



Fire Safety and Fire Risk Assessment Policy



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2.0	April 26	Full review and template change	Sharon Parkes CFIOSH Health and Safety Manager

Links to Associated Policies and Procedures

- Health and Safety Policy
- Health and Safety Arrangements
- Fire Risk Assessment Process Flow chart
- Fire Safety Arrangements

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This policy shall be reviewed *every two years* unless there is a change in legislation or regulation.

1.0 Introduction and Policy Objectives

- 1.1 As a landlord, Honeycomb Group (Honeycomb) is responsible for carrying out fire risk assessments, and taking action to identify, manage and mitigate risks associated with fire within the communal areas of buildings we own and manage.
- 1.2 We have a duty to take general fire precaution measures to ensure, as far as is reasonably practicable, the safety of the people in our buildings and in the immediate vicinity.
- 1.3 The key objective of this policy is to ensure that our Board, Executive Team, employees, partners and residents are clear on our legal and regulatory fire safety obligations. This policy provides the framework our staff and partners will operate within, in order to meet these obligations.
- 1.4 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our intranet and distributed to all relevant members of staff and contractors.
- 1.5 This policy is specifically for use and implementation by the Property and Housing Management teams.

2.0 Scope

- 2.1 This policy is relevant to all our employees, residents, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.
- 2.2 The policy should be used by all to ensure they understand the obligations placed upon Honeycomb Group to maintain a safe environment for residents and employees, within the home of each resident, and within all communal areas of buildings and other properties we own and/or manage. Adherence to this policy is mandatory.

3.0 Regulatory Standards, Legislation and Guidance

- 3.1 **Regulatory standards** – We will comply with the regulatory framework and applicable consumer standards set by the Regulator of Social Housing for registered providers in England, including requirements relating to the safety and quality of tenants' homes.
- 3.2 **Legislation** – The principal fire safety legislation applicable to this policy is:
 - The Regulatory Reform (Fire Safety) Order 2005, as clarified by the Fire Safety Act 2021, supplemented by the Fire Safety (England) Regulations 2022, and amended by section 156 of the Building Safety Act 2022.
- 3.3 **Guidance** – The principal guidance documents applicable to this policy include:
 - LACORS: Housing – Fire safety guidance on fire safety provisions for certain types of existing housing.
 - Home Office: Fire safety in purpose-built blocks of flats. This guide should be treated as a useful reference document but not as a comprehensive statement of current requirements pending publication of revised guidance.

- Home Office: Check your fire safety responsibilities under the Fire Safety (England) Regulations 2022.
- Home Office: Check your fire safety responsibilities under section 156 of the Building Safety Act 2022.
- Housing Act 2004: Housing Health and Safety Rating System Operating Guidance.
- Housing Act 2004: HHSRS addendum for the hazard of fire and for cladding systems on high-rise residential buildings.
- Ministry of Housing, Communities and Local Government: advice for building owners of multi-storey, multi-occupied residential buildings.
- National Fire Chiefs Council: Fire Safety in Specialised Housing.

3.4 **Preparing for future legal and policy changes** – We will keep this policy under review to reflect relevant government policy, inquiry recommendations, consultations and legal developments affecting fire safety and building safety.

- Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018);
- Building a Safer Future - Proposals for reform of the building safety regulatory system: A consultation (June 2019);
- The Regulatory Reform (Fire Safety) Order 2005: Call for Evidence (July 2019);
- Grenfell Tower Inquiry: phase 1 report. Volume 1 – 4 (October 2019) & Volume 2 (September 2024)

3.5 **Sanctions** – Failure to discharge our responsibilities properly could lead to enforcement action, unlimited fines, imprisonment for relevant offences, prosecution under applicable health and safety and fire safety law, and regulatory action by the Regulator of Social Housing where applicable.

3.6 **Enforcement** – Enforcement action may be taken by the Fire and Rescue Service, Local Authorities, the Health and Safety Executive, the Building Safety Regulator where relevant, and the Regulator of Social Housing within its regulatory remit.

