

Appendix 1: Housing Assets – Building & Fire Safety Action Plan

	Legislation/Regulatory Requirement	Implications, Action & Outcomes	Action Status
Item #	2. The Fire Safety Act 2021		
2.2	The Act clarifies without doubt, that where a building contains 2 or more sets of domestic premises, the structure, external walls (including cladding and balconies), external doors and windows, and any common parts including flat entrance fire doors, are all within the scope of The Fire Safety Order.	<p>The new Fire Risk Assessments (FRAs) which are carried out by an external specialist Fire Safety Consultant, have been expanded to include the additional parts of the domestic premises including a fire risk appraisal of the external walls. 38 FRAs are performed annually on high-risk residential buildings and Independent Living Schemes, and another 107 are performed every three years on lower-risk buildings.</p> <p>In addition to the above change, one-time Fire Risk Assessments have also been carried on all 147 blocks that do not have communal areas. This is to determine if these buildings require a further Fire Risk Appraisal of the External Walls (FRAEW). All the FRAs have verified there is no need to take any further action regarding this risk. These assessments provide evidence to leaseholders, surveyors and mortgage lenders that these buildings are exempt from the requirements of an External Wall Survey Form 1 (EWS1) which are required under RICS requirements.</p> <p>EWS1 (External Wall System) assessment forms are used by surveyors and lenders to evaluate the fire risk associated with the external wall cladding and insulation used in a building. Originally implemented in the wake of Grenfell for buildings over 18m, they have often been requested for any building with 2 or more domestic premises.</p>	Complete and continue to update
2.3	Through The Fire Safety Act, government have developed an online tool in the form of the Fire Risk Assessment Prioritisation Tool (FRAPT). Its purpose is to support the Responsible Person to develop a prioritisation strategy for updating their fire risk assessments. Although not obligatory, the responsible person may use the online tool to evidence and demonstrate that they have met their obligations. If they decide not to use FRAPT, they may be required to provide alternative evidence of how they have met this aspect of their Fire Safety Order.	GBC have adopted this practice to demonstrate they have met their obligations. Our Fire Safety Consultant completes the Government online tool, FRAPT on our behalf, in conjunction with the new FRAs that are carried out. Completing the FRAPT is a one-off task for each residential building, but it enables us to prioritise future fire risk assessments.	Complete and continue to update
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	3. The Building Safety Act 2022		
3.3	The Building Safety Act will be fully enforceable by October 2023 and Landlords will need to register higher-risk buildings they own with the Building Safety Regulator between 06 April 2023 and 21 October 2023. After which it will become an offence where a landlord/building owner has not registered their higher-risk building. The fee to register each building is £251.	<p>GBC are one of the few authorities which have participated in the Health & Safety Executive's testing programme for the HRB register. This has allowed us to understand the requirements and provide feedback on the online questionnaire. Many aspects of our feedback were taken on by the HSE to ensure the registration process was straightforward, clear and uncomplicated. Therefore we are in an excellent position to complete the register before October 2023.</p> <p>The Accountable Person (AP) needs to be clarified by the Authority. It can be the corporate body or a named individual. However there may be a requirement for a named individual to be stated as the main contact for the AP. The Accountable Person can designate another competent individual to register the buildings on their behalf.</p>	In Progress
3.6.1	The Act defines higher-risk buildings as buildings in England that are at least 18 metres in height or with at least 7 storeys and containing two or more dwellings. It clarifies that height measurement will be from ground level to the top floor surface of the top storey of the building, excluding any	Gravesham Borough Council has 5 buildings in scope. They are Carl Ekman House, Chantry Court, The Hive, Gravesham Court and Homemead.	Completed

	storey which is a roof-top machinery or plant area, or which consists exclusively of machinery or plant rooms.		
