

Fire Safety Policy



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Relevant National Standards or Regulations	- Regulatory Reform (Fire Safety) Order 2005 (FSO) - Fire Safety (England) Regulations 2022 - Regulator of Social Housing – Safety & Quality Standard (Consumer Standards, Apr 2024) - NFCC – Fire Safety in Specialised Housing (2017) – Supported Accommodation guidance - PAS 79-1:2020 (FRA for non-domestic premises) and BS 9792:2025 (FRA for housing) - BS 5839-1 (Fire detection & alarm systems – non-domestic) and BS 5839-6 (domestic premises) - BS 5266-1 (Emergency lighting – code of practice) - BS 5306-3 & BS 5306-8 (Portable fire extinguishers – maintenance; selection & positioning) - BS 8214 (Timber fire door assemblies – specification, installation, maintenance) - BS 9991 (Fire safety in the design, management and use of residential buildings) - LGA – Fire safety in purpose-built blocks of flats (current edition) - HHSRS Operating Guidance (Housing Health & Safety Rating System – fire hazard)
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Relevant Legislation	- Fire Safety Act 2021 (amends the scope of the FSO) - Housing Act 2004 (incl. HHSRS enforcement) - Building Regulations 2010 (as amended) & Approved Document B (Fire Safety) - Landlord and Tenant Act 1985, s.11 (repairing obligations affecting fire safety) - Equality Act 2010 (reasonable adjustments relevant to evacuation/PEEPs) - Occupiers' Liability Acts 1957 & 1984 - Corporate Manslaughter and Corporate Homicide Act 2007
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Fire Safety Policy



Purpose

This Fire Safety Policy sets out how Harbour Light ensures the safety of all residents, staff, and visitors in its supported accommodation properties. It is a statutory policy, meaning it is required for legal compliance with fire safety laws. The purpose of this policy is to prevent fires as far as possible and to protect life and property if a fire does occur. Harbour Light is committed to meeting all duties under the Regulatory Reform (Fire Safety) Order 2005 (FSO) and related laws, and to following best-practice guidance for supported housing from the National Fire Chiefs Council (NFCC). This policy provides clear procedures and responsibilities so that “Get Out, Stay Out” evacuation is achieved quickly and safely in every Harbour Light building, and that effective fire prevention measures are in place at all times. The policy also establishes how Harbour Light coordinates with its contracted Support Providers to ensure no gaps or confusion in fire safety responsibilities.

Scope

This policy applies to all properties managed by Harbour Light, including 287 units across 54 properties in 47 locations. These properties range from single-tenant bungalows to blocks of flats accommodating up to 24 people. The policy covers all Harbour Light staff and Board members, contracted Support Provider organisations and their on-site support staff, as well as any maintenance contractors working on fire safety systems. It also sets expectations for residents/tenants living in Harbour Light accommodation in relation to fire safety (e.g. not misusing fire equipment and complying with evacuation procedures).

Three of Harbour Light’s properties do not have permanent staff on-site, while all others have 24/7 staffing provided by contracted Support Providers. In every case, Harbour Light remains the landlord and Responsible Person for the premises under fire safety law, with the Support Provider’s staff acting as the frontline for day-to-day fire safety tasks on-site. This policy and its procedures therefore apply to both Harbour Light and the Support Providers in a coordinated way. It defines which organisation or role is responsible for each aspect of fire safety (as per an agreed responsibility matrix). All locations, regardless of size or staffing, are included in the scope – the procedures will be scaled appropriately to the building’s size and risk level.

Responsibilities

Harbour Light and its Support Providers will work together closely to fulfil all fire safety duties, in line with Article 22 of the Fire Safety Order (which requires cooperation and coordination where responsibilities are shared). The following roles and entities have specific responsibilities:

- **Chief Executive:** The CEO has ultimate accountability for fire safety across Harbour Light’s properties. The Harbour Light CEO approves this policy and ensures that sufficient resources are allocated to implement all fire safety measures. The Harbour Light CEO promotes a culture of safety and ensures that fire safety performance is reported to the Board. The CEO also appoints competent persons (fire safety specialists) to assist in complying with the Fire Safety Order.
- **Harbour Light (Organisation/Landlord):** As the property owner and Registered Provider, Harbour Light is the primary “Responsible Person” under the FSO for the common areas of all buildings. Harbour Light’s management must establish effective arrangements for planning, implementing, controlling, and monitoring fire safety measures (per Article 11 of the FSO). Key duties include:



- **Fire Risk Assessments (FRAs):** Scheduling and commissioning FRA surveys by a competent fire risk assessor for each property at the required intervals (detailed in Procedures below). Harbour Light reviews FRA findings and ensures that all required actions/remedial works (e.g. installing self-closing devices or improving alarm systems) are carried out within a reasonable and practicable timescale.
- **Maintenance of Fire Safety Systems:** Overseeing installation and servicing of alarms, emergency lighting, fire doors, fire-fighting equipment (blankets, extinguishers), and any fire safety signage or building fabric measures. Harbour Light ensures compliance with relevant standards (e.g. BS 5839 for alarm systems) and that maintenance contracts are in place for periodic inspection/testing of systems.
- **Compliance Monitoring:** Keeping records of all fire safety checks, maintenance, drills and training. Harbour Light audits each property's fire safety logbooks and conducts site inspections periodically to verify that both Harbour Light's and the Support Provider's duties are being carried out. Any non-compliance or issues identified are addressed through action plans.
- **Policy and Coordination:** Providing this Fire Safety Policy and an accompanying **Responsibilities Matrix** to each Support Provider, clearly outlining who does what (for example, Harbour Light handles physical maintenance and statutory compliance, while support staff handle emergency planning, drills and individual evacuation plans). Harbour Light management meets regularly with Support Provider management to review fire safety performance, share information (e.g. FRA reports, fire incident reports), and document cooperation as required by law.
- **Competent Person (Fire Safety Officer / Advisor):** Harbour Light designates a competent fire safety professional (either an internal Fire Safety Officer or external consultant) to assist the organisation. This person's responsibilities include advising on fire safety improvements, conducting or reviewing FRAs, and monitoring that preventive and protective measures remain effective. They ensure Harbour Light stays up to date with fire safety regulations and guidance. The competent person also liaises with the Fire and Rescue Service (FRS) as needed (for example, providing information about building risks or layout). All advice from the competent person is reported to senior management for action.
- **Support Provider (Contracted Organisation):** Each property with on-site support is managed day-to-day by a contracted Support Provider. The Support Provider is responsible for on-site fire safety management in line with this policy and the agreed matrix. Their management must ensure:
 - Support staff are trained in fire procedures, alarm use, and assisting evacuations.
 - Personal Emergency Evacuation Plans (PEEPs) are in place and kept up to date for all residents who would need assistance to evacuate.
 - Regular fire drills and alarm tests are carried out (and documented) at the frequency required.
 - Any concerns with building fire safety (e.g. faulty equipment, blocked exits, resident behaviour creating risk) are immediately communicated to Harbour Light for remedy. Under Article 22, the Support Provider must inform Harbour Light of any fire risks arising from their activities or the residents' needs.
 - They cooperate fully with Harbour Light's fire risk assessments and follow any fire-related house rules (such as no smoking policies or restrictions on portable heaters, etc.).
 - At some sites, the Support Provider may install additional safety systems (e.g. Premises Information Boxes or monitoring devices) – if so, the Support Provider maintains these and ensures information is current, while informing Harbour Light of their presence.

