



# Fire Safety Strategy (2024)

## 1. Introduction

- 1.1 The aim of this document is to set out how we (VIVID) will operationally manage and maintain fire safety within all our properties. It will outline what key measures we will take, and those already implemented, to manage all aspects of fire safety to ensure the safety and wellbeing of our residents. This document will also provide assurance regarding how we manage fire safety inline with our fire policy commitments. These two key documents are intrinsically linked and provide the key elements of information to show how we will manage fire safety and the associated risks to our residents, our properties, and the business in general.
- 1.2 Over the past two years we have seen the introduction of various new regulatory requirements that have been implemented to ensure that all organisations within the housing sector can evidence what measures they have in place to ensure the safety of all their residents. The onus is on us (VIVID) to ensure that we have in place robust fire safety management measures and that we can provide the necessary detail to satisfy all aspects of the “Golden Thread” principle. The Golden Thread was enshrined within the Building Safety Act 2022 and is intended to ensure that essential information throughout construction and maintenance is available and managed effectively throughout a building’s life cycle. This strategy will show what we have already done and what we shall be doing going forward to maintain the highest levels of fire safety management across all our homes.

## 2. High Rise Blocks (HRB’s)

- 2.1 An HRB is a building that contains at least two residential units, is either at least 18m tall or seven storeys high or is used for care or hospital services. As of April 2024, VIVID has fourteen HRB’s. The introduction of the Fire Safety Act and the Building Safety Act set out clear guidelines and implemented regulatory requirements to ensure that organisations such as VIVID had to take on new levels of responsibility for such buildings. The introduction of the Building Safety Regulator (BSR) to oversee and police all aspects of building safety is further evidence to show the new level of scrutiny the housing sector is now under. The registration of HRB’s, the requirement to provide Key Building Information (KBI) and the need to provide highly detailed Building Safety Cases (BSC) are all key elements of the Golden Thread. This information / evidence will be continuously reviewed by the BSR and local Fire and Rescue Services, we will be expected to update and re-submit any changes or issues as part of a continuous improvement plan.
- 2.2 We are required to conduct a Fire Risk Assessment FRA to all our 18m + blocks on an annual basis. Changes to the regulatory requirements mean that as of 2023 the FRA on all blocks (all our buildings with two or more domestic premises) should also reference / report on the external fabric of the building and note any balconies or additional external elements that may have an impact on the fire safety management of the building.
- 2.3 HRB’s with an External Wall System (EWS) will come under further scrutiny and evidence regarding the testing and reviewing of such systems must be provided with a remediation plan should any of the elements of the “cladding” be outlawed within the governments guidelines.

- 2.4 In 2023 we saw the introduction of “Fire Door Inspections”, these need to be conducted quarterly regarding communal doors, and annually in respect of Flat Entrance Doors (FED’s). This applies to HRB’s and extends to 11m + buildings. As of April 2024, VIVID has twenty-six 11m+ buildings.
- 2.5 It is a requirement for us to be able to provide evidence that we are maintaining our buildings and all aspects of fire safety within those buildings to the required standards. We must ensure that maintenance and servicing is being conducted to the correct industry standards and within the appropriate timescales as set out by the compliance regime.
- 2.6 We are also required to have in place a resident “Communication Strategy,” this is to ensure that all the residents living within a block are fully aware of the fire safety measures applicable to that block and their individual flats. This includes making them aware of their responsibilities in respect of how their actions can have an impact on their fellow resident’s safety.
- 2.7 An additional requirement is for us to evidence how we intend to maintain and manage all key areas of fire safety going forward, this needs to show how we intend to improve and introduce any key amendments or additions to the regulatory requirements when introduced in future years. Some of these may require the replacement of key elements of the Fire Safety Strategy, which is a requirement for all our buildings with two or more domestic premises and covers emergency protocols and procedures) for an individual block or the implementation of any remedial action to mitigate and manage any potential risk to the residents or the building.

### **3. VIVID’s HRB Strategy**

- 3.1 As mentioned above there are key requirements that we need to implement to ensure we are managing fire safety within our HRB’s. Below outlines what measures we have taken and those we are going to introduce to ensure we meet our statutory obligations.

### **4. Building Safety Registration**

- 4.1 As of April 2023, all our HRB’s have been registered, all the required information has been provided and we have notification that those details are registered.

### **5. Key Building Information (KBI)**

- 5.1 As of September 2023, all our HRB’s have had the required KBI’s submitted, and we have received notification that the information has been registered.

### **6. Building Safety Cases (BSC)**

- 6.1 We need to provide a BSC for each individual building over 18m in height, these are highly detailed documents containing various key details in respect of the construction and fire safety management elements for the building. The BSC portal opened in April 2024, we will have the building safety cases in respect of our buildings registered once we have been requested to submit. As these are a live document they will be constantly monitored and update as required.

