

Fire Safety Management Policy

Policy

Background

The approach by the Government and fire safety authorities to fire safety management has dramatically changed following the tragic fire at Grenfell Tower in June 2017.

Over the past several years various pieces of legislation and advice have been introduced, and in some cases, withdrawn.

The Fire Safety Act 2021 was the first piece of legislation to be introduced in April 2021, before being fully implemented in May 2022. Part of this legislation was the introduction of PAS 9980, which is a risk-based approach to building fire safety issues, which allows for a much more measured and methodical approach, such as installation of sprinklers for example, as an alternative to more costly and sometimes unnecessary work. With the introduction of this risk-based guidance, all the previous Advice Notes were withdrawn.

The Building Safety Act became law in April 2022, where various provisions within the Act will become law in phases over the next 12-18 months.

The final piece of new legislation introduced is The Fire Safety (England) Regulations 2022, which comes into force on 23rd January 2023. This a wide-ranging piece of legislation that covers all buildings that contain two or more domestic premises, with differing requirements dependent upon the height of the building. This legislation is mainly focused on regular checks of fire doors and fire safety equipment on a monthly or annual basis, with this information formally recorded and actioned where necessary. There is a requirement to provide residents with fire safety and fire door information at the start of the tenancy, or an annual basis. There is also a requirement for new wayfinder signage to be installed in all blocks over 18 metres in height, to provide accurate and easy to read directions to firefighters attending a fire in such a block.

Irwell Valley Homes (IVH) have already acted upon all the above legislation, particularly the Fire Safety Regulations, which requires the most intensive resource for colleagues within the Fire Safety Team, and other colleagues across the business. A new app has been created for the monthly and annual checks for the Fire Safety Team to record these checks, and information is ready to be sent out to all residents. IVH are in a strong position to commence the requirements of the new legislation prior these coming into force.

As lessons are learnt and changes in legislation and good practice are introduced, IVH has introduced a dynamic risk-based approach to ensure that all residents and buildings are as fire safe as is reasonably practicable.

We have developed our revised Fire Safety Policy to address the new measures contained in these Acts and Regulations, along with lessons learned and shared from the Public Enquiry and

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early adopter peer groups.

IVH recognises its responsibility to ensure the safety of its customers, colleagues, contractors and visitors.

This Policy sets out IVH's guiding principles and practices with regards to fire safety management.

This Policy covers both the buildings owned and managed by IVH (including relevant leased properties).

IVH will liaise with partner organisations to achieve similar standards within buildings owned by IVH but managed and operated by the partner organisations.

Aims & Objectives

Aims

- To ensure that customers, colleagues, contractors, visitors and all property managed by IVH, are safeguarded in the event of fire
- To minimise the risk of fires starting and spreading in properties owned by IVH.
- To comply with the Regulatory Reform (Fire Safety) Order 2005, The Housing Act 2004,
 The Building Regulations and other related legislation.
- To comply with The Fire Safety Act 2021, The Building Safety Act 2022 and The Fire Safety (England) Regulations 2022.
- To ensure all residents have the information they need on what to do in the event of a fire, and to be kept up to date on fire safety issues affecting their home.

Objectives

- To ensure our residents feel safe and secure in their home, and to be kept regularly informed on fire safety matters that affect them.
- To ensure all buildings, where required, have an up-to-date Fire Risk Assessment (FRA)
 and that these are reviewed at appropriate intervals and following a change of use or
 refurbishment of the building.
- To ensure that procedures and resources are in place to review and implement recommendations from FRAs.
- To ensure that works carried out to IVH buildings comply with relevant fire safety standards and that procedures are in place to assess compliance.
- To communicate to customers any works arising from risk assessments where it impacts on their health & safety.
- To train all relevant colleagues on fire risk management and provide relevant channels for colleagues to report issues.
- Complete remedial works required in a risk-based and timely manner.

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- Obtain the services of chartered fire safety engineers where required and implement their advised measures as soon as reasonably possible and practicable.
- Seek to access external funding for remedial works and relevant associated costs where
 possible and feasible, and only pass on costs to the leaseholders once all other options
 for managing costs have been explored.

