

Fire and Building Safety Policy

This policy applies to Croydon Council members of staff. It outlines how the Council fulfils its responsibility for Fire and Building Safety under the relevant legislation.

Contents

1. Introduction.....	3
2. Statement of Intent	3
3. Our commitments	4
4. Measuring compliance.....	5
5. Key Roles and Responsibilities	6
6. Croydon Councils Organisational Structure for Fire and Building Safety.....	7
7. Information Storage (Golden Thread).....	7
8. Appeals and complaints.....	8
9. Reasonable Adjustments.....	8
10. Consultation.....	8
11. Monitoring and review.....	9
12. Document control	9

1. Introduction

- 1.1. Croydon Council is committed to ensuring that our residents' homes, are safe and secure places in which to live and work.
- 1.2. The policy seeks to ensure that we meet our obligations as a landlord and that our buildings are safe are appropriately managed. We aim to take reasonable steps to make sure, that our residents, employees, and the general public, are not exposed to any risks to their health or safety and well-being from fire, structural, or other unknown building-related issues.
- 1.3. The policy applies to all residential properties owned and managed by Croydon Council.

2. Statement of Intent

- 2.1. Croydon Council will take reasonable steps to prevent and control the risk to buildings from fire, and structural incidents in the properties that we own or manage. In addition to fire safety, we will work to ensure that other compliance areas such as gas, water, asbestos, electrical, and lifts are managed safely. These compliance areas are detailed under separate policies and procedures.
- 2.2. The Council will provide employees, contractors, and residents with clear advice on building and fire safety. The Council will also provide a clear and transparent process for undertaking Fire Safety Assessments (FRAs) and the works that arise out of those assessments.
- 2.3. The Council is committed to keeping employees, residents, contractors, and visitors to our properties safe from fire or structural risk and meeting our obligations as a 'Reasonable Person' under all current and relevant legislation, as well as looking to achieve 'best practice.'
- 2.4. Croydon Council obligations regarding building safety are mainly set out in the Regulatory Reform (Fire Safety) Order 2005, the Housing Act 2004, the Construction (Design Management) Regulation 2015, the Health and Safety at Work Act 1974, the Building Regulations 2010, the Fire Safety Act 2021, the Fire Safety (England) Regulations 2022 and the Building Safety Act 2022.
- 2.5. We also have regard to the Home Secretary's guidance (Check your fire safety responsibilities under the Fire Safety (England) Regulations 2022) under Article 50 of the Regulatory Reform (Fire Safety) Order 2005
- 2.6. As Chief Executive of Croydon Council I am personally committed to ensuring, as far as reasonably practicable, the health and safety of all employees, tenants, service users, contractors, and members of the general public.

Katherine Kerswell, Chief Executive

3. Our commitments

- 3.1. Croydon Council will aim to meet current relevant legislative standards and work towards exceeding these standards with good industry practices.
- 3.2. We will meet our building safety and fire safety obligations and protect our residents, staff, and visitors from risks to their health and safety from fire, structural failure, inherent building defects, or other relevant property compliance failures by:
 - Demonstrating the highest health and Safety compliance standards by:
 - Maintaining accurate records and data
 - Regularly reporting on compliance performance
 - Monitoring and challenging our performance, through a programme of internal audit, and seeking independent assurances
 - Implementing a fire risk management strategy in accordance with BS 9997: Fire risk management systems.
 - Continuing to provide Decent Homes and increase investment in compliance by:
 - Delivering remedial works and supplementary testing as required of responsible persons and other duty-holders.
 - Maintaining and servicing our building and fire safety assets.
 - Implementing the findings of the Hackitt report, independent review of Building and Fire Safety, and managing associated fire risks both during work and following completion of work.
 - Increase our investment in staff training and development over the next three years.
 - Increase resident's involvement in the safety and improvement of our services, estates, and neighbourhoods by:
 - briefing residents, staff, and contractors about evacuation procedures.
 - Better understanding of the vulnerabilities of our residents and staff, identifying where additional support may be required to ensure their safety in the event of evacuation being required.
 - Creating an inclusive resident engagement strategy putting residents at the heart of building safety.
 - Provide training and materials that can be utilised by our residents in support of fire prevention, fire protection, and fire procedures within their homes and their blocks.
 - Engaging openly and proactively with the community, particularly with respect to collaboration with our residents and the London Fire Brigade, Building Safety Regulator, Regulator of Social Housing, and other stakeholders.
- 3.3. We will proactively comply with the Fire Safety Act 2021 and Building Safety Act 2022 requirements in existing and new developments