3.7 **Non-compliance** – Non-compliance may result in notices, prosecution, unlimited fines, imprisonment for relevant offences, reputational damage and regulatory intervention.

4.0 **Additional Legislation**

4.1 This policy also operates within the context of the following legislation:

- Housing Act 2004.
- Health and Safety at Work etc. Act 1974.
- Management of Health and Safety at Work Regulations 1999.
- Building Safety Act 2022.
- Fire Safety Act 2021.
- Fire Safety (England) Regulations 2022.

- Fire Safety (Residential Evacuation Plans) (England) Regulations 2025.
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.
- Building Regulations 2010, including Approved Document B (Fire Safety).
- Management of Houses in Multiple Occupation (England) Regulations 2006.
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006.
- Gas Safety (Installation and Use) Regulations 1998.
- Furniture and Furnishings (Fire) (Safety) Regulations 1988.
- Health and Safety (Safety Signs and Signals) Regulations 1996.
- Electrical Equipment (Safety) Regulations 2016.
- Construction (Design and Management) Regulations 2015.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- Homes (Fitness for Human Habitation) Act 2018 and Data Protection Act 2018, where relevant to this policy and associated records.

5.0 Obligations

- 5.1 Honeycomb Group is the corporate Responsible Person for the purposes of the Regulatory Reform (Fire Safety) Order 2005 in relation to the common parts of the residential buildings it owns and manages, and for other premises within the scope of the legislation.
- 5.2 The Responsible Person must ensure that suitable and sufficient fire risk assessments are undertaken to identify the general fire precautions and other measures needed to comply with the Regulatory Reform (Fire Safety) Order 2005. Although the statutory duty principally applies to the common parts of relevant premises, the assessment may need to take account of matters affecting the building as a whole where necessary to evaluate and manage risk properly.
- 5.3 The Responsible Person must implement, or ensure the implementation of, the general fire precautions and any other measures identified through fire risk assessment, inspection, audit, testing or review.
- 5.4 The Responsible Person must ensure appropriate arrangements are in place for maintenance, inspection, testing, emergency procedures and the appointment of competent persons to support implementation of this policy.
- 5.5 Fire risk assessments will be reviewed at intervals appropriate to the premises, the occupancy and the level of risk, and sooner where there is reason to suspect they are no longer valid or where significant change has occurred. Honeycomb Group will discharge its duties through the governance and operational arrangements set out in section 6.0.

6.0 Key Roles and Responsibilities

- 6.1 The Board has overall governance responsibility for ensuring this policy is implemented and remains effective. The Board will approve this policy and review it at least every two years, or sooner if required by changes in legislation, regulation or material risk.
- 6.2 For assurance that this policy is operating effectively in practice, the Board will receive regular updates on its implementation, fire safety performance and non-compliance.
- 6.3 The Executive Director of Operations will receive regular performance reports in respect of fire safety, seek assurance that compliance is being achieved and maintained, and be notified of material non-compliance issues.
- 6.4 The Head of Compliance, or equivalent postholder, has strategic responsibility for the management of fire safety, for overseeing delivery of this policy, and for monitoring that compliance is achieved and maintained.
- 6.5 The Head of Repairs and Maintenance, or equivalent postholder, has operational responsibility for delivery of fire safety-related inspection, servicing, maintenance and remedial work programmes.
- 6.6 Honeycomb Group will appoint independent, suitably competent and appropriately qualified fire risk assessors to undertake fire risk assessments.

