

FIRE SAFETY POLICY

1. INTRODUCTION

Islington & Shoreditch Housing Association (ISHA) is committed to ensuring the safety of its residents, staff, contractors, and visitors from fire. ISHA recognises its role as the **Responsible Person** under the **Regulatory Reform (Fire Safety) Order 2005 (as amended by the Fire Safety Act 2021)**, the **Housing Act 2004**, and the **Building Safety Act 2022**.

ISHA's housing stock is varied but primarily constructed post-2000. Some stock is designated for residents requiring support, including sheltered housing for elderly residents. The properties are located across London, covering the boroughs of Waltham Forest, Hackney, Haringey, Islington, Camden, and Tower Hamlets.

ISHA's aim is to implement general fire precautions that, so far as reasonably practicable, preserve and protect life, prevent fire occurrences, and ensure compliance with statutory duties.

2. LEGISLATION

ISHA's fire safety responsibilities are governed by a comprehensive legal framework that establishes clear duties for landlords, building owners, employers, and managers to identify and manage fire risks, maintain fire safety measures, and ensure the safety of residents, staff, and visitors.

The core legislative framework relevant to ISHA includes:

- **Regulatory Reform (Fire Safety) Order 2005 (FSO)**, as amended by the Fire Safety Act 2021 – Applies to workplaces and “relevant buildings” (residential buildings in England containing two or more sets of domestic dwellings). The Fire Safety Act 2021 explicitly requires assessments of external walls and flat front entrance doors.
- **Housing Act 2004** – Provides the regulatory framework for fire safety in residential premises via the Housing Health and Safety Rating System (HHSRS), HMO licensing, and management regulations.

- **Building Safety Act 2022** – Introduces enhanced duties for higher-risk residential buildings (HRRBs), defined as buildings over 18 metres or 7 storeys. Key requirements include:
 - Registration of HRRBs with the Building Safety Regulator.
 - Development and maintenance of a Safety Case and Golden Thread of information.
 - Appointment of an Accountable Person and Principal Accountable Person.
 - Mandatory occurrence reporting of fire and structural safety events.
 - Development of a Resident Engagement Strategy.

- **Fire Safety (England) Regulations 2022** – Introduces procedural requirements for multi-occupied residential buildings, including:
 - Monthly checks of lifts and firefighting equipment.
 - Installation and maintenance of Premises Information Boxes in HRRBs.
 - Provision of fire safety instructions to residents on move-in and at least annually.
 - Annual provision of fire door safety information to residents.

ISHA also aligns with relevant British Standards (e.g. BS 9999, BS 9991, BS 5306, PAS 79-2:2020, PAS 9980:2022) and National Fire Chiefs Council (NFCC) guidance.

3. FIRE SAFETY POLICY

The purpose of ISHA’s fire safety policy is to provide a clear framework for ensuring, so far as reasonably practicable, the safety of staff, residents, contractors, and visitors from fire.

This policy applies to all ISHA workplaces, including offices, sheltered housing, residential buildings, and any other locations or parts of buildings for which ISHA has responsibility.

ISHA will:

- Take all reasonable steps to prevent and control fire risks, maintaining both active and passive fire precautions.
- Maintain an open information policy and work collaboratively with tenants, residents, staff, contractors, and statutory bodies.
- Empower operational staff with training, skills, and resources to manage fire safety effectively.
- Ensure FRAs prompting remedial action are prioritised and implemented.
- Monitor, review, and continuously improve fire safety arrangements.
- Ensure compliance with Building Safety Regulator reporting and Golden Thread requirements for HRRBs.
- Provide annual resident fire safety information and ensure accessible formats are available for vulnerable residents.

4. FIRE RISK ASSESSMENT

ISHA regards fire risk assessments (FRAs) as an essential tool for identifying, evaluating, and controlling significant fire hazards, and for prioritising remedial actions across its housing and commercial stock. FRAs are carried out for all offices, existing buildings, acquisitions, and new builds in accordance with the Regulatory Reform (Fire Safety) Order 2005 (as amended by the Fire Safety Act 2021). Housing stock assessments also consider requirements under the Housing Act 2004.

FRAs will be undertaken:

- Annually for HRRBs and sheltered housing schemes.
- Every three years for all other blocks, unless a trigger event requires earlier review.

