

Report to: **Housing Review Board**

Date of Meeting: 23 January 2020

Public Document: Yes

Exemption: None

Review date for release None



Subject: **Review of Fire Safety Policy**

Purpose of report: Members to note the amendments to the Fire Safety Policy.

Recommendation: **To agree the review of the Fire Safety Policy.**

Reason for recommendation: To ensure we are meeting our statutory requirements in relation to fire safety.

To ensure the safety of our residents.

Officer: Graham Baker – Senior Technical Officer (Asset Management & Compliance)

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Financial implications: No specific financial implications.

Legal implications: The legal implications for Fire safety are contained within the policy document and require no further comment.

Equalities impact: Low Impact

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Climate change: Low Impact

Risk: Comments
High Risk

There are high risk consequences of failing to comply with Statutory Regulations/Legislation in relation to compliance from a safety financial and reputational perspective.

Links to background information:

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Link to Council Plan: Outstanding Homes and Communities
Outstanding Council and Council Services

Report in full

Introduction:

1. This policy details the system for the management of fire safety risks in properties owned and/or managed by East Devon District Council.
2. East Devon District Council (EDDC) will make every effort to minimise the risk to our tenants and their visitors in council owned housing stock by complying with all relevant legislation and subsequent guidance. These include The Regulatory Reform (Fire Safety) Order 2005 (RRO) and The Housing Act 2004.

Policy:

3. See attached

Recommendation:

4. That the Housing Review Board note and accept the proposed amendment to Housing's Fire Safety Policy.

HOUSING FIRE SAFETY POLICY

Introduction

This document details the system for the management of fire safety risks in properties owned and/or managed by East Devon District Council.

East Devon District Council (EDDC) will make every effort to minimise the risk to our tenants and their visitors in council owned housing stock by complying with all relevant legislation and subsequent guidance. These include The Regulatory Reform (Fire Safety) Order 2005 (RRO) and The Housing Act 2004.

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1) Policy statement

East Devon District Council will take all reasonable steps to prevent and control the risk from fire in all of the properties that it owns or manages.

EDDC will maintain a fire safety policy and will work with tenants, residents, leaseholders, staff, contractors and the statutory enforcement bodies to agree and deliver legally compliant solutions to fire safety issues. In this regard we will:

- Implement our fire safety policy by empowering nominated staff with specific responsibilities and duties.
- Ensure that all nominated staff receive the appropriate training and resources required to fulfil their statutory responsibilities/duties under fire safety legislation.
- Ensure that prompt remedial action shall be taken to safeguard persons in properties where there is a serious risk from fire.

The Housing Service aims to provide a safe environment in which our residents are assured that the risk of injury or damage to their homes caused by fires is minimised.

We will foster and maintain good working relationships with partners and contractors to help ensure the ongoing safety of our residents; this includes Devon & Somerset Fire & Rescue Service (D&SFRS).

In aiming to deliver this safe environment we will seek to identify, assess and reduce risks to ensure compliance with the Regulatory Reform (Fire Safety) Order 2005.

In discharging our obligations to fire safety we will:

- Carry out our Fire Risk Assessments (FRA's) in accordance with the Regulatory Reform (Fire Safety) Order 2005
- Carry out monthly fire safety risk checks of communal areas of all blocks of flats

We provide tenants and leaseholders with advice and information about fire safety in newsletters; leaflets; posters in blocks and community centres; on our website; social media; the Tenant Handbook and at tenancy visits.

2) Policy development

This policy has been developed to allow East Devon District Council to comply with the:

- Regulatory Reform (Fire Safety) Order 2005.
- The Housing Act 2004
- The Building Regulations 2019
- Equality's Act 2010
- The Health and Safety at Work Etc. Act 1974
- The Management of Health & Safety at Work (Amendment) Regulations 2006
- The Construction (Design & Management) Regulations 2015

Regulatory Reform (Fire Safety) Order 2005 (FSO)

The main provisions of the FSO are to:

- Carry out periodic fire risk assessments identifying any possible dangers and risks and create a work plan to address all recommendations arising from them.
- Eliminate or reduce the risk from fire as far as is reasonably possible and provide general fire precautions to deal with any remaining potential risks
- Create a plan to deal with fire emergency and record any major findings and action taken
- Review fire risk assessments regularly and make changes where necessary.

