



Fire Safety Policy

AST-POL-17-04

June 2023

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1. Introduction

1.1 Torus owns and manages a range of Assets including Single Dwellings and Non-Domestic Assets. The key objective of this Policy is to describe how Torus will manage Fire Risk as far as is reasonably practicable. This includes:

- The identification of its specific responsibilities for each of its Assets.
- The creation of a Fire Safety Management Plan and associated staff training to provide guidance on the implementation of the commitments contained in this Policy.
- The key activities (e.g., Risk Assessment, Testing, Servicing) that Torus undertakes.
- Maintaining competent staff and contractors.
- Communication internally and with customers and other stakeholders
- How the Torus Board, as Duty Holder, will delegate responsibility for the implementation of Policy, monitor its effectiveness and receive assurance of compliance.

1.2 This Policy explains how Torus's commitments to Fire Safety will be met. It will be supported by a Fire Safety Management Plan providing more detailed Guidance and Procedures.

1.3 The scope of this Policy includes:

- The undertaking of Fire Risk Assessments (FRA), and the Remedial Works and Actions arising from the FRA;
- Cyclical Maintenance of Fire Safety Systems and Equipment including but not limited to: Automatic Fire Detection and Alarm Systems; Emergency Lighting; Automatically Opening Smoke Vents or Smoke Control Systems; Portable Fire-Fighting Equipment; Dry or Wet Risers; Sprinkler/Mist Systems; Fire-Fighting Lifts.
- General repair, maintenance and management activity which could have an impact on Fire Safety within a building or individual property.
- A commitment to resident engagement on fire safety matters, including ensuring access to customer's homes to address fire risks.

2. Statement of Intent

2.1 The key objective of this Policy is to describe how Torus will meet the required statutory, legislative, and regulatory requirements in relation to Fire Safety. It will also cover how the Torus Board, as Duty Holder, will receive assurance of statutory, legislative, and regulatory compliance.

2.2 Torus will seek to comply with all current and relevant statutory obligations, primarily as detailed in the following;

- The Building Regulations 2010;
- The Housing Act 2004 and;
- The Regulatory Reform (Fire Safety) Order (RRFSO) 2005.
- The Fire Safety Act 2021
- Fire Safety (England) Regulations 2022 (in force from 23rd January 2023)
- The Building Safety Act 2022 (in force from 1st January 2023)

2.3 Torus takes the view that delivery of the commitments within this Policy will ensure that the requirements of other legislation, such as the Health and Safety at Work Act 1974 and Landlord Tenant Act 1985, will also be met.

2.4 In addition, Torus must meet the requirements of both the Regulator of Social Housing's (RSH) Home Standard and the requirements of the Care Quality Commission (CQC) and new Building Safety Regulator (within the HSE (Health and Safety Executive)).

2.5 Our primary objective is to ensure that customers, contractors, staff, and visitors remain safe in our premises (both Domestic and Non-Domestic). Failure to properly discharge our legal responsibilities may also result in:

- Prosecution under the Regulatory Fire Safety Order 2005, Health and Safety at Work Act 1974, or Corporate Manslaughter, Corporate Homicide Act 2007, or Building Safety Act 2022.
- Regulatory intervention (via scrutiny and potential determination of a breach of the Home Standard and serious detriment having been caused/potentially caused) by the RSH and/or the CQC.
- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

2.6 Torus will maintain a Fire Safety Management Plan and associated Operational Guidance which shall:

- Provide additional guidance on how the commitments outlined within this Policy will be implemented.
- Provide clear lines of responsibility for the management of Fire Risk
- Set out key Operational Processes.
- Ensure that a clear and consistent process is in place to obtain access to Properties where this is required. This will include pro-active assessment of available data for relevant

information about the customer to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement action will be used where required.

- Maintain a process for dealing with unsafe situations.

2.7 All staff who have roles identified in the Fire Safety Management Plan will receive associated training appropriate to their role.