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Fire Safety Approach

The Fire Safety Team have reviewed the current Irwell Valley Homes FRA programme and have introduced a risk-based approach. This risk-based approach focusses not only on the guidance on our external fire risk consultants' assessments but also incorporates information and opinion from our fire engineering consultants, where commissioned, and our fire safety teams' inspections.

The Risk Ratings Building spreadsheet is key to facilitating this approach. This spreadsheet report has been developed which incorporates the important site-specific information, such as whether there are vulnerable persons on site, the presence and type of building cladding, and so on, to give a clear identification of a building's risk level.

In January 2021, we adopted a FRA frequency based on our Risk Rating Buildings report:

- High-Risk buildings receive 12-monthly FRAs.
- Medium risk buildings receiving 24-monthly FRAs, and
- Low Risk Buildings receiving 36-monthly FRAs.

This report will be owned by the Head of Assets and managed by the Fire Safety Manager.

Updates will be tracked on the spreadsheet and there will be consultation at each Fire Response Group meeting by relevant stakeholders to feed in additional information that will inform the risk rating.

Visual Fire Checks (VFCs) are carried out by a member of the Fire Safety Team, which involves checks on all communal areas of all blocks. The check is recorded, and any issues found are then automatically fed back to either the Repairs Team, Community Coordinators, or the Fire Safety Team for investigation and action where required. VFCs are completed:

- Weekly on high-risk blocks.
- Every 30 days on medium-risk blocks, and
- Every 60 days on low-risk blocks.

The individual risk rating of each building will be regularly reviewed by the Head of Assets and the Fire Safety Manager, who will evaluate whether the risk rating is still appropriate for the building. Any change will be documented on the Building Risk Rating Change Form and signed by both individuals to agree to the change. The new risk rating will be updated on QL and the Risk Rating Spreadsheet. This also impacts the frequency of the VFC that is completed by a member of the Fire Safety Team. Any change to the risk rating of the building would then immediately change the frequency of the VFC.

We are working closely to our fire engineering consultants' guidance covering our High Risk Residential Buildings. High Risk Residential Buildings are defined by Government guidance and are identified in our Risk Rating Buildings spreadsheet.

Some of these High Risk Residential Buildings are buildings confirmed as 18 metres

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or over. They are assessed by our Fire Safety Engineering consultants and the associated risks from these buildings are fed back into the Building Risk Rating Spreadsheet. As per the requirements of all the new legislation, building safety document files have been developed detailing the safety measures for such buildings and they will require certification and five yearly reviews to ensure the buildings are maintained in a safe and compliant manner.

This guidance is a more in-depth assessment of the buildings categorised as High Risk than the FCS Fire Risk Assessments. We are focusing on the highest risks first. In addition, the Fire Safety Manager will continue to visit our properties prioritising high risk properties. These visits will assess, verify and where required commence action on the documented recommendations of the fire safety consultants. All additional risks which the Fire Safety Team notes whilst on site will be recorded. It is important that their in-house knowledge is utilised to provide a more robust final risk assessment.

Fire Risk Assessments

FRAs will be carried out for all new and existing buildings which are subject to the Fire Safety Order 2005. It will be a requirement of the fire risk assessor to ensure all internal reviews of the FRA are completed within 21 days of the assessment.

The allocation and timing of resources to complete the significant findings identified by the FRAs will be carried out in a risk-based approach as identified through the Risk Rating Buildings report.

Risk ratings will be reviewed and recorded at each Fire Response Group Meetings by relevant stakeholders.

A new FRA must be conducted prior to any proposed fundamental changes to the structure of the building, introduction of any new processes, storage of flammable materials, a fire or any significant changes in the number of occupants in the buildings.

FRAs will be completed by external fire risk assessment consultants that hold accreditation and are registered with the BAFE 205 scheme for life safety and with the Institute of Fire Engineers.

FRAs will be carried out on buildings based on the risks associated with the build type.

In addition to the standard Type 3 FRAs that are not intrusive, Type 4 FRAs / Compartmentation Surveys will be completed on certain buildings as defined in the Risk Rating Buildings report. Primary focus is to firstly make the escape routes compliant. Thereafter a programme of works on Type 4 FRAs will be considered where necessary.