The FSO applies to:

- The common parts of buildings containing flats and maisonettes
- The common parts of sheltered accommodation
- Offices, shops and factories
- Community halls and other community premises

The FSO does **not** apply to purely domestic premises occupied by a single-family group including individual flats, maisonettes, bedsits, or residential units themselves.

The Fire and Rescue Authority, have a statutory duty to enforce the requirements of the Order. This can be by means of notification of deficiencies, formal enforcement notices, prohibition notices and/or ultimately by means of prosecution.

Housing Health and Safety Rating System (HHSRS) introduced under the Housing Act 2004,

The main provisions of the HHSRS are that:

- Any residential premises should provide a safe and healthy environment for any potential occupier or visitor and;
- To satisfy this principal, a dwelling should be designed, constructed and maintained with non-hazardous materials and should be free from both unnecessary and avoidable hazards;
- In relation to fire safety, the HHSRS applies to those matters which can properly be considered the responsibility of the owner (or landlord).

In relation to fire safety, the HHSRS does not apply to those elements of a dwelling for which responsibility lies with the user (the occupier) including fixtures and fittings (unless supplied by the landlord as a part of a furnished tenancy or where shared rooms are provided).

The Local Authority has a duty to act where category 1 or 2 hazards are found. They have a duty to enforce the requirements of the Act. This can be by means of informal notice to improve, formal enforcement notices, prohibition notices and/or ultimately by means of prosecution.

3) Scope of the policy

This policy is applicable to all buildings owned or managed by East Devon District Council as part of its Housing stock.

Individual Dwelling- EDDC as a residential landlord has a duty to provide a “decent home” fit for the occupant/s to live in and ensure that it doesn't endanger their health. This includes ensuring there are no Category 1 or 2 fire hazards in the property as determined by the HHSRS under the Housing Act 2004. The requirements of the Regulatory Reform (Fire Safety) Order 2005 do not apply to this type of property.

Blocks of flats - EDDC has a duty under the Regulatory Reform (Fire Safety) Order 2005 to ensure that a suitable and sufficient fire risk assessment has been undertaken to evaluate the risks to the occupants and all other relevant persons who would be regarded as lawfully on the premises.

The risk assessment is limited to the communal areas of the building up to and including the front door of the flat/maisonette. These common areas must have adequate protected escape routes (including fire related signage and lighting), adequate means for the testing and maintenance of all fire systems, and adequate fire safety training of staff, and information to tenants/leaseholders to comply with the Regulatory Reform (Fire Safety) Order 2005.

Additionally the individual flat/maisonette should comply with the duty mentioned above for an “individual dwelling” under the Housing Act 2004.

The tenant/resident – EDDC will endeavour through its resources and working with partner agencies e.g. Mental health services, DSFR fire safety team and other statutory and non-statutory agencies to identify and assist vulnerable tenants/leaseholders who may be a threat to both themselves and to others in the event of a fire, whilst being mindful of its statutory obligations the Equalities Act and the Regulatory Reform (Fire Safety) Order 2005 regarding the disabled, elderly and young persons.

Leaseholder – EDDC will keep leaseholders informed of their responsibilities/duties to ensure that as “responsible persons” they comply with the requirements of the Regulatory Reform (Fire Safety) Order 2005.

4) Responsibilities of the Organisation

The Strategic Lead – Housing, Health & Environment & The Service Lead – Housing are the Responsible Persons, as defined in the Regulatory Reform (Fire Safety) Order 2005 and has a duty to ensure that East Devon District Council has a clearly defined and effective management system incorporating, planning, organisation, control, monitoring and review of the preventative and protective measures.

To fulfil the obligations and duties under the Order the Responsible Person must, appoint one or more competent persons to assist in undertaking the preventive and protective measures.

The responsible person must ensure that the person/s appointed have adequate time and the means at their disposal for them to fulfil their duties under the Order.

A person is to be regarded as competent for the purposes of the Order where they have sufficient training and experience or knowledge and other qualities to enable them to undertake their duties.

EDDC have delegated/appointed the following roles as “nominated competent persons” for the purposes of the Regulatory Reform (Fire Safety) Order 2005 and this policy.