3. Policy

Delivery:

Fire Risk Assessment

3.1 Torus will undertake suitable and sufficient FRAs in accordance with the RRFSO which applies to all non-domestic premises in England and Wales. This includes multi-occupied residential buildings, such as blocks of flats, although individual flats are excluded (unless undertaking Type 4 FRAs). The updated legislation confirms that where “a building contains 2 or more sets of domestic premises”, the RRFSO applies to:

- the building’s structure and external walls (including windows, balconies, cladding, insulation, and fixings) and any common parts
- all doors between domestic premises and common parts such as flat entrance doors (or any other relevant door)

3.2 Torus will record the significant findings and aim to undertake recommended Remedial Work within the timescales set by the Competent Person.

3.3 Torus will ensure that fire risk assessments are reviewed no later than the review date set by the current fire risk assessment.

3.4 The fire risk assessment to a building will be reviewed following a fire, change in building use, change in working practices that may affect fire safety, following refurbishment works to the building or as and when required following an independent fire safety audit.

3.5 Due to new emerging requirements to consider the fire risk from external wall materials, FRAs will now include external wall risks in scope. As part of updating FRAs to include this information, FRAs will be prioritised in accordance with risk level. Where necessary the Compliance Manager will engage a competent professional who can advise on external walls and update their fire risk assessment.

External Wall Assessments

- 3.6 Torus will develop and maintain a record of multi-occupancy buildings external wall materials
- 3.7 Torus will appoint a Competent Person to undertake a Fire Risk Appraisal of External Walls (FRAEW) to consider external wall construction and cladding of existing multistorey and multi occupied residential buildings, applying the methodology set out in PAS 9980 Code of Practice. Information from the FRAEW's will feed into the main Fire Risk Assessment for the building and support any future Safety Case Reports.
- 3.8 The FRAEWs (Fire Risk Appraisal of External Walls) will be undertaken to different scales, depending upon the complexity of individual buildings. Torus recognise that not all buildings will require an appraisal, and of those that do, not all will require intrusive inspection. The Fire Risk Assessor will determine if a building meets the requirement and will put forward a recommendation for FRAEWs.
- 3.9 Torus will endeavour to ensure that appropriate risk mitigation is put in place where there is any identified increased risk of fire from the external wall system.

Evacuation

- 3.10 Torus will ensure each building has an Evacuation Strategy stated clearly within the FRA. The Evacuation Strategy will be agreed with the Competent Person undertaking the FRA.
- 3.11 Where appropriate a Personal Emergency Evacuation Plan (PEEP) will be carried out for tenants with a disability, mobility issues or physical and mental wellbeing needs within a building requiring a fire risk assessment and that this PEEP will be reviewed annually by a competent person. This will be kept in the Fire Safety Log held securely on site and made available to the fire service in the event of an evacuation. The PEEP will consider individuals on a case-by-case basis and consider a person's ability to evacuate or understand their responsibility and their capacity.
- 3.12 Where appropriate Person-Centred Fire Risk Assessments (PCFRA) will be used to identify tenants who are at higher risk from fire in their own accommodation – whether this is due to their behaviours or their ability to respond and escape from a fire. The risk assessment will include an action plan that specifies what steps will be taken to improve the safety of the vulnerable tenant. The PCFRA will consider individuals on a case-by-case basis and consider a person's ability to evacuate or understand their responsibility and their capacity.
- 3.13 For Commercial, Community and Non-Residential premises it is the responsibility of each employee to inform their Line Manager of any physical or sensory impairment he/she may have,

including temporary impairment, which may affect how they evacuate the premises. Torus will be pro-active in becoming aware of people who may need assistance to escape in the event of a fire.

- 3.14 In a general needs' property, where practicable and should assistance be requested, Torus will provide advice and guidance to assist residents in developing their own Means of Escape Plan in General Needs premises. This will not involve the assistance of staff in the evacuation.
- 3.15 Within a Specialised Housing setting, an assessment of individuals will be made by appropriate staff. This will involve detailed and up-to-date records of occupants, and in some buildings, they will require Person Centred Fire Risk Assessments (PCFRAs) and Personal Emergency Evacuation Plans (PEEPS). Assistance in evacuation provided by staff will be determined on a case-by-case basis. The Fire and Rescue Service will be included in the process and where required appropriate information will be held on site.
- 3.16 Where appropriate provide equipment to aid evacuation which should only be used by appropriately qualified or trained persons e.g., the Fire and Rescue Service.
- 3.17 Where it is identified that residents in High Rise are unable to self-evacuate, a PCFRA will be undertaken by the organisation, and a Home Fire Safety Visit arranged with the local Fire & Rescue Service to discuss any issues that may make it difficult to escape from the flat in the event of a fire.