All blocks will have a Type 3 FRA carried out, including leasehold blocks. The Type 3 FRA would mean the assessor gaining access to inside the individual apartments that are the domain of the leaseholder. Therefore, any actions raised for the interior of the apartment, would be for each leaseholder to complete, unless it concerns the fabric of the building, which IVH are responsible for. Nevertheless, it is crucial that we adopt a holistic approach in all of our blocks so that we have a full understanding of any issues

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early on, so steps can be taken to address them. This will also require cooperation between the Fire Safety Team and the Leasehold Team.

For Commercial units where responsibility for carrying out an FRA lies with the lessee, they shall send us a copy of the completed FRA annually, which will be stored on C365. Any actions raised on the FRA will be managed internally and completed in line with that specific lease agreement.

FRA renewal will be based on their risk rating as detailed in the Risk Ratings Building report with the following frequency being set:

- High Risk Buildings: annual.
- Medium Risk Buildings: 2-yearly.
- Low Risk Buildings: 3-yearly.

Where a building is identified as requiring a compartmentation survey, a Type 4 FRA will be requested if required following a review by the Fire Safety Team and Head of Asset Management.

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Responsibility

Irwell Valley Homes Board of Management

Gain assurance that there is an effective Fire Safety Policy in place and that it is being implemented effectively.

Chief Executive Officer

The Chief Executive Officer is responsible for the effective implementation of this Policy. They must operate in accordance with the legislation in enacting the role of Responsible Person as detailed in the Regulatory Reform (Fire Safety) Order 2005.

Executive Directors/Senior Leadership Team

Set the tone and embed the dynamic fire safety approach within the organisation.

Provide support where possible to staff under their directorship to assist in achieving high standards of fire safety management compliance.

Act upon recommendations from the Fire Response Group by adopting a risk-based approach.

Must ensure that there is effective Fire Safety Policy in place and that it is being implemented correctly.

To support the Fire Safety Team in the embedding of relevant fire safety management processes within their teams.

Head of Assets

To oversee, coordinate and report on the delivery of the operational aspects of this policy and procedure relating to risk assessment, review and remedial works to the buildings.

To oversee the management of the risk rating of the IVH's assets.

Deliver fire safety updates via the quarterly compliance report to Board.

Managers

To ensure their team collaborates with the Fire Safety Team in maintaining the safety of customers and colleagues through monitoring of colleague performance.

To liaise with the Fire Safety Team in organising any colleague fire safety training required.

Fire Response Group

To receive reports from the fire safety officers on fire safety issues, latest industry updates and to agree as a group on required actions to continually improve fire safety management.

To discuss and provide feedback on fire safety issues across the business, providing recommendations to support

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compliance to the Leadership Team and Board where relevant.

Fire Safety Team

To complete regular programmed inspections of IVH properties on a risk-based priority.

The Fire Safety Manager will receive significant findings from the fire risk assessments in a timely manner and verify the works of the external fire safety consultants prior to the works being placed on IVH's fire safety action tracker and make changes to the risk rating with supporting evidence where required which will be reported on to Fire Response Group

To provide guidance to IVH staff on fire safety related queries.

To maintain the legislation / guidance tracker.

To attend inspections with fire service and local authority personnel, external fire safety experts / consultants and update managers without delay.

Carry out fire accident incident investigations and work with internal / external teams/ agencies on findings and remedial actions.

To coordinate the completion of actions required raised from fire risk assessments or internal safety inspections.

Investigate false fire alarms and provide advice on remedial actions.

To manage, in conjunction with fire engineers, the process of removing or making safe any aspect of our buildings that are not compliant. This is to include cladding and any attachments to the buildings.

For any contractor instructed by the fire safety team, the relevant person in this team will be responsible for ensuring that the contractor holds the relevant qualifications and that they are provided to IVH where there are any staff changes. This is to be covered as an agenda item at the regular contractor meetings.

Arranging fire risk assessments with the involvement of the fire safety team.