7.0 Statement of Intent

- 7.1 We acknowledge and accept our responsibilities under the Regulatory Reform (Fire Safety) Order 2005, as set out in section 5.0 of this policy.
- 7.2 Each property requiring a fire risk assessment will have one in place that has been carried out by a competent fire risk assessor and documented in a format aligned to current recognised housing fire risk assessment standards and guidance.
- 7.3 Fire evacuation strategies will be determined on a building-by-building basis, in accordance with the recommendations of the competent fire risk assessor.
- 7.4 All FRAs will be reviewed no later than the review date set within the most recent FRA for that building.
- 7.5 The FRA for a building will be reviewed in the event of:
 - A fire in the building.
 - Change in building use.
 - Change in working practices that may affect fire safety.
 - Following refurbishment works; or
 - If required following an independent fire safety audit.
- 7.6 We will operate robust processes to implement all mandatory fire precaution measures identified by FRAs.
- 7.7 We will inspect, test and replace smoke and carbon monoxide alarms in accordance with legal requirements, relevant standards, tenancy obligations and our planned compliance activities.

- 7.8 We will assess evacuation support needs in a proportionate and lawful way. In workplace settings and supported housing settings where we provide support services, we will put in place appropriate personal emergency arrangements where required. For residential buildings, we will keep our approach to person-centred fire risk assessment and evacuation support under review and implement any specific legal requirements that apply to the buildings within our scope.
- This includes employees and residents in supported or specialised housing settings where individual evacuation arrangements are required as part of service delivery or employment responsibilities; and
 - This also includes residents in residential buildings where a person-centred fire risk assessment or other lawful assessment process identifies the need for appropriate support measures.
- 7.9 When letting properties, we will consider the suitability of the accommodation for the prospective resident in respect of fire safety.
- 7.10 We are committed to working with the relevant Fire and Rescue Service and other partners to improve fire safety outcomes. This may include information sharing where lawful, seeking advice, joint learning and staff training.
- 7.11 We will advise new tenants of the opportunity to request a free home fire safety check from the relevant Fire and Rescue Service, where such a service is available.
- 7.12 We will ensure appropriate evacuation policies are in place across our buildings which are in accordance with the recommendations of the competent fire risk assessor and any guidance from the relevant fire authority.
- 7.13 We will operate robust processes to gain access where a resident/customer refuses access for essential fire safety inspection, testing, servicing or remedial works, in accordance with our no access procedure.
- 7.14 We will operate robust processes to gain access to properties where additional risks relating to vulnerability are known or identified, including hoarding, while ensuring that we safeguard the wellbeing of the resident.
- 7.15 We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 7.16 We will operate a robust process to identify, escalate and manage fire safety situations that present an immediate or serious risk.
- 7.17 We will generally adopt a sterile environment approach in all internal communal areas, requiring residents to remove combustible materials from corridors and fire escape routes. In some housing schemes where we operate a managed approach (permitting limited personal items outside the home), we will introduce a sterile environment approach, subject to the outcome of resident consultation, within the life of this policy.
- 7.18 We will not permit the storage of mobility scooters within internal communal areas of our buildings (except for in suitably designed and designated storage areas).

- 7.19 Where we become aware of any resident behavioural issues which create specific fire safety risks, such as hoarding, we will undertake a risk assessment to identify any required control and mitigation measures and implement them to reduce and manage the risk.
- 7.20 We will establish and maintain a risk assessment for fire safety management and operations, setting out our key fire safety risks and appropriate mitigations.
- 7.21 To comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be in place for all repairs work to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement and refurbishment work.
- 7.22 We will operate robust processes to record, investigate and act on fire safety-related near misses. A near miss is an unplanned event that does not result in injury but had the potential to do so.
- 7.23 We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to fire safety.