Fire Safety Policy



- **On-Site Support Staff (Support Workers/Scheme Staff):** The staff working within each supported accommodation property (on shifts 24/7 in most cases) have hands-on duties for fire safety:
 - **Daily/Weekly Checks:** Staff conduct visual inspections to keep escape routes and fire exits clear at all times, check that fire doors are closed and not obstructed, and test fire alarms weekly (usually a “fire alarm test” at a set time), logging the results.
 - **Personal Plans and Assistance:** Staff familiarise themselves with each resident’s PEEP and are prepared to assist those individuals in an emergency as per the plan. As tenants are not required to check in or out, it is not possible to maintain a real-time list of who is physically present. However, an up-to-date occupancy and unit/room allocation list (i.e., residents’ names linked to room/flat numbers) must be kept in the Premises Information Box (PIB), where used, and updated whenever residents move in or out.
 - **Fire Drills and Exercises:** On-site staff carry out fire evacuation drills (practice evacuations) at intervals determined by risk (typically at least annually, and for higher-risk sites more frequently, e.g. quarterly). They ensure drills cover both daytime and nighttime scenarios over the year. After drills, staff report any issues (e.g. someone didn’t hear the alarm, or difficulty using an exit) to their management and Harbour Light so improvements can be made.
 - **Emergency Response:** If an alarm sounds or a fire is discovered, support staff immediately implement the “Get Out, Stay Out” evacuation plan – they raise the alarm (if not already sounding), assist residents to evacuate (with priority to those who need help as per PEEPs), ensure the Fire and Rescue Service (FRS) (999) is called, and prevent any re-entry until the Fire and Rescue Service declares the building safe. A senior staff member on duty will act as the “fire warden” to coordinate evacuation and then liaise with attending firefighters (providing information such as missing persons or locations of fire and handing over PEEPs or site info if needed). This will be organised by the Support Provider as they have control over Staffing and rotas, etc.
 - **Reporting and Feedback:** After any fire incident (even false alarms) or drill, support staff prepare an incident report for Harbour Light and their employer. They note what went well or any problems (e.g. alarm fault, resident refused to evacuate, etc.). This ensures continuous improvement and that Harbour Light can update the FRA or procedures if needed.
- **Residents/Tenants:** While vulnerable tenants are not “employees,” they still have a role in keeping themselves and others safe from fire. Residents must:
 - Comply with all fire safety guidance provided – for example, evacuate immediately when the alarm sounds and do not attempt to stay or re-enter (Get Out, Stay Out).
 - Not disable or tamper with any fire safety equipment (smoke alarms, fire doors, extinguishers, alarm call points, etc.). Tampering is prohibited as it puts everyone at risk.
 - Keep their own belongings and routines fire-safe: avoid smoking indoors (in line with this policy’s smoking rules), use electrical equipment safely, and do not obstruct corridors or exits with furniture or possessions. Hoarding or accumulation of combustibles must be managed; support staff will assist residents to maintain safe conditions.
 - Participate in fire drills and PEEP discussions. If a resident has disabilities or support needs, they should cooperate with staff in developing a Personal Emergency Evacuation Plan that works for them.
 - **Report** to staff any fire hazards or incidents they notice (for instance, if an exit light is broken or they smell burning). This helps ensure swift action.

Fire Safety Policy



In summary, Harbour Light retains overall responsibility as landlord to ensure the premises are safe and compliant, while Support Providers and their staff handle the immediate operational aspects of fire safety on-site. Both parties must communicate and cooperate effectively – their duties are distinct but interdependent. This coordinated approach follows NFCC guidance, which emphasises having a clear matrix of responsibilities between the housing provider and care/Support Provider.

Legislation and Regulations

Harbour Light's fire safety arrangements comply with all applicable fire safety legislation in England. The key laws and guidance informing this policy are:

- **Regulatory Reform (Fire Safety) Order 2005 (FSO):** The main fire safety law applying to non-domestic premises and the communal areas of residential buildings. Under the FSO, Harbour Light (as landlord/employer) is the "Responsible Person" and must take general fire precautions to ensure the safety of all "relevant persons" (residents, staff, visitors). This includes conducting fire risk assessments, implementing fire prevention measures, maintaining emergency routes/exits, fire detection and warning systems, firefighting equipment, and training. Article 11 of the FSO requires Harbour Light to have effective arrangements for planning, organisation, control, monitoring and review of fire safety measures – This policy is part of meeting that duty. Article 22 of the FSO requires cooperation and coordination when responsibilities are shared, which is highly relevant as Harbour Light shares premises with Support Provider – we document and practice such cooperation in this policy. Non-compliance with the FSO can lead to enforcement notices or penalties, so Harbour Light treats these obligations with the highest priority.
- **Fire Safety Act 2021:** This Act amends and clarifies the FSO. In particular, it confirms that for any building containing two or more domestic dwellings, the fire safety duties under the FSO extend to the building's structure and external walls (including cladding, balconies, windows) and to individual flat entrance doors that open into common areas. Harbour Light ensures that its fire risk assessments and maintenance regimes cover these elements – for example, checking flat entrance fire doors and the fire integrity of walls/ceilings between flats and common corridors. The Fire Safety Act 2021 was introduced post-Grenfell to make sure any risks from external wall systems are assessed and mitigated. Harbour Light complies by having our competent fire risk assessor evaluate external wall materials (where applicable) and flat front doors as part of each FRA, and by promptly addressing any issues (e.g. installing self-closing devices on flat doors or arranging surveys of cladding if present).
- **Fire Safety (England) Regulations 2022:** These regulations, effective 23 January 2023, impose additional duties on "Responsible Persons" of residential buildings, stemming from the Grenfell Tower Inquiry recommendations. Harbour Light complies with the following requirements of these regulations:
 - **Information to Residents (Regulation 9):** Harbour Light will ensure that residents receive clear, consistent fire safety information appropriate to the premises and the residents' needs. Going forward, Harbour Light will maintain a controlled Resident Fire Safety Information Template (including plain English wording and, where required, an accessible format). Each contracted Support Provider will be responsible for issuing and explaining this information to residents at commencement of occupancy and thereafter at least annually (or sooner where risks change), and for keeping evidence of delivery (e.g., induction checklist/record). Harbour Light will verify compliance through contract monitoring and periodic audit of site records.
 - **Fire Doors Checks (Regulation 10):** For buildings over 11 metres in height (typically 4+ storeys), the regulations require quarterly checks of all communal fire doors and



annual checks of all flat entrance doors by the Responsible Person. Currently, Harbour Light's housing stock is primarily low-rise (one to three storeys). If any building meets the 11m threshold or otherwise is in scope, Harbour Light will implement the required door inspection regime. As best practice, even in smaller buildings, we periodically inspect flat doors and communal doors for functionality (ensuring self-closers work, no damage to seals, etc.) during our property visits and FRAs.