Initial FRAs provide sufficient information to determine whether further, more detailed or invasive assessments are required to ensure, so far as is reasonably practicable, the safety of all relevant persons from fire risks. Where compartmentation concerns exist, Type 3 (non-domestic and sampled dwellings) or Type 4 (invasive) assessments will be commissioned.

FRAs undertaken by competent staff or accredited third-party contractors will conform to current guidance, including PAS 79-2:2020 methodology where applicable. Assessments consider both the likelihood of harm and severity of harm to determine risk levels and prioritise control measures.

4.1 Fire Risk Assessment methodology

ISHA regards fire risk assessment as the primary tool for identifying and controlling fire hazards.

- FRAs will be undertaken for all workplaces, housing stock, new acquisitions and developments, in line with the FSO, FSA 2021, FS(E)R 2022, and Housing Act 2004.
- Until a new British Standard replaces PAS 79-2:2020, ISHA will follow established PAS 79 principles alongside the Home Office Fire Risk Assessment Guides and NFCC guidance.
- FRAs will be undertaken by competent assessors who meet the Fire Risk Assessment Competency Council (FRACC) criteria and hold third-party accreditation (e.g. IFE, IFSM, FRACS).

Likelihood	Slight harm	Moderate harm	Extreme harm
Low	Trivial	Tolerable	Moderate
Medium	Tolerable	Moderate	Substantial
High	Moderate	Substantial	Intolerable

Actions are determined based on risk level:

- **Trivial:** No action required.
- **Tolerable:** Monitor and consider cost-neutral improvements.
- **Moderate:** Implement risk reduction within an agreed timeframe; further assessment may be needed for extreme consequences.
- **Substantial:** Urgent measures required; work should not proceed until risk is mitigated.
- **Intolerable:** Work or occupation must not continue until the risk is reduced.

4.2 Property categorisation

ISHA categorises its housing and commercial stock to provide a structured framework for risk prioritisation. Property type, resident vulnerability (including mobility, sensory, or cognitive impairments), and historical risks (e.g., arson, malicious damage) are considered.

This process is dynamic, requiring regular review in response to changes in occupancy or building use, significant structural or systems modifications, or new industry best practice guidance. Categories are management tools only and do not define legal risk. For example, a poorly managed 3-storey property may present higher risk than a high-rise building or sheltered scheme. Properties classified as higher-risk buildings (HRBs: 7 storeys / 18m or above) are subject to additional statutory obligations under the Building Safety Act 2022, including registration, Safety Case preparation, and enhanced resident engagement.

Fire Risk Assessment scoring:

- intolerable
- substantial
- moderate
- tolerable
- trivial.

4.3 Risk assessment review

FRAs are reviewed regularly and following any trigger events, including:

- fires or near misses
- arson or malicious damage
- changes to building use or structure
- alterations affecting passive or active fire precautions
- significant changes in resident vulnerability
- updates to statutory requirements or industry best practice.

For new developments, FRAs will be undertaken promptly after completion before occupation, taking account of design fire regimes, regulatory approvals, and Building Safety Act 2022 requirements for HRBs.

4.4 Functional requirements of assessments

FRAs will, where applicable, address:

- **Means of escape:** Horizontal and vertical escape, emergency lighting, communal areas, flat front doors (FSA 2021).
- **Internal fire spread:** Linings, structural elements, compartmentation, fire-stopping.
- **External fire spread:** Construction, cladding, roof coverings (PAS 9980).
- **Fire service access:** Mains, vehicle access, personnel access, special considerations.
- **General fire precautions:** Housekeeping, maintenance regimes, inspections, resident communication.
- **Fire detection and warning:** Automatic systems, alarms, personal evacuation plans.

4.5 FRA storage and submission

All FRAs and supporting documentation are stored in a central compliance database, facilitating management oversight, reporting, and monitoring of remedial actions. Third-party contractors must submit FRAs in an electronic format compatible with ISHA's system.

4.6 Assessor competency

FRAs will be undertaken by competent, accredited professionals, registered with recognised bodies such as the Institution of Fire Engineers. Reports must provide actionable recommendations specific to each property, including precise locations and required interventions, rather than generic guidance.

