers this service to leaseholders at a rechargeable cost.
- √ The use of supplementary heating (portable heaters) and electric blankets by residents is minimised by the provision of effective central heating systems in all of our properties.
- √ Replaced existing Automatic opening vents to communal stairwells

## Agenda Item 5: Fire Safety Management Strategy – Appendix A

- √ Installed dry risers to communal blocks where necessary
- √ Installed additional emergency lighting to communal areas
- √ Secured bin areas and improved waste management
- √ Increased fire signage to communal areas
- √ Replaced or upgraded UPVC windows where appropriate on escape routes
- √ Increased compartmentation by protecting external airbricks
- √ Replaced communal area meter boxes with fire protected and insulated types
- √ Increased fire protection of bin chutes and fitted dampers to chutes
- √ Replaced storage doors with minimum FD30 doors
- √ Upgraded fire seals to doors
- √ Replaced infill panels to common areas with fireproofed alternative
- √ Replaced riser shaft doors
- √ A programme has been in place to ensure that all dwellings have a working smoke detector in the circulation areas, hardwired into the electrical supply with a battery back-up by 2015. With further improvements now underway to interlink detectors.
- √ Currently all properties have an electrical periodic certificate that is less than 5 years old. A programme of periodic testing is still in place and we have commenced a re-wire programme.
- √ Front doors to flats where there is an impact on means of escape are in the process of being replaced with those that meet current standards, in those properties where the risk is deemed to be highest
- √ Introduced a 'zero tolerance' [policy](#) and procedure for the management of fire risks in common areas
- √ The Council has designed, tested and constructed discreet fire resistant riser covers that can be retro fitted to vertical risers, bin chute covers and electric metre cupboards
- √ Financed a budget of approx. £5.3 million specifically for works identified from FRAs from 2013/18

## Agenda Item 5: Fire Safety Management Strategy – Appendix A

- √ Embarked on an estate inspection schedule throughout the year where we inspect communal areas of estates where there are 10 or more properties
- √ Revised our Void Standard to include consideration for means of escape, fire protection in the kitchen to include a kitchen fire door
- √ All visiting staff have undertaken HHSRS training that includes an awareness of the hazard of fire
- √ Continued a programme of stock condition surveys – aiming to undertake one full survey in each property every five years
- √ STG have been commissioned by the council to undertake and review FRA's that evaluate the risk of fire and safety to people within common parts; and recommended a program of works to mitigate risks identified

### **Aims**

The strategy is broken down into three separate aspirational standards/benchmarks.

- Common Areas
- HFIL Schemes
- Internals

Benchmarks should be used to assess the standard of fire protection in a block of flats. They are not prescriptive, and the aim should be to use them to determine a reasonable approach to improving fire safety where the fire protection measures have been found to be inadequate, as detailed in the action plan that follows.

### **Common Areas**

Our 'common area' standard has incorporated works identified from FRA's and meets the general principles of these that include:

- Measures to reduce the risk of fire and the risk of spread of fire
- Means of escape from fire
- Measures to ensure that escape routes can be safely and effectively used
- An emergency plan, including procedures for residents in the event of fire
- Measures to mitigate the effects of fire

### *External facades*

External facades should not provide potential for extensive fire spread. When assessing blocks of flats, particular attention should be given to any rainscreen or other external cladding system that has been applied and to facades that have been replaced. The use of combustible cladding materials and extensive cavities can present a risk, particularly in high-rise blocks. Restrictions are normally applied to the nature of such materials and in particular their surface spread of flame characteristics. Cavity barriers are also required in some circumstances.

### *Smoke control*

Measures should be taken to provide and ensure that escape routes remain free from smoke such as vents or windows in internal communal areas.

### *Electrical installations*

Fixed electrical installations will be subject to periodic testing and test every five years in the case of the common parts.

### *Surface finishes*

The surface finishes of walls and ceilings in escape routes can affect the rate of fire spread and contribute to the development of a fire and their suitability will be reviewed.

### *Corridors and stairwells*

Corridors leading to and including stairways need to be enclosed in fire resisting construction with fire resisting, self closing doors.

Any external stairways need to be suitably separated from the building by fire resisting construction and doors.

