

# FIRE AND STRUCTURAL SAFETY POLICY

May 2025

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# 1 Introduction

The health and safety of our tenants, leaseholders, visitors, staff and contractors is of paramount importance to Haringey Council.

We take building safety which includes fire and structural risks very seriously, and are working to protect our tenants and leaseholders from fire and structural hazards. We will also ensure that our staff and contractors are competent to work safely in our council housing stock.

This policy underpins the Council's Building Safety Strategy 2024-2028 objectives for achieving suitable and sufficient measures for fire and structural safety in our council housing, in accordance with current legislation.

We will work with other responsible persons for example other local authorities where they are accommodating a Haringey Council tenant including commercial tenants connected with our residential buildings.

When we use the terms 'we', 'our', and 'us' in this policy we mean Haringey Council.

The delivery of this policy forms an integral part of our wider council corporate commitment to create and maintain a health and safety culture amongst our staff and contractors as outlined our Corporate Health, Safety and Wellbeing Statement and Policy.

## 2 Aim of the policy

This policy aims to ensure that we have relevant measures in place to comply with the Regulatory Reform Fire Safety Order 2005, Fire Safety Act 2021, Building Safety Act 2022, Building Act 1984 and other relevant codes of practice and guidance including building regulations and approved documents.

This policy sets out how we will:

- Ensure our compliance with legal and statutory requirements including carrying out, updating, and regularly reviewing fire risk assessments and structural building appraisals in our residential buildings in line with the level of risk.
- Outline the roles and responsibilities within the Council and contractors to meeting our fire safety obligations.
- Approach the maintenance of our premises, equipment and devices.
- Focus on minimising as far as reasonably possible the risk of fires igniting and spreading in our council housing.
- Commit to ensuring that tenants, leaseholders and staff know what to do when a fire does occur – in partnership with the emergency services.
- Provide staff training appropriate to their duties under Fire and Building Safety to ensure competencies to undertake their required duties.

## 3 Key roles and responsibilities

### 3.1 The Cabinet

Has overall responsibility for ensuring:

- The Fire and Structural Safety Policy is delivered to ensure full and continuing compliance with the regulatory standards, legislation and approved codes of practice.
- Suitable arrangements for fire safety are communicated, maintained, and reviewed whenever legislation, regulations or guidance changes. This includes learning lessons from any fire related incidents and adapting to changes in technology.
- Sufficient numbers of competent staff are employed to meet the Council's statutory responsibilities.

### 3.2 Chief Executive (responsible person)

The statutory role of the Responsible Person (Duty Holder) as outlined within the Fire Safety Order is Haringey Council led by the Chief Executive.

Haringey Council is the Responsible Person under the Fire Safety Order 2005 and the Principal Accountable Person under the Building Safety Act.

The Chief Executive will ensure that suitable arrangements and adequate resources are in place for their management team to deliver Building Safety (Fire and Structural) measures.

### 3.3 Directors and Assistant Directors

Will assist the Chief Executive in:

- Ensuring continuous improvement through reviewing the safety performance and the safety management system within their directorate.
- Ensuring fire safety issues are given a high priority and adequately resourced.
- Ensuring statutory provisions are complied with and best practices is adopted in all work activities where possible.
- Reporting safety performance to the Corporate Leadership Team.
- Promoting a culture of fire safety risk awareness and responsibility at all levels across the organisation
- Ensuring sufficient, suitable, and appropriate skills, qualifications and training are in place through recruitment, retention and procurement policies and processes.

### 3.4 Heads of Service

Have been delegated duties and responsibilities for the management of fire safety.

### 3.5 Managers and Supervisors

Must ensure that the detailed arrangements to deliver this policy, processes and procedures are implemented within their area of control. They are responsible for ensuring that staff under their management have adequate training, understand the impact of fire and structural safety in their roles and are aware of this policy.