5. RESPONSIBLE PERSON

Under the Regulatory Reform (Fire Safety) Order 2005 (as amended by the Fire Safety Act 2021), the Responsible Person is defined as the individual or organisation ultimately accountable for ensuring that fire safety measures are implemented and maintained. In practice, this includes anyone who has control of premises or a degree of control over specific areas, systems, or equipment.

The Order requires the Responsible Person to identify and manage risks associated with fire that could foreseeably affect relevant persons. Examples of who may be considered a Responsible Person include:

- An employer for those areas of a workplace they control.
- A self-employed person with business premises.
- A managing agent or owner of shared premises, responsible for common areas and shared fire safety equipment.
- A charity or voluntary organisation with premises control.
- A contractor with partial control over a building or system.
- Any person with control over a part of a premise, in so far as that control extends.

As an employer, building owner, and landlord, ISHA is the Responsible Person for all its housing and office stock. While operational staff may be tasked with implementing fire safety measures, this does not transfer the legal responsibility of the Responsible Person under the FSO 2005, Housing Act 2004, Building Safety Act 2022, or Fire Safety (England) Regulations 2022. Those tasked with operational duties remain accountable for proper execution and compliance within their role.

Where a building has more than one Responsible Person, ISHA ensures that cooperation, coordination, and clarity of responsibility are defined, documented, and periodically reviewed. For buildings with shared management or repair responsibilities, the Responsible Person is clearly defined through:

- Service Level Agreements (SLAs)
- working arrangements or procedures
- contractual documents (e.g., leases).

These arrangements ensure that responsibilities for fire safety are explicit, auditable, and aligned with statutory duties.

6. ORGANISATIONAL ARRANGEMENTS

The Chief Executive holds overall responsibility for fire safety across Islington & Shoreditch Housing Association (ISHA), supported by senior management and designated officers.

The Board will appoint a Non-Executive Fire Safety Lead to provide independent oversight, challenge, and assurance in relation to fire and building safety governance.

Accountable Person and Principal Accountable Person responsibilities

Islington & Shoreditch Housing Association (ISHA) is the Accountable Person for its Higher Risk Residential Buildings (HRRBs) under the Building Safety Act 2022. Oversight of Safety Case preparation and maintenance, Golden Thread information management, and resident engagement obligations will be undertaken by ISHA's Building Safety Team on behalf of the organisation.

Where a Higher Risk Building is leased and managed by another organisation, the Principal Accountable Person (PAP) for that building will be responsible for fulfilling the statutory duties relating to the Safety Case, Golden Thread management, and resident engagement, in accordance with the Building Safety Act 2022. In such circumstances, ISHA will ensure that cooperation, coordination, and information-sharing arrangements are clearly defined, documented, and kept under review.

6.1 Chief Executive

- Ultimate accountability for fire safety across ISHA.
- Communicates fire safety objectives to the Board, Directors, and Managers.
- Ensures adequate resources and budgets for fire safety measures, assessments, and compliance.

6.2 Deputy CEO and Development Director of Building Safety and Compliance

- Develops, maintains, and monitors ISHA's Fire Safety Policy.
- Advises senior management on compliance, emerging risks, and mitigation measures.
- Ensures fire safety is considered in the design and refurbishment of new build and existing properties.
- Confirms contractors and designers are competent and adhere to fire safety standards.
- Considers additional fire risk measures for timber-framed developments and high-rise buildings.
- Maintains appropriate insurance coverage.

6.3 Director of Housing and Neighbourhoods

- Ensures ISHA's Fire Safety Policy is adhered to in the management & maintenance of the housing stock.
- Monitors the implementation of required fire safety measures in managed housing stock.
- Ensures management teams have sufficient resources and authority to implement policy.

6.4 Finance Director

- Reviews fire safety costs in contractor engagement and operational budgets.

