

Albyn Group

Fire Safety Policy

Policy Owner	Helen Sellers
Policy Sponsor	Morag Beers

Version Control	Date of Current Review	Date of Next Review	Reviewed by
1.0	Feb 2021	Feb 2024	Helen Sellers

Corporate Fit	
Internal Management Plan	✓
Risk Register	✓
Business Plan	✓
Regulatory Standards	✓
Equalities Strategy	
Legislation	✓

Contents

- 1.0 [Introduction](#)
- 2.0 [Legal and Regulatory Framework](#)
- 3.0 [Aims and Objectives](#)
- 4.0 [Related Policies and Strategies](#)
- 5.0 [Scope](#)
- 6.0 [Definitions](#)
- 7.0 [Roles and Responsibilities](#)
- 8.0 [Policy Statement](#)
 - 8.1 [Our Approach](#)
 - 8.2 [Responsible Person\(s\)](#)
 - 8.3 [Development of New Homes](#)
 - 8.4 [Newly Acquired Homes](#)
 - 8.5 [Premises Fire Risk Assessments](#)
 - 8.6 [Person-Centred Fire Risk Assessments](#)
 - 8.7 [Firefighting Equipment](#)
 - 8.8 [Cyclical Testing and Servicing](#)
 - 8.9 [Contracts](#)
 - 8.10 [Inspections](#)
 - 8.11 [Working from Home](#)
 - 8.12 [Information](#)
 - 8.13 [Record Keeping](#)
 - 8.14 [Competency and Training](#)
- 9.0 [Performance, Monitoring and Reporting](#)
- 10.0 [Complaints](#)
- 11.0 [Equal Opportunities](#)
- 12.0 [Policy Review](#)

1.0 Introduction

- 1.1 Albyn Group aims to incorporate our Purpose, Mission, Values and Vision into our policies and decision making.

With that in mind, we aim to follow our guiding principles that apply to all policies:
<https://www.albynhousing.org.uk/about-us-2019/our-history/>

- 1.2 The risks to our tenants, other residents of our homes, our contractors, and our employees from any failure to manage fire safety are potentially significant and dire. Albyn Group consequently takes fire safety extremely seriously.

2.0 Legal and Regulatory Framework

- 2.1 The following establish the legal and regulatory framework under which Albyn must manage fire safety:

- Housing (Scotland) Act 1987 (as amended)
- Fire (Scotland) Act 2005
- Fire Safety (Scotland) Regulations 2006
- Construction (Design and Management) Regulations 2015
- Housing (Scotland) Act 2006
- Scottish Social Housing Charter
- Scottish Housing Regulator's Regulatory Framework:
- Scottish Housing Quality Standard
- Health and Safety at Work etc Act 1974

- 2.2 In addition, Albyn Group has a general duty of care towards our tenants, other residents in the homes we own and manage, other customers, our contractors and our employees.

3.0 Aims and Objectives

- 3.1
- To set out a framework that will enable Albyn Group to understand, mitigate and manage the risks from fire for our homes, common areas and workplaces
 - To minimise the risk of harm from fire in or around our homes and workplaces.

4.0 Related Policies and Strategies

- 4.1 This policy should be read in conjunction with the following:
- Electrical testing policy
 - Gas safety policy
 - Training policy.

5.0 Scope

- 5.1 This policy covers fire safety in all buildings and development sites owned, occupied or managed by Albyn Group.

6.0 Definitions

- 6.1 **Albyn Group:** Throughout this policy, Albyn Group means Albyn Housing Society and its subsidiary companies.
- 6.2 **Responsible Person:** This is the person who has overall responsibility for ensuring and maintaining correct fire safety procedures. Different areas of work will have different Responsible Persons overseeing them.
- 6.3 **Competent Person:** This is a person who is suitably trained and experienced to enable them to carry out a specific role to an acceptable standard. For example, a fire risk assessment must be carried out by a competent person. A competent person may be an employee of Albyn Group, a contractor, or a consultant.