### 3.6 All employees

Have a responsibility to:

- Take reasonable care for their own health and safety and that of others.

- Report immediately any concerns they may have relating to this policy or its procedures.
- Report any hazards they see immediately relating to fire and structural safety.
- Co-operate with their managers to enable compliance with this policy and the legal duties the council holds.

### 3.7 Contractors

Are required to report any fire safety concerns when instructed to work on or in our council housing and to ensure that the fire safety of our council housing is maintained during, and because of, all works for which they are engaged.

#### **Accountable Persons Duties**

We recognise our obligations and duties as “Accountable Persons” for higher-risk buildings under the Building Safety Act 2022, as being the persons who are legally responsible for repairing the common parts of a building, such as the exterior and structure, corridors, or lobbies.

We also note that in some instances there may be other Accountable Persons for a building and as the Principal Accountable Person responsible for repairing the exterior and structure of the building we will work with those other Accountable Person(s).

#### **Principal Accountable Person’s Duties**

We recognise our obligations and duties as “Principle Accountable Persons” who are responsible for several critical duties covering “higher-risk” buildings, including:

- Registering buildings with the Building Safety Regulator
- Applying for Building Assessment Certificates, as directed by the Regulator, and displaying them in their buildings
- Preparing a Safety Case Report for each higher risk building using a risk assessment and updating it as required to ensure it is complete, accurate, and sufficient
- Maintaining and managing the important information necessary for safely managing the building, also known as the "golden thread" of information
- Developing a resident engagement strategy and complaints procedure
- Reporting certain occurrences, such as fires, to the Building Safety Regulator in the form of mandatory occurrence reports.

## 4 Tenants, leaseholders and visitors responsibilities

Tenants and leaseholders are responsible for their own household’s safety and ensuring that they or their visitors do not do anything that might:

- cause a fire or weaken the structural integrity within their home or shared areas.
- result in risks to health and safety to people or to the building safety of our council housing.

Tenants must not interfere with any measures provided for their safety e.g. closing mechanisms on their fire door, smoke and heat detectors and firefighting equipment.

Tenants must allow reasonable access to their homes for fire safety purposes.

These responsibilities are outlined in the tenancy agreement and are designed to prevent potential fire risks and ensure that fire evacuation routes are not obstructed.

Tenants are not allowed to bring gas bottles or pressurised cylinders into Haringey council housing. This is unless it is needed to provide specialist healthcare equipment prescribed and provided by a medical professional such as pressurised oxygen cylinders for home oxygen therapy for tenants with severe respiratory conditions. These should be used in line with the [London Fire Brigade advice](#) on reducing fire risk when using/caring for someone who uses specialist healthcare equipment.

As outlined in our Garage Allocations Policy, garage licensees must only use their garage for storage in compliance with the Garage Licence agreement and any relevant environmental, health and safety regulations and/or applicable planning controls. If we find any issues that would breach the licence agreement, we will enforce and look to recover our costs.

Following advice by London Fire Brigade, we recognise that HMO conversions may present higher risks for emergency access and increased fire risks. It is very important that leaseholders seek our permission before making any alteration or improvement that will affect the internal or external structure of their property. Further information on leasehold home alterations including our alterations policy for leaseholders and how to apply to us for landlord consent can be found on our [leasehold home alterations webpage](#).

## 5 Our approach to managing fire safety

### 5.1 Fire Risk Assessment and Action Plans

As a landlord, we are responsible for carrying out fire risk assessments and acting to identify, manage and mitigate risks associated with fire within the common areas of our council housing.

The fire risk assessments take into consideration the effect a fire may have on anyone in or around the premises plus neighbouring property and will be kept under regular review.