6.5 Head of Assets and Repairs

- Oversight and monitoring of statutory fire servicing arrangements.
- Periodic reporting of performance to the Chief Executive, Board, and Senior Management Team.
- Notifying the Director of Housing and Neighbourhoods of shortcomings in fire safety arrangements.
- Ensuring fire safety arrangements are addressed in ISHA's health and safety policy.
- Representing ISHA in discussions with enforcement authorities and stakeholders.
- Ensuring that documented periodic inspections are undertaken in communal areas and void properties.
- Reviewing budgets to ensure that sufficient provision has been included for fire servicing.
- Ensuring that materials used in refurbishment works meet current fire safety standards
- Ensuring that ISHA's zero-tolerance policy for storage in the communal areas of housing stock is enforced.
- Maintains a preferred contractor list with verified competence in fire safety compliance

6.6 Head of Building Safety

- Ensuring compliance with building safety regulations (such as the Building Regulations 2010, Regulatory Reform (Fire Safety Order) 2005, Fire Safety Act 2021, Building Safety Act 2022, Fire Safety England Regulations 2022, relevant approved documents (particularly structural, fire, gas, and electrical), and industry standards.
- Periodic reporting of performance to the Chief Executive, Board, and Senior Management Team.
- Notifying the Director of Housing and Neighbourhoods of shortcomings in fire safety arrangements.
- Ensuring that incidents of fire are investigated and, where possible, the underlying causes identified and communicated throughout the organisation for lessons to be learnt.
- Develop and review Building Safety Case Reports and risk assessments are regularly updated, reviewed, and submitted to the Building Safety Regulator within the period specified.
- Lead the identification of the key elements in managing the golden thread principles, including maintaining the safety case report, so that risks are proactively identified, and response measures are put in place and maintained.

6.7 Head of Housing

- Ensuring that ISHA's zero-tolerance policy for storage in the communal areas in housing with care stock is enforced.
- Preparing budgets that address fire safety within their remit for Board approval.
- Ensuring that all staff under their control receive general fire safety training (e-learning as a minimum) and those delegated specific responsibilities are competent to undertake their roles.
- Notifying the Director of Housing and Neighbourhoods of any shortcomings in housing fire safety arrangements.

6.8 Facilities Team

- Ensuring that the facility team is adequately resourced and suitably empowered to facilitate full implementation of the fire policy.
- Maintaining records of fire precautions maintenance, Fire Warden training, etc, at all ISHA office locations.
- Arranging six-monthly fire evacuation drills at all ISHA office locations.
- Producing fire evacuation drill reports detailing clearance times and any additional measures required to improve performance.
- Monitoring false alarms at office locations and, where required, taking action to prevent reoccurrences.
- Requesting and evaluating the significant findings of office building tenants' fire risk assessments.
- Reviewing and monitoring the performance of contractors engaged for the installation and/or maintenance of active/passive fire precautions.
- Arranging FRA reviews in all ISHA office locations and ensuring that resultant risk mitigation actions are implemented.
- Ensuring that procedures are in place to notify those renting or hiring commercial units of their responsibility to ensure fire safety measures are considered and maintained throughout the period of hire.
- Notifying the Head of HR and Housing and Neighbourhoods Director of any shortcomings in fire safety arrangements.

6.9 Building Safety/Compliance/Asset and Repairs/Neighbourhoods Teams

- The developing and maintenance of fire risk assessment documentation and records on relevant compliance database system/s.
- Tracking and reporting implementation of the fire risk assessment programme, risk mitigation measures, and adherence to fire safety arrangements.
- Reviewing and monitoring the competence and performance of contractors engaged for the installation and/or maintenance of active/passive fire precautions.
- Supporting development, publishing, and distributing fire safety guidance for residents with the Communication Team.
- Notifying the Head of Assets and Repairs, Head of Building Safety, and Director of Housing and Neighbourhoods of any shortcomings in fire safety arrangements.
- Monitoring best practice and innovation to ensure that fire safety arrangements remain current and up to date with developing technical standards.
- Arranging FRA reviews to identify significant changes that would trigger a full assessment.
- Ensuring the remedial works identified from the FRA process are completed in accordance with the risk rating.
- Ensuring that incidents of fire are investigated and, where possible, the underlying causes identified and communicated throughout the organisation for lessons to be learnt.
- Putting measures in place to ensure that locally engaged contractors comply with ISHA's health and safety rules.
- Arranging and reviewing fire safety performance audits. The audits will address maintenance of active fire precautions, inspections, contractor performance and damage repairs.