7.0 Roles and Responsibilities

- 7.1 The Chief Executive Officer or nominated competent person has overall responsibility for health and safety at Albyn Group supported by the Directors.
- 7.2 The following have responsibility for the day-to-day management of specific parts of this policy:
- Director of Customer Services
 - Director of Assets and Subsidiaries
 - Head of HR and Organisational Development
 - Or nominated competent person

8.0 Policy Statement

- 8.1 **Our Approach:** We will:
- **Responsible Person(s):** Appoint competent and qualified Responsible Persons to co-ordinate the management of fire safety;
 - **Development of new homes:** Ensure our new build development sites are safe from fire, new homes have appropriate fire detection and prevention measures, and new communal spaces are safe.
 - **Newly acquired homes:** Ensure homes that we acquire (by purchase or through a management agreement) are fitted with appropriate fire detection and prevention measures, and any associated communal spaces are safe.

- **Premises Fire Risk Assessments (FRAs):** Ensure Premises FRAs are carried out in relevant premises to eliminate or mitigate risks from fire, and carry out remedial actions identified.
- **Person-centred Fire Risk Assessments (FRAs):** Ensure Person-Centred FRAs are carried out where the characteristics, capabilities or behaviour of an individual using a building significantly increases the risk from fire there to eliminate or reduce the risk.
- **Firefighting equipment:** Install firefighting equipment (such as smoke and heat detectors, fire extinguishers, smoke vents, fire suppressant systems) in homes, communal spaces and offices where appropriate, and are maintained and serviced.
- **Cyclical testing and servicing:** Carry out cyclical testing and servicing to reduce fire risk (eg electrical testing, chimney sweeping and gas servicing).
- **Contracts:** Ensure the contracts we have with our tenants and lessees, and the owners of homes we manage, set out fire safety obligations clearly.
- **Inspections:** Carry out regular inspections of communal areas to identify any fire risks that arise, and address these promptly.
- **Working from home:** Provide advice to employees working from home to enable them to maintain a safe workspace.
- **Information:** Provide clear information to tenants to help them manage fire safety in their home.
- **Record keeping:** Maintain accurate records of our actions, and monitor these to ensure actions are completed on time.
- **Competency and training:** Ensure that staff working on issues relating to fire safety are appropriately trained, and that contractors employed on fire safety are appropriately qualified and experienced.

8.2 Responsible Persons: Albyn Group will appoint Responsible Persons to ensure we manage fire safety effectively.

The Director of Assets and Subsidiaries is the Responsible Person for the purposes of:

- Development of new homes;
- Newly acquired homes;
- Premises Fire Risk Assessments;
- Firefighting equipment (provision and servicing and testing);
- Cyclical testing and servicing;
- Contracts (leases for properties owned by Albyn Housing Society and leased to other organisations or individuals; leases for properties owned by other organisations or individuals and leased to Albyn Housing Society);
- Contracts (leases for properties owned by other organisations or individuals and managed by HRI; tenancy agreements and licences for properties owned or managed by HRI);
- Inspections (Communal areas of homes owned or managed by HRI);
- Inspections (offices);

- Information (provision of fire safety information to HRI tenants and owners);
- Record keeping (Fire Safety Register and all other areas above);
- Competency and training (contractors and consultants).

The Customer Services Director or nominated person is the Responsible Person for the purposes of:

- Person-Centred Fire Risk Assessments (by managing agents providing support);
- Firefighting equipment (repairs);
- Contracts (tenancy agreements and licenses for Albyn Housing Society properties);
- Inspections (communal areas of homes owned or managed by Albyn Housing Society);
- Information (provision of fire safety information to Albyn Housing Society tenants);
- Record keeping (all areas above).

The Head of HR is the Responsible Person for the purpose of:

- Person-Centred Fire Risk Assessments (of employees);
- Working from home;
- Competency and training (employees).

8.3 Development of new homes: This section applies when Albyn Group either builds new homes on a site, or redevelops an existing building into new homes.

Managing fire safety in the development of new homes aims to ensure contractors and employees are safe during construction, and that safe homes are handed over for management or sale.

Where Albyn Group is the developer of a site, we will appoint a CDM Co-ordinator for the site to advise on health and safety, including fire safety.

We will ensure that all our new homes and shared spaces comply with all relevant fire safety legislation and regulations.

Where a block of housing with a shared communal area is imminently due for handover, the Investment Team will arrange for a Premises FRA to be completed and provided to the Asset Management team. The Asset Management team will record the Premises FRA on the Fire Safety Register, along with any actions required, and notify appropriate individuals of their responsibility for completing the required actions.

8.4 Newly acquired homes: This section applies to properties acquired in the following ways:

- We buy new build properties that we have not developed ourselves;
- We buy existing properties through schemes such as Mortgage to Rent;
- We lease properties from landlords for social rent;
- We lease properties from landlords for mid-market rent.

