



Group Policy:

Health and Safety Arrangements

Fire Safety Policy

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| Policy Owner | Executive Director Customer Services |
| Policy Manager | Head of Assets |
| Approval Body | Social Landlord Operations Committee |
| Approval Date | 26 th January 2021 |

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This policy is available, on request, in different languages and in other formats such as large print, audio format and braille as required.

1. Scope

- 1.1 The Fire Safety Policy details how River Clyde Homes Group (RCH Group) meets the requirements of the Fire (Scotland) Act 2005 and the Fire Safety (Scotland) Regulations 2006. In addition to this, the Policy provides assurance to RCH Group that measures are in place to identify, manage and/or mitigate risks associated with fire. As part of the policy, RCH Group will ensure compliance with fire safety legislation and formally report at Executive Leadership Team (ELT) and board level, including the details of any non-compliance and planned corrective actions.
- 1.2 The key objectives of this policy are to establish:
- Duties of staff and landlord in managing fire safety
 - Fire safety management procedures
 - Competent persons
 - Management of fire risk assessments (FRA)
 - The management and provision of fire safety equipment
 - The promotion of fire safety to tenants, employees, volunteers and contractors
 - Information, instruction, training and supervision.
 - Effective record keeping in managing fire safety
 - How RCH Group manage non-compliance Fire Safety Risk Management issues.
 - The development and use of Personal Emergency Evacuation Plan (PEEP).
 - The development and use of Person-Centred Fire Risk Assessment (PCFRA).
 - Accountability and responsibility.
- 1.3 The policy is relevant to all RCH Group employees, tenants, volunteers and contractors and other persons or other stakeholders, who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon RCH Group to maintain a safe environment for tenants and employees within the home of each tenant and within all communal areas of buildings (those parts of a block of flats used by occupants of more than one flat for access and egress).

a) Introduction

- 2.1 RCH Group acknowledges and accepts its responsibilities under the Fire (Safety) Scotland Act 2005 and The Fire (Scotland) Regulations 2006 and other relevant legislation and guidance relating to fire safety. It is the objective of RCH Group to ensure that the promotion of fire safety is a mutual objective for employees at all levels of the organisation and that they understand their duty, within each role, to appropriately contribute to effective proactive management of fire safety.
- 2.2 RCH Group will follow a systematic approach to the management of fire safety to ensure it meets the requirements set out in the Fire (Scotland) Act 2005, The Fire (Scotland) Regulations 2006, Practical Fire Safety Guidance for Existing High Rise

Domestic Buildings (Scottish Government December 2019), Scottish Government Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises (2020), The Housing (Scotland) Act and from February 2022 an amendment to the statutory tolerable standards under Section 86 of The Housing (Scotland) Act 1987 which requires all dwellings regardless of tenure, must have satisfactory provision for detecting fires and for giving warning in the event of fire or suspected fire. This is to ensure the safety of tenants, employees, volunteers and members of the public.

b) Policy Statement Principles

- 3.1 The Executive Leadership Team (ELT) will ensure, as far as reasonably practicable, the following principles are achieved:
- a) RCH Group holds accurate records against common areas of each property it owns rents or manages, setting out the requirements for having a fire risk assessment.
 - b) Accurate records are also held against each property it owns rents or manages, setting out the requirements for servicing, maintenance and repair of fire prevention, detection and firefighting equipment. This includes fire alarm systems, emergency lighting, smoke/heat detectors, dry and wet risers, fire extinguishers, fire blankets, suppression systems including sprinkler systems, mist activation systems, smoke extraction systems and any other equipment relating to fire safety.
 - c) RCH Group will ensure programs are in place to deliver servicing and maintenance in accordance with all relevant British Standards and manufacturer's recommendations for all fire detection, prevention and firefighting systems and equipment within buildings owned or managed.
 - d) RCH Group will periodically undertake an asset data review to ensure that fire safety data held against our property assets is accurate and up to date.
 - e) RCH Group will ensure all fire loss incidents and near misses are recorded, reported and investigated; including information from the Out of Hours Reports (OOH) relating to tenants, Fire Alarm activations and any damage sustained to properties/buildings to the Health and Safety Team E Mail Mailbox.
 - f) RCH Group will ensure that each property that includes a communal facility will have a fire risk assessment in place and has been undertaken by a competent fire risk assessor(s).
 - g) Fire risk assessments will be reviewed no later than the review date set by the fire risk assessment and that this review will be undertaken by a competent person(s).
 - h) RCH Group will ensure that the fire risk assessment of a building is reviewed following a fire, near miss, change in building use, changes to working practices that may affect fire safety, following refurbishment works to a building, or as and when required following an independent fire safety audit, and that this review is

undertaken by a competent person(s).