3.8	<p>One of the main principals of the Act is the requirement on duty holders and the Accountable Person to compile and maintain a “golden thread” of information running through the life cycle of every higher-risk building. This information shall provide an understanding of the building and the steps needed to keep both the building and people safe, now and in the future. The information must be kept digitally and made accessible to residents</p>	<p>GBC is in the process of implementing the new MRI Asset Data system and is at UAT stage. Unfortunately, Housing Assets has been operating without a system for the past two years, which has had an impact on how easily accessible digital records can be stored and retrieved. It is anticipated that the new system will provide all the tools to manage information about any particular building and assist with the “Golden thread” of information held for HRBs.</p> <p>To assist us with the “Golden Thread”, we are currently reviewing a range of Building Information Modelling (BIM) packages which will allow us to digitally create and manage a 3D model of each HRB. This will play an important role in building and fire safety and enable us to facilitate the sharing of safety-related information among stakeholders, including residents, contractors and the Fire & Rescue Services.</p> <p>After reviewing a range of BIM packages, Housing Assets are in the process of exploring one particular package in more detail developed by DEEO, called Twinnedit. Costs for Twinnedit are £110,250 for our five HRBs and annual maintenance for the platform of £4,874 per annum. Future re-scans of each building after major refurbishments will cost an average of £6,640 per building.</p>	<p>In Progress</p> <p>In Progress</p> <p>In Progress</p>
3.10.2	<p>From April 2024, the BSR will begin a programme to invite the AP for each registered building to apply for a building assessment certificate (BAC). Buildings will then be reassessed every five years at minimum to ensure they are being managed and maintained effectively.</p> <p>The application for the building safety certificate for each building in scope must include:</p> <ul style="list-style-type: none"> • The safety case report • The resident engagement strategy • Mandatory Occurrence Reporting arrangements 	To be actioned once invited.	Not Commenced
3.10.4	The Accountable Person will need to ensure that each building in scope of the Act has a building assessment certificate placed in a prominent place in the building where residents can see it.	To be actioned once issued.	Not Commenced
3.11	<p>For all HRBs Accountable Persons will be required to identify and assess building safety risks and take reasonable steps to ensure those risks are reduced and controlled to a proportionate level on an ongoing basis. This information needs to be held digitally and easily accessible in a Safety Case.</p> <p>Legislation regarding the form, content and submission of Safety Case Reports is still in development by the Health and Safety Executive (HSE), however the BSR recommends that APs start work on their Safety Cases and Safety Case Reports asap, and importantly have stated there will be no template for the application but guidelines will be published on the HSE website.</p>	<p>See 3.8 Action</p> <p>Legislation regarding the form, content and submission of Safety Case Reports is still in development by the Health and Safety Executive (HSE).</p> <p>With around 13,000 existing buildings in scope, it will take the Regulator considerable time before they can review all the Safety Case Reports and issue Building Safety Certificates (BACs). It is estimated it may take up to 5 years for the Regulator to process all the applications.</p>	Not Commenced
3.12	As part of the Safety Case Report, the Accountable Person will be required to describe the resident engagement strategy and provide an overview of how you communicate and consult with residents of each building. The report should also describe how residents can raise concerns and how these concerns are investigated and fed back.	Work has commenced in this area. The Compliancy Team have been working with TPAS, tenancy engagement experts, on a behavioural insight project to look at the best way to engage with residents on this important safety measure. Once this piece of work has been undertaken it will feed into the draft strategy. The service has also committed to the introduction of a residents’ scrutiny panel specifically for building safety.	In Progress

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	3. The Fire Safety (England) Regulations 2022		
4.1	The Regulations apply to all residential buildings with two or more domestic premises; however, additional requirements apply to buildings taller than 11 meters, and additional requirements are exclusive to HRBs (buildings over 18m).	Gravesham Borough Council have circa.300 residential buildings within scope containing two or more domestic premises. These include 7 buildings over 11m and 5 buildings over 18m in height.	Completed
4.2.4	Although not mandatory, the use of FRAPT will be beneficial to the Responsible Person to show due diligence, and assist in establishing proceedings, that they are meeting their obligations under the Fire Safety Order (as amended by the Fire Safety Act 2021).	We have instructed our Fire Risk Consultant to utilise and complete the Home Office's online tool (FRAPT) in conjunction with completing our Fire Risk Assessments. This will assist us to prioritise future fire risk assessments and focus our resources on those buildings that are most at risk of fire. The FRAPT tool asks 21 questions about each building and provides a priority score. An example of the Home Office confirmation of the FRAPT has been completed is attached as Appendix 3 . An example of the FRAPT report can be viewed in Appendix 4 .	Completed