6.10 Managers

- Notifying their line managers of any shortcomings in fire safety arrangements.
- Planning for the effective implementation of the fire policy in ISHA's offices and housing stock.
- Organising, controlling, and coordinating the activities of subordinate staff to facilitate the effective implementation of the fire policy and promote continuous improvement.
- Monitoring and reviewing the performance of employees and any other parties (contractors, etc.), reporting exceptions to senior management in accordance with the company's reporting procedures.
- All new starters receive a local induction on the first day of employment that includes fire safety instruction.
- Ensuring all staff under their control receive general fire safety awareness training and instruction.
- Ensuring good standards of housekeeping are maintained in areas under their control, including maintenance of walkways, escape routes and fire exits.
- Promoting fire safety awareness and adherence to group policies, procedures and safe systems of work.
- Undertaking fire inspections and, where applicable, contractor compliance audits in areas under their control.

6.11 Employees

- Co-operating with their employer, work colleagues, and contractors to ensure the implementation of the fire policy.
- Communicating any shortcomings in ISHA's fire safety arrangements to management to ensure that a safe and healthy workplace is maintained.
- Controlling their own activities to take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions.
- Not intentionally or recklessly interfering with or misusing anything provided in the interests of health, safety or welfare.
- Carrying out instructions and complying with their training whilst undertaking safety related and general work duties, as required in implementing the fire policy.
- Communicating to their line manager when their level of competence is such that they cannot carry out a task in a safe and healthy manner.
- Reporting all incidents resulting in injury and/or damage, or dangerous occurrences (near misses) with the potential to cause injury and/or damage to persons or property.
- Complying with ISHA's requirements including, but not limited to, fire safety training, personal protective equipment, and safe systems of work etc.

6.12 Residents

Residents have legal duties to cooperate with ISHA in complying with the Fire Safety Order. They are responsible for:

- Allowing reasonable access for the maintenance and servicing of fire safety measures and for carrying out fire risk assessments.
- Not altering or replacing flat entrance doors without ISHA's written consent. All flat entrance doors open onto communal areas and form a key part of the building's fire safety strategy. ISHA will take enforcement action where necessary to ensure compliance.
- Not installing unauthorised security grilles, gates, or shutters that could impede escape or fire service access.
- Not smoking in communal areas.
- Not storing belongings, mobility scooters, or other items in communal areas, risers, or escape routes.
- Reporting any damage to fire safety features (e.g. fire doors, signage, extinguishers, smoke vents) to ISHA immediately.

7. MONITORING

ISHA will ensure that inspection and testing regimes align with relevant British Standards (e.g. BS 9999, BS 5266, BS 5306, BS EN 54, BS 9991). The following frequencies apply unless an FRA dictates otherwise:

7.1 Staffed premises

Fire safety inspections/checks/information requirements

Compliance with the fire safety functions set out in this section shall be undertaken by the Facilities Officer, or by nominated Fire Wardens where such responsibilities have been formally delegated.

Item	Frequency/requirement
Site/location induction training	First day of employment.
Group induction	Within first four weeks of employment.
Fire escape routes and exit doors	Daily visual check.
Fire alarm system	Weekly test (same day, same time) by Facilities Officer. Annual service by a competent contractor.
Visitor and contractor records	Maintained daily
Emergency lighting	Weekly visual check by Facilities Officer/Fire Warden. Monthly functional test, annual full discharge test by a competent contractor.
Fire extinguishers	Monthly visual check by Facilities Officer/Fire Warden, annual service by competent contractor (BS 5306).
Fire signage	Weekly visual check by Facilities Officer/Fire Warden.
Smoke ventilation (AOVs/Powered systems)	Weekly operational check manual openable windows by Facilities Officer or delegated to Fire Wardens – annual test by a competent contractor.
Fire mains (Wet or dry risers)	Visual inspection every six months. Full test annually by a competent contractor.
External fire escapes	Facilities Officer/Fire Warden inspection every six months, Surveyor inspection every three years.
Fire dampers	Annual inspection and service by a competent contractor.
Lightning conductors (where installed)	Annual test by a competent contractor.
Fire Action Notices	Clearly displayed throughout the building (checked during routine inspections).
Fire Warden list	Displayed on each level; updated as required.
Personal Emergency Evacuation Plans (PEEPs)	Prepared, implemented, and reviewed as required by the Housing & Neighbourhoods Team or Facilities Officer.
Electrical installation (fixed wiring)	5-yearly inspection by a competent contractor (EICR).
Portable Electrical Appliances (PAT)	Annual testing (or risk-based frequency).
Fireman's lift	Six-monthly thorough inspection, Planned maintenance in accordance with usage & manufacturer's guidance.