Property & Asset Manager - senior level management of fire safety within EDDC and reporting directly to the Housing Review Board. Responsibility for ensuring compliance with the legislation for the following areas:

- EDDC fire related policies and procedures.
- Staff training.
- Coordinating information awareness to tenants.
- Fire risk assessments are undertaken by competent persons, on all properties requiring one and a review process is in place.
- Statutory maintenance contracts on fire systems.
- External contractors and in-house works standards.
- To monitor that the statutory annual maintenance to all fixed and portable fire systems have been procured and completed at the appropriate times and records kept for those buildings which we have control.
- To ensure that where repairs are undertaken on any structure or fire system that the repair does not compromise the existing level of fire safety compliance.
- That we monitor that the statutory annual maintenance to all fixed and portable fire systems have been procured and completed at the appropriate times and records kept (as it applies to the housing stock and corporate buildings under their control).

Landlord Services Manager - has management responsibility for ensuring that:

- All estate and office staff have received the appropriate fire safety training on induction and periodically thereafter in line with the training statement below.
- Estate Management Officers and the Sheltered Mobile Support Officers, that a system is in place to receive and act upon all fire risk assessments and action plans relevant to their areas of control, that they are checked and actions to rectify deficiencies' are undertaken and recorded on the FRA action plans.
- Ensure that staff are undertaking monthly fire safety risk checks in communal areas and that these are recorded and action taken as required.

Housing Needs & Strategy Manager – has management responsibility for ensuring that:

- A process is in place to ensure that allocation officers are assessing the suitability of housing tenants above ground floor
- Allocations officers are able to provide re-housing advice to tenants who live in properties above ground floor who can no longer self-evacuate in the event of a fire and wish to move to ground floor accommodation

Senior Technical Officer (Asset Management & Compliance) - has overall management responsibility for ensuring fire risk assessments and reviews are conducted in accordance with the arrangements set out below. In particular:

- Ensuring that all staff have received the appropriate fire safety training on induction and periodically thereafter in line with the training statement below.

- To monitor that the statutory annual maintenance to all fixed and portable fire systems have been procured and completed at the appropriate times and records kept for those buildings which he has control.
- To ensure that where works are undertaken on any structure or fire system that the works do not compromise the existing level of fire safety compliance.
- To provide an annual statement of asset management compliance/risk to the Housing Review Board.

Senior Technical Officer (Day to Day Repairs & Voids)

The role of the post holder includes:

- Ensuring that all staff have received the appropriate fire safety training on induction and periodically thereafter in line with the training statement below.
- To ensure that all contractors follow the principles as detailed below (Contractors).
- Ensure that fire stopping is carried out as part of void works within flats in an approved complaint manner.

The Compliance Surveyor & Programme Works Officer

The role of the post holder includes:

- Ensuring planned maintenance and annual certifiable testing of all fixed fire systems in accordance with relevant British Standards (fire alarms, escape lighting, and firefighting equipment).
- Ensuring that all annual certificates are recorded on a central data base and that copies are also held on those sites where a fire log book is located.
- Ensuring that all domestic fire alarm systems are annually tested (and recorded) as part of the annual gas safety check, solid fuel service or through another contract of each dwelling.
- Co-ordination of the fire risk assessment and review process.
- To undertake the FRA reviews in accordance with the time schedule below.
- Undertake random quality control audits.
- To provide operational guidance and support to area based staff. To ensure that a system to monitor that the statutory annual maintenance to all fixed and portable fire systems have been procured and completed at the appropriate times and records kept.

Estate Management Officers and Mobile Support Officers

Responsibilities are:

- Ensuring good local community relations with the local Fire Service including invitations to local resident events and meetings.
- Ensure that bulky waste materials are collected, safely stored and disposed of.
- Ensure that any repairs identified via monthly fire safety risk checks in particular defects to any fire safety equipment, fire doors, emergency lighting, fire related signage etc. are communicated to the repairs section immediately.

- Organise recharges for the removal of possessions or damage against tenants breaching fire safety policy.
- Identify breaches of tenancy where tenants fail to comply with fire safety policy such as where fire doors are propped open or possessions stored in the means of escape.
- Identify vulnerable tenants during Tenancy Audits and site visits and offer fire safety visits from DSFR if required. Any tenants who reside in a block of flats and would be unable to evacuate without assistance in the event of a fire must be identified in the 'Fire Service Information' sheet which is to be kept in the applicable red fire boxes.