- **High-Rise Provisions (Regulations 4-8):** Harbour Light does not presently own or manage any high-rise residential buildings (defined as 18m+ or 7+ storeys) – our tallest blocks are three storeys. If in future we do manage a high-rise, we will comply with all additional duties, including installing a Secure Information Box at the Fire and Rescue Service (FRS) entrance with building plans and key contacts, sharing electronic building plans and facade materials information with the local Fire & Rescue Service, providing wayfinding signage on each floor, and carrying out monthly firefighting lift checks. For now, these specific high-rise regulations do not apply to Harbour Light's current properties, but we voluntarily adopt any relevant good practices from them (for example, maintaining a Premises Information Box at some larger sites as described later).
- **Other Applicable Law:** Harbour Light notes that the above regulations supplement the existing FSO duties. Article 24 of the FSO allows such regulations. We ensure full compliance with all legal requirements as they evolve.
- **Housing Act 2004 (Housing Health & Safety Rating System):** Although primarily a housing standard, it includes **fire as a hazard** to be minimised in residential accommodation. As a Registered Provider, Harbour Light must ensure its homes are free from Category 1 hazards, including risk of fire. Our robust fire safety measures contribute to meeting the Home Standard set by the Regulator of Social Housing (which mandates landlords to comply with health and safety legislation).
- **National Fire Chiefs Council (NFCC) – Fire Safety in Specialised Housing (2017):** Harbour Light aligns its approach with the NFCC Specialised Housing Guidance. This guidance is tailored for housing that accommodates vulnerable people (such as supported living for people with learning disabilities, mental health needs, or substance misuse recovery). We specifically follow the sections on **Supported Accommodation**, rather than those on sheltered or extra-care housing, as our model involves 24/7 supported living rather than warden-controlled or care home settings. The NFCC guidance emphasises person-centred fire risk assessments and multi-agency collaboration, which Harbour Light implements through requiring PEEPs and close working with support staff and local Fire and Rescue Service (FRS)s. It also provides best practices on issues like mobility scooter storage, homely environments, and evacuation planning, which we incorporate in this policy's procedures.
- **Other Guidance and Standards:** We also take into account the Local Government Association's guide *"Fire Safety in Purpose-Built Blocks of Flats"*, British Standards such as **BS 5839** (fire detection and alarm systems) and **BS 9991/BS 9999** (fire safety in design and management of residential buildings), and the new **BS 9792:2025** which replaced **PAS 79** for housing fire risk assessments. While these detailed standards mainly guide our technical and assessment processes (outside the scope of this policy document), they underpin our commitment to high standards. In all cases, where guidance or best practice suggests a higher level of safety than the minimum legal requirement, Harbour Light will consider and, where reasonably practicable, implement the higher standard to protect our vulnerable residents.

This policy shall be reviewed and updated whenever there are changes in legislation or guidance to ensure ongoing compliance. It ensures that Harbour Light meets not just the letter of the law but the spirit of safety regulations, keeping our supported accommodation safe for all.



Procedures

Harbour Light has implemented the following procedures and measures to fulfil the purpose and comply with the above requirements. These procedures cover everything from risk assessment and maintenance to emergency response and training. All staff and contractors must follow these procedures, and Support Providers must have their staff follow them as part of their contractual agreement. The procedures are organised by key areas of fire safety:

1. Fire Risk Assessments (FRA):

A suitable and sufficient Fire Risk Assessment is the cornerstone of our fire safety management. Harbour Light will ensure that:

- **Frequency of FRAs:** Every property undergoes a full FRA by a competent assessor at a regular interval based on building size and risk:
 - **Three-storey buildings (or any site assessed as higher risk):** At least every 3 years, a new full FRA is completed. These are typically our larger blocks or those with more complex layouts or a higher number of residents.
 - **Smaller buildings (two-storey or single-level bungalows) assessed as lower risk:** At least every 5 years, a new full FRA is completed. This five-year cycle is Harbour Light's internal standard for lower-risk supported housing, recognising the generally simpler layouts and lower occupancy. A full FRA will be brought forward where changes in circumstances, identified risks or competent advice make this necessary.
- **FRA Reviews:** Harbour Light will ensure that FRAs are reviewed regularly and kept up to date in accordance with Article 9(3) of the Regulatory Reform (Fire Safety) Order 2005. The frequency and extent of reviews will be proportionate to the risks associated with each property and any recommendations made by the competent fire risk assessor.

An FRA review will also be undertaken whenever:

- There is reason to suspect that the existing assessment is no longer valid.
- There has been a significant change to the premises or their use.
- Alterations have been made that could affect fire safety.
- There has been a fire, relevant near miss or other incident revealing potential shortcomings in existing fire safety arrangements.
- Changes in occupancy, residents' needs or support arrangements may affect fire risks or evacuation arrangements.

Where a review identifies material changes or deficiencies, the FRA will be updated or a new assessment commissioned, as appropriate, by a competent person.

A separate annual documentary review is not a fixed organisational requirement. Harbour Light will maintain suitable arrangements for monitoring changes in fire risks and determining when a review or reassessment is necessary.

- **Competent Assessors:** Harbour Light uses independent fire safety consultants or appropriately qualified in-house staff to carry out FRAs. We ensure they have experience with specialised supported housing environments (e.g. understanding the balance of homely



settings and safety). We look for assessors familiar with NFCC guidance and person-centred risk assessment approaches.

- **Person-Centred Considerations:** While FRAs primarily evaluate the building (common means of escape, fire detection, construction, etc.), our FRA process also considers the occupant risk profile. In supported housing, residents may have mobility issues, cognitive impairments, or other vulnerabilities. Our assessors liaise with support staff to understand if, for instance, certain individuals would not hear an alarm or need physical assistance. Those factors are noted, and the FRA will recommend measures accordingly (like additional detection in a bedroom of someone who smokes, or ensuring an evacuation chair is provided for wheelchair users on upper floors). This approach aligns with NFCC guidance to consider “generic characteristics” of residents in the assessment. However, individual-specific planning is addressed through PEEPs (see section 3 below).
- **Action Plans:** Every FRA results in a written report with recommendations. Harbour Light management reviews these and creates an action plan with responsibilities and deadlines. For example, if an FRA finds that an emergency light is insufficient in a corridor, Harbour Light’s maintenance team will schedule an installation of additional lighting. If an FRA suggests staff need more training on evacuation, we work with the Support Provider to implement that. The action plan is tracked to completion, and records are kept to demonstrate compliance. High-risk findings are addressed immediately. FRA reports and completed actions are shared with the Support Provider management so they are aware of any changes or measures in their building.
- **Record Keeping:** All FRA documents, review notes, and evidence of completed actions are filed centrally by Harbour Light. Summaries of FRA status are reported periodically to the CEO and Board to give assurance of compliance. These records would also be made available to Fire Authorities or Regulators on request to demonstrate our proactivity.

2. Evacuation Strategy – “Get Out, Stay Out”:

All Harbour Light properties follow a simultaneous evacuation strategy. This means that if a fire is detected (by an alarm or by a person discovering a fire), everyone in the building must evacuate immediately – there is no “stay put” policy in our supported accommodation. The slogan we use is “Get Out, Stay Out, and Call 999”, which is communicated to all staff and residents as the fundamental rule. Key points of this strategy:

- **No Delayed Evacuation:** As soon as the fire alarm sounds or any person shouts “fire”, all occupants should make their way out by the nearest safe route. Staff on duty will sweep the area if safe to do so, to assist anyone who has not heard the alarm or who is struggling. We do not designate “fire refuges” for waiting in these small buildings; the goal is full evacuation to open air. (In rare cases where someone cannot evacuate, see PEEPs below for planning.)
- **Do Not Re-enter:** Once out, no one may re-enter the building for any reason until the Fire & Rescue Service (FRS) gives explicit confirmation that it’s safe. Belongings, pets, or even attempts to fight the fire should not be reasons to go back inside – “Stay Out” means stay outside at the assembly point. Support staff ensure residents do not re-enter to retrieve items. Firefighters will conduct rescue/firefighting; only they go in if necessary.
- **Calling 999:** Staff are trained that as soon as evacuation is underway, one of them (or a resident if no staff are present) must call 999 and ask for Fire, giving the address and details. Even if an automatic monitoring system or alarm company is in place, a direct 999 call is always made to avoid any delay. Residents are also informed that if they discover a fire, they should activate the alarm and call 999 once safe outside.
- **Assembly Point:** Each property has a pre-determined fire assembly point at a safe distance (e.g. the far end of the car park or a nearby identified location). The assembly point is chosen



by the Support Company as the best option, taking into account the issues noted in the PEEPs for all the tenants at the property. It is communicated to residents and staff by the Support Company. At the assembly point, the senior staff member will carry out a best-efforts roll call, using the occupancy and unit/room allocation list and any local visitor sign-in arrangements where used. There is no register for tenants, so this must be taken into account; the roll call may not be accurate. Any persons unaccounted for must be reported immediately to the Fire and Rescue Service.