Any areas, rooms or risers opening onto communal escape corridors and stairways need to be fitted with fire resisting doors that are self closing or kept locked shut.

Additional protection is needed where there is only a single stairway for normal access and for egress in an emergency, normally comprising lobby approach and permanent openings or automatically opening vents for clearing smoke.

We will enforce a zero tolerance for items stored in communal areas.

### *Heating and ventilation*

Heating and ventilation systems should be maintained regularly; particularly where they serve the common parts or are common to more than one flat.

### *Emergency lighting*

There should be adequate illumination of escape routes to be able to see the way out in an emergency. With the possible exception of small two storey blocks of flats, with good borrowed light, for example, street lighting, blocks of flats should be provided with emergency escape lighting.

Adequate artificial lighting and, where necessary, emergency escape lighting should be provided in common escape routes, such as corridors, lobbies and stairways, to enable residents and visitors to make their way safely out of the building (not necessary for small blocks of no more than two storeys). The lighting should be tested every month for its functionality and undertake a full discharge test once a year.

Any lighting protection systems should be subject to regular maintenance.

### *Signage*

Fire exit signs will be displayed to assist in the use of an escape route with which people are unfamiliar. We will not displace signs in a single stairway building, as it is not usually considered necessary to signpost the route that residents normally use to gain access to their flats.

No smoking signs are a statutory obligation and will be put in place and replaced where identified as missing.

### *Refuse/chutes*

Refuse bins and chutes should be enclosed in fire resisting construction and have permanent ventilation direct to open air. An automatic fire-resisting shutter should be fitted at the base of the refuse chute to restrict the spread of fire and smoke from a fire in the bin room.

The provision of refuse chutes in low-rise buildings may also allow a rapid vertical spread of fire. Bin rooms will be fitted with smoke detection and dampeners to quickly suppress a fire within the refuse present. Smoke detectors will be fitted to the head of the refuse chute with a fire suppression device to reduce the risk of fire spread. In addition, the refuse chute hoppers will be fire resisting and fit correctly with a good seal in the chute aperture.

### *Compartmentation*

Obvious openings between floors, and in walls between flats and other ancillary accommodation (e.g. plant rooms) and the common parts, should be considered. Particular attention should be paid to service ducts or risers and any common ventilation systems.

### *Security*

- Access control linked to entry phones in flats
- Effective lighting
- Areas free from combustible material

### *Communal Facilities*

Communal facilities include common rooms that may be used by all or a group of tenants. Examples include lounges, kitchen facilities and laundries. Where such facilities are not required they will be removed in consultation with the tenants / leaseholders of the building.

Communal facilities will be inspected with a frequency proportionate with risks identified in the Fire Risk Assessment.

### *Front and hallway doors*

Under current benchmark design guidance, doors forming part of the protected entrance halls and stairways within flats are normally specified as 20 minute fire resisting doors. Similarly, doors forming part of the protected escape route from the flat entrance door to the final exit, including the flat entrance door itself, are normally specified as 30 minute fire resisting doors with smoke seals

Self closing doors – fire resisting flat entrance doors, and doors provided to protect common corridors, lobbies and stairways, should be fitted with suitable positive action self closing devices. The self closing device should be capable of closing the door in its frame from any angle and overcoming the resistance of any latch. The fitting of suitable self closing devices – whether to replace rising butt hinges or because the doors are not fitted with self closing devices – must be undertaken in the short term as a matter of priority.

### *Dry risers*

Where identified via the fire risk assessment we will fit dry risers and maintain buildings that exceed the trigger distance.

## **HfIL Schemes**

### *Mobility Scooters*

The use of mobility scooters is increasing and with it a requirement for space to store them. Normally, it would be expected that a tenant would store their mobility scooter within their property. Some existing tenants may be permitted to store a maximum of one mobility scooter within common parts under the following conditions:

1. It does not obstruct the main thoroughfare,
2. All flammable articles and substances (including oxygen) are removed,
3. Charging is not undertaken whilst in the communal area unless specific provision is supplied by the Council.

Where it has been identified as feasible some schemes have dedicated external storage through recent works.