Housing Allocations Officers & Devon Home Choice Officer

- Ensure that when allocating properties above ground floor all members of the household are able to self-evacuate in the event of a fire
- Provide re-housing advice to tenants who live in properties above ground floor who can no longer self-evacuate and wish to move to ground floor accommodation

Every employee must, while at work in area offices or on site:

- Ensure they are familiar with the emergency plan for their workplace and co-operate by participating in fire evacuation/drill.
- Co-operate with, their managers and supervisors to ensure that a safe and healthy workplace is maintained.
- Report to their manager or supervisor any concerns about fire safety.
- Be familiar with all escape routes.
- Not wedge fire doors open, nor block or obstruct them.
- Be aware of the action to be taken on discovering a fire, hearing a fire alarm, for raising the alarm (including the location of fire alarm call points) and calling the fire and rescue service.
- Promptly evacuate the premises, in accordance with the emergency plan, to a place of safety without putting themselves and others at risk, and NOT attempt to extinguish a fire unless they have been specifically trained.

5) Staff training and information

EDDC is committed to ensuring that all work activities performed within the organisation are performed by persons competent to carry out the activities.

It is the responsibility of senior managers to ensure that all members of staff for whom they are responsible receive training as required for them to discharge their tasks and duties in a competent manner. Conversely it is also the duty of each staff member to ensure that they are 'in date' on any time related training course.

Training records - Managers must ensure that a written record is kept of local fire safety training. The record should include the type of training, local information and instruction provided, date and names of those attending. These records must be made available by the Service to the EDDC Property & Asset Manager and for inspection by the enforcing authority.

6) Fire Safety Information

Information to staff

This document is not intended to provide detailed technical guidance on fire safety issues.

Any questions or concerns in relation to fire safety should be directed to the Property & Asset Manager, The Landlord Services Manager or The Housing Needs & Strategy Manager.

The Compliance Surveyor and/or Programme Works Officer shall ensure that an up-to-date copy of all fire risk assessments is available in within the “Fire Safety Information “folder on the “S” drive. In addition the folder will contain information on the relevant fire legislation and all relevant guidance documents, the EDDC Fire management policy and all fire related policies.

Information to tenants

Information on the Fire Risk Assessments for all buildings where the Regulatory Reform (Fire Safety) Order 2005 is applicable will be made available to tenants upon request.

The Landlord Services Manager shall ensure that residents with specific needs are identified and given appropriate information about the action to be taken in event of fire. In cases where the Landlord Services Manager has a concern about the safety of a tenant either due to their age or infirmity then contact should be made with Devon and Somerset Fire and Rescue Service to initiate a home safety check, provided that the tenant is happy for them to attend.

Tenant fire safety awareness

This will generally take the form of:

- Fire Routine Notice (*to all buildings except single dwellings not forming part of any form of flat arrangement*)
- Leaflet information (*on new tenancy and occasional leaflet drops*)
- Fire home safety checks where requested, delivered by Devon & Somerset Fire & Rescue Service
- Newsletters and social media
- As required by EDDC staff undertaking maintenance /general visits to individual tenants
- Estate visits/fire safety risk checks.

7) Evacuation plans

EDDC have adopted site specific evacuation plans for all purpose built blocks of flats. Where there is appropriate fire compartmentation between dwellings and escape routes a ‘stay put’ approach may be appropriate.

For all other premises the evacuation plan has been designed to allow for “full” evacuation immediately on notification of a fire alert unless otherwise stated. All residents and staff must refer to the appropriate Fire Action Notice on site. EDDC regularly remind residents to ensure they refer to the appropriate Fire Action Notice so they are aware of what to do in the event of discovering a fire.

8) Fire Fighting Equipment (provision and use)

Use of fire extinguishers - As a general principle it is the expectation that all tenants or staff will upon finding a fire to raise the alarm and to assist in the evacuation of the building. In normal circumstances it is not expected for non-trained staff, tenants and members of the public to tackle a fire using a fire extinguisher.

The only people who should tackle a fire would be those “nominated” members of staff who have received additional practical training on the selection and use of fire extinguishers. It will be for their judgement to actually determine if the fire is safe to tackle or not.

Residential accommodation- It is not considered appropriate to provide fire extinguishers within the individual dwellings or the communal areas (corridors and staircases) of blocks of flats.

Peripatetic trades staff – (gas fitters, plumbers, electricians, joiners etc.) Due to the nature of the processes carried out and the potential that as a result of the works being undertaken that a fire could be started. Contractors are expected to provide suitably trained staff with appropriate equipment for a safe system of work.