The building fire risk assessment concentrates on the following areas:

- Elimination or reduction of risks (ignition sources)
- Suitable means of detecting & raising the alarm in the event of fire
- Adequate emergency escape routes and exits.
- Adequate fire compartmentation (fire & smoke spread and the protection of escape routes)
- The appropriate type and sufficient number of fire extinguishers
- Correct type and sufficient number of fire signs and notices
- Provisions for the correct maintenance of installed fire equipment
- Suitable provisions for the protection of Fire Brigade personnel

We will conduct fire risk assessments within our council housing which have communal areas on a regular basis to identify potential risks and put measures in place to mitigate/remove the risks.

Fire risk assessments will identify measures that need to be taken to properly address fire safety concerns, or where applicable recommend further intrusive surveys for compartmentation and external cladding investigations. The fire risk assessments will also where applicable trigger more intrusive compartmentation or external wall surveys

and/or Type 4 Fire Risk Assessments (which are the most intrusive types of fire risk assessments) in void properties.

We will undertake the most appropriate fire risk assessment for the building using the PAS79:2012 Code of Practice for all fire risk assessments, to support these assessments, we will also ensure that the risks relating to the external walls are identified in accordance with PAS 9980:2022 Fire risk appraisal of external wall construction and cladding of existing blocks of flats – Code of practice. This will assist with prioritising and delivering and appropriate management action.

We will ensure that we share with our assessors important and relevant information about our council housing to allow an informed assessment of the risks for each property. This will include for example:

- details of vulnerable tenants and leaseholders who may need assistance to evacuate
- key reports and structural surveys on the materials contained
- the construction materials used in external wall systems and balconies.

We will maintain a fire risk register on all our council housing requiring fire risk assessments, recording and reporting findings in accordance with fire safety legislation.

The frequency and type of inspection depends upon the level of risk determined by a competent fire risk assessor, with a minimum period of 1 year for moderate or above but not exceeding 3 years for tolerable rated buildings.

We will undertake a new fire risk assessment no matter what the risk category is following:

- Major Works, (alterations or structural)
- Any material changes to the building or its use
- Fire, near miss or threat of arson

We will produce a Pre-occupation assessment for our new council housing.

During occupation we will carry out a fire risk assessment 3 months after occupation, followed by annual or 3 yearly assessments based on the risk. Fire risk assessments will be carried out on the following triggers:

- Following a fire
- Following a change of use or occupancy type
- Following a significant change of fire safety legislation or code of practice
- In any case, tolerable buildings will undergo a desktop review in year two.

## Remediation and risk mitigation

We will prioritise our council housing for remediation and risk mitigation as follows:

**Intolerable** – Immediate action should be taken to mitigate the risk\*.

Mitigation of intolerable or substantial risk may involve carrying out targeted works to reduce the risk rating or completing all works to ensure appropriate allocation and use of resources. Intolerable cases could involve the immediate implementation of a waking watch and a change of fire strategy or immediate decant if necessary.

**Substantial** – Urgent action should be taken to mitigate the risk within a reasonable time\*.

The timescales for completion of measures or 'actions' that need to be taken, will be based on the action risk rating determined by a competent fire risk assessor and scheduled for completion within maximum timescales set out within the fire action plan for each building. A suitable and competent supply chain and/or in-house resources will be kept in place to deliver programmes to ensure the safety of the buildings and all relevant persons.

**Moderate** – The building should be assessed for the most appropriate programme.

**Tolerable** – The building should be considered for further improvement.

## 5.2 Fire evacuation

We will keep all tenants and leaseholders informed about our fire safety guidance for their block. This includes fire action notices being displayed in the communal area of each building which sets out the what the evacuation strategy is for that building, how to report a fire, and any other instruction that tells tenants and leaseholders what they must do in the event of a fire, based on the building's evacuation strategy.

Each residential building with a communal area will have a clearly defined evacuation policy.

The fire risk assessment will be communicated to tenants and leaseholders and on new lettings will be advised of the arrangements for their new home as well as issuing a general reminder on an annual basis. Posters will also be displayed in communal areas (such as the building's lobby or any visible part of the building).

