FIRE SAFETY MANAGEMENT

SEPTEMBER 2026

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FIRE SAFETY MANAGEMENT POLICY

(*Note Lanarkshire Housing Association hereinafter referred to as LHA)

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1.0 INTRODUCTION

LHA recognises that it has a duty of care to employees, tenants, visitors, and the public who may be affected by the operation and maintenance of premises owned or managed by LHA.

This policy ensures the effective identification, assessment, and management of fire safety risks across all domestic homes, common areas and commercial premises owned or operated by LHA.

2.0 SUPPORTING DOCUMENTS

The implementation of this policy is supported by the following policies and procedures.

- Property Services Policies and Procedures
- Fire Safety Operations and Action Plans
- Health & Safety Policy (2026)
- Gas Safety and Electrical Safety Policies and Procedures
- Asbestos Management Policy
- Tenancy Management Policy and Procedures
- Tenant Participation Strategy and Complaints Handling Procedure

3.0 PURPOSE

The aim of this Fire Safety Management Policy is to ensure that LHA effectively administers compliance with its landlord and employer obligations regarding fire safety, life safety systems, and structural fire protection. The main objectives include:

- Ensuring robust systems are in place to enable LHA to comply with statutory health and safety duties under Scottish fire safety legislation

- Operating an effective, risk-based Fire Risk Assessment (FRA) management regime and life safety asset servicing programme

- Maintaining clear audit trails for statutory fire risk assessments, fire door inspections, life safety system servicing, and remedial action tracking

- Reviewing policies, procedures, and systems regularly to reflect up-to-date legislation, Scottish Fire and Rescue Service (SFRS) guidance, and industry best practices

- Employing only competent, adequately qualified people, accredited specialist risk assessors, and qualified fire safety contractors

4.0 POLICY OBJECTIVES

This policy contributes to LHA's delivery of the following Corporate Objectives:

- Maintaining, Improving, and Growing our Customers Experience
- Retaining, improving and growing Our People
- Maintaining, improving, and growing Our Assets
- Maintaining, improving, and growing Our Financial Wellbeing
- Maintaining, improving, and growing Our Connections

Specifically, Strategic Plan Action 3.5 says we will:

"Review Health & Safety strategies and systems to ensure Compliance and create a Safe Culture for both customer, and our people"

5.0 LEGISLATION, REGULATION AND GOOD PRACTICE

LHA will comply with all relevant legislation, regulations, and approved codes of practice in relation to fire safety and asset management, including:

- Health & Safety at Work etc. Act 1974
- Fire (Scotland) Act 2005
- Fire Safety (Scotland) Regulations 2006
- Building (Scotland) Regulations 2004 and Building (Scotland) Amendment Regulations 2022
- Management of Health and Safety at Work Regulations 1999
- Housing (Scotland) Act 2014
- Housing (Scotland) Act 2006 (Repairing Standard - Interlinked Smoke and Heat Alarm Requirements)
- Scottish Government Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation (2022)
- Construction (Design and Management) Regulations 2015 (CDM)
- Housing (Cladding Remediation) (Scotland) Act 2024

6.0 EQUALITY

LHA is committed to providing fair and equal treatment to all current and prospective customers. An Equality Impact Assessment (EQIA) has concluded that this policy has no adverse impact on protected groups under the Equality Act 2010 and is expected to deliver positive benefits for older people, disabled people, and those who are pregnant or have young children through enhanced fire safety and emergency evacuation arrangements.

As with all LHA policies and practices, we comply with Outcome 1 (Equalities) of the Scottish Social Housing Charter. This policy and associated documents are available in alternative formats on request, and LHA uses the 'Happy to Translate' service to support customers who require language assistance.

7.0 DEFINITIONS AND DESCRIPTION

For the purposes of this policy, unless otherwise stated, the following definitions shall apply:

Fire Risk Assessment (FRA): A structured and systematic evaluation of a property to identify fire hazards, assess the risk to occupants, and determine the necessary fire safety measures required to eliminate or reduce risk.

Category 1 Premises (Enhanced Assessment): Residential developments featuring external wall cladding systems (specifically including the two identified developments containing medium-risk aluminium cladding) and commercial/office premises. Subject to rolling annual FRAs, specialised external wall assessments, with tenants offered PEEP reviews.

Category 2 Premises (Standard Risk): Standard multi-tenancy residential blocks and common close tenements, subject to rolling 3-year FRAs (or annual reviews where risk profile changes).

Competent Person (Fire Risk Assessor): An independent specialist assessor possessing third-party accreditation via a recognised body (such as NAFRAR, IFE, or UKAS certification) holding demonstrated competence in Scottish fire safety legislation.