- **Staff as Fire Wardens:** On staffed sites, support staff act as fire wardens during any evacuation. They wear high-visibility vests if available (kept near fire panels or entrances) to be easily identified by residents and fire crews. Staff will check their “zone” or wing of the house if safe, close doors behind them to slow fire spread, and usher everyone out calmly. There is always at least one staff member carrying the keys in case a secure door or gate needs opening during escape (though emergency exits are designed to open without a key, some external gates may need unlocking).
- **Evacuation Drills:** Practising “Get Out, Stay Out” is essential. Drills are scheduled (see section 5 on Training & Drills) to simulate an evacuation. During drills, staff ensure that everyone follows the procedure (no grabbing personal items, no lingering). If drills reveal issues (e.g., a resident refuses to leave or is too slow), their PEEP and support plan is revisited, and additional control measures (like extra staff prompts or equipment) are put in place.
- **Properties with periods without on-site staffing:** Where a premises has periods without on-site support staff (for example, absence of waking-night cover), the “Get Out, Stay Out” strategy still applies. These are typically small, shared houses or small blocks of individual flats. Going forward, the Support Provider will ensure that residents receive a site-specific fire safety induction (including assembly point) and at least an annual refresh, using Harbour Light’s controlled resident information template. Ultimately, residents in premises without permanent on-site staffing are expected to self-evacuate and then call 999 from a place of safety, as per training.

3. Personal Emergency Evacuation Plans (PEEPs):

Because many Harbour Light residents have additional needs, individual evacuation plans are vital. Harbour Light requires that:

- **Support Providers Create PEEPs:** The on-site Support Provider is responsible for preparing a **Personal Emergency Evacuation Plan** for each resident who would need any assistance or special arrangements to evacuate in an emergency. This typically includes residents with mobility impairments, sensory impairments (e.g. deafness), cognitive or mental health issues that might affect their understanding of danger, or medical conditions that slow their response. The Support Provider’s keyworker or manager will work with the resident (and family/representatives if appropriate) to write a tailored plan.
- **Contents of a PEEP:** A PEEP outlines exactly how that individual will evacuate or be evacuated. It specifies the preferred route (e.g. “Joan will be assisted via the stairs by two staff using an evacuation chair”), any equipment needed (evacuation chair, walking frame, visual alarm for the hard-of-hearing, etc.), and the roles of staff (who helps whom). It also covers what to do if the person is not in their usual location – for instance, if a person often stays in their room, but might occasionally be in a common lounge, the staff plan for both scenarios. If a resident sometimes refuses to leave due to anxiety or confusion, the PEEP will include strategies to persuade or compel them (in their best interest for safety). The timing is considered too: if someone needs longer to exit, the PEEP might have them start evacuation as soon as the alarm sounds, with continuous assistance.



- **PEEP Accessibility:** Completed PEEP documents are kept readily accessible to staff and Fire and Rescue Service (FRS)s. For example, a copy might be in the staff office or in a Premises Information Box at the entrance (where used). Support staff should be intimately familiar with the PEEPs (they are trained on them), and a grab-pack or fire folder is available so that if firefighters arrive, staff can hand over information on anyone who is known to still be inside and what help they need. In high-risk sites, firefighters appreciate having PEEP info on arrival.
- **Regular Updates:** PEEPs are reviewed and updated whenever the resident's condition or abilities change, or at least annually. If a new resident moves in, the Support Provider completes a PEEP for them as part of their intake. Harbour Light requires Support Providers to confirm that all current residents have up-to-date PEEPs on file (we may audit this periodically as part of contract management). If a resident no longer needs a PEEP (e.g. they become more independent), it will be noted as well.
- **Individual arrangements where staffing is limited or absent:** Going forward, individual evacuation arrangements (including PEEPs where applicable) will be developed for any resident who requires assistance or bespoke measures to evacuate safely. Where a premises has periods without on-site staffing, the individual arrangements must explicitly address how evacuation will be achieved during those periods (including any technology-assisted alerting/telecare where used). If a resident is assessed as unable to self-evacuate during periods without on-site assistance, this will trigger a joint risk review and accommodation suitability review involving the Support Provider and Harbour Light, with escalation to commissioners/placing authorities where relevant. Individual arrangements must operate within the premises' fire strategy and must not introduce contradictory evacuation instructions for the building as a whole.
- **Coordination and Drills:** Support staff incorporate PEEP procedures into fire drills. For example, if someone's PEEP says they need carrying downstairs, drills will practice that (using equipment if it's unsafe to physically carry during a drill). This tests the feasibility and ensures staff are confident in executing the plan. If any PEEP is found unworkable during a drill, it is revised immediately.
- **Confidentiality and Consent:** PEEPs contain personal information about individuals' health and abilities. Support Providers prepare these in consultation with the tenant and with respect for their dignity. Residents are made aware that the plan will be shared with those who need to know (staff, building management, and potentially emergency services) for their own safety. We balance privacy with safety – e.g., a PEEP might note "John Doe in Flat 2 uses a wheelchair – needs evacuation chair" without exposing unnecessary personal detail beyond what's needed for rescue.

Ultimately, PEEPs ensure no one is left behind in a fire. They operationalise the person-centred risk assessment by translating individual needs into action steps. Harbour Light's role is to ensure Support Providers fulfil this duty and to facilitate any building-related provisions (like installing evacuation aids or adjusting alarm systems for those with sensory impairments) that PEEPs identify as needed.

4. Fire Detection and Alarm Systems:

Robust early warning of fire is crucial, especially when residents may have an impaired ability to respond quickly. All Harbour Light flats and houses are equipped with appropriate fire detection and alarm systems, as follows:

- **Individual Flats (Single Household Units):** In properties that are self-contained flats (where each tenant has their own apartment within a larger building), each flat is fitted with a hardwired interlinked smoke alarm system (Grade D1 or D2 per BS 5839-6: mains-powered with battery backup). Typically, this includes:



- Smoke alarms in hallway/landing and living areas,
 - Heat alarm in the kitchen,
 - Smoke alarm in any bedroom if assessed necessary (especially if tenant smokes or is bed-bound, etc.).
- All alarms within the flat are interlinked, so if one activates, all sound in that flat. Additionally, in most Harbour Light flat complexes, the alarms are also linked to a building-wide panel or at least to alert staff, so that if a smoke alarm goes off inside a flat, it triggers a signal at the staff office or a master alarm panel.
- **Communal Areas and Shared Houses:** In buildings like shared supported houses or blocks with communal corridors, we install a fire alarm panel system (Grade A system) with detectors in common areas and sounders throughout the building. For example, smoke detectors in hallways, lounges, stairwells, and heat detectors in kitchens. These systems have manual call points at exits. When activated, the fire alarm sounds throughout the building, ensuring everyone is alerted. System type varies by premises and FRA outcome;
 - **Smaller Shared Properties:** Smaller properties will only require domestic-grade detection without a panel or manual call points. Over time, we will improve these systems so that they are Smart IoT systems that can be monitored remotely.
 - **Alarm Monitoring:** In staffed properties, the presence of staff 24/7 means alarms are responded to immediately on site. In premises without permanent on-site staffing, residents are still instructed to call 999 themselves as soon as they evacuate.
 - **Maintenance and Testing:** Harbour Light contracts a certified alarm company to perform routine servicing of fire alarm systems every 6 months, in line with BS 5839 recommendations. They test detectors, check batteries, clean smoke heads, and test the panel functionality. Additionally, the support staff test the alarm weekly by activating a different call point or detector each time (as per a schedule). They record these tests in the on-site fire logbook. Any faults (e.g., a detector not working or a sounder not audible) are immediately reported to Harbour Light maintenance for urgent repair. We keep a maintenance log of all alarm inspections, tests, and any false alarm incidents.
 - **Alarm Audibility and Accessibility:** We ensure alarms are loud enough (usually at least 75 dB at bedheads in bedrooms) to wake sleeping persons. If any resident is identified as hearing-impaired, we will provide specialised alerting devices as part of their PEEP, such as vibrating pillow pads or strobe light alarms in their room. Similarly, if a resident is likely not to respond to the alarm due to cognitive issues, their plan may include a direct staff alert (staff go to them). The alarm systems are designed to minimise false alarms (e.g., heat detectors in kitchens rather than smoke, and routine maintenance to avoid dust build-up). But when alarms do go off, we treat it as real until confirmed otherwise.
 - **Upgrades:** Harbour Light commits to upgrading alarm systems as needed. For example, if a property originally had battery alarms and gets brought into our portfolio, we will hardwire and interlink them. Or if an FRA suggests that a higher category system is needed (for instance, going from Grade D to a full Grade A panel in a larger HMO-type house), we will invest in that. All new refurbishments will include the installation of an appropriately assessed system to meet the needs of the occupants.
 - **Testing by Fire Drills:** Our fire drills serve as a practical test of the alarm's audibility and effectiveness. If, during carrying out drills, the Support Company find that there is a tenant in a far bedroom who couldn't hear the alarm well, upon informing Harbour Light, we will address that by assessing the situation and, if required, improving the system, for example by adding a sounder or louder alarm device there. Thus, feedback loops from real-life practice help ensure the detection and alarm system truly covers everyone.