Monitor and report on progress of contractor and fire risk consultant provision of documentation within agreed timeframes

Conducting inspections, arranging for maintenance and testing of all:

- Fire safety equipment
- Systems and procedures
- Emergency communication systems i.e. Fire Service, off-site monitoring
- Ensuring any compliance work carried out is by competent persons and suitable temporary arrangements are put in place if fire safe measures are affected/taken off-line
- Ensure all fire safety equipment information and its testing is maintained up to date
- Keep a digital copy of all service records which can be readily accessed for inspection and

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monitoring purposes

- Maintain the fire actions tracker and ensures adequate evidence is gathered to prove an action is complete
- Produce reports for Fire Response Group.

Gas Team

The Gas Team Manager must ensure that all relevant domestic and communal gas appliances are tested for safety on an annual basis.

External Fire Safety Consultants

Work in accordance with the contract held with IVH and in accordance with the current edition PAS 79 that is in force at the time of the assessment.

Finance, Risk and Assurance Team

Assist with fire safety issues by coordinating reviews to gain external assurance through IVH's Internal Auditors and through internal compliance checking, reporting results to the Fire Response Group.

Health and Safety Team

To assist the Fire Safety Team where possible with fire safety management through inspections using a risk-based approach to ensure that any issues noted are incorporated into the overall fire safety issues action list.

Assist the Fire Safety team in accident management where required.

Neighbourhoods and Independent Living Teams and Leasehold Team

Work in accordance with training provided to complete fire safety checks

Address customer management issues to ensure fire safety risks are resolved

Raise any issues directly with the Fire Safety Team

To assist Fire Safety Team in addressing issues flagged for properties under their responsibility and to notify fire safety officers of any fire incidents without delay

To assist fire safety contractors with access to properties

To manage Personal Emergency Evacuation Plans in line with the Fire Safety Procedure and ensure these are updated and returned to the Fire Safety Team on an annual basis before the review date

To manage the Fire Safety Communal Area policy in line with the Fire Safety Procedure

Managing Agents and Supporting Agents for Supported housing

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Managing Agents and Supporting Agents must operate in accordance with their Management Agreement contract and in particular, they must honour their fire safety responsibilities as set out in the contract.

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Managing Agents must implement their own fire safety arrangements in accordance with the above-mentioned contract and liaise with the landlord. This will be audited by IVH in accordance with the details outlined in the Fire Safety Procedure. Each managing agent / supporting agent will be audited annually by the Supported Services Manager. IVH will work collaboratively with Managing Agents and Supporting Agents, sharing results of fire risk assessments to support them in their duty to provide for the safety of the occupants of the property.

Asset Management Team

The Assets Management Team are responsible for managing the appointed fire safety works contractors and will work alongside the Fire Safety Team to ensure a risk based planned programme of works is implemented. The team will operate in the project management of any works generated from the fire risk assessments such as fire door replacement etc.

The Asset Management Team will ensure that all new building work and alterations are carried out and completed according to Building Regulations Approved Document B and the latest Government issued guidance.

For any contractor instructed by this team, the relevant person in this team will be responsible for ensuring that the contractor holds the relevant qualifications and that they are provided to IVH where there are any staff changes. This is to be covered as an agenda item at the regular contractor meetings.

Development Team

The development team has a responsibility for all new build and refurbishment schemes. They have an input into the design to ensure:

- The building complies with all relevant fire safety legislation and building regulations. Do
 not assume that when a building is signed off by the building control officer that all of the
 works comply with the Building Regulations in relation to fire safety and the principle of fire
 prevention.
- The design of the building and safety systems meets IVH objectives in the use of the building (occupancy) and how the building will be managed.
- The architect/contractor has produced an appropriate Fire Strategy for the building.
- The Principal Contractor produces all relevant Health and Safety information and files for the building.
- That the building work is suitable and sufficient.
- Ensuring that any problems or defects noted once people start to use the building are rectified by the Principal Contractor during the warranty period.
- Meet with the Fire Safety Manager at regular intervals during new build projects on apartments blocks to ensure the correct specification of fire safety equipment meets IVH's requirements.

For any contractor instructed by this team, the relevant person in this team will be responsible for ensuring that the contractor holds the relevant qualifications and that they are provided to IVH where there are any staff changes. This is to be covered as an agenda item at the regular contractor meetings.