3.4. We will:

- 3.1.1. Ensure that every in-scope building will have an individually tailored Building Safety File in place by April 2024, providing the body of evidence required to support the Building Safety Case. With nearly 20 in-scope buildings there is a need to prioritise higher risk category blocks. Risk categories have been defined in the 'Building Safety Programme'.
 - 3.1.2. Increase resident's involvement in the safety and improvement of our services, estates, and neighbourhoods, creating an inclusive resident engagement strategy and putting them at the heart of building safety.
 - 3.1.3. Ensure that we prioritise digital investment to help us deliver our objectives. The "golden thread" of building information must be maintained digitally and made accessible to key stakeholders.
 - 3.1.4. Review and, where required, carry out any recommendations requested by the regulators.
 - 3.1.5. Nominate named duty holders, including the Accountable Person and Building Safety Manager (BSM), for all relevant buildings.
- 3.2. Duty holders will be required to identify potential hazards and at-risk persons, evaluate the risk, decide on necessary controls and mitigation measures, and record, evaluate, and monitor the risks on an ongoing basis.

4. Measuring compliance

4.1. The Head of Building Safety and Head of Compliance will report to the Corporate Directors, Directors Management Team, Housing Scrutiny Panel, Performance Management Group, and Regulator on the progress and performance of the:

- Fire Risk Assessment programme, in accordance with approved Key Performance Indicators (KPIs) which shall include:
 - British Approvals for Fire Equipment (BAFE) Scheme for Fire Risk Assessment accreditation, BAFE SP205-1 of in-house Fire Safety Team and Contracted third-party assessors.
 - Completion of the fire assessment identified remedial actions.
 - Fire risk assessment actions that are overdue.
- The Building Safety Case Programme, in accordance with key performance indicators which shall include:
 - The Type 4 Fire Risk Assessment and external survey programme.
 - External Wall Survey to PAS9980, including EWS1, where appropriate.

- A structural survey programme confirming the structural integrity of the block in specific regard to disproportional collapse.
- Registering each building, deemed in-scope of the Building Safety Act 2022, with the regulator and progress on any remedial actions required, including alteration enforcement, prohibition notices, and Notice of Deficiency (ND) actions.
- A Building Safety Manager appointed to achieve compliance for all “in scope” buildings and review and report on status.