- i) RCH Group will ensure that robust processes are in place to address all significant findings identified by fire risk assessments, where practicable will be within a programme of works to be completed within a reasonable time scale. These timescales will be detailed within the fire risk assessments action plan held for each property.
- j) RCH Group will implement a programme of regular property inspections to all premises with a fire risk assessment in place to audit that all required management actions are taking place. These inspections will be undertaken at regular intervals and records will be kept against each premise. This will include the integrity of fire doors, ensuring common areas, including means of escape, are maintained free from obstructions. RCH Group will further ensure that all flats accessed via a common area have a working smoke alarm, heat detector and relevant door closer.
- k) RCH Group will test smoke alarms and carbon monoxide detectors in domestic dwellings that they have landlord responsibility for as part of the annual gas safety check, or the 5-yearly electrical inspection and testing programme. Defective alarms and detectors will be replaced where necessary. RCH Group will also impress upon tenants, the need to ensure quick and effective reporting mechanisms for defective protection equipment, whereby replacements can be actioned and installed at the earliest opportunity.
- l) RCH Group will ensure that residents with a form of disability, have mobility issues or physical and mental wellbeing needs within buildings requiring a fire risk assessment, will have either a Personal Emergency Evacuation Plan (PEEP) or a Person-Centred Fire Risk Assessment (PCFSRA) and that this PEEP or PCFSRA will be reviewed annually by a competent person(s). This will be kept in the Fire Safety Log held securely on site and made available to the Scottish Fire and Rescue Service (SFRS) in the event of an evacuation.
- m) RCH Group have robust processes and controls in place to ensure that there are suitable fire safety measures in place when letting properties to prospective tenants, including, that RCH group will ensure all properties meet RCH void standard before being let to all tenants.
- n) RCH Group will ensure that only suitably competent fire risk assessors and fire safety engineers appropriately certified under a UKAS accredited certification scheme undertake fire safety assessments or works following a robust and suitable tendering process.
- o) RCH Group have a robust process in place to gain access should any tenant or leaseholder refuse access to carry out essential fire safety related inspection and remedial works or where tenant vulnerability issues are known or identified to ensure compliance with this policy.

- p) RCH Group is committed to working with the Scottish Fire & Rescue Service (SFRS) and the Health and Social Care Partnership (HSCP) to create safer places to live and work. Partnership working may include sharing of information, review of risk assessments and PCFSRA.
- q) The Fire Safety Steering Group (FSSG) is in place to monitor our robust approach to fire safety including ensuring that the Fire Safety Risk Management Plan (FSRMP) is monitored, reviewed and actions are implemented by the respective leads. The FSSG will include Managers from Assets, Head of Customer Experience, and Health & Safety.
- r) RCH Group consider that effective communication is essential in delivering their fire safety policy and will therefore ensure that information relating to fire safety, fire prevention and fire protection will be made available to residents and building users via leaflets and information on our website.

c) **Roles and Responsibilities**

- 4.1 In order to comply with the Fire (Scotland) Act 2005 and Fire Safety (Scotland) Regulations 2006, and other relevant legislation relating to fire safety, RCH Group Chief Executive Officer (CEO) will ensure suitable arrangements are in place and:
- Appoint a 'competent person to lead the management of fire safety risk management and ensure compliance is achieved and maintained throughout the RCH Group.
 - Ensure the Fire Safety Risk Management Plan (FSRMP) is updated and implemented.
 - Commission competent persons to undertake fire risk assessments with the purpose of identifying the general fire precautions and other measures required to comply with the Fire (Scotland) Act 2005 and Fire Safety (Scotland) Regulations 2006.
 - Implement all necessary general fire precautions and any other preventive and protective measures identified by a fire risk assessment.
 - Periodically review fire risk assessments in a timescale appropriate to the premises and/or occupation fire risk level. This timescale will be determined by the fire risk assessor at the time of the assessment.
 - Provide means of detection and giving warning in case of fire within all relevant properties in line with current legislation and guidance.
 - Ensure maintenance, servicing and testing programme to, at least, the minimum recommended standards of all fire detection, emergency lighting, hold open devices, smoke ventilation systems, fire extinguishers, dry risers and other firefighting equipment provided within RCH Group properties.
 - Provide fire safety training to new and existing employees and refresh knowledge regularly as required.