4.2.5/6	<p>Fire Safety Instructions. The RP must display fire safety instructions in a conspicuous part of the building. The instructions must be in a comprehensible form that residents can reasonably be expected to understand. The instructions must cover the following matters:</p> <ul style="list-style-type: none"> the evacuation strategy for the building (e.g. stay put or simultaneous evacuation) instructions on how to report a fire (e.g. use of 999 or 112, the correct address to give to the fire and rescue service, etc.) any other instruction that tells residents what they must do when a fire has occurred <p>These instructions must also be provided directly to new residents as soon as reasonably practicable after they move into their accommodation, and these instructions should be reissued to all existing residents at periods not exceeding 12 months.</p>	<p>Fire safety instruction are displayed in all of our residential buildings with communal areas. A fire safety advice leaflet has been developed as part of a suite of safety information for our residents. The leaflet is provided to all new tenants and mailed out on annual basis with rent statements. The leaflet (Appendix 5) provides key information on what measures their landlord takes to reduce the risk of fire occurring and spreading. It also provides advice on what residents can do to keep their families safe.</p> <p>We are also investigating new technologies to communicate with our residents such as digital noticeboards and videos of evacuation procedures specific to each building available to view in communal areas.</p>	<p>Completed</p> <p>In Progress</p>
4.2.7/8	<p>Fire Door Information. The RP must also provide relevant information about fire doors, particularly residents' flat entrance doors, as these play an important part in containing any fire within the flat in which it starts.</p> <p>Again, the information about fire doors must be provided to residents as soon as reasonably practicable after they move into their flat and at periods not exceeding 12 months thereafter.</p>	The Fire Door Information is provided in the aforementioned fire safety leaflet which is distributed annually.	Completed
	<i>For Residential buildings between 11m and 17.9m in height</i>		
4.3.2	Communal Fire Doors. All fire doors in communal areas of the building must be checked at least every three months. In checking these doors, ensure that the doors are effectively self-closing (or, in the case of cupboard and riser doors, are kept locked shut).	<p>This inspection programme has commenced, initially using in-house officers who have had the necessary training to be competent to complete the checks.</p> <p>However in-house resources are limited, and we are exploring to employ a full-time door inspector who can also carry out minor remedial works to ensure each fire door remains compliant. Although only residential buildings over 11m are in scope of these regulations, the Fire Safety Order does legislate that any fire safety equipment provided in respect of the Order shall be subject to a suitable system of maintenance. This actively means all fire doors in respect of the Order</p>	<p>Completed</p> <p>In Progress</p>

		should be inspected and maintained. This widens the scope of buildings to include Assisted Living Schemes and low/mid-rise residential blocks.	
4.3.5	<p>Flat Entrance Fire Doors. The RP must use best endeavours to undertake checks of all flat entrance fire doors at periods not exceeding 12 months. You must keep a record of the steps taken to comply with this requirement, including, in any case where access to a flat was not granted for this purpose during any 12-month period, the steps taken to try to gain access</p>	<p>This inspection programme has commenced utilising an existing service provider, Turnkey Fire Services. The contractor already obtains access to carry out sprinkler inspections and fire alarm servicing within flats, and staff have had the necessary training to be competent to carry out fire door inspections at the same time, reducing the need for another contractor to visit.</p> <p>However as mentioned above we are exploring to employ a full-time door inspector who can also carry out minor remedial works to ensure each fire door remains compliant. Although only residential buildings over 11m are in scope of these regulations, the Fire Safety Order does legislate that any fire safety equipment provided in respect of the Order shall be subject to a suitable system of maintenance. This actively means all fire doors in respect of the Order should be inspected and maintained. This widens the scope of buildings to include Assisted Living Schemes and low/mid-rise residential blocks.</p>	<p>Completed</p> <p>In Progress</p>
	For Residential buildings 18m (or 7 storeys) and above in height		
4.4.2/4/5	<p>Wayfinding Signage. Because of the height of the building, there is a need to provide suitable signage to assist fire and rescue service crews with orientation in the event of a fire.</p> <p>The signs must be visible both in normal conditions and in low lighting or smoky conditions. The size of the lettering, the typeface to be used, the mounting height and suitable wording are provided within the Building Regulations Approved Document B.</p> <p>You must make sure that the signs are maintained in good condition, so it is important that you check them regularly (e.g. during other legally required checks within the building).</p>	<p>Wayfinding signage has been replaced in all residential buildings above 18m and comply with the Building Regulations Approved Document B</p> <p>Signs are inspected during Fire Risk Assessments and during inspection of communal fire doors, and replacements fitted if required.</p>	<p>Completed</p> <p>Completed</p>