Evacuation Drills

- 3.18 Evacuation Drills will be carried out in all Non-Residential Buildings and a selected set of Residential Buildings. This will be determined by the FRA. In Non-Residential Buildings Torus will endeavour to conduct Drills twice annually. Residential premises with Alarms will be assessed as to the appropriateness of regular Fire Drills on an individual basis. Results will be monitored to ensure evacuation in a safe and timely manner and improvements to evacuation processes made where necessary.
- 3.19 All relevant new staff to the organisation will be instructed in the Fire Evacuation Procedure upon Induction.

Premises Information Boxes

- 3.20 Emergency Response Packs will be prepared and maintained up to date within Premises Information Boxes accessible to the Fire and Rescue Service, in accordance with both the Fire Safety (England) Regulations 2022 and the National Fire Chiefs Council (NFCC) Code of Practice, as a minimum, this will apply to the following high rise residential buildings:

- existing blocks of flats whose top storey floor height is 18m or more, or over six storeys (ground plus five upper storeys), whichever is the lower;
- existing blocks of flats whose top storey floor height is below 18m or under six storeys which have additional complexity i.e., layout, access, floor numbering, flat numbering, firefighting facilities, fire engineering etc;
- New build blocks of flats whose top storey floor height is 11m or more.

3.21 In accordance with the NFCC Specialised Housing Guidance, accessible Premises Information Boxes will be maintained in place containing information on vulnerable residents in Sheltered/ Extra Care accommodation, including key details identified from PEEPs (Personal Emergency Evacuation Plan), also identifying any cylinders for medical gases.

Responding to Fire & Rescue Services

3.22 Torus will also ensure the Fire and Rescue Services have the required information to assist them to plan and, if needed, provide an effective operational response in a fire emergency. Therefore, in compliance with Fire Safety (England) Regulations 2022, Torus will ensure for High Rise buildings (i.e., *18 metres - or at least seven storeys*), provision of key information including:

- Building Plans
- External Wall System information
- Checks undertaken on Fire Fighting Lifts and other Key Fire-Fighting Equipment
- Wayfinding Signage (identifying flat and floor numbers in the stairwells of relevant buildings)

3.23 For low and medium sized blocks of flats, any other dwelling or commercial property Torus will cooperate with Fire & Rescue Services in accordance with the organisation's Emergency Response Plan.

Further Investigations

3.24 Torus will pro-actively undertake further investigations to the buildings for which it is responsible, where required. This may include, but is not limited to, investigations into External Wall Systems, Balconies, Compartmentation and Fire Doors. Such further investigations will be recommended by the FRA, the Fire and Rescue Service or initiated where Torus is not satisfied it has appropriate assurance around the design, installation, or maintenance of a building component. As a result of emerging guidance and the size of the Torus portfolio, there is likely to be numerous further investigations required. Torus will maintain a time-bound Programme of these investigations prioritised by building risk profile.

Fire Door Inspections

- 3.25 Fire Doors will be sample inspected as part of the FRA process and at regular intervals as recommended within the FRA.
- 3.26 Torus will comply with Regulation 10 of The Fire Safety (England) Regulations 2022, ensuring for all multi-occupied residential buildings, with two or more sets of domestic premises, over 11 meters in height, including:
- Quarterly fire door checks for communal area fire doors (including self-closing devices), and:
 - Annual checks of all flat entrance doors (including self-closing devices) that lead onto a building's common parts.
- 3.27 In addition, fire door checks will be undertaken annually in multi-occupancy buildings under 11m in height, this exceeds the Regulatory minimum requirement, however Torus will ensure this is in place as part of general fire precautions, under the RRFSO, regardless of building height.
- 3.28 Also, in accordance with Regulation 10(5), Torus will provide residents with information on the importance of fire doors to a building's fire safety.
- 3.29 An electronic record of fire door checks and subsequent follow-on works, will be maintained as an evidence base and performance will be monitored against the above quarterly/ annual checking requirements.