## 5.3 Vulnerable tenants and leaseholders

### **Person Centred Fire Risk Assessments (PCFRAs)**

We know that some of our tenants and leaseholders may have physical difficulty leaving their home when a fire occurs or a non-visible disability that affects their ability to leave or know what to do in an emergency.

We will engage with tenants and leaseholders and ask them to let us know about any vulnerabilities they have and whether they would additional equipment or support in the event of a fire.

For anyone that lets us know they would like help or support, we will arrange to:

- carry out a Person-Centred Fire Risk Assessment (PCFRA), where we will discuss the tenants and leaseholders needs with them and decide how best to help them keep safe from fire.
- This is supported by home fire safety visits by the LFB that can be arranged by tenancy management

**A Personal Emergency Evacuation Plan (PEEP)** is a plan for a person who may need assistance evacuating, for instance, a person with impaired mobility, to evacuate a building or reach a place of safety in the event of an emergency. Such plans can often only be in place where there are staff or other persons who will be present to assist in the evacuation.

Information relating to tenants who have a PEEP or PCFRA is contained within the secured information box and is available to the fire service in the event of an emergency and will ensure evacuation assistance is provided to the resident.

We will respond appropriately to meet the needs of tenants and leaseholders who inform us they have a disability such as a hearing impairment, visual impairment and mobility issue and will provide appropriate equipment or support to ensure that they are alerted in the event of a fire.

Where we identify an individual with a vulnerability who may be at a high risk of causing a fire within their home a referral will be made to the Fire Service for an assessment for fire protection items such as fire-retardant night wear, blankets and personal misting units.

### **Supported Housing**

We manage supported housing for older people which are divided into two categories: Sheltered Housing and Good neighbourhood schemes. Our tenants are above the age of 50 and have various stages of disability / long term health conditions.

### **Fire safety measures**

When we are designing in fire safety measures in our housing, wherever a tenant or leaseholder lets us know about a specific issue such as being a victim/survivor of domestic abuse, we will assess and work with them to find a technical or other solution that meets their health and safety needs. We will approach this in line with our Domestic Abuse and Violence Against Women and Girls Policy for council tenants and leaseholders and those approaching the council as homeless.

## **5.4 Maintenance of Premises and Equipment**

We will ensure that our council housing and any facilities, equipment and devices provided as fire prevention measures are installed which is equal to or better than those required by regulation or manufacturer's guidance or standards.

They will also be subject to a regular and suitable system of maintenance and maintained in an efficient state, in efficient working order and in good repair including replacement and /or upgrading where deemed necessary.

We will

- operate appropriate services and programmes through which facilities, equipment and devices will be inspected, maintained, replaced or upgraded. This may require specialist technical skills and management and will be managed in accordance with the duties of managers and supervisors as set out in section 3 of this policy.
- maintain current and appropriate safety policies in support of Fire Safety including but not limited to the electrical safety policy and the Gas and heating safety policy.

## **5.5 Clear Communal areas**

We adopt a 'managed approach' to items stored in the communal areas of our council housing and limit the types of items that are allowed to reduce health and safety risks (including fire and structural risks) in line with our clear communal areas policy.

In practice, this means our expectation is that communal areas are kept clear. However, before any permission can be granted to store items in the communal areas the Tenancy officer must seek advice from the fire safety team.

## **5.6 Access**

When access to a tenant or leaseholder's home is required, we will make all reasonable attempts to contact them first, including contacting their family and other people they know who may or may not live with them in line with our access for emergencies, safety or welfare policy.

The tenancy and lease agreement set out reasons why we may need to enter properties. It also gives us a contractual right to access the property and explains when access must be provided.

Tenants must allow access to their homes for fire safety purposes in line with their tenancy agreement and our access for emergencies, safety or welfare policy.