8.0 Inspection Programmes

- 8.1 **FRAs** - We will ensure all our communal blocks and other properties (such as sheltered housing, extra care schemes and offices), that we own or manage, have an FRA in place where we have the legal obligation to do so.
- 8.2 Thereafter, we will maintain a programme of FRA reviews at intervals appropriate to the premises and the level of fire risk, as determined by a competent fire risk assessor.
- 8.3 We will undertake Type 1 FRAs (which will include gaining access to roof spaces within buildings). We will only undertake intrusive FRAs (either Type 2 or Type 4 assessments) if we identify specific risk factors for a particular building.
- 8.4 We will ensure that a pre-occupation FRA is carried out on all new build schemes or new acquisitions where we have an obligation to do so, followed by a post-occupation FRA a maximum of three months after the first tenant moves in.
- 8.5 **Properties managed by others** – We will obtain FRAs where our properties are managed by a third party.
- 8.6 **Fire door checks** – For multi-occupied residential buildings in England with storeys over 11 metres in height, we will carry out quarterly checks of fire doors in the common parts and use best endeavours to undertake annual checks of flat entrance doors, in accordance with the Fire Safety (England) Regulations 2022. For other relevant buildings, we will carry out fire door inspections at frequencies determined by risk, building type and the findings of fire risk assessments.
- 8.7 **Servicing** – We will maintain programmes of inspection, servicing, maintenance and testing for fire detection, alarm, emergency lighting, firefighting and other relevant fire safety systems and equipment in accordance with legal requirements, relevant standards and manufacturers' recommendations.

8.8 Regular inspections – We will carry out regular inspections of buildings with fire risk assessments in place to verify that required management controls are operating and that actions are being progressed and completed.

9.0 Follow-up Work

- 9.1 We will maintain robust processes to implement all mandatory fire precaution measures identified by fire risk assessments. Required improvement actions will be prioritised according to the level of risk identified by the fire risk assessor and managed within target timescales set by the organisation, having regard to the assessor's recommendations and the nature of the risk.
- Immediate risk: normally within 24 hours to 7 calendar days.
 - High risk: normally within 7 calendar days to 3 months.
 - Medium risk: normally within 30 calendar days to 3 months.
 - Low risk: normally within 3 to 6 months or delivered through a planned programme within 12 months where it is safe and appropriate to do so.
- 9.2 Where completion of works is affected by the procurement of equipment or materials, contractor availability or other supply chain issues, we will take appropriate interim measures to reduce and manage the risk until the required works are completed.
- 9.3 We will maintain robust processes to manage follow-up works arising from fire door checks, fire risk assessments, and the inspection, servicing, testing and maintenance of fire safety systems and equipment.

10.0 Data and Record Keeping

- 10.1 We will maintain an integrated asset register on our compliance management system of all properties we own or manage, setting out which properties require an FRA. We will also set out which properties require fire safety servicing and maintenance regimes (for example, fire alarms, emergency lighting and smoke/heat detection).
- 10.2 We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from fire safety programmes and the programme remains up-to-date.
- 10.3 We will maintain records of fire safety inspection dates, fire risk assessments, fire risk assessment actions and servicing records for each relevant property within our compliance management arrangements. Fire safety logbooks will be retained electronically or securely on site, where practical, for properties on the fire risk assessment programme.
- 10.4 We will keep all records for at least two years from creation and have robust processes and controls in place to maintain appropriate levels of security for all fire safety related data.

11.0 Resident Involvement and Engagement

- 11.1 We consider good communication essential in the effective delivery of fire safety programmes, therefore, in accordance with our Customer Voice approach we will continue to develop our

resident engagement strategy and communication programme. This will support residents in their understanding of fire safety, advise them of how they can keep themselves and other residents safe, and encourage them to report any fire safety concerns.

- 11.2 We also aim to successfully engage with vulnerable and hard to reach residents. We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.
- 11.3 We will provide residents with accessible fire safety information about their building, including a resident-friendly summary of relevant fire risk assessment findings where appropriate, and will make further information available on request in accordance with legal and operational requirements.

12.0 Competent Persons

- 12.1 The Health and Safety Manager will be supported by training, knowledge, experience and, where appropriate, formal qualifications that are proportionate to the fire safety responsibilities of the role.
- 12.2 Only suitably competent contractors, fire risk assessors and fire engineers will undertake FRAs or works to fire safety equipment, systems and installations. These must be certified by BAFE and/or an IFSM member, and on a UKAS accredited certification scheme that meets the competency criteria established by the Fire Risk Assessment Competency Council.
- 12.3 Only suitably competent fire safety consultants and contractors will provide third party technical quality assurance checks.
- 12.4 All contractor checks will be undertaken during procurement and then on an annual basis and evidenced appropriately.