Remedial Actions

- 3.30 All Remedial Actions arising from the FRA or further investigations shall have clear Completion Targets agreed by the Competent Person undertaking the FRA. Any proposed changes to the agreed Completion Targets will be documented, agreed by a Competent Person, and proposed to the Asset Compliance Group for approval. The decision will be recorded and reported within the Key Performance Indicators (KPIs) to ensure clear visibility.
- 3.31 All Fire Safety Remedial Work should be carried out in accordance with the relevant British Standard, approved Code of Practice or associated Good Practice Guidance. Any contractors undertaking specialist Fire Safety Remedial Works should be Third Party Accredited.
- 3.22 The Fire Risk will be reviewed regularly from the time of FRA completion until Remedial Works have been completed.
- 3.23 Large Remediation Programmes following further investigations may be monitored as distinct Projects outside of general Remedial Actions.

Testing and Maintenance of Fire Safety and Equipment, Gas Installations and Electrical Installations

- 3.24 All Fire Safety Equipment within the scope of this Policy will be tested and maintained in accordance with regulatory and statutory requirements and considering manufacturer's requirements. This will include the completion of all essential Remedial Works requirements identified during the testing/maintenance activity.
- 3.25 Torus shall ensure that all Assets have a satisfactory Electrical Installation Condition Report (EICR) in accordance with the Electrical Safety Policy.
- 3.26 Torus shall ensure that Gas Installations are maintained in accordance with the Gas Safety Policy, including the completion of Landlord Gas Safety Records (LGSR) where appropriate.
- 3.27 All repairs to Fire Safety Equipment and Gas and Electrical Installations will be undertaken in accordance with the relevant Policy.
- 3.28 In some cases, Electrical and Gas Safety Inspections relating to the dwelling will be the responsibility of a Shared Owner or Leaseholder. Torus will not typically request evidence that these have been undertaken but may write to the residents periodically to remind them of the importance of them. Where an FRA indicates that Torus should seek evidence, Torus will request this.

Domestic Smoke/Heat Detection

- 3.29 Torus will ensure that all Dwellings owned by Torus (excluding Leasehold and Shared Ownership) will have working Mains-Powered Smoke/Heat Alarms installed (or Battery-Powered Smoke Alarms as an interim measure until Mains-Powered can be installed).
- 3.30 These Smoke/Heat Alarms will comply with the requirements of The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022. Ensuring at least one Smoke Alarm is equipped on each storey of homes where there is a room used as living accommodation. The appropriate level of provision will be installed in accordance with British Standard (BS 5839:6 2019) and will include LD2 (Additional Protection – a Smoke Alarm also in the 'principal habitable room' i.e. Living Room and a Heat Detection Alarm in the Kitchen), or Category LD1 (Maximum Level Protection – detection installation in all rooms and all circulation spaces) within homes occupied by high risk residents, such as within specialised housing.
- 3.31 Torus will maintain a Programme of upgrading to Mains-Powered with standby Battery Systems across all Properties over the next 5 years as part of the EICR Programme.

- 3.32 Torus will check Smoke Detection annually as part of the Heating Servicing contract or, where Properties are not part of Heating Contract/s, through other Cyclical Maintenance contracts.

Repairs and Maintenance Activity

- 3.33 There is a risk that Repairs and Maintenance activity unwittingly impacts Fire Safety. Owing to the volume and nature of Repairs Works it is not practicable to undertake specific Risk Assessments of all jobs. Torus will manage this risk by ensuring that all contractors must obtain prior permission before working on any of its properties, and that R&M (Repairs & Maintenance) contractors (internal and external) have a general awareness of Fire Safety to inform Dynamic Risk Assessment when undertaking Responsive Repairs that may have an impact on Fire Safety. Repairs will be carried out in accordance with the relevant British Standard, Approved Code of Practice or associated Good Practice Guidance and by Third Party Accredited contractors where required.
- 3.34 Any contractors (internal or external) undertaking Hot Works as part of repairs activity must have an approved Hot Works Procedure. This should include avoidance of Hot Work unless no alternative method is feasible. The Contracts Register will identify if a contractor has such a Procedure and is permitted to undertake such works.
- 3.35 Certain Buildings may be assigned as Permit to Work areas to manage the work to a particular element, area, or of a certain type. Torus will review the need for the operation of a Permit to Work Scheme for a specific property on a scheme-by-scheme basis.