### **7. NROSH – Fire Safety Remediation Survey**

- 7.1 We are required to provide building details requested in the survey on a quarterly basis, this is information relating to the general status of our 18m and 11m + buildings. We are currently fully up to date with our submissions with the latest one being completed April 2024.

## **8. Fire Risk Assessments (FRA)**

- 8.1 Our 2024 FRA programme started in January 2024 and is currently fully up to date and compliant in respect of buildings requiring an FRA. We have introduced an additional element to the FRA in respect of roof voids / lofts, additional scrutiny is required when reviewing these areas of the building.

## **9. External Wall Systems (EWS)**

- 9.1 Over the past few years VIVID has been pro-active to ensure that all our HRB's have had the appropriate surveys conducted in respect of EWS / cladding. All our 18m + buildings have also had a PAS9980 survey (which is designed to offer a risk-based approach to evaluating the fire risk of a building without performing intrusive fire testing) conducted to validate the external fabric of the building is compliant to the current requirements. In 2023 we completed the remediation of three of our blocks, that now leaves us with two blocks to remediate, Portsmouth Road and Pemberly Place. One of those blocks, Portsmouth Road, is currently undergoing replacement works and the final block Pemberley Place, is going through the government grant scheme (cladding safety scheme) application process with works anticipated to start early 2025. A waking watch is in place in both blocks to mitigate and manage any potential risk(s) in the event of a fire.
- 9.2 We are also currently investigating some potential issues regarding The Foyer in Portsmouth; we have some concerns regarding the original construction and are in the process of carrying out some intrusive investigation works.

## **10. Fire Door Inspections**

- 10.1 As of the end of March 2024 we completed our first full year of fire door inspections. All four quarterly communal door inspections were conducted, and we also completed our annual FED inspections. As previously mentioned, this covers our HRB's and includes our 11m + blocks, as per the regulatory requirement.

## **11. Building Maintenance and Compliance**

- 11.1 VIVID has in place a robust building maintenance and compliance regime which covers all key elements of fire safety within our buildings. Listed below are the service areas covered within the compliance programme. This programme applies to all our blocks of multiple occupancy, approximately one thousand six hundred blocks, including our HRBs, 11m+, and blocks from 5 storeys down to 2 storey.
- Fire Alarms (sometimes referred to as AFD – automatic fire detection)
  - Emergency Lighting (E/L)
  - Automatic Opening Vents (AOV)
  - Electrical testing (5-yearly EICR's)
  - Dry Risers
  - Lifts
  - Door Entry Systems
  - Fire Fighting Equipment (FFE)
  - FRA's
  - Fire Door Inspections

- 11.2 These are all reported on at both Executive and Board level.

## **12. Fire Safety Communication Strategy**

- 12.1 Our communication strategy has been in place for over a year and consists of a quarterly newsletter, as agreed with the residents, which is specific to each individual block. This contains information regarding the fire safety strategy for the block and focuses on resident awareness and other topical issues / items.
- 12.2 We are in the process of going back to the residents for their feedback regarding any potential changes or additions they may want to see in the future.

## **13. 11m + Blocks**

- 13.1 As stated above as of April 2024 VIVID has twenty-six 11m+ buildings. There have been various discussions and arguments within the national fire safety bodies regarding 11m + blocks being brought under the same requirements as 18m + buildings. The current feeling within the sector is that this is now a question of “when” not “if.” On that basis VIVID decided to treat our 11m + buildings in the same way as we do our 18m +.
- 13.2 The strategy in respect of fire safety management is the same, all aspect of fire safety are reviewed under the same risk-based approach as that of the 18m +. We are conducting PAS9980 surveys on all these blocks to validate the external fabric and all information is collated based on the Golden Thread principles.
- 13.3 Fire Door Inspections are conducted on all our 11m + buildings as part of the recently updated regulatory requirements and are subject to the same frequency as that of 18m +.
- 13.4 All our 11m + blocks are subject to the same robust maintenance and compliance regime as previously mentioned, and all the key service areas are all part of that same compliance programme.

## **14. Fire Safety Investment Programme**

- 14.1 The FS investment programme is based on a 10-year plan to replace, renew, and upgrade, all the six key elements (see below list) that form the backbone of our building fire safety management. These works will apply to all properties that require an FRA and all elements of work will be subject to handover by certification and / or sign off by a competent qualified tradesman. The six key elements are:
- FED's
  - Communal Fire Doors
  - Fire Stopping and Compartmentation
  - Fire Alarms
  - Emergency Lighting
  - Fire Safety Signage
- 14.2 These key elements all play a part in the management of fire safety in each of our buildings, some play a specific role, and others are part of a wider plan. The ability to contain a fire (i.e. the principles of compartmentation).to a specific area or limit the spread plays a major part in the management of resident safety. If we can minimise the impact of a fire, it means that residents can escape if required and the fire service have a much better chance of fighting the fire and limiting any potential damage to the building. The investment programme will mean that all elements of work conducted will be certified and compliant, this will provide assurance to both the residents, the business, and the other key stakeholders.