13.0 Training

- 13.1 We will deliver training on this policy and the procedures that support it, including team briefings; basic fire safety awareness training; refresher training and on the job training for those delivering the programme of FRAs and other fire safety programmes, planned maintenance and repairs works as part of their daily job. All training undertaken by staff will be formally recorded.

14.0 Performance Reporting

- 14.1 We will report robust key performance indicator (KPI) measures for fire safety. These will be provided to the Executive Team and to the Board on a quarterly basis. As a minimum, we will report:

Data – the total number of:

- Properties – schemes with communal areas and other properties.
- Properties on the FRA programme.
- Properties with a valid and in date FRA.
- Properties without a valid and in date FRA.
- Properties due a new FRA within the next 90 days; and

- Completed, in-time and overdue follow-up works/actions arising from the programme (split by priority).

Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Anticipated impact of corrective action; and
- Progress with completion of follow-up works.

In addition:

- Compliance with the fire safety equipment, systems and installation service and maintenance program.
- The number of RIDDOR notifications to the HSE with regards to fire safety.
- Details of any enforcement notices from the Fire and Rescue Service or other enforcement bodies.
- Recording and reporting on property fires to identify trends and target awareness campaigns.

15.0 Quality Assurance

- 15.1 We will ensure there is a programme of internal quality assurance audits of FRAs (field and desktop), on a ten per cent sample basis.
- 15.2 We will carry out a programme of regular property inspections to all properties with an FRA to audit that all required management actions have been completed.
- 15.3 We will carry out an independent audit of fire safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues for correction.

16.0 Non-Compliance/ Escalation Process

- 16.1 Our definition of non-compliance is - any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or becoming aware of it.
- 16.2 Any non-compliance issue identified at an operational level will be formally reported to the Head of Repairs and Maintenance in the first instance, who will agree an appropriate course of corrective action with the Executive Director of Operations and report details of the same to the Executive Team. Non-compliance incidents will be reported to the Executive Team within five working days of a serious breach or near miss. Serious non-compliance incidents will be reported to the Board within ten working days of an incident or near miss being identified.
- 16.3 In cases of serious non-compliance, the Executive Team and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

17.0 Linked policies and procedures

- Health and Safety policy
- Fire Risk Assessment process flow chart
- No access procedure

18.0 Glossary

18.1 This glossary defines key terms used throughout this policy:

- **BAFE:** Is the independent register of quality fire safety service providers, who are certified to ensure quality and competence to help meet fire safety obligations.
- **Building:** Refers to all properties owned or managed by Honeycomb Group.
- **Communal areas:** Means all shared areas within housing schemes which may be used by two or more sets of tenants or leaseholders.
- **FRA:** A fire risk assessment is an assessment involving the systematic evaluation of the factors that determine the hazard from fire, the likelihood that there will be a fire and the consequences if one were to occur.
- **FRA survey:** The FSO states that an FRA is required, however, it does not prescribe how intrusive or destructive this should be. There are four types of FRA:
 - Type 1 – common parts only (non-destructive), basic level to satisfy the FSO.
 - Type 2 – common parts only (destructive), element of destruction on sample basis.
 - Type 3 – common parts and flats (non-destructive), considers means of escape and fire detection within at least a sample of flats.
 - Type 4 – common parts and flats (destructive).
- **IFSM:** The Institute of Fire Safety Managers.
- **PAS79:** A publicly available specification published by the British Standards Institution which focuses on making sure that all the required information that pertains to both an FRA and its findings are recorded.
- **PEEP:** A personal emergency evacuation plan is a bespoke escape plan for individuals who may not be able to reach an ultimate place of safety unaided or within a satisfactory period of time in the event of any emergency.
- **UKAS:** The National Accreditation Body for the United Kingdom, appointed by government to assess and accredit organisations that provide services including certification, testing, inspection and calibration.

Data Protection

For processing, storing and sharing the personal data associated with this policy we will ensure that it is carried out in accordance with current data protection legislation (UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025).