7.2 Communal parts of blocks

Fire safety inspections/checks/information requirements

ISHA intends that all staff visiting housing stock will carry out a basic health and safety check and report back their findings. The active and passive fire precautions listed below may not be present in every block.

For communal areas of residential blocks, primary responsibility for undertaking and coordinating routine inspections shall rest with the Neighbourhoods Team, in accordance with the frequencies and requirements set out in this section. All other periodic statutory and compliance testing shall be undertaken by the Compliance Team.

Item	Frequency/requirement
Fire safety information for residents	Provided on moving in by Housing & Neighbourhoods (resident handbook, welcome pack, etc.) Building Safety Team (Fire safety booklet, PEEPs information). Accessible via web portal.
Fire escape routes and exit doors	Weekly visual check by Neighbourhood Officers (NO). Quarterly inspection by Neighbourhood Officers. Annual inspection by technical experts.
Fire signage	Weekly visual check by Neighbourhood Officers. Quarterly inspection by Neighbourhood Officers.
Automatic fire detection	Weekly visual check by Neighbourhood Officers. Annual test and service by a specialist fire contractor.
Emergency lighting	Monthly functional test by Neighbourhood Officers. 6–12 monthly full discharge test by a specialist fire contractor.
Smoke ventilation (AOVs/Powered systems)	Six-monthly service by specialist fire contractor. Manually openable windows – tested by Neighbourhood Officers.
Fire mains (Wet or dry risers)	Visual inspection every six months. Full operational test annually by a competent contractor.
Fire doors/Door sets	Quarterly inspection of the common area doors by a competent Contractor. Flat entrance doors are annually inspected by a competent contractor.
External fire escapes	Quarterly inspection by Neighbourhood Officers. Three-yearly inspection by a competent surveyor.
Fire dampers	Annual inspection and testing by a competent contractor.
Dry risers	Annual inspection and testing by a specialist fire contractor.
Gas systems (where installed)	Annual service by a competent Gas Safe contractor.
Lightning conductors (where installed)	Annual test and certification by a specialist contractor.
Communal electrical installation (Fixed wiring)	Five-yearly inspection and testing (EICR) by a competent contractor.

Fireman's lift	Monthly inspection by a competent lift contractor. Six-monthly thorough examination by the lift insurer. Planned maintenance in line with usage & manufacturer's guidance.
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7.3 Void property

Responsibility for delivery

All fire safety inspections, checks, and remedial actions identified for void properties under this section will be carried out and coordinated by the Planned Works Team. The Planned Works Team is responsible for ensuring that fire compartmentation, active fire precautions, and fire doors are inspected, assessed, and made compliant before reletting, and that all findings and completed works are formally documented and uploaded to the asset management database.

Void properties present increased fire safety risks and will therefore be subject to inspection before re-letting. Inspections will include, as a minimum:

- Fire compartmentation: Checks for breaches and the adequacy of fire stopping, with intrusive inspections carried out where necessary.
- Active fire precautions: Verification of automatic fire detection (smoke/heat detection, alarms) and other systems, ensuring provision is in line with current standards.
- Fire doors: Assessment of the condition and suitability of doors leading onto communal areas, confirming compliance with relevant fire resistance ratings.

All inspections will be formally documented and uploaded to the asset management database. Findings will inform both remedial works to the individual property and evaluation of the adequacy of the wider fire safety arrangements within the building.

8. FIRE PRECAUTIONS

ISHA intends that, where dictated by fire risk assessment findings and/or Building Regulation requirements, active and passive fire precautions will be installed and maintained in accordance with recognised standards and industry sector best practice.

8.1 Passive precautions

- ISHA will adopt the default 'zero tolerance' position recommended in Department of Local Government fire safety guidance in respect of resident storage in communal areas.
- Fire doors: The fire policy of individual properties will dictate requirements for the resistance of fire doors (generally FD30 or FD60). ISHA staff will periodically inspect fire doors protecting communal areas to ensure that, as far as reasonably practicable, these areas remain available to aid the safe evacuation of building occupants.