Contractors

IVH will ensure that only competent contractors are approved to work for IVH. All approved contractors are responsible for:

- Assessing the fire safety risks arising from their works/activities and implement control measures in accordance with the principles defined in the Regulatory Reform (Fire Safety) Order.
- Co-operating with IVH on all matters of fire safety.
- Ensuring that they and all staff falling under their control have received appropriate information, induction and training to enable them to comply with the fire safety management system and the emergency arrangements.
- Obeying all instructions relating to fire safety given by authorised members of the organisation.
- Having in place approved permits to work.
- Ensuring existing fire safety measures are not put at risk.
- Ensuring that no new compartmentation breaches are created through their working practices.
- Ensuring suitable and sufficient risk assessments and method statements are in place before the commencement of any works.
- Ensuring fire prevention measures are in place such as hot work permits, permit to work systems and other controls to ensure the risk of fire is minimised.

The Fire Safety Team will audit a sample of contractor works on completion of all projects. Failure to meet relevant standards, will be addressed by the Fire Safety Team and the Procurement Team.

Contractors are to provide evidence of their work within the agreed timeframes of their contract. This will be monitored by the Compliance Team and reported at Fire Response Group Meetings by exception. All relevant certification by our fire safety repairs contractor will be provided within 30 days of their works. This timeframe is dependent on external factors (e.g. specialist external contractor availability).

Work in accordance with their contractual requirements and in accordance with their specialist training.

Report any fire safety concerns to the Fire Safety Team without delay.

Procurement Team

To work with the Fire Safety Team to draft a service level agreement detailing the standard of work required as well as the certification and qualifications of the contractor. These certifications and qualifications will be reviewed on an annual basis by our framework provider or the Procurement Team.

Fire Marshalls

Fire marshals are to operate in accordance with the training provided by IVH.

Report fire safety issues to the Fire Safety Team.

Operate in accordance with the fire evacuation procedures relevant to their work area.

Colleagues

Colleagues are responsible for:

- Maintaining good housekeeping
- Reading and working within this Policy and related procedural documents
- Reporting any fire safety issues immediately to their line manager
- Attending fire safety training as required

Customers (including tenants, licencees, shared owners and leaseholders)

Comply with the requirements of their tenancy agreement/ licence and/or lease.

Report any fire safety concerns / issues without delay to IVH.

Contact IVH and request approval before making any alterations to their home.

Customer Voice and Safety

IVH will work collaboratively with our customers to ensure their safety. We will look to raise awareness of the measures we have in place and engage on intended additional measures. In particular, we will look to set up resident engagement panels in line with the Building Safety Act for our customers in high-risk residential buildings. These are anticipated to start mid-2023.

Working with the Customer Voice Team, and in line with the Customer Engagement Strategy, the Fire Safety Team will communicate in a number of ways with our customers to include surveys, use of social media, our website, letters etc. We will ensure that training and awareness raising amongst all staff will ensure that customer concerns are listened to and acted upon as agreed and communicated with the customer and highlighted accordingly on management and CRM systems.

To ensure the safety of customers in the event of a fire in their building, clear guidance and signage is provided on site and included in all tenancy sign up information. For vulnerable customers who cannot evacuate unaided, IVH will operate in accordance with our Personal Emergency Evacuation Procedure to ensure their safety.

Engaging with residents, we will discuss the implementation of the fire safety communal area policy to ensure there is buy in to work together to maintain communal escape routes in a safe condition.

In addition to the general guidance provided in relation to raising repairs, IVH will work towards providing specific information about fire safety measures for customers' buildings.

Competence and Training

IVH will use a combined approach of contracting competent external fire safety consultants and internal resource to meet our requirements under Article 18 of the RRO. IVH will ensure that it has

appointed one or more competent persons who have adequate knowledge, training experience or other qualities to assist the responsible persons and IVH to discharge its legal duties.

The Fire Safety Team will set the required standards for external fire safety consultants and through verification checks, they will ensure the external fire safety consultants operate to that standard.

Role specific training will be provided to all IVH colleagues as detailed in the approved training matrix. All IVH colleagues complete mandatory fire safety awareness training on an annual basis.