- 14.3 Within the investment strategy there are also provisions made to upgrade the larger elements of fire safety equipment, such as AOV's, dry risers, etc.
- 14.4 Our initial focus (years 1-3) will be on remediating and upgrading all our HRB's, 11m + blocks and care and extra care sites. We will then work our way through our 5,4,3, and 2 storey blocks (years 4 -10).
- 14.5 To enable us to deliver our Investment Strategy we are setting up our own Framework Contract via a large-scale procurement exercise. This will allow us to procure Fire Safety accredited contractors with a variety of the key skillsets we require to deliver a focused programme of works over a potential 10-year period. The aim of this procurement exercise is to ensure consistency in the quality of work being carried out with the long-term ability to provide value for money.
- 14.6 The FS investment programme has been reviewed by HIWFRS and their feedback has been positive, and they support the reasoning and logic regarding the use of the six key elements.
- 14.7 Being a large significant landlord, the fire safety management of our buildings is of significant interest to the local Fire and Rescue Services (FRS) throughout our geography. To enable us to manage these important local stakeholders we have entered a Primary Authority Scheme (PAS) with Hampshire and Isle of Wight Fire & Rescue Service. The Primary Authority Scheme allows us to have a statutory partnership with all the local FRS. Through the scheme, we receive assured advice from a primary authority, ensuring consistency of regulation across all the local FRS and we can rely on our PAS relationship contact to act on our behalf with other local FRS. This reduces duplication of paperwork and inspections, streamlining compliance with fire safety regulations.
- 14.8 We make sure that we keep our PAS informed on our annual and longer-term Fire Safety Investment Programme as we get the internal approvals to budgets and business plans. It is vital that we have PAS agreement to our investment programme to maintain alignment with what will be compliant with their audit approach as well as their longer-term priorities for community fire safety prevention and protection.

## **15. Fire Safety Awareness and Training**

- 15.1 We regularly work on Fire Safety communications for our stakeholders, customers and colleagues. For the 2024 year, we are in the process of putting together a Fire Safety Awareness document for both our colleagues and our residents. It is essential that we play a proactive role in ensuring that all our colleagues are provided with the correct levels of training and knowledge applicable to their roles and they are both confident and capable of raising any concerns or escalating any potential issues that they come across when performing their daily duties. The level of training will dependant on the roles and responsibilities associated with the level of operational exposure when performing their daily duties.
- 15.2 Resident Fire Safety Awareness is a key part of the new legislation, but it is also an essential part of our strategy to ensure that all our residents are aware of the potential impact they can have if they do not follow the basic principles of fire safety and fire safety management. By ensuring that our residents have the right information and knowledge we can dramatically reduce the level of risk of a fire starting within their block / flat. We have first hand knowledge of what can happen when residents are poorly informed of what they are required to do in respect of informing VIVID when they wish to conduct works to their properties. We also need to make sure that they are aware of what can happen if they do not follow the simple steps when dealing with the day-to-day occurrences within their homes.

## **16. General Fire Safety Management**

## **16.1 Person Centred Fire Risk Assessment (PCFRA) / Personal Emergency Evacuation Plan (PEEP)**

- 16.2 These are conducted as a matter of course in all our HRB's, these consist of 18m + blocks and all care and extra care buildings. These are reviewed and updated as and when required but undergo an annual review no matter what the circumstances.
- 16.3 They are also conducted on request or when residents are referred on sign up to a home with us, there is also some information in our on-line FS section. This informs the resident that if they have mobility or medical issues, they should contact us, and we will visit them at home.

## **16.4 Audit Process**

- 16.5 The Fire Safety Team have three levels of audit control conducted on an annual basis.

## **17. Internal**

- 17.1 This consists of nine separate audits covering different types of fire safety equipment and servicing regimes. There are also two audits in respect of FRA's, these will include FRA content and quality and the management of FRA Actions.

## **18. External**

- 18.1 We have an annual audit conducted by KPMG, this will vary in content and can cover a variety of items / issues relating to the management of fire safety.

## **19. Third Party**

- 19.1 Third party audits are focused specifically on the FRA's conducted by DDS over the course of the year. These audits were introduced in early 2024 as part of a Board assurance exercise to ensure that the content of the FRA's is consistent in the level of detail and approach, these are currently planned to take place twice a year.

## **20. FRA Actions**

- 20.1 In 2024, following internal reallocation of competent trades resources from building maintenance, we will be using Fire Safety Team internal resource to manage and deliver our FRA Actions. We shall be adding additional resources to the team to enable us to conduct a greater number of remedial works / actions in-house. This will give us the ability to provide greater focus in respect of our current overdue actions and will improve our performance across all aspects of our FRA Actions management. A new quarterly progress report will be available from July 2024, this will reflect a new targeted strategy aimed at the completion of targeted work packages.