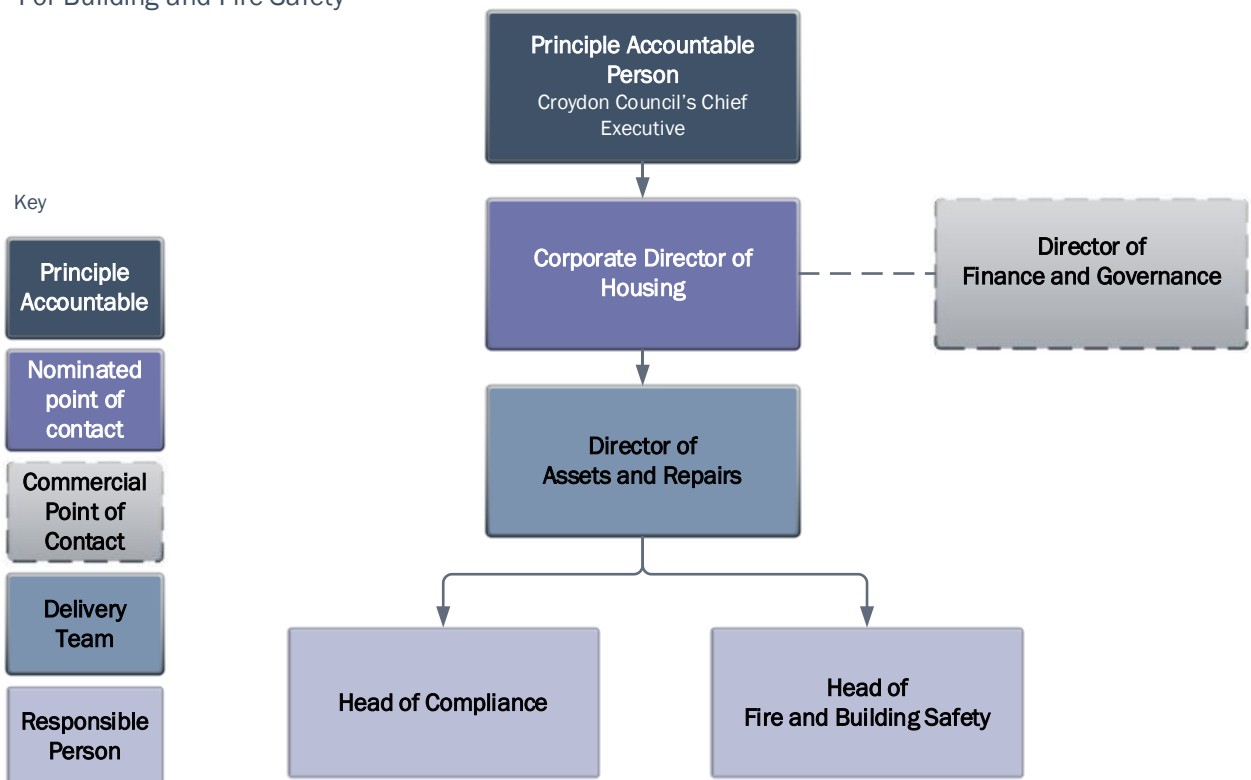
5. Key Roles and Responsibilities

- 5.1. To fulfil its obligation under the Building Safety Act 2022 Croydon Council, as a corporate body, is defined as the Principle Accountable Person.
- 5.2. Key roles and responsibilities for managing Building and Fire Safety will be overseen are as follows:
- Director of Finance and Governance in respect of lettings and other operational locations (not included in the site listed under the Strategic Director of Housing).
 - Director of Housing in respect of buildings in the operational portfolio managed by Corporate Facilities Management.
 - Director of Children’s and Adults Services in respect of education establishments where the Local Authority is the employer and/or owns the buildings and the other operational locations (not included in the sites listed under Strategic Director of Housing above).
 - Director of Housing in respect of domestic properties (embracing sites managed by Housing Services, communal areas, and Tenants and Residents Halls) owned by the Council and other associated non-domestic operational locations (not included in the sites listed under Strategic Director of Housing above).
 - Strategic Director of Environment and Social Regeneration in respect of operational locations (not included in the sites listed under Strategic Director of Housing above).
- 5.3. The lead Directors are responsible for implementing and maintaining appropriate arrangements for fire safety management activities which will be described in a department specific fire strategies (establishing regimes, procedures, and protocols, induction, and refresher training/information arrangements) that support the requirements of the corporate policy.
- 5.4. Corporate Facilities Management will act as a central resource, to assist and support the lead Directors in ensuring that their responsibilities in respect of the corporate fire safety policy are met.

- 5.5. Corporate Facilities Management will ensure a robust approach to fire safety compliance and consistent implementation of compliance activity. They will do so by reviewing and auditing current and ongoing fire safety compliance, procuring and managing required compliance works on behalf of the departments for properties that fall within the Corporate Compliance Programme, and maintaining and managing fire safety data as a corporate record.
- 5.6. The Corporate Director of Housing is appointed as the Nominated Point of Contact under for obligations under the Building Safety Act 2022.
- 5.7. The Head of Building and Fire Safety is the appointed Responsible Person under the Regulatory Reform (Fire Safety) Order 2005.