An appointment letter for the annual gas safety check will be posted ten months after completion of the previous check. The appointment will be on or around two weeks from the date of the appointment letter and will provide details for rearranging the appointment if the auto generated appointment is inconvenient. A further appointment letter will be sent if the engineer is unable to access and complete the gas safety check.

If tenants refuse access after reasonable requests, we:

- may ask the court for an injunction to allow us access into the property and the tenant to pay our legal fees.
- may serve a Notice of Seeking Possession letting you know of our intention to seek possession of your home.
- may obtain a warrant of entry from the Magistrates Court

We will only enter a tenant or leaseholder's home or other property e.g. garages without their permission or a pre-arranged appointment in exceptional circumstances where there is an emergency.

## 5.7 Communication

We will help residents stay safe in their homes through our messaging of fire safety advice and guidance and will make efforts to communicate fire safety messages to tenants, leaseholders and their tenants. We will also support tenants to report to us any concerns about fire safety.

We will use the following methods of communication:

- Providing regular fire safety tips and updates via our Homes Zones magazine and e-bulletins to include but not be limited to:
  - o seasonal guidance such as the safe use of candles in the winter and reminders about BBQ safety in the summer (note BBQs are not allowed in communal areas or balconies)
  - o sharing advice and updates on priority issues flagged to us by the London Fire Brigade across our channels – for example safe charging of e-bike batteries
  - o flagging our safety inspections and actions to keep residents safe (such as removing grilles and gates) and encouraging residents to provide access when we need to check their homes
- We will provide information in plain English with a simple, accessible and jargon-free style and ensure that translation and interpretation is provided where possible/when necessary.

- Speaking to residents about fire safety during site visits, on our building safety patrols and through our dedicated building safety management team
- Links to London Fire Brigade guidance and access to fire risk assessments on our [safety for council tenants webpages](#)
- Display fire safety instructions in a conspicuous part of the building which contains common parts through which tenants and leaseholders would need to evacuate in the case of an emergency
- Communications should fire safety incidents occur

## 5.8 Training

We will deliver staff training on this policy and the procedures that support it which is appropriate to their duties under the Fire Safety Order. Staff with delegated responsibility for fire safety will complete specific training to assure and demonstrate competency to undertake required duties.

Training will be delivered through appropriate methods, including team briefings and fire safety awareness training. We will explore methods and opportunities to deliver training to residents on fire safety.

All training undertaken by staff will be formally recorded.

# 6 Legislation, regulations and guidance

As the landlord, we will ensure that we carry out this policy in accordance with legal and statutory requirements.

## 6.1 Legislation and regulations

The principal legislation and regulations applicable to this policy are the Regulatory Reform Order 2005, Fire Safety Act 2021 and Building Safety Act 2022.

Other regulations which are applicable to this policy include but are not limited to:

- Fire Safety Regulations 2022
- The Smoke and Carbon Monoxide Alarms (Amendment) Regulations 2022
- Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023
- The Building Regulations 2019 incorporating 2020 amendments; Approved Document B (Fire Safety)
- Housing Health and Safety Rating System 2005 (- Hazard 24: Fire)
- The Furniture and Furnishings (Fire) (Safety) Regulations 1988
- The Building Act 1984

Associated enacted legislation:

- Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023
- The Health & Safety at Work etc. Act 1974

## 6.2 Guidance

- [RRFSO HM Govt Guide 1 - Offices & Shops](#)

- [RRFSO HM Govt Guide 4 - Residential Care Premises](#)
- [RRFSO HM Govt Guide - Means of Escape for Disabled People](#)
- [Local Govt Group - Fire Safety in Purpose Built Flats 2023](#)
- [National Fire Chiefs Council Specialised Housing Fire Safety Guidance](#)

## 7 Performance monitoring

### 7.1 Audit

Annual internal audits of the management team are carried out by our Health & Safety team against safety management systems, risk assessments and workplace safety.

Audit will as a minimum test for compliance with the regulation, legislation and codes of practice and delivery of this policy through associated procedures. It may also include or separately test for data accuracy in our programming and reporting systems.

