

Fire Safety Management Policy

For council housing and other HRA properties

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Document Control

Governance

Table 1 – Policy information

Item	Response
Title	H&N Fire Safety Management Policy for Council Housing
Responsible officer	H&N Head of Assets and Building Safety
Author	Former H&N Head of Assets and Development
Approved by	V2.0 Cabinet 12/03/2024
Version approval date	V2.1 PHB 14/04/2026
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Review responsibility	H&N Head of Assets and Building Safety
Applicable to	Homes & Neighbourhoods staff and contractors. Homes & Neighbourhoods tenants, leaseholders and other residents.
IIA date	29/01/24 IIA-580258221 Fire Safety Management Plan
Regulatory framework	Social Housing (Regulation) Act 2023 and associated RSH Regulatory Standards . Health & Safety at Work Act 1974; Regulatory Reform (Fire Safety) Order 2005 (RRFSO); Fire Safety Act 2021; Building Safety Act 2022.

Revision history

Table 2 – Revision details

Date	Version	Author	Authorised by	Revision details
06/07/22	1.0	HE	Exec Board	First publication.
12/03/24	2.0	HE	Cabinet	Full policy review to reflect changes in law.

Date	Version	Author	Authorised by	Revision details
14/04/26	2.1	JG/Building Safety Team	HNSLT/PHB	Document redrafted and formatted to align with Kirklees Council's document accessibility standards. Legal context reviewed and updated. Fire Safety Management Plan noted as being under review. Commitment to considering individual tenant circumstances added (aligned with Vulnerable Tenant Policy). Section added on tenant responsibilities (to align with new Tenancy Agreement and Safety in Communal Areas Policy). Job titles updated. Minor edits and clarifications throughout.

1 Introduction

1.1 Purposes of this policy

- 1.1.1 Kirklees Council is responsible for the maintenance and repair of around 22,500 domestic and non-domestic premises owned through the Housing Revenue Account.
- 1.1.2 Kirklees Council is committed to identifying and minimising the risks associated with fire safety in its properties and ensuring that all fire safety works, including installation, maintenance, and testing of equipment, are carried out in compliance with the Regulatory Reform (Fire Safety) Order 2005, Fire Safety Act 2021, Building Safety Act 2022 and other regulatory and industry body requirements.
- 1.1.3 This policy sets out Kirklees Council's commitments to meeting its fire safety obligations as a landlord, and identifies key responsibilities within the organisation. The policy seeks to provide assurance that fire safety is effectively managed to ensure the safety of employees, contractors, tenants, leaseholders, and members of the public.
- 1.1.4 The policy should be read in conjunction with the Council Housing Fire Safety Management Plan (currently under review), which provides further detail on the actions put in place to ensure compliance.

1.2 Legal context

- 1.2.1 This policy responds to the [Social Housing \(Regulation\) Act 2023](#) and the associated [Regulatory Standards](#) by addressing the following requirements:

Safety and Quality Standard

- When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas.
- 1.2.2 This policy also aims to ensure compliance with the following legislation and guidance:
- Building Safety Act 2022
 - Fire Safety Act 2021
 - National Fire Chiefs Council (NFCC) Fire safety in Specialised Housing Guidance 2017;
 - Construction (Design and Management) Regulations 2015
 - The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
 - Building Regulations 2010 – Approved Document B (Fire Safety)
 - Fire Safety (Employee’s capabilities) (England) Regulations 2010
 - Regulatory Reform (Fire Safety) Order 2005
 - Housing Health and Safety Regulations 2005
 - Housing Act 2004
 - The Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002
 - Control of Substances Hazardous to Health (COSHH) Regulations 2002
 - Management of Health and Safety at Work Regulations 1999
 - Health & Safety (Safety Signs and Signal) Regulations 1996
 - Workplace (Health, Safety & Welfare) Regulations 1992 (as amended)
 - Smoke Detectors Act 1991
 - Health and Safety at Work etc. Act 1974
 - Defective Premises Act 1972
 - Occupiers’ Liability Acts 1957 and 1984
 - HSE Guidance HSG 168 – Fire Safety in Construction
 - LACORS - Housing Fire Safety Guidance
 - ‘Fire Safety in Purpose-Built blocks of Flats’ – Government Guidance
 - ‘Fire Safety Risk Assessment: Sleeping Accommodation’ – Government Guidance
 - Relevant British Standards
- The above list is not exhaustive.