5. Firefighting Equipment and Systems:

Fire Safety Policy



Harbour Light provides certain fire safety equipment in its properties, balanced with the principle that the primary strategy is evacuation, not occupant firefighting. Our approach includes:

- **Fire Blankets:** A fire blanket is supplied in every kitchen across all properties. These are simple devices mainly for smothering small pan fires or clothing fires. Support staff will be familiar with their operation, and they also instruct residents (where capable) on when and how a fire blanket might be used (e.g., if a frying pan catches fire and it's safe to do so, turn off the heat and cover with a blanket). Fire blankets are checked regularly by support staff (during monthly room checks or so) to ensure they remain in place and accessible.
- **Fire Extinguishers:** Harbour Light's policy is to minimise the provision of fire extinguishers in supported living environments, in order to maintain a non-institutional feel and because untrained individuals are generally discouraged from tackling fires. Many of our properties (especially the smaller houses and flats) do not have portable extinguishers in resident areas. Instead, we prioritise evacuation. However, we do install extinguishers in higher-risk or complex buildings or where required by the FRA:
 - For example, in a larger building with multiple storeys and longer escape routes, there may be a couple of water or foam extinguishers in corridors, and possibly a CO₂ extinguisher near an electrical plant room. As the office space is entirely under the control of the Support Providers, they should, if deemed necessary, equip staff offices with an appropriate extinguisher if there is significant electrical equipment.
 - If provided, it is incumbent upon the Support Provider to ensure their Support Staff are trained in the basic use of extinguishers (aim, pull pin, etc.) and, crucially, in the decision-making of when **not** to use them (if a fire is growing or the environment is smoke-logged, evacuation is the only safe action). Staff are told never to jeopardise their own or others' escape by trying to fight a fire – an extinguisher should only be used on a very small, early-stage fire, and only if the person is confident and has a clear exit behind them.
 - Extinguishers, where present, are maintained annually by Harbour Light's contracted fire protection company (they check pressure, condition, and replace if needed). Any extinguisher that is in a common area will have appropriate signage ("Fire extinguisher – Foam") and usually a simple pictogram for the type of fire it can be used on. Support staff also do a visual check (noting any that are missing, discharged, or obstructed) during their routine walk-arounds.
- **Emergency Lighting:** All multi-unit buildings and any with internal common corridors/stairs are fitted with **emergency lighting** to illuminate escape routes in case of mains power loss. Harbour Light ensures installation of emergency lights (typically LED bulkhead lights or downlighters with battery backup) in stairwells, hallways, exit routes and above exit doors. These are tested monthly by support staff (via a quick function test or fish-key test to ensure the light comes on) and annually serviced with a full duration test by an electrician. Even smaller bungalows with no communal areas usually are ground-floor with direct exits, so emergency lighting is not needed there; but wherever a route could be dark if power fails, we address it.
- **Fire Doors and Compartmentation:** To prevent the spread of fire and smoke:
 - **Fire-resisting doors** are installed to protect escape routes (for example, flat entrance doors, doors on staircases, and doors to high-risk rooms like laundries or boiler rooms are at least 30-minute fire-resistant). These doors are equipped with **self-closing devices**, so they shut automatically after use. Harbour Light maintains these through inspections and replacements/upgrades where needed. In accordance with the Fire Safety (England) Regulations, Harbour Light will undertake inspections of fire doors in



line with the organisation's Fire Risk Assessment (FRA) schedule. As none of our properties exceeds 11 metres in height, Regulation 10 does not apply to the current portfolio. However, Harbour Light will maintain fire doors so they remain effective, using a risk-based inspection regime aligned to the Fire Risk Assessment (FRA). Support Providers will inform Harbour Light as part of their regular repairs reporting duties if any communal fire doors show signs of damage. Support company should ensure during their day-to-day duties that fire doors are operational and are closing fully. Harbour Light will undertake and/or commission periodic landlord inspections and ensure defects are rectified within agreed timescales.

- Support staff take care not to wedge fire doors open. We explicitly forbid any practice of disabling self-closers (like tying a fire door open), because a fire door only works if it's closed during a fire. Staff monitor this and educate residents not to wedge their bedroom or flat doors. If fire doors are a hindrance to residents (for example, heavy doors for someone frail), Support Companies can install hold-open devices linked to the alarm (so the door stays open for convenience but automatically closes when the alarm sounds). This way, we maintain a homely environment without compromising safety for accessibility needs.
- **Compartmentation:** Harbour Light ensures that the structural compartmentation in buildings (walls, floors, ceilings that should resist fire) is not breached. If contractors do work (installing cables, pipes), they must fire-stop any holes. Our FRAs include checking for obvious breaches in fire barriers. We maintain a "fire stopping log" for any repairs done. This is particularly important in conversions or older houses. Keeping a good compartmentation standard supports safe evacuation and protects adjacent flats. It is an ongoing maintenance item that Harbour Light manages.
- **Premises Information Boxes (PIB):** At some of our larger or more complex sites, the Support Provider (with Harbour Light's agreement) has installed a Premises Information Box near the main entrance. These secure boxes (often a Gerda or similar PIB) contain critical site information for the Fire and Rescue Service (FRS) – such as floor plans of the building, the roster of residents with PEEPs (or a summary of those who need assistance), location of utility shut-offs, and emergency contact numbers. While the installation and upkeep of the PIB and its contents are managed by the Support Provider (since they update the PEEP list and resident info), Harbour Light cooperates by providing building plans and maintenance information to include. We ensure the Fire and Rescue Service (FRS) can access the box (typically it's keyed to a Fire and Rescue Service (FRS) standard key). The presence of a PIB is noted in the fire risk assessment. The NFCC guidance notes that having a premises information box is a good practice for specialised housing, and it facilitates Article 22 cooperation by sharing information. Harbour Light supports this by encouraging Support Providers to use such boxes for the safety of residents and responding crews, especially in buildings where not immediately obvious who might need help or where services (like oxygen use) might pose additional hazards.

