London Borough of Brent

Fire Safety Policy 2026-2027

This policy sets out Brent Council's approach to managing fire safety across its housing stock, ensuring compliance with relevant legislation and maintaining effective fire safety arrangements throughout the lifecycle of its buildings. It defines the responsibilities and oversight needed to manage fire risks and protect residents and others.		
Owner:	**Spencer Randolph, Director of Housing Services**	
Approved by:	**DMT/Board/Cabinet**	**dd/mm/yyyy**
Review cycle: (years)	**1**	
Next review date:	**dd/mm/yyyy**	

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Regulator:	• Health and Safety Executive (HSE) • London Fire Brigade (LFB) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	• Regulatory Reform (Fire Safety) Order 2005 • Fire Safety Act 2021 • Fire Safety (England) Regulations 2022 • Building Safety Act 2022 • Housing Act 2004, including the Housing Health and Safety Rating System (HHSRS) • Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 • Health and Safety at Work etc. Act 1974 • Building Regulations 2010
Codes of Practice:	• BS 9997:2019 – Fire Safety Management Systems • PAS 79 – Fire Risk Assessment • PAS 9980:2022 – Fire Risk Appraisal of External Wall Construction and Cladding • Approved Document B – Fire Safety • Fire Safety Risk Assessment guidance issued by the Home Office • Regulatory Reform (Fire Safety) Order 2005 – HM Government Fire Safety Risk Assessment guidance series
The policy also operates in the context of:	• Fire Safety Management Plan • Resident Engagement Strategy • Gas Safety Policy • Electrical Safety Policy • M&E Services Policy • Asbestos Policy • Water Safety Policy • Health & Safety Policy • Repairs and Maintenance Policy • Complaints Policy

Contents

1. Purpose 4
2. Scope 4
3. Policy Statement 4
3.1 Equality, Diversity and Inclusion 5
4. Strategic Principles 6
4.1 Lifecycle Fire Safety and the Golden Thread 6
4.2 Risk-Based and Proportionate Management 6
4.3 Governance and Accountability 6
4.4 Competence and Continuous Development 6
4.5 Resident Engagement and Inclusion 6
4.6 Monitoring, Audit and Continuous Improvement 7
4.7 Open Safety Culture 7
5. Governance and Accountability 7
5.1 Duty Holder 7
5.2 Fire Safety Management and Assurance 7
5.3 Employees 8
5.4 Residents and Leaseholders 9
5.5 Contractors 9
6. Monitoring and Assurance 9
7. Communication 9

DRAFT

1. Purpose

The purpose of this policy is to set out Brent Council's commitment to managing Fire Safety across its housing portfolio and to demonstrate compliance with all relevant fire safety legislation. Our objective is to protect life, property, and the wider community through a robust safety culture embedded at every level of the organisation.

This policy ensures that Brent Council, as a landlord, freeholder, and employer, meets its legal duties as the Responsible Person under the Regulatory Reform (Fire Safety) Order 2005, and as an Accountable Person under the Building Safety Act 2022.

2. Scope

This policy applies to:

- All residential properties owned or managed by Brent Council and have a common area. Including general needs, supported and sheltered housing, temporary accommodation, and houses in multiple occupation (HMOs).
- Communal areas within mixed-tenure and leasehold buildings where Brent retains responsibility for safety.
- All Brent Council staff, contractors, and partners involved in housing management, maintenance, or compliance services that could affect Building Safety.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

This Policy applies to all fire life-safety systems within Brent Council's residential housing stock, including fire detection and alarm systems, emergency lighting, firefighting equipment, smoke control systems, evacuation strategies, and resident fire safety measures. It does not govern electrical installation safety, mechanical plant safety, or general building services, which are addressed under separate specialist policies.

3. Policy Statement

Brent Council recognises its duties as the "Responsible Person" under the Regulatory Reform (Fire Safety) Order 2005 and as an "Accountable Person" under the Building Safety Act 2022. We are committed to protecting life, property, and the wider community through a robust and transparent fire safety culture embedded at every level of the organisation.