The RCH Group Board

- 4.2 The RCH Group Board is responsible for monitoring compliance with the Fire Safety Policy and The Fire Safety Risk Management Action Plan (FSRMP). On an annual basis, the Board will review and approve the Fire Safety Policy, and for the effective planning, organisation, control, monitoring and review of the fire safety measures as defined in the Fire (Scotland) Act 2005, review fire safety performance and ensure that any issues of significant risk are actioned appropriately. The Board has a collective role for championing fire, safety standards. The Chair of the Board and the Chief Executive will sign off the Health & Policy Statement on an annual basis. The Policy Statement is attached as Appendix 1.

The Chief Executive

- 4.3 The Chief Executive is ultimately responsible for implementation of the Fire Safety Policy and the FSRMP at all levels of the group companies and the provision of adequate resources to meet Fire Safety Risk Management requirements.

The Chief Executive will:

- Provide leadership to encourage all employees to be fire safety conscious and proactive at all times.
- Ensure responsibility for implementation and compliance with the Fire Safety Policy is properly assigned and accepted by the ELT and other members of the RCH Group Senior Leadership Team (SLT) and all employees under their control.
- Appoint the three ELT Directors to lead on the Health & Safety Management Committee and to co-ordinate fire safety risk management within the RCH Group. The Head of Corporate Services and the Health & Safety Manager will also be members of the Health & Safety Management Committee to provide support on the management of fire risk

ELT Directors and SLT Members

4.4 The ELT Directors and SLT Members will:

- Appoint Managers across the RCH Group companies to be members of the Fire Safety Steering Group (FSSG). The FSSG membership will include the safety representatives from the recognised trade unions.
- Ensure that Managers within their departments are suitably trained, competent and fully understand their fire safety obligations.
- Support managers by providing resources and advice to ensure proportionate and effective standards of fire safety are achieved.
- Support the Fire Safety Steering Group throughout the RCH Group companies.
- Monitor the activities of their directorates and departments in relation to fire safety to ensure compliance with relevant legislation, policies, procedures and good practice guidelines.

Managers/Supervisors

4.5 Managers at all levels of the organisation will:

- Provide leadership, support and coaching to their team in relation to Fire Safety.
- Bring the Fire Safety Policy to the attention of employees under their management and ensure an understanding of the content.
- Undertake hazard identification and related fire risk assessments for their areas of control and introduce and maintain suitable and sufficient control measures.
- Ensure that employees they have received adequate training, instruction and information.
- Ensure all fire related accidents, incidents, near misses, and hazards are reported to the health and safety team as soon as is reasonably practicable, in particular, undertake investigations where appropriate and act upon the findings.
- Ensure that any fire safety responsibilities delegated to employees are clearly understood.
- Ensure contractors (and subcontractors) appointed to carry out works on behalf of the RCH Group companies are made aware of the fire safety policy and procedures, are notified of known hazards and carry out their work without risk to others.

Health & Safety Manager

4.6 The Health & Safety Manager will:

- Keep the Chief Executive and Senior Management Teams informed of fire safety related matters that may affect the area of service under their responsibility.
- Provide guidance to employees at all levels of the organisation on all aspects of fire safety.
- Monitor, and continually strive to improve, fire safety performance and the fire risk management culture of the organisation
- Assist line managers to promote high standards of fire and safety by raising awareness of key issues as and when required.
- Regularly review and monitor the fire safety policy and procedures to ensure they are relevant to, and inclusive of, the hazards facing the RCH Group companies.
- Monitor Compliance with Fire Safety legislation in Registers and Risk Registers
- Maintain records of all reported fire related incidents, accidents and near misses to allow trends to be identified and necessary action to be taken to reduce or prevent recurrence.
- Provide the Health & Safety Management Committee with performance information on fire safety risk management.
- Assist in identifying, developing and organising appropriate fire safety training in conjunction with line managers and as identified by Fire Risk Assessments.