## Agenda Item 5: Fire Safety Management Strategy – Appendix A

### *Communal hallway doors*

Where upgrades are being undertaken, consideration for individual needs is given to disabled residents who find it difficult to negotiate self-closing fire doors during everyday use of the building. The fitting of hold open devices, particularly on doors within the horizontal circulation spaces and in communal areas, should be considered.

### *Communal facilities*

Communal facilities in schemes such as kitchens, lounges, laundry rooms and any plant or service room – should, where necessary, be separated from common escape routes including corridors and stairways. They should have 30 minute fire resisting partitions and fire resisting doors. High hazard rooms should be separated from stairways by a protected lobby.

To reduce accidents while cooking in communal kitchens, the council ensures that all kitchens meet with appropriate standards and that there is no Category 1 hazards as set out in the Housing Health and Safety Rating System.

### *Assessments*

Limitations of the residents should be taken into account when undertaking assessments in sheltered schemes, and any particular concerns resulting from the vulnerability of any residents should be addressed.

### *Means of escape*

Adequate means of escape should be provided from communal areas, such as a lounge, which, ideally, should have one exit leading direct to open air.

### *Furnishings*

Any furniture or soft furnishings provided in the common parts should be subject to a risk assessment and marked tagged with, "Carelessness causes fire"

### *Fire safety systems and equipment*

Putting in place programmes for routine inspections, testing, servicing and maintenance of the fire safety systems and equipment.

Fire alarm systems in place. Emergency plans will be clearly defined. A residents needs for support are usually assessed when they take up occupation, and this should include their ability to escape unaided in a fire, should then be reviewed as a matter of course as a persons circumstances change.

Will store a premises emergency information box that contains information on the layout of the building and details of the residents for the fire and rescue service.

## **Internal**

This aspirational standard is based on reviewing stock condition surveys which include FRA works, when a property is either void or having planned maintenance works undertaken.

### *Kitchens*

As the kitchen is a significant source of ignition, the Council will work towards installing 30-minute fire resisting doors to kitchens in low-rise buildings. Whilst this is above the standard required of existing doors, whenever a kitchen door requires repair works, the door, frame and furniture will be enhanced to ensure 30-minute resistance.

All kitchens in General Dwellings, where practicable, are to be enclosed with suitable walls and door. Any proposed alteration must be approved by the Council in writing. Any application that reduces the fire integrity of means of escape or critical fire resisting barriers will be denied. If unauthorised works are carried out, the tenant will be expected to return the structure to its original state or will be re-charged to make it so.

In order to reduce the potential for fire-spread between flats would be to first fully assess the line of ducts and their location before undertaking remedial works.

Works would be designed to prevent the spread of flames and hot gases. This is a reasonable approach for bathrooms, but is less satisfactory for kitchens, where there is the potential for a serious fire in the room in which the vent is located. In these cases, the ideal solution would be to rearrange the ventilation to discharge directly to outside and not via a common duct. Depending on access, should be tested once every two years for those operated by fusible links. For those that are spring operated, this should take place every year.

Common kitchen or bathroom extraction ducts will be suitably protected to ensure the spread of fire via these ducts is minimised. This may take the form of fire resisting baffles within the duct or intumescent grilles fitted to extraction fans.

### *Smoke Alarms*

Smoke alarms will be fitted and hardwired in a suitable place in every property. This will normally be the hallway. Where additional risks are identified, additional linked smoke alarms should be fitted to mitigate this risk.

Smoke alarms in flats – flats with more than one level and those with more than one hallway or circulation space will always require more than one smoke alarm.

Each flat should have a minimum of a Grade D category LD3 system with smoke alarms in the circulation space or entrance hall.

## Agenda Item 5: Fire Safety Management Strategy – Appendix A

### *Gas*

Gas appliances will be serviced and inspected annually. A landlord safety certificate will be obtained for every property. See also Gas Safety Policy and Tenancy Agreement.

### *Electricity*

Void properties will not be 'let' unless an electrical safety certificate is provided. This will ensure the distribution box and circuits are all up to the minimum standard required at the time of rental. In addition, all redundant wiring will be removed wherever reasonably possible.

All properties will have an electrical test undertaken every five years.

### *Lofts*

Where properties form part of a line of joined properties, such as a terrace, the lofts are to be compartmented. Where compartmentation is not present, this will be introduced within a timescale based on risk.