9) Fire risk assessments and reviews

Fire risk assessment (FRA)

The Responsible Person is required to carry out a suitable and sufficient assessment of the risks to relevant persons from fire, and that the significant findings of this assessment are to be written down and where deficiencies are noted they are to be acted upon in a planned and organized manner.

There is a need for the significant findings of the assessment to be fully accessible by the Responsible Person and the relevant persons as applicable.

The Fire Risk Assessment will be re-done/reviewed in accordance with this policy and where there has been significant changes to the building in terms of either, its construction, processes used, or occupancy.

All FRA's and reviews will be commissioned by the Senior Technical Officer and when completed copies will be made available to the relevant area/office managers for distribution to the officers responsible for the respective units.

The RRO 2005 identifies EDDC as the responsible person and as such we have a duty to carry out a FRA in relevant premises and take reasonable steps to remove or reduce any risks that have been identified and act upon significant findings.

We will regularly review FRA's as follows:

- medium rise blocks – every year or after a fire or following any significant changes
- Sheltered schemes – every year or after a fire or following any significant changes
- Low and medium blocks and converted properties i.e. houses converted into flats every year, after a fire or following any significant changes.

Fire Risk Assessor

The Fire Risk Assessor's role will be carried out by a competent person who shall:

- Carry out FRA's
- Provide technical and expert advice
- Ensure compliance with the requirements of the Regulatory Reform (Fire Safety) Order 2005
- Are accredited to the BAFE SP205 scheme (Fire Risk Assessment Provider)

Review of fire risk assessment

Where no change has taken place, the original assessment should be reviewed in accordance with the policy to ensure that the building, management procedures and that testing /maintenance and training of staff remain adequate and compliant with all relevant fire safety legislation. This review is to be organised by the Compliance Surveyor or Programme Works Officer.

After a "Fire" reviews

A fire safety review/investigation of the building and in particular the dwelling will be conducted by senior managers with the support of the Compliance Surveyor in particular after a significant fire. This will include any fire which has resulted in a fatality, serious injury or where the fire has spread from the room of origin.

The purpose of the review should be to determine any corporate failings, things that could be done better and what works are required to ensure compliance for the rest of the building.

Fire Risk assessment records

Fire Risk Assessments will be available to tenants on request.

For internal use electronic copies will be retained within the Fire Safety Information folder on the S/drive and eventually on the OpenHousing/Civica system.

Our fire preventative measures are designed to protect people, property and assets against the loss of life, injury and damage caused by fire.

Wherever possible we will undertake measures to prevent the risk of fire, this will include:

- Ensuring that our common ways and storage areas are kept clear and by carrying out enforcement where breaches occur.
- That staff are trained in order to identify and report any potential risks.
- That we provide good information and advice to existing and new tenants and leaseholders about how to reduce the risk of fires with the help of D&SFRS.
- That we provide leaflets and posters to highlight the risks of fires and how to help prevent them.
- Ensuring we identify and work with our more vulnerable tenants who may be at greater risk should there be a fire.

Fire Protection

Evacuation routes and fire exits

To ensure safe evacuation, routes will have adequate signage and be kept free of sources of ignition, flammable and combustible material and obstructions at all times. We will enforce this with tenants and residents where necessary by implementing the fire safety and clearance of common ways/means of escape. In blocks of flats FRA's will be carried out to identify and deal with such issues alongside those identified during cleaning and estate inspections.

Fire exits will not be left open to ensure that security of the building is maintained. In blocks of flats and in sheltered schemes inspections will be carried out to identify and deal with such issues.

Fire Doors – common areas and tenant/leaseholder doors

Fire doors are provided to help prevent the spread of smoke and fire and must be kept closed or fitted with door holders which are designed to release when the fire alarm is activated. Fire doors in common areas are checked regularly during FRA's and by staff to ensure they are operating correctly and are not damaged.

Fire doors, including entrance doors to tenants'/leaseholders' flats, provide a minimum of 30 minutes fire resistance. Doors should not be propped open, tampered with or compromised in any way, i.e. materials affixed to frame/door to prevent banging noises and/or cat flaps.

Flat entrance fire doors are checked by staff during visits to ensure they are operating correctly, the self-closure is working and the door is not damaged.

Signage

Appropriate fire safety signage is displayed throughout communal areas indicating the fire exit/s. Fire action notices are also present in all communal areas. Fire doors are marked to keep shut and no smoking signs are affixed inside the block.