1.3 Definitions

1.3.1 For the purposes of this policy, the following general definitions apply:

Table 3 – List of definitions used in this policy

Term	Definition
Homes & Neighbourhoods; H&N	Kirklees Council's housing management services, inclusive of all departments and teams.
Tenant	A person that rents a home from Homes & Neighbourhoods.
Leaseholder	A person that owns a home on a lease, within a council-owned building.
Resident	Any person that is registered as living in a council-owned home or other building, including tenants, leaseholders and others.
Staff; Officer; Employee	A person that works for Kirklees Council, including temporary or agency workers and apprentices.
Contractor	A company or person that works on behalf of Kirklees Council.
Pinnacle Housing	A company that manages some council-owned homes on the council's behalf. The homes are managed through a Private Finance Initiative (PFI) contract known as Excellent Homes for Life.

2 Objectives and scope

2.1 Policy objectives

- 2.1.1 The primary aim of this document is to ensure that Kirklees Council is compliant with statutory legislation relating to fire safety within all council homes and non-residential properties managed through the Housing Revenue Account.
- 2.1.2 The policy seeks to minimise the likelihood of fire occurring, and to minimise injury and loss in the event that a fire does occur.
- 2.1.3 The policy aims to provide clarity on the council's overall approach to fire safety, assuring tenants and other stakeholders that our approach to fire safety is robust and effective.

2.2 Policy scope

- 2.2.1 This policy applies to all Homes & Neighbourhoods staff and contractors who have responsibility for, or who may come into contact with fire safety systems or equipment during their normal work activities.
- 2.2.2 The policy should be read and understood by all parties who have responsibilities relating to Fire Safety within H&N and a duty of care under the Health & Safety at Work Act 1974, Regulatory Reform (Fire Safety) Order 2005 (RRFSO), Fire Safety Act 2021 and Building Safety Act 2022.

- 2.2.3 The policy applies to fire safety arrangements within all council homes and non-residential properties managed by Kirklees Council through the Housing Revenue Account. It covers the following properties:
- All residential properties (including general needs housing, supported housing, sheltered housing, extra care housing and other rented properties) owned and managed by the council.
 - All non-residential properties (including offices, depots, shops, other commercial buildings, community premises, blocks and communal areas, remote plant, and garages) under the management of Homes & Neighbourhoods (H&N) through the Housing Revenue Account (HRA).
 - Leasehold or shared ownership properties, and other rented housing managed by Kirklees Council on behalf of a third party; unless other parties are explicitly specified as having statutory responsibility in a lease or management agreement.
- 2.2.4 The policy is relevant to all tenants, leaseholders and others who may live in, work in, visit or use homes or other premises owned and managed by Homes & Neighbourhoods.
- 2.2.5 Pinnacle Housing, who manage some homes on behalf of the council, are required to provide assurance that the landlord's fire safety obligations are being met. Separate arrangements are in place and maintained to ensure this.

3 Policy statement

3.1 Inspections, assessments and prevention

- 3.1.1 Fire safety inspections of premises will be conducted to ensure that safe standards are maintained with regard to fire prevention, containment, detection, alarms, means of escape, evacuation etc., and in compliance with relevant legislation, approved codes of practice and industry guidelines. Systems will be tested in accordance with best practice and relevant standards.
- 3.1.2 Each maintenance, upgrade or renewal scheme will be assessed to ensure fire safety standards are not compromised by the works and will remain compliant after works are carried out.
- 3.1.3 Suitable and sufficient fire risk assessments, in accordance with the Regulatory Reform (Fire Safety) Order 2005 will be carried out. Significant findings will be recorded and communicated, and any necessary remedial work will be undertaken in a timely manner.
- 3.1.4 Clear fire safety procedures are in place to enable employees to work safely by assessing risks, and by implementing and monitoring controls. These procedures will be reviewed annually or sooner if there are any changes to legislation or working practices.
- 3.1.5 Adequate resources will be made available to maintain standards in fire safety.

- 3.1.6 Kirklees Council, tenants and leaseholders have a shared responsibility to keep communal areas clear and safe, as set out in the H&N Safety in Communal Areas Policy.
- 3.1.7 Council staff (e.g. Housing Management Officers, Independent Living Officers and Estate Caretakers) ensure all communal areas are visually inspected at monthly intervals as a minimum.
- 3.1.8 Tenants and leaseholders have a responsibility to keep all entrances, passageways, balconies, communal areas and stairs clean and free from obstruction.
- 3.1.9 All tools, machinery, equipment, installations, and systems will be maintained in a safe condition and stored safely.
- 3.1.10 Fire related incidents will be investigated in a timely manner, and in conjunction with West Yorkshire Fire and Rescue Service, to identify immediate, root and underlying causes and the measures required to reduce or eliminate the likelihood of recurrence.