- Tenants will not be permitted to change dwelling access doors for alternatives that do not meet the original fire resistance standards.
- For leaseholders, ISHA does not currently have direct legal jurisdiction. However, leaseholders altering flat entrance doors will be formally reminded of their duties under the Fire Safety (England) Regulations 2022. Non-compliance will trigger a process of three formal letters before referral to the local Fire and Rescue Service. ISHA, like other landlords, awaits further legislation and case law to strengthen enforcement in this area.
- **Compartmentation:**
 - All works affecting compartmentation will be reviewed and inspected by a competent person (e.g. designer, clerk of works, building control).
 - Inspections of fire stopping and compartmentation will be prioritised in timber-framed or conversion properties, where risks may be higher.
- **Construction and refurbishment:** The materials (wall and floor coverings, doors, windows, etc.) used in new construction projects and refurbishments will be required to meet industry standards for fire safety as a minimum.

8.2 Active precautions

- ISHA intends that all active fire precautions within its offices and housing stock are installed and maintained in accordance with the relevant British Standards.
 - This includes smoke and heat detection, which will be maintained in line with recognised standards.
 - Premises Information Boxes will be installed and maintained in Higher-Risk Residential Buildings (HRRBs).
- Recognising challenges in some housing stock (e.g. visual inspections of emergency lighting), ISHA will take a reasoned approach to the frequency of inspections based on the level of risk associated with each property. ISHA will also utilise staff (housing officers, caretakers, cleaners, etc.) as an additional resource for visually checking that active precautions are in place and functional. Levels of inspection will reflect the competencies of those carrying them out.
- **Tampering prevention:** ISHA will put appropriate measures in place to prevent tampering with active fire precautions (e.g. securing fire alarm isolators).

- Suppression systems:
 - ISHA will continue to evaluate the viability of sprinklers and other fire suppression systems, particularly in respect of timber-framed and other high-risk stock.

9. FIRE EVACUATION

9.1 Offices

All ISHA office space will have suitable fire alarm systems installed, as determined by the Fire Risk Assessment (FRA). An evacuation strategy appropriate to the risk will be implemented, typically either:

- simultaneous evacuation (all occupants exit at once), or
- staged evacuation (occupants exit in phases, based on location and risk).

9.2 Residential stock

In line with NFCC guidance and fire safety principles for blocks of flats, ISHA recognises that full evacuation of an entire block is rarely necessary when a fire is contained within an individual flat.

- Fire within a flat: Occupants are expected to alert others in the flat of origin, evacuate via common escape routes, and summon the Fire and Rescue Service (FRS).
- Fire within common areas: Occupants in the affected area are expected to evacuate immediately and summon the FRS.
- Other residents: Those not directly affected should remain in their flats (“Stay Put”) unless directed to leave by the FRS.

This approach is based on the principle that flats within purpose-built blocks are designed to provide adequate fire resistance and protect residents through compartmentation.

9.3 Circumstances where “Stay put” may not be appropriate

The FRA will ultimately determine the most suitable evacuation strategy. A Stay Put policy will not be adopted where:

- the building is a conversion and standards of compartmentation are unsatisfactory.
- the integrity of compartmentation has been compromised.
- fire stopping or fire doors are missing, defective, or poorly maintained
- housekeeping or general fire precautions are inadequate
- the premises have employed staff on site (e.g. sheltered schemes) where alternative strategies may be more appropriate.

9.4 ISHA's commitments

ISHA will:

- adopt evacuation strategies based on FRA outcomes
- maintain a Stay Put policy in purpose-built blocks unless compartmentation is compromised
- ensure evacuation plans are available in Secure Information Boxes (SIBs) for Higher-Risk Residential Buildings (HRRBs)
- provide Personal Emergency Evacuation Plans (PEEPs) or alternative arrangements for residents who may require assistance to evacuate
- review evacuation strategies periodically and after any significant fire safety works or changes in building use.

10. TIMBER FRAMED BUILDINGS

ISHA recognises that timber-framed buildings present additional risks during both construction and occupation. To mitigate these risks, ISHA will:

- Design and construction: Require designers/contractors to follow the UK Timber Frame Association "16 Steps to Fire Safety" and the NFCC Timber Frame Guidance (2022).
- Occupation: Prohibit partial or full occupation until the entire development has Building Regulations sign-off.
- Refurbishment and repairs: Ensure that works do not compromise fire safety; FRAs will include hidden cavity inspections where practicable.
- Resident guidance: Provide residents with clear information on the risks of unauthorised alterations or DIY works.
- Monitoring: Undertake inspections of voids and communal areas to confirm that passive fire precautions remain effective.