All new starters will receive fire safety awareness training within their induction process.

Auditing and Internal Inspections

Auditing

The IVH Fire Safety Officer will carry out audits on:

- Fire Risk Assessment content
- Fire Safety Repairs contractor works
- Communal Area Inspections

The Fire Safety Team will conduct a quarterly audit of the fire risk action tracker to ensure that a compliance standard is being maintained.

The Supported Services Manager will conduct audits on all managing agents / support providers annually to ensure they are complying with their contractual fire safety requirements.

| Audit | Frequency | Reporting by | Reporting to | Records stored |
|---|---|---------------------|------------------------|--|
| Fire Risk Assessor Review | 3 monthly, a week before Fire Response Group meeting | Fire Safety Team | Fire Response Group | Fire Response Group Teams Folder |
| Fire Safety Repairs Contractor | 3 monthly, a week before Fire Response Group meeting | Fire Safety Team | Fire Response Group | Fire Response Group Teams Folder |
| Fire Action Tracker Evidence Quality | 3 monthly, a week before Fire Response Group meeting | Fire Safety Team | Fire Response Group | Fire Response Group Teams Folder |
| Communal Area Inspections Desktop Audit | 6 monthly | Fire Safety Team | Fire Response Group | Fire Response Group Teams Folder |

| Managing Agents Fire Safety Records | | | • | Fire Response Group Teams Folder |
|--|----------------------------|------------|-----------------|-------------------------------------|
| Fire Safety Audit – | As per | Governance | Fire Response | Fire Response Group |
| Internally arranged | Internal Audit Strategy | Team | Group and Board | Teams Folder |

Internal Inspections

Internal inspections will be completed on an ongoing basis by Irwell valley homes colleagues. All colleagues completing such checks will receive training to provide them with the required skills. All internal inspections will be documented and recorded. This will ensure that required actions are identified, addressed and completed. The frequency of these inspections will be based on the risk rating of the property and is set out in the Fire Safety Procedure.

Fire Evacuation Procedures

Fire Evacuation Procedures are listed on the OOH Major Incident Property Spreadsheet

GEEPS – General Emergency Evacuation Plans

Based on the building type and its risk, the evacuation procedures have been established by the fire safety consultants and verified by the in-house fire safety officers.

IVH have two policies in relation to evacuation: Stay put / Stay Safe or Simultaneous Evacuation Procedures. These procedures will be displayed on signage in all of our buildings and where the procedure is changed, all customers will be notified.

Simultaneous Evacuation Procedures will be invoked in cases where a building is not able to support a stay safe status due to required works to ensure adequate compartmentation and fire protection of the building.

PEEP - Personal Emergency Evacuation Plans

For individuals that are not able to evacuate, Personal Emergency Evacuation Plans will be drafted using the Personal Emergency Evacuation Plan form. This will be completed by scheme managers with the assistance of the fire safety officer for customer schemes. These plans will be updated as changes arise and stored in a premises information box at each entrance.

For individuals in homes that are general let, the Community Coordinator will review their residents needs on an ongoing basis, with the assistance of the fire safety officer where required. Where there are individuals who are not able to evacuate and live in general let properties that have a simultaneous evacuation status, IVH will seek to relocate the tenant to suitable housing for their needs. The Risk Ratings Building spreadsheet will be the primary document for informing on the evacuation procedures for a property. For blocks over 18 metres in height, all residents are to be contacted on an annual basis by the Community Coordinator, and the details of residents who identify as having mobility or sensory difficulties, or any other impairment that means they cannot self-evacuate, then a PEEP is to be produced by the Community Coordinator and sent to the Fire Safety Team. This information will then be recorded on the Vulnerable Residents Register and placed in the premises information box on site.

For Leaseholders or individuals sub-letting a Leasehold home, a responsibility will be set on the Leaseholder to assess their or their tenant's capabilities to evacuate and ensuring in cases where an individual is not able to evacuate, that the Leaseholder will update IVH, develop a PEEP and cover the cost of providing a PEEP information box at the entrance to the property for the Fire Services to access.