3.2 Competence

- 3.2.1 This policy and any subsequent amendments will be brought to the attention of staff and contractors through induction and training. Alternative formats and languages may be used, as and when necessary.
- 3.2.2 Fire related training, instruction, information, and supervision will be provided to enable employees to perform their duties safely and efficiently.
- 3.2.3 Evacuation drills will be conducted to maintain overall awareness and to practise procedures.
- 3.2.4 Contractors and suppliers will be committed to achieving and adhering to relevant fire safety standards. Kirklees Council has a duty to ensure that it only uses competent contractors to undertake fire safety and improvement works, and will ensure this through the procurement process.
- 3.2.5 Records of fire safety training, competence and qualifications will be maintained and made available for audit and assurance purposes.

3.3 Engagement and communication

- 3.3.1 Clear and regular communications on fire safety will set out the responsibilities of H&N, tenants and leaseholders. Communications will be delivered in a range of formats including through tenant panels, surgeries, newsletters, social media campaigns, and digital or phone surveys.
- 3.3.2 Fire safety guidance information will be made available on the council's Homes & Neighbourhoods webpages for tenants, elected members and the wider public. The information may be provided in alternative formats/languages as and when necessary.

- 3.3.3 Tenants and others will be advised that they have a duty to co-operate as far as is necessary to enable the council to comply with fire safety requirements.
- 3.3.4 Homes & Neighbourhoods will work with residents on an individual basis to understand their specific circumstances, including information about any communication needs, disabilities, or vulnerabilities. Fire safety services and arrangements will be delivered in a way that considers and respects tenants' individual needs, in line with the H&N Vulnerable Tenant Policy.
- 3.3.5 Kirklees Council recognises that some residents may be at increased risk in the event of fire due to vulnerability. The council will take reasonable steps to identify, record and consider vulnerability and evacuation needs, including the use of Personal Emergency Evacuation Plans (PEEPs) or other proportionate arrangements, in line with legislation and guidance.

3.4 Fire Safety Management Plan

- 3.4.1 The Council Housing Fire Safety Management Plan sets out further detail on how Kirklees Council's policy commitments to fire safety will be delivered for council housing. The document is currently under review and will be published on the council's website when this review is complete.
- 3.4.2 The management plan includes guidance on the delivery of the council's policy commitments for council housing in the following areas:
- Fire risk assessment (FRA).
 - Actions arising from FRA.
 - Management of buildings in relation to fire safety.
 - The testing, inspection, and servicing of fire safety systems.
- 3.4.3 It also includes guidance on:
- Data - how data is captured and controlled in each of the four areas detailed above.
 - Access - the process relating to gaining access.
 - Performance and assurance - how and when performance is monitored, reported and assured.

4 Roles and responsibilities

4.1 Council responsibilities

- 4.1.1 Kirklees Council is the responsible legal entity and is accountable for ensuring implementation of this policy and the Fire Safety Management Plan.

- 4.1.2 The Chief Executive Officer has overall responsibility for monitoring the consistent implementation of this policy and the Fire Safety Management Plan.
- 4.1.3 Homes and Neighbourhoods Improvement Board is, on behalf of Cabinet, responsible for ensuring ongoing compliance with fire and building safety legislation, and for escalating any key risks.
- 4.1.4 The Executive Director for Place is responsible for ensuring sufficient resources are in place to fulfil Responsible Person roles for all fire safety requirements.
- 4.1.5 The Service Director for Homes and Neighbourhoods is responsible for providing an effective performance management framework to strengthen risk control and provide greater levels of assurance in relation to fire safety.
- 4.1.6 The Head of Assets and Building Safety is responsible for managing the strategic implementation of this policy and the Fire Safety Management Plan and ensuring compliance with all regulations in relation to fire safety.
- 4.1.7 More detailed information on roles and responsibilities can be found in the Fire Safety Management Plan.