The audits will identify any non-compliance issues and make suitable recommendations for improvement.

All agreed recommendations will be implemented within reasonable and, where possible, recommended timescales.

### 7.2 Quality Control and Assurance

We will put in place quality assurance inspections of all management activities to ensure they are being fully and robustly implemented and completed safely.

Where issues of poor performance are identified, we may increase targeted inspections to establish the root cause and required improvement actions.

### 7.3 Monitoring

We will monitor adherence to and effectiveness of this policy and procedures by our staff, contractors, tenants and leaseholders.

We will ensure that such monitoring is sufficient to ensure policies and procedures are effective.

- Through regular reporting to our Building Safety and Compliance Board and Property Compliance Board
- Through monthly contractor meetings.
- Following recommendations from on-site monitoring, audits and/or investigations.
- Resident engagement and analysis of tenant satisfaction data.
- Analysis of quality inspection results.

We will closely monitor the performance of our contractors, with specific focus upon:

- Compliance with fire inspection and maintenance dates
- Safe working practice, incidents.
- Timeliness of appointments.
- Customer satisfaction and complaints.

## 8 Links to other policies and strategies

This policy links to and should be read together with the following Haringey Council policies and strategies:

- Access for Emergencies, Safety or Welfare Policy
- [Alterations Policy for Leaseholders](#)
- Asbestos Safety Policy
- [Building Safety Strategy 2024 - 2028](#)
- Clear Communal Areas Policy
- [Corporate Health, Safety and Wellbeing Statement and Policy](#)
- [Domestic Abuse and Violence Against Women and Girls Policy for council tenants and leaseholders, and those approaching the council as homeless](#)
- Electrical Safety Policy
- Garage Allocations Policy
- Gas & Heating Safety Policy
- Lift Safety Policy
- [Responsive Repairs policy](#)
- [Vulnerable tenants and leaseholders policy](#)
- [Safeguarding council tenants and leaseholders policy](#)
- Water Hygiene Policy

## 9 Resident co-design and engagement

### **When did you discuss development of this policy with residents?**

At meetings of the Resident Voice Board in September 2024 and February 2025.

### **What did they tell you?**

When designing in fire safety measures in our council housing, we should consider the resident's needs and specific requirements. Residents told us that the policy should clarify that the policies link to our responsive repairs policy and ensure it that the policy covers the help available for disabled tenants in a fire.

The need to clarify that the policy covered Sheltered Housing and Good neighbourhood schemes

### **How has what tenants and leaseholders told us informed development of this policy?**

The policy states in section 5.3 that when designing in fire safety measures, wherever a resident lets us know about a specific issue, we will assess if there is a technical or other solution that can be developed.

For example, it confirms that wherever a tenant or leaseholder lets us know about a specific issue such as being a victim/survivor of domestic abuse, we will assess and work with them to find a technical or other solution that meets their health and safety needs.

The policy confirms, also at section 5.3 that we manage supported housing for older people which are divided into two categories: Sheltered Housing and Good neighbourhood schemes.

## 10 Equalities

The Council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to

have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, we treat socioeconomic status as a local protected characteristic.

This policy makes no changes to operational practices. They are being updated to reflect the insourcing of the council housing function. There are no known equality issues with current provision, and it is not anticipated that there will be disproportionate impacts on any protected characteristics, disadvantaged communities or vulnerable residents.

This policy has a section (section 5.3) which details the support provided to vulnerable tenants and leaseholders across housing management and building safety. This summarises and links to the approach outlined in the Council's Vulnerable Tenants and Leaseholders Policy. A comprehensive EQIA was conducted for the Vulnerable Tenants and Leaseholders Policy as part of its approval by Cabinet in July 2024.

## 11 Reviewing the policy

We will review this policy every three years with the next review due in May 2028 unless earlier events or legislation require an earlier update to this policy.