PEEPs information for High Rise buildings will be factored into the IVHA Incident Response Plan. Further details on the specifics of Fire evacuation procedures management is contained in the Fire Safety Procedures. All information held about customers will have personal details redacted to comply with GDPR requirements and will only refer to the property.

Fire Safety Communal Area Policy – Sterile & Managed Approaches

IVH will have a combined approach which is fair and consistent. All communal areas in general let properties will have the sterile approach applied. Directly managed scheme properties will have a managed approach. This managed approach can be rescinded where IVH colleagues do not or cannot successfully manage it on site. Specific details are held in the Fire Safety Procedures document.

Performance Indicators / Targets / Standards

Review

The policy and procedure will be reviewed at least annually and in reaction to legislative changes.

Performance Indicators

Quarterly fire safety compliance KPIs are reported to Board of Management.

Standards

PAS 79:2012

RRFSO and associated standards

Targets

Once investigated, based on resources, ability to gain access, establishing agreement with relevant stakeholders and realistic timeframes for sourcing material, actions will be closed off at the earliest possible time. Timeframes are set in the below table and due to the above listed factors, they are indicative*. Where there is a delay in resolving the issue, it will be ensured all possible mitigating measures are implemented immediately.

Justification will be required where timescales are missed. This will be tracked and reported as a standing item in the Fire Response Group meeting's agenda.

| Risk Levels | Investigation Timeframe | Implementation Timeframes* |
|-------------|-------------------------|----------------------------|
| High | Within 7 calendar days | Within 3 months |
| Medium | Within 30 calendar days | Within 9 months |
| Low | Within 90 calendar days | Within 18 months |

Inspection targets are as per the Audit section above.

Current Legislation

As the nation and housing sector strives towards further improvement in fire safety, there will be continuing introduction of additional law and guidance. IVH will track these changes through regular research and updates and will record them on the H&S and Fire Safety Legislation Matrix. All updates will be discussed at the Fire Response Group Meetings.

Equality and Diversity Implications

Irwell Valley Homes is committed to treating people with honesty, dignity, respect, and trust. This applies to colleagues, customers potential customers, contractors, and Board Members. At IVH: • Equality is about ensuring that every individual has an opportunity to make the most of their lives and talents. • Diversity is recognising difference and responding positively to those differences. • Inclusion is about creating an environment where our services and employment opportunities are accessible to all.

IVH will be mindful of the Equality Act 2010 in all its actions and will consider all the protected characteristics of the Act which are: Race, Sex, Gender Reassignment, Disability, Sexual Orientation, Religion or Belief, Age, Marriage/Civil Partnership and Pregnancy and Maternity explicitly. Further to the protected characteristics, IVH will be mindful of socio-economic disadvantage and will do everything in its power to minimise this and other forms of disadvantage.

When applying this policy, we will use data we hold about the diverse needs of customers to make appropriate service adjustments. We will ask customers how the repair is impacting their safety and security to assess if the repair is having a disproportionate effect due to protected characteristic(s) e.g. physical disabilities or mental ill health, pregnancy, age, experiencing domestic abuse or hate crime, and needs to be completed quickly.

We will ensure customers have a wide range of choices in terms of accessing the service, the format and media used to communicate information about the service.

Appendix A includes details of repairs responsibilities. In some instances, we will carry out repairs that would usually be customers responsibility, for example, repairs needed due to damage caused because of incidents of domestic abuse or serious anti-social behaviour (ASB), repairs when customers are no longer able to complete a repair due to age and/or some disabilities, for the purposes of reasonable adjustment. Colleagues will receive training to help identify signs of abuse or serious ASB and to assess when it is reasonable for IVH to take the responsibility for repairs. All judgements will be recorded and monitored to prevent discrimination.

Cross Reference Documents

Fire Safety Legislation Matrix Fire Safety Procedures IVH Incident Response Plan

Appendix 1 – Management Structure

Chief Executive Officer

Executive Director of Finance, Governance and Investment

Head of Assets

Fire Safety Manager

Fire Safety Team

Compliance Team

External Fire Safety Consultants

Reporting and Management Functions: Neighbourhood Team, Leasehold Team, H&S Team, Governance and Assurance Team, Homes Team