4.2 Tenant responsibilities

- 4.2.1 In line with the Tenancy Agreement, tenants must allow council staff, agents or contractors access to their homes to carry out fire safety checks and any required servicing and associated works.
- 4.2.2 Tenants and leaseholders must not use internal communal areas for storing possessions. All escape routes must remain free from both obstruction and fire risk at all times, so as not to impede an escape in an emergency. We do not allow any items to be kept in internal communal areas. Some examples include (but are not limited to):
 - Pushchairs
 - Bikes
 - Carpets, rugs or floor mats
 - Bookcases
 - Curtains or net curtains
 - Shoes and boots
 - Flammable liquids or gases
 - Electrical equipment
 - Festive decorations e.g. Christmas trees and wreaths
 - Furniture of any kind
 - Wheelchairs and mobility aids
 - Mobility Scooters

- E-Scooters
 - Rubbish Bins and waste
 - Furniture including items you are waiting to dispose of
- 4.2.3 Tenants must not let waste or other materials build up which may cause a fire, contribute to the spread of a fire, or block an escape route.
- 4.2.4 Tenants must not keep any moped, motorbike or similar vehicle, or any other machine driven by an internal combustion engine, inside their home or in any common areas.
- 4.2.5 Motor vehicles, including mopeds, motorbikes and similar vehicles must be stored outside on a council approved hardstanding (a driveway or paved area intended for parking) or if appropriate using on-street parking.
- 4.2.6 Tenants must not store bottled gas, petrol, paraffin or other flammable or explosive substances in their homes or on any land nearby except for a limited amount of such material which is reasonable for domestic use.
- 4.2.7 Barbeques, patio heaters, burners, fire pits, and similar items are not allowed in communal gardens without the written permission of Homes & Neighbourhoods, who will carry out a risk assessment. All items of this nature are not allowed to be stored in or near communal buildings.
- 4.2.8 Tenants must not allow any fire door or security door to be propped open.
- 4.2.9 Tenants must not damage any walls that have been compartmentalised to prevent the spread of fire.
- 4.2.10 Tenants must not allow any fire-fighting equipment, any compartmentation of the property that prevents the spread of fire, fire alarms, smoke detector, security system or similar safety or security device that the council has installed to be interfered with or removed at any time.
- 4.2.11 Tenants, their households or visitors must not interfere or damage anything in communal areas and/or, anything provided for health or safety purposes. This includes (but is not limited to) smoke detectors, fire alarm systems, fire extinguishers, dry or wet risers, fire doors or door closers, emergency lighting, CCTV, door entry or sprinkler systems. Fire doors must not be wedged open.
- 4.2.12 Doorbells and/or cameras are not permitted to be installed on fire doors or any walls where compartmentalisation work has been undertaken to prevent the spread of fire.
- 4.2.13 Tenants are responsible for taking out their own insurance to cover damage to their belongings and decorations and any third-party liability if there is a fire.

5 Monitoring and review

5.1 Monitoring and improvement

- 5.1.1 Monitoring fire safety and updating risk assessments are an integral part of the Homes & Neighbourhoods Fire Safety Management Plan.
- 5.1.2 A system of formal audit of the Fire Safety Management Plan is in place to ensure that both policy and procedures are being implemented.
- 5.1.3 Incidences of fire and false alarms are investigated and learning is taken from the findings.
- 5.1.4 Where the Head of Assets and Building Safety or appointed competent person(s) in the Fire Safety Team have reason to believe that the Fire Safety Management Plan is not achieving the aims of this policy, the Service Director for Homes and Neighbourhoods and the Safety, Health and Environment Manager shall be notified, and a review of the plan shall be carried out. If the review identifies deficiencies, the Head of Assets and Building Safety shall take action to amend the plan as required.

5.2 Policy review

- 5.2.1 This policy will be reviewed annually, or in response to relevant changes in legislation, regulation or organisational structures.
- 5.2.2 The policy will also be reviewed after every significant fire-related event in council housing properties and after any major events in the wider housing sector.
- 5.2.3 Any significant changes will be consulted on prior to implementation and relevant approvals sought.
- 5.2.4 The policy and future updates will be published on the council's website.

6 Associated policies and strategies

6.1 Homes & Neighbourhoods policies

- 6.1.1 The following Homes & Neighbourhoods policies and other documents are relevant:
 - Homes & Neighbourhoods Fire Safety Management Plan
 - Homes & Neighbourhoods Tenancy Agreement
 - Homes & Neighbourhoods Vulnerable Tenant Policy
 - Homes & Neighbourhoods Safety in Communal Areas Policy
 - Homes & Neighbourhoods Mobility Scooter Policy

- Homes & Neighbourhoods Guidance on Domestic Recording Systems