6. Croydon Councils Organisational Structure for Fire and Building Safety

Croydon Councils Organisational Structure
For Building and Fire Safety



7. Information Storage (Golden Thread)

- 7.1. Dame Judith Hackett reported that *'A robust 'golden thread' of key information' should be passed across to future building owners to underpin more effective safety management through the buildings life cycle'*.
- 7.2. To comply with this requirement, we will:
 - Use digital tools and systems to enable key information to be stored and used effectively to ensure safer buildings.

- Support duty holders and Accountable Persons throughout the life cycle of a building (during the gateway process, building registration process, the safety case approach, and throughout occupation) by recording the original design intent and ensuring subsequent changes to buildings are captured and preserved.
- Incorporate all the information needed to understand a building and how it should be managed so that the building and, above all, the people in and around a building, are safe, both now and in the future.
- Make information easily available to the right people at the right time.
- Put in place a new higher standard of information-keeping which will support the building safety regulator in being assured buildings are being managed safely.

8. Appeals and complaints

- 8.1. Should there be a complaint from a tenant concerning, any aspect of Building safety, this will be dealt with via the Council's Corporate Complaints Policy.

9. Reasonable Adjustments

- 9.1 Croydon Council will make reasonable adjustments to support our residents' needs when they access our services. The term 'reasonable' refers to what we can do without compromising our resources, efficiency, or ability to practically fulfil requests. This does not include [Aids and Adaptations](#) to our properties and common parts of a building.
- 9.2 No resident should be at a disadvantage when accessing our services. The following statements offer a general overview to ensure that our services are adjusted to meet the needs of our residents where possible. This list is not exhaustive, and we will adapt our approach based on individual resident needs.
- 9.3 We aim to provide services that are accessible to all who require them. As a result of this, we will:
- Ensure our officers get to know our residents and their individual needs
 - Provide a range of ways for residents to contact our officers including phone, mail, email and via [Housing Online](#)
 - Provide alternative communication methods on request, such as Braille, foreign language interpreter, large print etc.
 - Ensure residents are always able to select their preferred method of contact.
 - Ensure our offices are fully accessible to visitors
- 9.4 We will continue to diversify our services to meet residents' needs where possible.

10. Consultation

- 10.1. Staff with responsibility and operational knowledge of lift maintenance have been consulted during the development of the policy. The consultation will be carried out through the different management levels before seeking approval from the Health & Safety Board.
- 10.2. The Council's Legal team has reviewed the policy.
- 10.3. Residents have engaged and been consulted in the development and review of this policy.

11. Monitoring and review

- 11.1. The implementation of this policy, frequent compliance reports, and any incidents will be reported to and monitored by the Building Safety team.
- 11.2. This policy will be reviewed every year, or as and when there are changes to any legislation and national policy governing this area of work.
- 11.3. Arrangement for a full internal audit of the Building Safety procedures will be undertaken by the Council's Internal Auditors. The full scope of the audit will be agreed upon with the Internal Auditors, the Head of Building Safety, the Head of Compliance, and the Director of Assets and Repairs.

12. Document control

- 12.1. This is a controlled document and should not be changed unless by authorisation of the policy owner.

Monitoring		
Approved Date:	24 September 2024	
Next Review Date:	1 April 2026	
Effective date:	1 October 2024	
Consultation Review		
Stakeholders review:	13.05.2024	
Legal review date:	31.07.2024	
Residents reading group:	16.09.2024	
Policy owner:	Director of Assets and Repairs	
Ratified by:	Housing DMT on 24 th September 2024	
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.	
Version Updates		
Version Number	Summary of change	Author and Approver
1.0	New Policy	Developed and reviewed by Housing Subject

		matter experts and the Resident's Reading Group
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