Personal Emergency Evacuation Plan (PEEP): A bespoke escape plan tailored for individual residents who have identified mobility issues, disabilities, or vulnerabilities preventing unassisted evacuation in an emergency.

8.0 OUR APPROACH

LHA shall undertake all necessary steps to assess, manage, and eliminate fire risks across all stock and commercial premises. We shall ensure that:

Fire Risk Assessments: Statutory FRAs are undertaken by third-party accredited competent persons on a 12-month rolling cycle for Category 1 premises and a 36-month cycle for Category 2 premises (with annual desktop risk updates).

Cladding & External Wall Safety: LHA maintains a dedicated Risk Register for all properties featuring external wall cladding systems.

For the two developments containing medium-risk aluminium cladding:

- LHA will commission formal Single Building Assessments (SBAs) and Fire Risk Assessments of External Walls (FRAEWs) executed by competent, third-party accredited Fire & Façade Engineers
- Assessment findings and remediation plans will be submitted to the Scottish Government Cladding Assurance Register
- Interim risk mitigation and operational controls will be managed strictly in accordance with the specific recommendations set out within the professional SBA reports pending permanent remediation

Personal Emergency Evacuation Plans (PEEPs): For Category 1 premises, LHA will communicate with residents who have self-declared mobility or sensory impairments. Tailored PEEPs will be compiled and managed in accordance with the operational templates.

Evacuation & Egress Strategy: LHA manages common closes, stairwells, and egress routes in accordance with Scottish Government fire safety guidance. LHA promotes clear escape routes by communicating with residents and requesting voluntary removal of combustible items and obstructions.

Life Safety Asset Maintenance: Servicing, testing, and maintenance regimes are strictly enforced across active and passive life safety systems:

- **LD2 Fire Alarm Systems:** Inspected during Void periods and annual gas safety/electrical checks to maintain compliance with the Repairing Standard
- **Automatic Opening Vents (AOVs) & Smoke Control:** Inspected and serviced bi-annually by specialist contractors where fitted
- **Dry Risers:** Inspected and maintained in accordance with BS 9990, comprising 6-monthly visual inspections and annual pressure tests
- **Emergency Lighting:** Annual testing alongside monthly functional check cycles in common areas

Incident Escalation: Any structural fire, serious life safety defect, cladding failure, or major injury will be reported under RIDDOR 2013 where applicable and escalated immediately to the Scottish Housing Regulator (SHR) as a Notifiable Event.

9.0 LONG TERM VOIDS

Where properties or common blocks are affected by long-term void periods or planned capital refurbishment works, fire safety must be safely managed:

- All void properties will undergo an immediate inspection to confirm interlinked smoke, heat, and carbon monoxide detectors comply with LD2 statutory standards prior to re-letting
- Common areas adjacent to void properties will be kept clear of waste, combustible materials, or construction debris
- Fire doors and compartmentation surrounding void dwellings must be checked to ensure passive fire resistance remains uncompromised before re-occupation

10.0 RECORD KEEPING

LHA understands the importance of accurate record keeping and shall undertake the following in relation to fire safety management:

- Maintain an electronic compliance database logging all completed Fire Risk Assessments, Single Building Assessments, and action plans
- Retain comprehensive servicing logs, statutory examination certificates, external wall safety reports, and repair records for all life safety systems and cladding assets
- Ensure all statutory fire safety records, FRA reports, SBA documents, active PEEPs, and certificates are retained for at least 5 years

11.0 MONITORING OF THE POLICY

Any matter which demonstrates a serious failure of internal controls or statutory fire safety compliance should be reported immediately to the Chief Executive.

Performance on our compliance with fire safety standards, servicing schedules, SBA progress, and FRA remedial actions will be reported to the Management Committee, or delegated Sub-Committee. The reporting will include:

- Confirmation that statutory Fire Risk Assessments, Single Building Assessments, and reviews are complete and within valid target dates
- Remedial action tracking statistics (High, Medium, and Low priority FRA/SBA actions)
- Compliance metrics for interlinked smoke/heat detection (LD2) and statutory life safety servicing programmes
- Progress updates on cladding remediation or mitigation programmes for identified medium-risk aluminium stock
- Summary of any reported fire incidents or Scottish Fire & Rescue Service (SFRS) enforcement notices

12.0 ROLES AND RESPONSIBILITIES

LHA has defined the following roles with accountability and responsibility for aspects of the fire safety management system:

Overall accountability	Chief Executive
Overall responsibility	Property Services Director
Delivery and Administration	Property Services Director Senior Property Officer
Specialist Services	Competent Accredited Fire Risk Assessors Chartered Fire & Façade Engineers (SBA/Cladding) Specialist Life Safety Maintenance Contractors
Repairs	Property Services Officer Maintenance Officer Property Services Assistant
Communications with tenants	Property Services Officer Housing Officer Property Services Assistant