(Note that this section does **not** apply where we acquire an existing property for redevelopment and the property will be vacant until the work starts: this situation is covered by section 8.3 above).

Where we acquire such a property, we will ensure the following are in place before the property is let:

- Current and satisfactory electrical inspection condition report;
- Current gas servicing certificate (where appropriate);
- Current chimney sweeping certificate (where appropriate);
- Working smoke detector, heat detector and CO monitors to LD2 standard;
- Current Premises FRA for any internal communal area connected with the property (even where this communal area does not form part of the lease).

The Albyn Group team managing the acquisition will provide a copy of the Premises FRA to the Asset Management team. The Asset Management team will record the Premises FRA on the Fire Safety Register, along with any actions required, and notify appropriate individuals of their responsibility for completing the required actions.

- 8.5 **Premises Fire Risk Assessments:** Premises FRAs aim to minimise the risk of fire and, in the event of a fire, minimise the likelihood that it will spread, and maximise the likelihood that any individuals in the building at the time escape safely and raise the alarm.

Albyn Group maintains a Fire Safety Register, which holds a record of all the assets we own or manage, and sets out:

- Which assets require a Premises FRA and which do not (note that some single flats owned or managed by Albyn Group that are part of a block that we do not own or manage will still require us to have a completed Premises FRA);
- Where an asset does not require a Premises FRA, the reason for this;
- Arrangements for carrying out the Premises FRA (where Albyn Group is not both the owner and manager of the asset);
- Date of last Premises FRA and date next Premises FRA due;
- Actions arising from the Premises FRA with target and actual completion dates.
- Where a Premises FRA is required but is carried out by another organisation (such as in HMOs managed by another organisation), Albyn Group will request a copy of the FRA and record the date and all remedial action required and taken, as if we had carried out the FRA.

The Asset Management team will arrange for Premises FRAs to be carried out at appropriate times, and will update the Fire Safety Register accordingly.

FRAs will be carried out by a Competent Person, and in line with the Fire (Scotland) Act 2005.

Unless there is good reason to suspect serious deficiencies in structural fire protection (such as inadequate compartmentalisation), a non-invasive inspection will be carried out. However, where doubt exists, or concerns are raised as part

of the Premises FRA process, a full compartmentation survey will be carried out by a suitably qualified contractor.

Once the Premises FRA has been completed, the Asset Management team will:

- Record the date of the Premises FRA and the date the next Premises FRA is due in the Fire Safety Register;
- Record all actions identified in the Premises FRA in the Fire Safety Register along with the person responsible for their completion, and the target date for completion;
- Notify the person responsible for each action.

Albyn Group will review Premises FRAs within the following timescales **unless** one of the criteria listed below applies:

Risk Profile	Examples of stock type	Maximum timescale for FRA review
Low	<ul style="list-style-type: none">• Purpose-built residential blocks with no more than two storeys• Stores with no associated sleeping or office accommodation	Three years
Medium	<ul style="list-style-type: none">• Purpose-built residential blocks of three to five storeys	Two years
High	<ul style="list-style-type: none">• Converted housing blocks• Shared housing used for support purposes• Offices	One year

FRAs will be reviewed before the above dates where:

- The previous FRA recommended a shorter review period;
- There is a fire, or a near miss, or the threat of arson at the premises;
- There is a change of use of the premises that affects fire safety (such as a general needs property becomes an HMO);
- There is some other change at the premises that affects fire safety.

8.6 Person-Centred Fire Risk Assessments: Where a property will be used by individuals whose characteristics, capabilities or behaviour may increase the risk from fire, Albyn Group will ensure that person-centred FRAs are carried out.

- Where we propose to employ a person aged under 18, or a person with a disability that increases their risk from fire (such as a person with limited mobility, or hearing loss), a person-centred risk assessment will be carried out before their employment starts or as part of their induction, and will include any actions required to ensure we manage fire risks. For this purpose, employment includes working on an unpaid basis, such as on a work experience placement. Where the person is under 18, a copy of the risk assessment will be provided to their parent or guardian before they start. A copy of Person-Centred FRAs for employees or potential employees will be held by HR, who will also ensure they are reviewed annually, or beforehand if there is good reason to do so.