11. CONTRACTOR CONTROL

ISHA recognises the importance of reviewing and managing contractors and agents acting on its behalf. To ensure that fire safety standards are consistently met, ISHA will:

- Pre-qualification and competence
 - Require contractors to submit their health and safety arrangements for review prior to formal engagement.
 - Require contractors undertaking fire safety works to hold appropriate third-party accreditation (e.g. FIRAS, BAFE, NSI Gold).
 - Review the competence of Designers, CDM Coordinators, Principal Contractors, and others involved in projects falling under CDM Regulations.
- Safe systems of work
 - Require contractors to provide task-specific risk assessments and method statements (RAMS) that address fire safety management.
 - Issue contractors with clear rules (e.g. hot works, smoking restrictions, permit-to-work systems).
- Monitoring and compliance
 - Undertake periodic reviews and site checks to ensure compliance with ISHA rules and adherence to approved RAMS.
 - Where contractors fail to meet expected standards, ISHA will take corrective action, up to and including removal from approved supplier lists.
- Agents and managing partners
 - Require agents managing ISHA premises to provide the significant findings of fire risk assessments and associated action plans annually to the Assets and Repairs Department for review.

12. COMMUNICATION

ISHA recognises that effective communication is central to achieving fire safety objectives. ISHA will ensure that suitable arrangements are in place to communicate clearly with:

- residents
- employees
- contractors and suppliers
- enforcing authorities
- partner organisations
- community groups
- agencies supporting vulnerable persons.

A range of communication methods will be used, including:

- website material and resident portals
- periodical newsletters and staff briefings
- fire safety leaflets, flyers, and handbooks for residents
- posters and notices in communal areas and estate offices
- staff training (e-learning and classroom delivery)
- joint initiatives with local Fire and Rescue Service (e.g. estate days, arson prevention campaigns)
- notifications of special events or new safety information
- a dedicated email contact for building safety: buildingsafety@isha.co.uk

13. CONSULTATION

ISHA is committed to consultation on fire safety at all levels of the organisation.

- Governance
 - Fire safety management will be a standing agenda item at Management Team (MT) and Senior Leadership Team (LT) meetings.
 - Fire safety management will also feature in Health and Safety Committee meetings as a standalone agenda item.
- Transparency
 - The minutes of these meetings will be posted on the company intranet, making them available to all employees.
- Scope of review

Health and Safety Committee meetings will review:

 - Outcomes of fire investigations.
 - Insurance survey findings.
 - Enforcement authority inspection findings.
 - Progress against fire risk assessment (FRA) action plans.
 - Significant changes to the use or occupancy of ISHA stock.
 - Innovations and good practice in fire safety management.
 - Non-conformances identified from staff inspections.
 - Internal and external audit findings.

14. TRAINING

ISHA recognises the benefits of providing fire safety training for staff and will ensure that all employees receive training proportionate to their role.

- Induction training
 - All new staff will receive basic fire safety induction covering:
 - Means of escape and assembly points.
 - Operation of fire alarm call points.
 - Role of Fire Wardens.
 - Reporting of non-conformances or fire safety concerns.
- Awareness training
 - All staff will complete a fire safety e-learning package as a minimum standard, with refresher training delivered periodically.
 - Staff in offices and manned residential schemes will receive additional training appropriate to their environment.
- Role-specific training
 - Staff required to undertake or review Fire Risk Assessments will receive training to a nationally recognised standard.
 - Managers of premises and staff providing advice to residents will receive fire safety awareness training.
- Continuous development
 - Training records will be maintained and monitored to ensure compliance.
 - Training content will be periodically reviewed and updated to reflect changes in legislation, guidance, or lessons learned from incidents.

15. REVIEW

This policy will be reviewed annually, and following any significant legislative changes, enforcement action, or major fire incidents.

Reference	Version	Created	Author	Review	Approved
Fire safety policy	2	February 2026	Daniel Sheridan, Head of Building Safety	March 2027	March 2026 (Leadership Team)
Fire safety policy	1	February 2022	Scott Hughes	March 2025	March 2022 (Board)