13.0 RISK

LHA takes a proactive approach to the management of risks, at both a strategic and operational level. Key risks that this policy seeks to mitigate:

- Failure to procure appropriately qualified and accredited independent Fire Risk Assessors or Chartered Fire Engineers, leading to incomplete risk identification or statutory non-compliance
- Failure to properly assess, monitor, or remediate external wall cladding systems on identified medium-risk properties, resulting in heightened fire spread risk, regulatory intervention under the Housing (Cladding Remediation) (Scotland) Act 2024, or uninsurable assets
- Inadequate tracking or delayed completion of remedial actions identified within FRAs and SBAs
- Failure to identify, implement, or review PEEPs for vulnerable residents within Category 1 premises
- Failure of active or passive life safety assets (e.g., AOVs, emergency lighting, or fire doors) due to missed servicing cycles
- Risks to safety arising from unmanaged common area storage, compromised compartmentation, or blocked escape routes
- Exposure to Scottish Fire and Rescue Service (SFRS) enforcement notices, statutory prosecution, or Notifiable Event reporting to the Scottish Housing Regulator (SHR)

14.0 COMPLAINTS

LHA values complaints and we endeavour to use the learning from complaints to help us improve our services.

Any complaint arising from our implementation of this policy, will be addressed through our complaints handling process.

A copy of our Complaints Policy is available at https://www.lanarkshireha.com

15.0 REVIEW

LHA undertakes to review this policy regularly, at least every three years, with regards to:

- Applicable legislation, rules, regulations, and guidance
- Changes in the organisation
- Continued best practice

Lanarkshire Housing Association Limited **Equality Impact Assessment Tool**	

Name of the **policy / proposal** to be assessed	Fire Safety Management Policy	Is this a **new policy / proposal or a revision**?	New Policy
Person(s) responsible for the assessment	Property Services Director		

1. Briefly describe the **aims, objectives and purpose** of the policy / proposal	The Fire Safety Management Policy aims to ensure that LHA effectively administers compliance with its landlord and employer obligations regarding fire safety, life safety systems, and structural fire protection under Scottish fire safety legislation. It aims to keep employees, tenants, visitors, and the public safe from fire risks across all domestic housing stock, common areas, and commercial premises so far as reasonably practicable.
2. Who is intended to benefit from the policy / proposal? *(e.g. applicants, tenants, staff, contractors)*	The policy sets out to benefit tenants by ensuring risks to life safety from structural fire, external wall cladding, and common area hazards are minimised. It further benefits employees, contractors, and members of the public visiting or working within LHA properties, while ensuring the Association meets statutory duties under Scottish fire safety law and protects its housing stock.
3. What **outcomes** are **wanted** from this policy / proposal ? *(e.g. the benefits to customers)*	To ensure compliance with Scottish fire safety legislation and regulatory standards through robust Fire Risk Assessments (FRAs), Single Building Assessments (SBAs) for external wall safety, routine life safety asset servicing, and clear audit trails. This mitigates the risk of harm, injury, or loss of life from fire for tenants, staff, contractors, and the public.

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*) ☒ Age ☒ Disability ☐ Marriage & Civil Partnership ☒ Pregnancy/Maternity ☐ Race ☐ Religion or Belief ☐ Sex ☐ Gender Reassignment ☐ Sexual Orientation		
5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here. The Policy is relevant for health reasons.		
	Positive impact(s)	**Negative impact(s)**
6. Describe the **likely positive or negative impact(s)** the policy / proposal could have on the groups identified in part 4	The policy applies equally to all properties, but proactively addresses risks for groups identified as more vulnerable in emergency evacuation scenarios. **Age & Disability:** Older people and disabled residents, particularly those with mobility, sensory or cognitive impairments, may be at increased risk during a fire emergency. The policy supports these groups through Fire Risk Assessments, Personal Emergency Evacuation Plans (PEEPs) for vulnerable residents in Category 1 premises, and the proactive management of escape routes and life safety systems	None identified

	Pregnancy/Maternity: The policy supports residents who may experience temporary mobility limitations by promoting safe evacuation arrangements and maintaining clear means of escape. **Race:** Accessible information and the use of translation services help ensure fire safety information can be understood by residents whose first language is not English.	
7. What **actions** are **required** to address the impacts arising from this assessment? *(This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).*	Proactively identify and engage residents requiring tailored Personal Emergency Evacuation Plans (PEEPs) within Category 1 premises. Ensure communication regarding clear escape routes and common area storage is accessible, utilizing alternative formats and translation services where required in line with LHA equalities commitments.	

Signed: ______________________ (Job title): Property Services Director

Date the Equality Impact Assessment was completed: 24 August 2026

Please attach the completed document as an appendix to your policy / proposal report