Where compartmentation is required in a loft adjoining a leaseholder or owner-occupier, the Council will progress the required works in negotiation with the leaseholder and/or owner-occupier.

### *Fire Doors*

Individual flat front doors provide a key line of defense in fire safety and tenants and leaseholders are not permitted to change the front door to their flat without written permission from the Council. In order to ensure that this door remains fire resisting, any permission will insist that replacement of front doors, frames and door furniture are to be a minimum of 30 minutes fire resisting with intumescent strips and cold smoke seals.

Tenants or leaseholders who replace their front door with a door below this standard will have to upgrade to the FD30S standard as a minimum or will be recharged for works carried out to achieve this standard.

### *Compartmentation*

Ensure that fire protection in an existing block maintains or improves the standard of compartmentation in order to sustain the 'stay put' policy by protecting escape routes.

The minimal levels of fire resistance for compartment walls and floors for existing blocks of flats should be (for three storey flats) 30 minutes fire resistance – typically with timber floors with lath and plaster ceilings. Where this cannot be achieved, we should improve the means of escape, provide automatic fire detection and alarm systems.

Walls between flats and common parts need to be compartment walls and, as such, will provide the necessary fire resistance.

## Agenda Item 5: Fire Safety Management Strategy – Appendix A

Fire resisting enclosure of flats is maintained at all openings – e.g. flat entrance doors, internal windows into the access corridor, opening in walls and floors, vents and share extract ducts and doorways or hatches

### *Means of escape*

A fire anywhere within a flat should not prevent the occupants of that flat from escaping unaided to an exit from the flat.

Flat entrance doors should, where possible, be fitted with a suitable lock that can only be locked on the outside by use of a key operated deadlock, but than can still be opened from the inside by a handle or level without the use of a key.

### *Significant changes*

Tenants and leaseholders have a duty to request written permission from the Council before commencing any significant changes to their flat. This will be refused if the fire integrity of the property is likely to be adversely affected. Tenants and leaseholders are required to re-instate any alterations that have not been approved in writing by the Council. If they fail to do this within a reasonable time, the Council will carry out the works and charge the tenant or leaseholder for the work.

Where there is a significant change in use of the building or part of the building, Kent Fire Service are to be notified by the Head of Housing Management and the risk assessment is to be revised without undue delay.

Where a flat is significantly redesigned by the Council, fire modeling should be carried out by a competent person to identify any additional fire risk introduced as part of the redesign.

## **General**

### *Leaseholders*

We will have the responsibility for maintenance of the flat entrance doors. The council will undertake a section 20-consultation process to undertake the works on the leaseholders behalf and enforcing works where access is prevented.

Under these circumstances, the residents might be regarded as other persons having control of premises (as defined by Article 5(3) of the FSO, with a duty to ensure the adequacy of the flat entrance doors. However, use of powers under the Housing Act may be more appropriate and better defined route to achieving compliance with the FSO. In new leases, ideally the freeholder should retain control over all flat entrance doors.

### *‘Stay Put’*

Generally all accommodation is sufficiently compartmentised that a “stay put” policy is the norm. Residents would only evacuate in the event of an incident, if asked to by the emergency services or they are directly threatened.

## Agenda Item 5: Fire Safety Management Strategy – Appendix A

### *Communication*

We communicate vital messages including; how to prevent fires in the home and common parts; keep block secure; not store specific items; action to take in event of fire; 'stay put' policy; how to safeguard communal routes; don't change flat; test smoke alarm; report essential repairs, explain relevant parts of tenancy agreement including allowing access for gas safety checks.

### *Fire Fighting Equipment*

Fire fighting equipment will not generally be installed for the use by residents however fire blankets will be provided for flatted developments.

### *Records*

A fire record will be held for each HFIL and for others as considered necessary under the Regulatory Reform (Fire Safety) Order 2005. A fire record will be held for each low-rise building. This will detail:

- Risk Assessment
- Inspections
- Alarm maintenance and servicing (where appropriate)
- Emergency lighting tests/automatic opening vent testing
- Visits from a fire officer

### *Garages*

License agreement restricts the storage of items to vehicles only.

### **Action Plan**

An action plan has been agreed with staff to carry forward the noted actions. Target dates are currently in draft and will be confirmed by end of September 2015.