Planned and Major Works

- 3.36 Planned Maintenance or Upgrade Programmes commissioned by Torus to Buildings that require an FRA will be subject to a Risk Assessment by a Competent Person to consider their impact on Fire Safety. Works Programmes are likely to fall into one of three categories:
1. Works subject to Planning Permission and/or Building Regulations approval;
 2. Works not subject to the Building Regulations (including those covered by the Building Regulations, but delivered by/under a Competent Person scheme) but where there is a foreseeable impact on Fire Safety;
 3. Works not subject to the Building Regulations where there is no foreseeable impact on Fire Safety.

Works will only be in Category 3 if a Competent Person has reviewed the proposed Works and formally agreed that there is no foreseeable impact on Fire Safety.

3.37 For all other Works, Torus will ensure that prior to Works commencing a Competent Person will:

- Review the proposed Work against the Fire Risk Assessment and any Building Safety Case.
- Ensure anyone appointed to undertake Design or Construction activities can demonstrate the necessary competence to discharge their responsibilities relating to Fire Safety. This will include Duty Holders identified in the Construction (Design and Management) Regulations 2015 (the Client, the Principal Designer, the Principal Contractor, Designers and Contractors).
- Request reasonable assurance that Duty Holders have demonstrated that resident safety can be assured during the Works or that a suitable Decanting Strategy is in place.
- Engage with residents on Fire Safety matters that affect them.
- Request reasonable assurance that Duty Holders have complied with the Building Regulations in relation to Fire Safety where required.
- Request reasonable assurance that there is an appropriate Site Inspection and Sign-Off Programme in place for all the stages of the Work.

During the Project and at its conclusion, Torus will make any updates to the FRA, Building Safety Case, or other key Fire Safety information as required.

3.38 For certain Projects on buildings, there will be additional requirements in relation to notification and consent from the Building Safety Regulator (*once established*). This is covered further below.

Resident Commissioned Works

3.39 Torus will maintain a consent process for any Resident Commissioned Works. In Buildings that are subject to an FRA, the proposed Work will be evaluated by a Competent Person to consider if there is a foreseeable impact in relation to Fire Safety. Approval will not be unreasonably withheld, although consent may be refused, or conditions imposed where appropriate.

3.40 Where unauthorised Work with the potential to impact Fire Safety is discovered, Torus will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident.

Management

3.41 Torus will take the following actions to reduce the risk of fire:

- Prohibit the storage of any items in Communal Areas, including communal or service cupboards, and Escape Routes without Torus's express permission.

- Maintain a No Smoking Policy in all Communal Areas.
- Implement a risk-based approach to the Periodic Inspection of Communal Areas and Escape Routes in line with the Fire Safety Management Plan to enforce the above.
- Ensure that, where provided, furniture is compliant with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).
- Ask residents to alert Torus to the presence of stored oxygen so that it can alert the Fire and Rescue Service of its presence.
- Enforce resident responsibilities where required, considering a balance of individual residents' rights with the need for effective, timely action where there is a risk to the safety of other residents.

Construction

3.42 There are detailed requirements on Torus as a Client during construction projects and these are considered elsewhere. However, in relation to Fire Safety Torus will ensure:

- It co-operates and shares information with stakeholders at key stages prior to, and during, construction;
- that the people it employs are competent to do the work they are undertaking;
- compliance with the Building Regulations and specific regulatory requirements imposed upon it;
- appropriate approvals are in place and that all information is handed over to all relevant parties (such as Housing Management or other operational colleagues) prior to any occupation;
- that an FRA is undertaken prior to occupation.