6. Housekeeping and Daily Fire Prevention:

Good housekeeping is one of the simplest and most effective fire prevention measures. Harbour Light and support staff jointly ensure:

- **Escape Routes Kept Clear:** Corridors, staircases and exits are maintained free of storage or obstructions. No bicycles, wheelchairs (when not in use), furniture, or rubbish is allowed to accumulate in hallways. Support staff check this daily – it is part of their shift duties to walk the means of escape and remove or report hazards. Harbour Light also ensures cleaners or



maintenance crew do not inadvertently block routes (e.g., never storing paint cans or tools in communal cupboards unless they are designated and fire-rated).

- **Control of Ignition Sources:** The Support Provider staff monitor that potential ignition sources are managed. For example, portable heaters or electric blankets used by residents are risk-assessed; faulty or unsafe electrical items are removed (with resident consent and replacement arranged). Cooking appliances are a major source of fires, so staff promote safe cooking practices: never leaving pans unattended, etc. If a resident is at high risk when cooking (due to forgetfulness or impairment), staff might implement additional safeguards like supervised cooking or install a stove isolation device (which Harbour Light can fit to automatically shut off power after a set time). Candles and open flames are generally not permitted due to the fire risk; residents are advised to use LED candles or similar if they want lights for sensory purposes. Smoking is addressed below (generally not allowed indoors).
- **Storage of Flammables:** Harbour Light ensures that any flammable liquids or chemicals (like paints, cleaning spirits, and medical oxygen) are stored safely. Oxygen cylinders (for medical use) if present for a resident, must be declared to the fire risk assessor and Fire and Rescue Service (FRS); they should be stored upright and away from heat, and signage may be placed on the flat door ("Oxygen in use" warning for firefighters). Support staff oversee that residents who use oxygen or aerosols do so safely (no smoking around oxygen, etc.). We also have guidance in place for mobility scooter charging – if residents use mobility scooters or electric wheelchairs, charging should ideally be done in a safe area (not blocking exits, and preferably where a fire from a charger would be contained). The NFCC guidance on mobility scooters is considered.
- **General Housekeeping:** Clutter and hoarding can increase fire load and hinder escape. Support staff regularly engage residents in keeping their living areas tidy and not allowing excessive accumulation of newspapers, clothing, or debris. If a resident is prone to hoarding, this is addressed in their support plan and closely monitored as it significantly raises fire risk. Harbour Light can assist by offering extra storage solutions or safe disposal services to help reduce the hoarding fuel load.
- **Security vs. Safety:** We maintain a balance between security (keeping building entry doors locked to prevent unauthorised access, for resident security) and fire safety (ensuring emergency egress). Final exit doors are fitted with quick-release mechanisms (like thumb turns or push bars) so that even if locked against entry from outside, people inside can always exit without a key. Support staff check these daily for proper function. Where electronic door locks are used for controlled access, they are tested to fail-safe (unlock) on power loss or fire alarm activation. At some properties, there may be court-imposed Deprivation of Liberty Orders (DoLs) in place; these may include that the doors have to be locked internally to prevent tenants absconding. In these instances, separate mitigating factors will be in place, and a specific Fire Risk Assessment will be undertaken by the Support Company to highlight the issues and the mitigating factors.
- **Night Time Precautions:** During night shifts, support staff do a round to ensure that any fire doors that residents or staff might have propped open (e.g., for convenience in the evening) are closed, that no appliances are left running unattended (like washers or dryers overnight, unless designed for it), and that any smokers have extinguished their cigarettes outside. They also dim lights or shut curtains as appropriate, except where emergency lighting is needed. This helps reduce ignition risks when people are sleeping.

7. Training and Drills:

Proper training of all parties is critical for fire safety. Harbour Light implements the following:

Fire Safety Policy



- **Staff Training – Harbour Light Employees:** All Harbour Light staff (including housing officers, maintenance personnel, and any employees who may visit the properties) receive basic fire safety awareness training. This covers understanding of the fire alarm signals, what to do if they're on site during a fire, and their role in reporting issues. Staff with specific roles (e.g. the property Compliance Manager or those overseeing contractors) receive more detailed training on fire safety management and legal duties. Harbour Light CEO and senior managers receive a briefing on their legal responsibilities under the FSO and how this policy addresses them.
- **Support Staff Training:** Harbour Light requires in contracts that each Support Provider ensures their **support staff are trained** in fire safety relevant to supported housing. At a minimum, it is recommended by Harbour Light that support workers have training at induction and refreshers annually on:
 - Fire prevention in the home (safe cooking, electrical safety, etc., so they can educate residents by example).
 - Use of fire alarm panel (silencing and resetting alarms **after** evacuation and all-clear, to avoid excessive disruption from false alarms).
 - How to conduct a sweep and assist evacuation, including the use of any evacuation aids (evac chairs, blankets).
 - PEEP implementation – knowing the specifics of each person's PEEP under their care.
 - Handling fire extinguishers and fire blankets – only if safe, and correct type for fire (with practical demonstration if possible).
 - Procedures for calling 999 and communicating with emergency services upon their arrival.
 - Testing of alarms and record-keeping in the fire logbook.
 - The importance of fire doors and other systems (for instance, why they should never tape down a door latch or disconnect a door closer).
 - Any site-specific issues, e.g., if the property has a sprinkler system or automatic smoke vents, what to expect from those systems.
 - Scenario drills or tabletop exercises for things like a fire at night when one staff is on sleep-in duty (discussing how to manage until back-up arrives).

Harbour Light may participate in or audit some training sessions, and we provide input or materials as needed (such as simplified fire action notices or checklists for staff use). Ultimately, the Support Provider is accountable to verify their staff are competent in fire safety – Harbour Light monitors this via contract reviews (e.g., requiring evidence of training completion).

- **Fire Drills:** Each staffed property must carry out at least one full fire drill per year (and we strongly recommend two per year, one during waking hours and one simulating night conditions with minimal staff). Drills may be announced or unannounced. All occupants should evacuate as if it were real. For safety, if using evacuation chairs, staff may simulate actually moving a person or practice with a stand-in, to avoid injury, but still practice the process. In some cases, a resident might be exempted from participating directly if it causes them distress (for example, certain people with autism or dementia might react poorly). In those cases, staff do a walkthrough with them separately or ensure staff practice that person's evacuation method.
 - After each drill, a debrief is conducted: support staff note the evacuation time, any difficulties (like "Resident X refused to leave until coaxed" or "smoke detector in lounge did not sound"), and improvements needed. They send a drill report to Harbour Light. If a drill report indicates a serious problem (say, someone was not



evacuated in a timely manner), Harbour Light will follow up immediately with the provider to rectify (which could involve revising the PEEP, providing extra training, or even increasing staff levels at certain times if needed to ensure safety).

- Premises without permanent on-site staffing: Support Staff assigned to the property encourage and educate residents to practice escape plans. Although a formal drill with all residents might be voluntary, we periodically (at least annually) discuss “if a fire happened, how would you get out?” with them and test the alarms in their presence so they recognise it. We also might coordinate with local Fire and Rescue Service (FRS) initiatives to do home visits and fire safety chats with those residents.
- **Documentation:** Training records are maintained by both Harbour Light (for its staff) and by Support Providers (for their staff). Harbour Light will review the Support Provider’s training compliance at contract monitoring meetings. Drill records, as mentioned, are stored in the fire logbook on site, and copies are sent to Harbour Light’s compliance manager. These documents could be reviewed by fire inspectors to see evidence of a fire safety culture.