- Where a property is being used for support for individuals who may affect the fire risk, the managing organisation will carry out Person-Centred FRAs. Each Person-Centred FRA will be reviewed annually, or beforehand if there is good reason to do so. For confidentiality reasons, Albyn Group will not require a copy of these Person-Centred FRAs. However, we will require annual assurance from the managing organisation that they have been carried out, and that any actions arising have been recorded and completed appropriately.

8.7 Firefighting equipment: Albyn has the following firefighting equipment present in some of our properties:

- Fire extinguishers
- Fire blankets
- Fire call points
- Dry risers
- Smoke tunnels
- Smoke release windows
- Fire suppressant systems (eg sprinkler systems)

The location of this equipment is recorded in the Fire Safety Register, along with the date of the last service and the date the next service is due. Servicing and testing will be managed by the Asset Management team.

Note that testing and servicing of smoke and heat alarms, CO monitors, and emergency lighting is covered in section 8.8 under electrical testing.

For clarification, Albyn Group is not responsible for the testing, servicing or management of firefighting equipment provided by a managing agent.

8.8 Cyclical testing and servicing: Albyn Group has the following cyclical servicing and testing programmes, all of which reduce the risk of fire:

- Gas servicing: All properties with gas appliances are serviced annually in line with legislation. Full details are set out in the Gas Servicing Policy.
- Electrical testing (including smoke and heat alarms and CO monitors and emergency lighting): All properties and internal communal areas are tested five yearly and homes are also tested when they become void. All our homes will be LD2 compliant by February 2022. Full details are set out in the Electrical Safety Policy.
- Chimney sweeping: All properties with open fires and stoves are swept at least annually, and more frequently if recommended by the chimney sweeping contractor. Where a tenant asks for permission to either open up a fireplace or install a stove, any permission granted will be conditional upon the tenant providing Albyn Group with a chimney sweeping certificate annually following installation.
- Fire suppressant and emergency lighting testing: All emergency lighting and fire suppressant systems will be tested annually unless otherwise recommended by the manufacturer.

8.9 **Contracts:** In order to be managed safely, it is important that everyone understands their responsibilities to improve fire safety. With this in mind:

- **Tenancy agreements and licences:** Albyn Group's customers have a wide range of different tenures including fair rent tenancies, secure tenancies, assured tenancies and private residential tenancies, as well as licences. As these standard documents are reviewed, we will ensure that the following are written into these documents:
 - That the tenant or licensee may not interfere or tamper with equipment provided for fire safety purposes such as smoke and heat alarms, CO2 detectors;
 - That the tenant or licensee may not store any items or rubbish in internal or external communal spaces;
 - That the tenant or licensee may not store flammable or other hazardous substances in the property other than small quantities for normal domestic use which must be stored in a safe manner;
 - That the tenant or licensee will take all reasonable steps to ensure that no members of their household or visitors do any of the above.
- **Leases for properties owned by Albyn Group and managed by another organisation:** We will ensure that all contracts signed from 01 April 2021, that let an Albyn Group property to another organisation clearly state:
 - Which organisation is responsible for day-to-day management of fire safety including regular testing of fire equipment such as fire alarms and fire call points (where required), and for keeping appropriate records;
 - Which organisation is responsible for carrying out a Premises FRA (where required) at appropriate intervals, and for providing a copy to Albyn Group, along with evidence of remedial action completed;
 - Where the property will be used by individuals who may – because of their characteristics, capabilities or behaviour – increase fire risk, the managing organisation is responsible for carrying out Person Centred FRAs;
 - Which organisation is responsible for repairs and maintenance;
 - Which organisation is responsible for cyclical testing and servicing (including electrical testing and LD2; gas servicing; chimney sweeping);
 - Which organisation is responsible for servicing and specialist testing of fire protection equipment servicing (including fire alarms; fire extinguishers; emergency lighting; fire suppressant systems).
- **Leases for properties owned by another landlord and managed by Albyn Group:** We will ensure that all contracts signed from 01 April 2021, establishing Albyn Group as manager of a property owned by another landlord clearly state:
 - Which organisation is responsible for day-to-day management of fire safety including regular testing of fire equipment such as fire alarms and fire call points (where required), and for keeping appropriate records;

- Which organisation is responsible for carrying out a fire risk assessment (where required), and for keeping appropriate records;
- Which organisation is responsible for repairs and maintenance;
- Which organisation is responsible for cyclical testing and servicing (including electrical testing and LD2; smoke and heat detectors and CO alarms; gas servicing; chimney sweeping);
- Which organisation is responsible for servicing and specialist testing of fire protection equipment servicing (including fire alarms; fire extinguishers; emergency lighting; fire suppressant systems);
- That where we are not the party that will carry out some functions above, we will be given access to copies of records to satisfy us that the work has been carried out.