Building Safety Reforms

3.43 The Building Safety Act 2022 (received Royal Assent April 2022) is currently allowing for an 'implementation period' for organisations, and the new Regulatory body the Building Safety Regulator (within the HSE), to prepare for the introduction of new a new legislative regime. Torus will ensure the following in preparation for compliance with the Act and ensuring customer safety by undertaking the following:

- Torus will establish a defined Register of HRRBs (Higher Risk Residential Buildings), including key details around the building type, construction, height, external wall system as detailed in the Fire Safety Management Plan
- Designate a Principal Accountable Person and Accountable Person responsible for assets which fall within the remit of the Building Safety Act 2022

- Prepare Safety Case Reports for in-scope buildings. The purpose of a Safety Case is to show how and why the buildings are designed and constructed to be safe and of a good standard and how they will stay safe for people living in them.
- Torus will ensure records are compiled in respect to mitigation approaches to (i) potential spread of fire and (ii) risk of structural failure. This will be kept up to date in preparation to submit to the Building Safety Regulator.
- Following submission of the Safety Case Torus will apply for a Building Assessment Certificate when directed by the Building Safety Regulator as part of a new Building Assessment Certificate process which is expected to begin in April 2024.

Data:

3.44 Torus acknowledges that to meet its obligations it must maintain a robust approach to identifying the Assets and components for which it has responsibility. Torus will:

- hold accurate records against communal areas of each property it owns or manages setting out the requirements for having a fire risk assessment. Accurate records are also held against each property it owns or manages setting out the requirements for servicing, maintenance and repair of fire prevention, detection, and firefighting equipment. These include fire alarm systems, emergency lighting, smoke/heat detectors, hose reels, dry and wet risers, auto window/door openers, fire extinguishers, fire blankets, sprinkler systems and any other equipment relating to fire safety.
- Maintain an up-to-date Master Database of all Properties that will indicate both where it does and does not have a responsibility to provide Fire Risk Assessments (FRAs) and/or maintain Fire Safety Equipment.
- Maintain a register of Higher Risk Residential Buildings (HRRBs) and ensure they are registered with the Building Safety Regulator (expected from April 2023) if they are in-scope i.e., *18m in height or have at least 7 storeys and contain at least 2 residential units*. Also, for any new build HRRBs, adhere to the Regulator's 'Gateway Approval Process' during design and construction.
- where a requirement for an FRA exists, hold full electronic copies of the current and previous FRAs along with key reportable and auditable information
- Where Fire Safety Equipment exists, hold reportable and auditable information
- Maintain current and auditable records of Remedial Works arising from the FRAs or other Fire Safety-related Inspection or Testing.

4. Implementation

- 4.1 This Policy will be effective from May 2023 following approval.
- 4.2 Staff will be made aware of the Policy at priority training and a copy will be available on the Intranet. The Policy will also be uploaded to the Torus website.
- 4.3 This Policy should also be read in conjunction with the Torus Compliance Strategy and the associated Fire Safety Management Plan.
- 4.4 Appropriate training will be provided for all those staff involved with the operational delivery and implementation of the Landlord Compliance requirements and obligations in respect to Fire Safety detailed within this Policy.

5. Communication with Stakeholders

5.1 Internal

Operate a Health and Safety Committee comprising of a cross-organisation team of staff which will include Fire Safety.

5.2 Residents

- Torus will encourage Fire Safety by the following actions:
 - Provide a copy of an FRA or evidence of Fire Equipment Servicing to a relevant resident within 28 days when reasonably requested to do so.
 - Inform residents of the importance of Fire Safety on a regular basis, through the provision of information via website, newsletters, leaflets, and information at New Tenancy Sign-Up.
 - Maintain a clear approach to gaining access to carry out surveys and undertake works and be clear that enforcement action may be taken when it is necessary to do so.
 - Communicate with residents through appropriate 'Fire Action' signage.
 - Maintain a clear Complaints Process and monitor and record complaints that indicate a risk to a Fire Safety.
 - Communicate with Leaseholders and Shared Owners to remind them of the importance of undertaking Periodic Electrical and Gas Safety Checks.

- For higher risk buildings, Section 95 of the Building Safety Act (2022) places increased duties on residents to cooperate to ensure safety within the building. Torus' Accountable Person will have the power to serve a Contravention Notice to residents, under Section 96 if they fail to uphold their duties.
- Torus will proactively communicate with customers to remind them of the evacuation strategy within their building and raising awareness of fire safety within the home. The Compliance Team and/or Building Safety Manager, as appropriate, will discuss any concerns raised by customers regarding fire safety in their home, including ensuring their understanding of the current evacuation strategy.

5.3 Staff

- Communicate with staff through Induction Training, Fire Drills, appropriate Signage and the Intranet.