8. Communication and Cooperation Between Harbour Light and Support Providers:

A core aspect of our procedure is ensuring seamless cooperation, per Article 22 FSO, between all parties who share fire safety duties. Our mechanisms include:

- **Responsibilities Matrix:** As referenced, Harbour Light provides each Support Provider with a written matrix or memorandum that spells out duties (mirroring much of this policy). It is signed by both parties. This avoids misunderstandings (for example, it clearly states that Harbour Light will arrange annual alarm servicing, while the support staff will do weekly tests, etc.). It also addresses cost responsibilities (Harbour Light covers capital improvements, the Support Provider covers day-to-day housekeeping, etc.). This document is reviewed whenever there’s a change (new provider, new property, or changes in law).
- **Regular Liaison Meetings:** Harbour Light’s property management team meets with each Support Provider’s manager for the scheme at least annually (or more frequently if needed) to specifically discuss fire safety (and other health & safety issues). In these meetings, they review outstanding FRA actions, recent drill outcomes, any incidents or false alarms since the last meeting, and upcoming changes (e.g., planning a renovation, which might require a new FRA and interim measures). They document any agreed actions. This ongoing dialogue ensures issues are caught early and that both parties are on the same page.
- **Information Sharing:**
 - Harbour Light shares FRA reports and annual review reports with the Support Provider, so they know what has been identified and can contribute to solutions (especially where it involves staff practice or tenant issues).
 - Support Providers share PEEP summaries and any high-risk tenant information (with appropriate consent) with Harbour Light, especially if it implies the building might need adjustments (for example, a tenant with severe mobility issues might mean Harbour Light needs to install an evac chair or maybe even assess if the accommodation is appropriate).
 - Incident Reports: If either party (support staff or Harbour Light maintenance) experiences a fire incident or even a near-miss (like discovering a charred outlet that could have caused fire), they will inform the other. There is a no-blame culture – the goal is to fix problems, not assign fault.
 - Maintenance Reports: Harbour Light informs support staff when critical maintenance is scheduled (e.g., “fire alarm engineer will visit on Tuesday at 10 am to service system and sound alarms”). Support staff then notify residents (especially those who might be alarmed by alarm testing, so they are prepared). Similarly, support staff notify

Fire Safety Policy



Harbour Light if they observe any maintenance issues (like an emergency light out) so we can schedule repair.

- **Joint Risk Assessments:** In some scenarios, Harbour Light and the Support Provider may conduct a joint fire safety walkthrough. This might happen if an FRA raised concerns that involve both building features and staff practices. By walking through together, they ensure all perspectives are considered.
- **Documentation of Cooperation:** We maintain records of all communications regarding fire safety – meeting minutes, emails, etc. This serves as evidence of compliance with Article 22's requirement for cooperation. It also provides continuity if personnel change; new managers can see the history of fire safety management at the property.
- **Emergency Response Plan:** Each site's emergency plan (usually part of the FRA document) is a product of cooperation. It details what staff should do, what Harbour Light on-call managers do, and what information is given to the Fire and Rescue Service (FRS). Harbour Light ensures Support Providers have a 24-hour contact for our management (so if a fire occurs at 3 am and the support staff need landlord assistance – for rehousing residents or securing the building after a fire – they can reach us). Conversely, Harbour Light's out-of-hours service has contact info for the Support Provider's on-call supervisor. This way, during an incident, both sides can communicate quickly and effectively.
- **Continuous Improvement:** After any significant event (actual fire, enforcement authority visit, etc.), Harbour Light and the Support Provider will hold a **post-incident review meeting**. They candidly discuss what went well and what could improve. The policy or procedures will be updated if needed to incorporate lessons learned. This joint learning approach strengthens the partnership and the safety of everyone involved.

9. Maintaining a Homely Environment:

Harbour Light is mindful that supported accommodation is *home* for the residents. We strive to implement fire safety in a way that does not create an institutional or unwelcoming atmosphere:

- **Signage:** We keep signage to the necessary minimum. In small domestic-style properties, we generally do not put "Fire Exit" signs above every door, because it is usually obvious how to exit (front door, back door, etc.) and residents are familiar with their home layout. Overusing signage can make a home feel like a workplace or hospital. Instead, we use signage strategically:
 - We ensure that final exit doors are clearly marked or known, and in larger buildings or complex layouts, we will use compliant photoluminescent "Running Man" exit signs where needed (especially if any doubt exists on the direction of escape).
 - Fire door signage: Fire doors that must be kept closed will have the small blue circular "Fire Door Keep Shut" sticker – these are required and remind everyone of their importance.
 - In communal areas, we may have a simple Fire Action Notice on a notice board, in plain language, summarising what to do in a fire ("Sound the alarm, get out, stay out, call 999" and where the assembly point is).
 - No Smoking signs: in line with the law, we post "No Smoking" signage at building entrances where smoking is prohibited completely. In practice, since we ban smoking in new properties, you will see these signs on those building doors. We opt for discrete but clear signage (often the standard no-smoking symbol).
- **Decor and Appearance:** Where fire safety installations are required within residents' rooms, we select equipment that is discreet and sympathetic to the domestic environment. Industrial or visually intrusive products are avoided wherever compliant, homely alternatives are



available. For example, alarm sounders are chosen with low-profile designs, and cabling is concealed within walls or ceilings rather than surface-mounted in trunking.

- **Resident Involvement:** We engage residents in fire safety without causing undue anxiety. For instance, some individuals might find frequent alarm tests stressful; we schedule these at convenient times and let them know in advance to minimise upset. We also might personalise their involvement – e.g., one resident might be given the role of helping to test the alarm weekly (pressing the test button under supervision), turning it into a positive activity. This inclusion can improve their understanding and reduce fear.
- **Risk vs. Autonomy:** Our approach recognises that overly strict rules can feel oppressive at home. We thus try to accommodate personal freedoms while managing risk. For example, if a resident strongly desires to burn incense for cultural reasons, rather than an outright ban, we might allow it under supervision or with special precautions (like only in a certain safe area and with a water bowl nearby, and never when alone). This would be care-planned. However, some high-risk activities (like indoor smoking or use of personal cookers in bedrooms) we cannot permit because the fire risk is too great in a shared environment; in those cases, we explain the reasons and work with them on safer alternatives.
- **Furnishings:** Harbour Light provides (or requires) fire-retardant furnishings in communal areas as per the Furniture and Furnishings (Fire Safety) Regulations. We also advise residents or their families, when they bring in furniture, that it must comply with the fire-resistant labelling laws.
- **Overall:** The intent is that our properties do **not feel like institutions** yet are as safe as necessary. We believe that by carefully implementing safety measures in a thoughtful way, we protect residents without sacrificing the comfort and normalcy of their home.

10. Smoking Policy:

Smoking is a well-known cause of domestic fires and a health hazard. Harbour Light's smoking policy for its properties is as follows:

- **New Properties – No Smoking:** In all newly acquired or newly built Harbour Light properties (and those which have been fully refurbished), smoking is prohibited everywhere indoors. Residents signing new tenancy agreements in these properties agree to a no-smoking rule inside their flats/rooms and indoor common areas. There may be a designated outdoor smoking area (a bench or shelter at a safe distance from the building) for those who do smoke. The rule is "if you smoke, you must do so outside in the designated area and use the provided safe cigarette bins for disposal." This is communicated clearly to incoming tenants and support staff reinforce it. We place no-smoking signs at entrances to reinforce this rule (as mentioned above).
- **Legacy Properties:** Some older Harbour Light schemes historically allowed smoking (for example, a few long-term residents may smoke in their own rooms). Harbour Light is working towards a non-smoking environment even in these legacy cases. In practice:
 - For existing smokers, Support Providers engage with them to encourage moving the habit outdoors or quitting. This may involve creating pleasant outdoor smoking spaces to entice usage and providing smoking cessation support through healthcare services.
 - If indoor smoking still occurs, Support Staff should help mitigate risk by assisting tenants in purchasing fire-resistant ashtrays, making sure smokers have fire-retardant bedding or chair covers, and checking on them regularly (especially if someone tends to smoke in bed, which is extremely high risk – that is actively discouraged and managed as a priority).