Employees of the RCH Group

4.7 In addition to the duties outlined in the Health and Safety Policy Statement, all employees will:

- Familiarise themselves with this Fire Safety Policy and all fire and safety procedures, risk assessments and method statements relevant to their role and workplace.
- Attend mandatory fire safety training courses as and when necessary.
- Report all fire related accidents, incidents, near misses, and hazards to their line manager as soon as is practicably possible and forward to the health and safety e mail inbox.
- Contribute and co-operate with management on all matters of fire safety.
- Carry out their duties using safe fire working practices, regarding themselves, their colleagues, tenants, members of the public and contractors.
- Report any matters they consider to be a danger to the management of fire risk to their line manager as soon as is practicably possible. This includes any deficiencies or shortcomings they have identified within this Policy and/or with arrangements for the management of fire safety. Reporting should be via the health and safety email inbox.
- Only use any fire safety equipment and plant appropriate for the task and which they are trained to use and refrain from using and report to their line manager, any defective or damaged fire equipment and fire safety systems.
- Use safe systems of work for tasks relating fire safety risks from electricity, gas installations, handling of chemicals, and any other activities that could potentially present a significant risk to fire safety.

d) Equality Impact Assessment

5.1 No equalities issues arising from this policy and the EIA is attached to this policy.

e) **Review**

- 6.1 This policy will be reviewed in its entirety on an annual basis, unless an earlier review is required due to changes in legal, regulatory or best practice requirements, or because monitoring and reporting reveals that a change in policy is required sooner.

APPENDIX 1

The River Clyde Homes (RCH) Group Health & Safety Policy Statement November 2020

The Chief Executive and the Boards of the River Clyde Homes (RCH) Group; River Clyde Homes and Home Fix Scotland, hereinafter referred to as the RCH Group are committed to discharging their obligations under the Health and Safety at Work etc Act 1974, The Management of Health and Safety at Work Regulations (2006 amendment & 1999) and all relevant statutory provisions to provide a healthy and safe working environment for all employees and stakeholders.

The Chief Executive and the Executive Directors of RCH and the Managing Director of Home Fix Scotland, known as the RCH, known as the RCH Group Executive Leadership Team (ELT) will endeavour to ensure the safety and health of all others who could foreseeably be affected by activities under their control. The health, safety and welfare of employees are of prime importance and essential to the efficient operation of the RCH Group companies.

The ELT will ensure that this Policy is pursued throughout the whole of the organisation and will take all reasonably practicable measures and precautions to ensure the health, safety and welfare at work of its employees and any other person, not employed by the RCH Group who may be affected by the activities of the Group companies.

To achieve high health and safety standards the active co-operation of all employees is essential. Employees are reminded of their duty, under the legislative and regulatory framework, to take care of their own safety and that of any other persons and to co-operate with their employer to enable them to carry out their responsibilities successfully. The organisation, responsibilities and arrangements to enable this Policy on Health & Safety to be effective are contained in the full Health & Safety Policy.

The full Policy and the associated documents will be reviewed annually (as a minimum) or as and when required and will be publicised within the offices throughout the RCH Group companies.

Signed:



Chair of the RCH Group Board
(On behalf of the RCH Group Board)
Date 27th November 2020

Signed:



RCH Group Chief Executive

Equality Impact Assessment (EIA) Process

RCH's equality impact process is used to ensure that our policies and practices:

- eliminate any unlawful or unfair forms of discrimination in respect of the protected characteristics and other grounds; and
- promote our equality charter.

The EIA process involves two main elements: firstly, an initial policy audit against a range of key standards and, secondly, an assessment of the effects of policy documentation on the relevant issues.

It is critical to note that, although the Equality Act 2010 focusses on a range of protected characteristics, individual people should not be defined by these characteristics. Indeed, individual people will “have” a range of protected characteristics at any one point in time; and needs vary through time. For example, a non-disabled person can become a disabled person at any time; while younger people move into older age groups naturally.

EIA: Staff template

The staff template covers five procedural sections: background; the public sector equality duty; the internal EIA; the external EIA; and consultation issues.

Section 1: Background

| | |
|---|---|
| Name of policy under assessment: | Health and Safety Fire Policy 2021-2022 |
| New or existing policy (please specify): | Existing Fire Policy March 2020 |
| Key aims of the policy under assessment: | The aim is to ensure as far as reasonably practical that measures are in place to identify, manage and/or mitigate risks associated with fire for all RCH properties. |
| Service or department: | Energy and Compliance |
| Person(s) responsible for the assessment: | Lesley-Anne Burns |
| Date of assessment: | 05-01-21 |
| What data sources were available – or consulted – as part of this assessment (please explain below): | |
| Internal sources to RCH | Staff from River Clyde Homes including the Energy and Compliance team, Operational Managers and Health and Safety team. |
| External sources to RCH | Fire (Scotland) Act 2005 Fire Safety (Scotland) Regulations 2006 Practical Fire Safety Guidance for Existing High Rise Domestic Buildings (Scottish Government December 2019) |

| | |
|--|--|
| | Scottish Government Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises (2020), The Housing (Scotland) Act |
|--|--|