5.4 Other Responsible Persons

- Comply fully with Article 22 of the RRFSA and ensure that where Torus are considered jointly responsible for a Property or Common Area, it will share its FRA with other relevant parties, and co-operate with them as far as is practicable to ensure the safety of relevant persons.

5.5 Fire and Rescue Service

- Torus are currently in a Primary Authority Partnership with the Fire and Rescue Service. This is regarded as fundamental to the ongoing Fire Safety Management within Torus and as such Torus will engage in a regime of regular and proactive communication with the Fire and Rescue Service to ensure good lines of communication and operational familiarity.
- Torus will maintain a record of any formal or informal notices from any Fire and Rescue Service site audits, and any subsequent action taken.

5.6 Building Safety Regulator

- Once established, we will maintain communication with the Building Safety Regulator. This will include reporting of mandatory and voluntary occurrences where required once this scheme is established.

6. Monitoring and Assurance

6.1 Monitoring

- The Performance Indicators (PIs) and Key Performance Indicators (KPIs) will be reported to the Asset Compliance Group, Executive Team or Board at the frequencies outlined within the Fire Safety Management Plan.
- These PIs or KPIs will be reviewed periodically by the Asset Compliance Team and additional/amended measures may be recommended.
- A detailed PI (Performance Indicators) and KPI (Key Performance Indicators) suite will be defined within the Management Plans.

6.2 Assurance

The following assurance activity will be undertaken:

- Internal checking independent of the Operational Teams to provide additional assurance around the accuracy of data and reporting and will include sample testing of the accuracy of data and the operation of controls.
- Internal Audit to provide independent assurance on the operation and effectiveness of controls. Frequency agreed as part of the **Internal Audit Programme** and reported to Audit and Risk Committee.
- Works-based Quality Assurance/Quality Control (QA/QC) to test the quality of work delivered. This will be at levels detailed within the Fire Safety Management Plan.

7. Competence

7.1 It is not possible to succinctly define competence requirements for all roles and activities outlined in this Policy. In many areas, competence will be assessed based on skills, knowledge, experience, and behaviours as opposed to a single qualification or standard. As defined above, Torus has a system of Directors evaluating competence within their areas of responsibility and Competent Person(s) are required to highlight the limits of the competence.

7.2 However, owing to the initial importance of the FRA in Torus's approach and the need to for Torus to have access to overarching Fire Safety advice, Torus will:

- Ensure that FRAs are undertaken by appropriately accredited organisations and all FRAs are subject to validation;
- Appoint an external Competent Person to provide retained support and advice in relation to Fire Safety. This will be (or include access to) a Chartered Fire Engineer and experienced Fire Risk Assessor – with experience on complex Residential Properties – who is listed on an Approved Register.
- For buildings with combustibile external wall materials in higher risk categories, the assessor should be part of a professional body that is within a scheme able to demonstrate third party accreditation or validation, from **UK Accreditation Service (UKAS)** or **UK Engineering Council (EngC)** demonstrating ability to apply the Code of Practice PAS9980, which sets out methodology for competent professionals to undertake an appraisal of external walls.

7.3 Specific areas of competence relating to Risk Assessment, Servicing and Maintenance activity are listed within the Fire Safety Management Plan along with a Procedure for checking these.

7.4 Torus' Training Matrix will reference various levels of training requirements by role, including mandatory basic level Fire Safety Awareness for all employees, specific training for persons responsible in staffed premises and offices, and role-specific training for example, for those involved in alterations in buildings/ refurbishments/ major works/ planned programmes, or delivering compliance related activity.

8. Consultation

8.1 This Policy is based on legislative and regulatory requirements and as such consultation with customers has not taken place. There has been consultation with Teams within Torus.

9. Equality Impact Assessment

9.1 We believe all people should be treated with dignity and respect regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including, nationality, ethnic or national origins), religion, belief or non-belief, sex, or sexuality or by association with someone with any of these characteristics or perception of having any of these characteristics.

10. Policy Review

10.1 The Policy will be reviewed upon any change to legislation or major guidance documentation, and at least every 12 months (or earlier if deemed necessary through the Monitoring and Assurance Process).

11. Amendment Log/Version Control

Date of Revision:	Record of Amendments:	Reason for Revision:	By Whom: Name and Title