4.4.6/7/10	<p>Secure Information Box. The Regulations require that the information is held in a secure information box, which must be positioned at a location in or on the building that is readily accessible to the fire and rescue service. The box must be capable of containing the documents required by these Regulations, and it must be reasonably secure from unauthorised access and vandalism.</p> <p>The RP must provide the local fire and rescue service with the details necessary to access the secure information box and must inform the fire and rescue service as soon as practicable if there are any changes to these details.</p> <p>The RP must inspect the secure information box at least annually to ensure that it remains secure and accessible to the fire and rescue service. It is strongly recommended that you also ensure that the information within the box remains accurate.</p>	<p>All our residential buildings above 18m have Secure Information Boxes (SIBs). However the existing boxes are not large enough to hold the new documentation/plans that are required to be present for the Fire Services. Therefore we are in the process of replacing them with larger Gerda SIBs which are also more secure. As part of this process we are also reviewing the location of them to ensure the Fire Services have easy access and are clearly displayed. Expected completion August 2023.</p> <p>We currently provide with Kent Fire & Rescue with the latest plans and documents electronically via email, but this will in the future be sent to their dedicated online portal</p> <p>SIBs are inspected during Fire Risk Assessments and during inspection of communal fire doors, and documentation updated when required.</p>	<p>In Progress</p> <p>In Progress</p> <p>Completed</p>
4.4.11/12	<p>Information on External Wall Construction. The RP must prepare a record of the design of the external walls of the building, including details of the materials used and provide this record to the local fire and rescue service by electronic means.</p>	<p>In 2020 we commissioned Potter Raper (Consultants) to carry out an external wall survey on each of our residential blocks above 18m and provide 2D drawings. These provided us with the data to complete the Government's Delta portal questionnaire, which focused on the external wall materials.</p>	<p>Completed</p>

	<p>This record must identify the level of risk to which the design and materials of the external walls gives rise, as determined by the fire risk assessment and must be provided to the Fire & Rescue Services.</p>	<p>The new Fire Risk Assessments carried out evaluate the risks of the external walls in relation to fire spread. The FRA, along with the external wall surveys and drawings have been provided to the Fire & Rescue Services.</p>	Completed
4.4.14/16	<p>Floor Plans and Building Plan. In the event of a fire in a high-rise building, plans of the building are of great assistance to fire and rescue service crews. The Regulations require that you must prepare a plan for each floor of a high-rise residential building.</p> <p>The RP must place a hard copy of the floor plans and the building plan in the secure information box. In addition, you must provide the local fire and rescue service with a copy of these plans by electronic means (i.e. email).</p>	<p>All our SIBs contain hard copies of floor and building plans which have also been provided to the Fire & Rescue Services electronically.</p> <p>However, these are being reviewed and will be replaced complying with the latest standards. Expected Completion December 2023.</p>	<p>Completed</p> <p>In Progress</p>
4.4.18	<p>Lifts and Essential Fire-Fighting Equipment. In high-rise residential buildings, one or more lifts are designed to be used by fire and rescue service crews to reach upper floors during a fire. The RP must undertake monthly routine checks of all lifts that are intended for use by firefighters. Similarly, you must undertake monthly checks of any evacuation lifts that are provided for the evacuation of disabled people in the event of fire.</p>	<p>Monthly servicing is completed by our Passenger Lift maintenance contractor, Apex Lifts and six monthly LOLER inspections are carried out by Zurich Engineering.</p>	Completed
4.4.19/20	<p>In addition, other special fire safety measures which are present operate correctly in the event of fire. Accordingly, the Regulations make requirements regarding routine checking of all such systems and equipment.</p> <p>The RP must undertake monthly checks of the following:</p> <ul style="list-style-type: none"> • rising mains (dry or wet risers) • smoke control systems • fire suppression systems • fire detection and fire alarm systems, including any systems linked to other fire safety equipment, such as smoke control systems • evacuation alert systems (a visual check of the control and indicating equipment, but not testing of the system) • automatic door opening or closing systems linked to fire detection and fire alarm systems <p>The RP must keep records of all of these monthly checks. The records of these checks must be accessible to residents of the building.</p>	<p>Housing Assets carry out regular inspections and maintenance as recommended by the British Standards for each safety measure. These are constantly reviewed in line with any changes to standards and regulatory requirements.</p> <p>Records of inspections and maintenance are stored centrally and will soon be migrating to the new MRI Asset Management database when live.</p> <p>Housing Assets are exploring ways to provide this information digitally to residents. As previously mentioned above, we are already exploring BIM software and to provide information such as animated evacuation procedure particular to each building on large screens situated in the foyer. This media would also assist us to provide regular live information to our residents regarding servicing and maintenance of fire safety equipment.</p>	<p>Completed</p> <p>In Progress</p> <p>In Progress</p>