Section 2: Compliance with the Public Sector Equality Duty

This decision is based on the following rationale (briefly explain why the three elements of the Duty are relevant for this policy):

| General Duty | Is the Policy Likely to have Equality Impacts? | |
|--|--|--|
| Elimination of unlawful discrimination, victimisation, or harassment | Yes | |
| Briefly explain why: This policy does not have any negative impact | | |
| Advancement of equality of opportunity between people with and those without protected characteristic | Yes | |
| Briefly explain why: Treating all tenants equally regarding the control of fire within our buildings by following the current regulations, legislation and HSE guidance. | | |

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| | | |
| Fostering good relations between people with and those without protected characteristic | Yes | |
| Briefly explain why: There is no negative impact on relations | | |

Section 3: Internal EIA of the policy

The internal EIA is vital as this examines if the policy attains specific standards essential to meeting and promoting equality standards.

| | | |
|--|--|--|
| 1 Does the document state, at the front of the document, that it can be made available, on request, in other formats such as in larger print, audio-format, Braille and in other languages, as appropriate? | | |
| Yes | | |
| If no, insert the following: This Policy is available, on request, in different languages and in other formats such as in larger print, audio- tape and Braille. | | |
| 2 Does the document use Arial font and minimum twelve type size? | | |
| Yes | | |
| If no, amend text as appropriate. | | |
| 3 Is the document accurate in terms of content, for example, are statements within the document accurate when evaluated against law, regulatory standards and related good practice guidance? | | |
| Yes | | |
| If no (or unsure), check the legal sources and other guidance and then specify the changes required to ensure that the document is accurate in all relevant respects. | | |

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| 4 Are there any rules specified within the policy? | | |
| | No | |
| <p>If yes (or unsure), assess if such rules could be discriminatory in terms of equality law and other law (for example, could rules constitute indirect discrimination?)</p> <p>Assessment details:</p> | | |
| 5 Is language appropriate throughout the document, for example, does it promote positive views about - and respect for other people? | | |
| Yes | | |
| If no (or unsure), specify the changes required to ensure that appropriate language is used. | | |
| 6 Is the document written in clear and plain language? | | |
| Yes | | |
| If no (or unsure), specify the changes required and amend text as appropriate. This could be part of the document or general paragraphs. (Remember that our preference is that sentences should, on average, be from fifteen to twenty words in length.) | | |
| 7 Does the document, if relevant, explain how service users can appeal and/or make a complaint? | | |
| | | Not applicable |
| If no, specify the changes required and amend text as appropriate. | | |
| 8 Does the document, if relevant, explain what positive action measures are in place? | | |
| | | Not applicable |
| If no, specify the positive action required and amend text as appropriate. | | |
| 9 Does the document, if relevant, explain what performance monitoring equality measures are in place? | | |
| | | Not applicable |
| If no, specify specific equality indicators required and amend text as appropriate. | | |

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Section 4: External EIA of the policy

Now that section one to three has been completed, is there any negative or positive effect on people.

Section 4 describes if the policy is likely to have any negative or positive effect on people in relation to the protected characteristics. It is emphasised that, since the previous sections are to ensure compliance with law and good practice, then negative impacts should be minimised or eliminated.

| Protected Characteristic | Negative Effect Yes/No | Positive Effect Yes/No | Explanation |
|---------------------------------|-----------------------------------|-----------------------------------|--------------------|
| Age | No | Yes | |
| Disability | No | Yes | |
| Gender reassignment | No | Yes | |
| Marriage and civil partnership | No | Yes | |
| Pregnancy | No | Yes | |
| Race | No | Yes | |
| Religion/belief | No | Yes | |
| Sex/gender | No | Yes | |
| Sexual orientation | No | Yes | |

| | | | |
|--------------------------|----|-----|--|
| | | | |
| Other grounds | | | |
| Social class | No | Yes | |
| Personal characteristics | No | Yes | |

Section 5: Consultation issues

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|---|
| Is consultation required in law and/or due to RCH's policy? Yes / No |
| No |
| Summarise what types of consultation have been carried out, if any, and with whom: |
| Please explain:N/A |

Signed off by Responsible Person: Lesley-Anne Burns

Date: 05-01-21

Next policy review date: January 2022