Smoke alarms

Hard wired smoke alarms are fitted when properties are empty or re-wired. All homes should have a smoke alarm fitted and Carbon Monoxide detectors in homes with gas or solid fuel appliances.

10) Maintenance

EDDC shall ensure that all fire related systems are regularly serviced in accordance with the relevant British Standards where appropriate:

- Fire detectors, fire alarms,
- Emergency lighting systems,
- Fire extinguishers
- Automatic smoke control systems.
- Dry rising fire mains and pumps.

- PAT testing
- Access/egress controls

- That all domestic fire alarms within EDDC property will be annually inspected and tested. (This to be done as part of the annual gas safety, electrical check & Home Safeguard alarm tests).
- All works carried out by contractors, are inspected at the start, periodically during the works and upon completion to ensure that the works do not compromise any of the fire measures incorporated within the building or the ability of the occupants to evacuate safely in the event of a fire.
- Make sure that all gas supplies are maintained in a good order and that a gas safety check is carried out every year by a competent person.
- Have a current electrical supply test certificate every 5 years.

Certificates are to be held on site (where appropriate) within the site fire box. Copies of these certificates will be held within EDDC compliance software to populate the Asset Register and advise the Compliance Surveyor of servicing requirements.

11) Testing of fire systems and the site log book

Checks of active (fire alarms, escape lighting, firefighting equipment) systems are to be conducted at agreed appropriate times during normal hours and comply with relevant British or European Standards.

A fire safety log book will be kept to record the details of all tests on passive and active preventative and protective measures, as well as inspections.

12) Contractors

EDDC accepts that under the aforementioned legislation, our contractors have a responsibility towards fire safety.

For all contracts of a substantial nature, the agreement or contract between the two parties will specify the legislation and fire safety standards to which the contractor will be expected to comply with.

Where the contractor employs five or more persons they should be asked for a copy of their own fire safety policy.

All contractors will also be asked to supply their fire risk assessment, and method statement/s with respect to planned operations involving significant risks.

Under CDM 'dangerous works' should be identified in the construction Health & Safety Plan. An assessment needs to be made in order to remove the risk.

EDDC will inform all contractors of any risks to their fire safety that may result from the activities of EDDC.

During works on site – The site is to be supervised by both the contractor and the nominated EDDC Surveyor to ensure that the fire safety standards expected under the contract fire risk assessment and the relevant guidance are being complied with.

Any questionable practices should in the first instance be brought to the person in charge on site. If the works being undertaken are judged to be "dangerous" then the works should be stopped immediately, until the dangerous practice has been eliminated. The Property & Asset Manager should be notified by e-mail of the incident and the remedial actions undertaken.

Leaving the site- (Both at the end of the day and end of contract)

The site should be left by the contractor ensuring that the fire protection to the building has not been reduced. For example any breaches in fire walls, etc., are to be made good before they leave site. Any signs removed have been replaced, all waste is to be removed, all slip and trip

hazards eliminated. Any secondary damage caused by the works undertaken should be identified and made good to the required standards.

13) Audit and review

The following Key Performance Indicators will be used to monitor the effectiveness of the Fire Safety policy:

- Number of fires recorded annually / number of fire related incidents.
- Cost of major fires (rebuild/repairs) to EDDC.
- Number and nature of enforcement, alterations or prohibition notices from statutory authorities.
- Number of FRA, s undertaken and FRA Reviews undertaken within date.
- Percentage of staff up to date for with their relevant fire safety training.

All persons are to ensure that proper records are maintained and available on demand for inspection.

14) Enforcing authorities inspections, audits general familiarisation

Where arrangements have been made for audits to specific buildings by either of the enforcing authorities with a responsibility for fire i.e. the Fire Service or our Auditors, the Property & Asset Manager should be immediately e-mailed with details of the planned audit.

Copies of all correspondence between either of the enforcing authorities received by EDDC should be copied immediately to the Property & Asset Manager.

15) Equality and diversity

EDDC will apply this policy consistently and fairly, and will not discriminate against anyone on grounds of their racial or ethnic origin, disability, gender, religious belief, sexual identity, or any other relevant characteristic.

EDDC will make this policy available in other languages and formats on request.

We will carry out an equality impact assessment on this policy, in line with our corporate procedure.

16) Monitoring and review

We will monitor this policy to ensure it meets good practice and current legislation and will review it in accordance with our review timetable for all policies. The policy should be revised by August 2022