Fire Safety Policy



- We treat oxygen users or those on air-flow mattresses as absolutely no smoking – non-negotiable due to explosive/fire risk – and Support Providers ensure compliance in those situations.
- **Enforcement:** Support staff are expected to enforce the no-smoking rules gently but firmly. If a tenant breaches it, they will be reminded and supported to comply. Harbour Light will involve tenancy enforcement only as a last resort (e.g., if someone consistently endangers others by smoking inside despite interventions, it could become a tenancy breach issue). Our primary approach is supportive: educating about the fire risk (most fatal fires in homes are caused by smoking materials), and offering help to change the behaviour.
- **E-Cigarettes:** Many residents use electronic cigarettes (vapes) as an alternative. While these reduce fire risk compared to traditional smoking, they are not risk-free (the charging of vape batteries has caused fires). Our policy allows vaping in private rooms (unless it bothers others or sets off smoke detectors – we found most vape aerosols won't trigger alarms, but heavy vaping near a detector might). We treat charging of e-cigarettes like any other device – don't leave it charging unattended overnight, use the correct charger – advice that staff convey.
- **Staff and Visitors:** The no-smoking rules apply to staff and visitors as well. Staff cannot smoke indoors at any scheme (even if a resident is allowed to in their own flat, staff must refrain and only smoke outside in designated areas during breaks). This sets a good example and keeps the environment safer. Visitors (including family or professionals) are also expected not to smoke inside; staff will kindly ask them to step outside if needed.
- **Ultimate Goal:** The goal is to eventually have all Harbour Light stock smoke-free indoors, protecting all residents from second-hand smoke and fire risk. We align with broader public housing trends moving to smoke-free environments for safety. Harbour Light will continue to assist Support Providers and residents through this transition with education and resources, recognising it as a positive move for health and safety.

11. Monitoring, Audit, and Review (Quality Assurance):

To ensure these procedures are effective and up to date:

- Harbour Light's Compliance Manager (or competent fire safety advisor) will conduct annual fire safety audits of a sample of properties. This is separate from the FRA; it is a management audit checking that daily/weekly routines (tests, drills, training) are indeed happening as reported. They may visit a scheme, talk to staff, inspect records, and even quiz a resident on what they would do in a fire (to gauge awareness). Findings are reported to the CEO, and action is taken on any shortfalls.
- The Board of Harbour Light receives periodic Health & Safety reports, including fire safety performance indicators: e.g. percentage of FRA actions completed on time, number of fire incidents or false alarms, training completion rates, etc. This keeps fire safety on the agenda at the highest level and demonstrates our governance oversight.
- Support Providers are expected to have their own internal audits as well. Harbour Light will request the results of any fire safety inspections they do.
- **Enforcing Authority Interaction:** We maintain an open, positive relationship with local Fire and Rescue Service fire safety officers. If they ever visit our premises for auditing (they have the power to), we will cooperate fully. Any recommendations or notices they issue are top priority for compliance. We also proactively seek their advice if unsure about any fire safety matter.
- **Policy Review:** This Fire Safety Policy itself will be formally reviewed every two years as a minimum, or whenever significant changes in legislation or guidance occur, whichever is sooner. For instance, if new regulations come into force (such as any future requirements for

Fire Safety Policy



PEEPs in high-rises, or changes post-Grenfell inquiries), we will update the policy accordingly. The review process will involve checking that all content is still accurate (property numbers, roles, etc.) and consulting with Support Providers for any feedback. The Harbour Light CEO will sign off on any revisions. The policy's classification as "Statutory" means the Board or a Committee of the Board will typically approve it to ensure top-level commitment.

- **Updates and Communication:** When the policy is updated, Harbour Light will distribute the revised version to all Support Provider partners and discuss any new requirements with them to ensure understanding. We will also issue a summary to our staff highlighting any changes. Important changes will be briefed in meetings or via training refreshers.
- **Document Control:** The policy is maintained in Harbour Light's policy library with version control. Each site should keep or have access to a copy (especially the responsibilities and procedures sections for reference). We discourage printing out copies that might become outdated – instead, the latest version is available digitally to all stakeholders.
- **Continuous Improvement:** Fire safety is an evolving field. We commit to continually improving our fire safety arrangements. Lessons from any fire incidents (internally or from sector-wide learning) will be incorporated. For example, if technology advances (like more affordable domestic sprinklers or misting systems that could benefit our properties), we will consider those in future refurbishments. We stay informed through NFCC updates, housing association forums, and fire safety publications.

By rigorously following the above procedures, Harbour Light and its Support Providers create a proactive fire safety culture. We prioritise the safety of some of the most vulnerable members of society in our accommodation, while ensuring they live in a comfortable, homely environment. These procedures ensure clarity of roles, legal compliance, and above all, effective protection against fire.

Review and Updates

Classification: This Fire Safety Policy is classified as Statutory - it addresses compliance with fire safety laws and regulations. As such, it will be reviewed and approved at the highest level of the organisation and kept under regular review.

- **Review Frequency:** The policy will be reviewed annually for minor updates, and comprehensively every 2 years (biennially). Interim reviews will be conducted immediately if there are significant changes in legislation (for example, if new regulations or guidance emerge that affect specialised housing fire safety) or if an internal/external review or fire incident indicates that our policy or procedures should be revised.
- **Responsibility for Review:** The Harbour Light Chief Executive and the Board sponsor for Health and Safety are responsible for ensuring the policy is reviewed on schedule. The actual task of gathering updates and drafting revisions may be delegated to the Competent Person (Fire Safety Officer) or Compliance Manager, who will then present the updated policy for approval.
- **Consultation on Updates:** When reviewing, Harbour Light will consult with key stakeholders – Support Provider management (to get feedback from the frontline on what's working or any challenges), staff, and, where appropriate, resident representatives or advocates. We may also incorporate any recommendations from Fire and Rescue Service (FRS) audits or from the Regulator of Social Housing (if any). This inclusive approach ensures the policy remains practical and effective.
- **Approval:** Being a Statutory policy, the revised document will be presented to Harbour Light's Board (or a delegated committee) for formal approval. The Harbour Light CEO will sign off on

Fire Safety Policy



the policy. The policy document will note the version number, approval date, and next review due date.

- **Communication of Changes:** After each update, Harbour Light will promptly communicate the changes:
 - A summary of key changes will be sent to all Support Provider partners, with specific instructions if any procedural adjustments are required on their part.
 - Harbour Light staff will be briefed in team meetings or via official memo on any changes in their responsibilities or procedures.
 - Where changes affect residents (for example, if we introduce a new alarm system or a new smoking rule), support staff will explain these to residents in appropriate meetings or one-on-one sessions, and Harbour Light will provide easy-read notices if needed.
 - Updated PEEPs or FRA processes resulting from policy changes will be implemented as soon as possible.
- **Document Control and Accessibility:** The current version of the policy will be accessible on Harbour Light's internal network and provided to each Support Provider for their own reference. Old versions will be archived. All personnel should ensure they refer only to the latest version. Support Providers are encouraged to integrate relevant parts of this policy into their own local fire procedures so that there is no confusion. Harbour Light will assist in this alignment.
- **Audit of Policy Implementation:** Periodically (at least annually), Harbour Light will audit compliance with this policy's provisions as part of the review. This means checking, for example, that FRA schedules are on track, training has been done, drills have occurred, etc. Any findings will feed into policy improvements or additional staff training.

In conclusion, Harbour Light's Fire Safety Policy is a living document that will evolve with time, legislation, and lessons learned. Regular review and updates ensure that we continue to uphold the highest standards of fire safety, keeping our residents and staff safe. By classifying this document as Statutory and integrating it into our organisational governance, we underline our unwavering commitment to fire safety compliance and excellence.