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Our policy is to:

- **Comply Fully** with all relevant fire safety legislation, regulations, and codes of practice, and to proactively adapt to emerging requirements or guidance.
- **Prevent Fires** by ensuring robust risk management, design-stage fire safety integration, and effective maintenance of fire protection measures.
- **Embed Fire Safety** through the entire lifecycle of every building, from design and construction through occupation, maintenance, refurbishment, and disposal. Supported by a "golden thread" of accurate, up-to-date information.
- **Ensure Competence and Accountability** by training all staff, contractors, and agents involved in fire safety to appropriate levels and holding them accountable for compliance with their duties.
- **Engage openly with Residents and Leaseholders** by ensuring that everyone understands their role in maintaining fire safety and that vulnerable occupants receive additional support where needed.
- **Promote Continuous Improvement** by learning from incidents, audits, near misses, and resident feedback to enhance fire safety standards. Learning from within the sector, such as the Grenfell Inquiry recommendations.
- **Collaborate with interested Responsible Persons** by identifying and coordinating with any other Responsible Persons operating within the same premises (e.g. commercial tenants, managing agents) and will cooperate to ensure fire safety arrangements and information sharing are effective across shared buildings.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf

Brent Council will ensure that Asbestos Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality.

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4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle Fire Safety and the Golden Thread

- Fire safety will be embedded throughout each building's lifecycle: design, construction, handover, occupation, refurbishment, and end-of-life.
- A robust information management system will maintain the "golden thread" of fire safety data to support informed decision-making and compliance assurance.

4.2 Risk-Based and Proportionate Management

- A proportionate, risk-based approach will be applied to fire safety management. Controls and resources will be targeted according to the nature, height, use, and occupancy of each building.

4.3 Governance and Accountability

- Fire safety performance will be assured through defined lines of responsibility, clear reporting routes, and active oversight by the Brent Housing Compliance Board, Cabinet, and Audit & Assurance Committee.
- A nominated Duty Holder, Strategic Responsible Person, and Building-Level Responsible Persons will provide leadership and accountability at every level.

4.4 Competence and Continuous Development

- All staff and contractors involved in Fire Safety will be suitably trained and qualified. Competence will be maintained through ongoing professional development and independent verification where appropriate.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will be kept informed about fire safety arrangements in their homes and buildings.
- Brent Council will encourage active participation through consultations, Building Safety Meetings, and resident feedback mechanisms.
- Particular consideration will be given to vulnerable residents through Person-Centred Fire Risk Assessments (PCFRAs) and Personal Emergency Evacuation Plans (PEEPs).

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4.6 Monitoring, Audit and Continuous Improvement

- Fire Safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Fire Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our Building Safety management systems and procedures.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report fire safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for fire safety across all housing assets. The structure ensures effective oversight, competent delivery, and continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for fire safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage fire safety risks across all Brent Council housing stock.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 Fire Safety Management and Assurance

Strategic Responsible	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk

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Person	Responsibilities	Holds overall strategic accountability for compliance with fire safety legislation and standards. Approves the Fire Safety Policy and Management Plan, secures resources, and ensures that fire safety is integrated within the wider Building Safety and Asset Management Strategy. Champions a positive safety culture and ensures that performance and risks are reported to the Chief Executive and corporate governance boards.
Deputy Strategic Responsible Person	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk
	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the fire safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that fire safety is given appropriate priority within service planning.
Local Responsible Person	Position	Strategic Compliance Manager
	Responsibilities	Provides assurance that operational arrangements for fire safety are effective and compliant. Oversees the implementation of the Fire Safety Management Plan, monitors contractor performance, and ensures that records, risk assessments, and statutory inspections are accurate and up to date. Acts as the principal contact for regulators, the London Fire Brigade, and other enforcing authorities.
Compliance Lead (Contract Manager)	Position	Contract and Compliance Manager Fire and Asbestos
	Responsibilities	Acts as the Council's professional lead for fire safety compliance. Manages the delivery of inspection, testing, and remedial programmes, verifies contractor competence, and monitors KPIs and SLAs. Provides expert advice to the Local Responsible Person on technical standards, legislation, and best practice.

5.3 Employees

All employees must cooperate with the Council's fire safety arrangements, follow

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safe systems of work, complete relevant training, and report hazards or concerns promptly.

5.4 Residents and Leaseholders

Residents and leaseholders must comply with fire safety instructions, allow reasonable access for inspections, and maintain communal areas free from obstructions. They are encouraged to report concerns immediately.

5.5 Contractors

All contractors must demonstrate competence and comply with Brent Council's fire safety procedures and legal requirements. Failure to do so may result in suspension or removal from approved supplier lists.

6. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Fire Safety Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

7. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels. In accordance with

Fire Safety (England) Regulations 2022, Brent Council will publish FRA summaries for high-rise buildings.

Residents may raise complaints regarding fire safety concerns through the Brent Council Complaints Policy.

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