8.10 Inspections: Albyn Group carries out the following regular inspections to manage fire safety:

- Internal and communal areas and bin stores of flat blocks: These are carried out by the Customer Services team (for Albyn Housing Society blocks) and HRI (for private and mixed tenure blocks) at least quarterly and monitor housekeeping (including notices on walls); communal area damage; operation of door closers and emergency push bars; access to emergency exits; and whether electric cupboards are locked. These inspections are recorded on the Fire Safety Block Inspection form and summarised in the Fire Safety Register.

For clarification, Albyn Group takes a zero-tolerance approach to items left in communal areas within our control, whether items belonging to an owner, tenant, household member or visitor. Any such items will be removed as soon as possible.

- Front doors of individual flats with common entry: Door closers and intumescent strips are checked annually by the Customer Services team or HRI team as appropriate. These inspections are recorded on the Fire Safety Block Inspection form and summarised in the Fire Safety Register.
- Office inspections: These are carried out at all Albyn offices and recorded in the Fire Safety Register. The inspections are carried out:
 - Weekly – fire alarm (with call points tested on rotation);
 - Monthly – emergency lighting (by an electrician);
 - Monthly – housekeeping, fire extinguishers.

8.11 Working from home: We will provide information to employees working from home to enable them to understand the importance of fire safety in their working environment.

8.12 **Information:** We will provide information to tenants on fire safety:

- **At tenancy sign-up:** Tenants will be given Scottish Fire and Rescue Service (SFRS) fire safety information as part of the sign-up pack and (for tenants of flats with communal entrances) advice on how to respond in the event of fire. For clarification, our standard advice to tenants in the event of fire, including tenants in blocks of flats, is to leave the building if it is safe to do so and then raise the alarm.
- **Mid-tenancy:** Our tenant newsletter will regularly feature articles on fire safety, including the availability of home fire checks by SFRS.

8.13 **Record keeping:** Albyn Group will maintain accurate, up-to-date records on fire safety. Details are set out in the relevant sections above, but in summary:

- **Fire Safety Register:** Includes information on Premises and Person-Centred FRAs; fire suppressant systems testing; fire equipment servicing; flat block inspections; office inspections; the individual responsible for each action or inspection.
- Servicing records for gas servicing; electrical testing and servicing, chimney sweeping, emergency lighting.
- HR training records.

8.14 **Competency and training:** Albyn Group will ensure that any individuals who are employed or contracted to work on fire safety are sufficiently trained and experienced to allow them to carry out their duties competently.

- Any employee who is a designated Responsible Person for fire safety purposes will receive role-specific training;
- Any individual who we employ or contract to carry out fire risk assessments in our buildings will be qualified to NEBOSH National Certificate in Fire Safety and Risk Management or equivalent;
- Any employee who acts as a Fire Warden in one of our offices will undertake role-specific training;
- Every employee will undertake general fire safety awareness training as part of their initial induction on starting with the organisation;
- Following initial training, refresher training will be provided at appropriate intervals.

9.0 Performance, Monitoring and Reporting

9.1 The following will be reported to Leadership Team monthly:

- Number of Premises FRAs overdue
- Number of FRA actions overdue
- Number of communal area inspections overdue
- Number of staff with Fire Safety Awareness training overdue
- Details of any fires or near misses on fire safety.

10.0 Complaints

- 10.1 Any complaints from customers about the fire safety policy or associated procedures will be dealt with through the normal customer complaints policy.
- 10.2 Any complaints from staff regarding this policy or associated procedures will be dealt with under the Whistleblowing Policy or Grievance Policy as appropriate.

11.0 Equal Opportunities

- 11.1 Some people – for example, as a result of a disability – may need specific actions to ensure they are protected from the risk of fire. This policy has taken this group into account by the introduction of person-centred Fire Risk Assessments.
- 11.2 This policy does not disproportionately affect any group with a protected characteristic, and complies with Albyn Group's Equalities and Diversity Statement.

12.0 Policy Review

- 12.1 This policy will be reviewed within three years.