FIRE SAFETY MANAGEMENT POLICY

Introduction

1. Richmond American University in London, hereafter referred to as The University, recognizes that fire is a major risk to the lives of its staff, students and members of the public who visit the University. The loss of buildings and infrastructure due to fire also poses significant risks to the continuing of teaching functions undertaken within the University. The University will, therefore, ensure that fire safety is a priority in all areas under its control.

2. The University is committed to complying with all duties imposed by the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety Act 2021, the Building Safety Act 2022**,** and other relevant fire safety legislation. We will maintain high standards of fire safety to protect our staff, students, visitors, and others who are lawfully present in our buildings or affected by our activities. The University will implement preventive and protective measures, prioritizing the elimination and reduction of fire risks where reasonably practicable. Residual risks will be actively managed through continuous monitoring, control measures, and regular fire safety assessments.

3. It is the University's fire safety management policy, as far as it is reasonably practicable to:

   3.1 Provide, and maintain, places of work, teaching, and recreation that are constructed, or refurbished, to ensure adequate structural protection and adequate means of escape for any building occupants in the event of a fire.

   3.2 Provide, and maintain, suitable and sufficient monitoring and alarm systems in the above places that ensure that building occupants receive adequate early warning of any fire related event.

   3.3 Provide, and maintain, suitable and sufficient information and communication systems that ensure timely and efficient response by the University's Security Services and that provide adequate details to the emergency fire services.

   3.4 Provide suitable and sufficient information and instruction on fire safety to University staff, students, contractors, and visitors.

   3.5 Provide management arrangements for identifying and controlling fire risks including risks to life safety, business continuity, and the environment.

   3.6 Provide all interested parties with appropriate and relevant fire safety advice by means of a directly appointed and properly qualified fire safety professional or by securing the services of external fire safety consultants.

Leadership and Commitment

4. The President and Vice-Chancellor holds ultimate legal responsibility as the Responsible Person under the Regulatory Reform (Fire Safety) Order 2005.

5. Operational responsibility for implementing the University's fire safety management arrangements is delegated to the Head of Facilities. This includes oversight of fire risk assessments, maintenance of fire safety systems, staff training, and coordination of emergency procedures.

6. All staff, students, contractors and visitors have a duty to comply with fire safety arrangements and to cooperate with evacuation procedures where required.

7. The University recognises the evolving regulatory framework surrounding building safety following the Building Safety Act 2022.

8. The Deputy Vice-Chancellor Finance & Operations acts as the institutional sponsor for building safety assurance. Operational responsibility for the implementation and day-to-day management of fire safety arrangements is delegated to the Head of Facilities.

9. The Head of Facilities is responsible for ensuring that appropriate fire safety systems, fire risk assessments, maintenance regimes, training arrangements, and compliance records are in place and maintained.

10. Where buildings are multi-occupied or managed by a third-party landlord or managing agent, the University will cooperate and coordinate with the relevant Responsible Person(s) to ensure effective management of fire safety risks.

Fire Safety Management

11. This Fire Safety Management Policy sets out the mechanisms, roles, and responsibilities by which fire safety risks are managed.

    11.1 Prevent the outbreak of fire at any University-controlled building, including addressing risks associated with external wall structures and fire doors, in accordance with the Fire Safety Act 2021.

    11.2 Ensure (as far as reasonably practicable) that relevant people do not suffer death or serious injury following an outbreak of fire at a University building, including those with disabilities or additional needs, through adherence to both the Regulatory Reform (Fire Safety) Order 2005 and Equality Act 2010.

    11.3 Limit the damage to building fabric and contents following an outbreak of fire at a university building through the adoption of measures consistent with BS 9999:2017 and PAS 79-2:2020.

    11.4 Limit the impact of a fire in a building causing disruption to the operations and business of the University by ensuring appropriate fire detection and alarm

systems are in place, regularly tested, and maintained to reduce false alarms and enhance the response to genuine threats.

11.5 Optimize people's response to alarms by minimizing exposure to false alarms while giving sufficient familiarity with alarms and evacuation procedures to respond appropriately when required, in line with fire safety awareness training.

11.6 Ensure (as far as reasonably practicable) that individuals with specific evacuation needs are identified and assisted appropriately through the creation of Personal Emergency Evacuation Plans (PEEP), as required under both the Regulatory Reform (Fire Safety) Order 2005 and the Equality Act 2010. Responsibility for initiating, maintaining and reviewing PEEPs lies with Estates & Facilities. Refuge spaces within buildings provide a temporary place of relative safety while evacuation assistance is arranged. The Fire and Rescue Service should not be relied upon to evacuate individuals from refuge spaces. Responsibility for evacuation assistance rests with the University through trained staff and established evacuation procedures.

11.7 Comply with all relevant fire safety legislation, including the Regulatory Reform (Fire Safety) Order 2005, Fire Safety Act 2021, Building Safety Act 2022, and Management of Health and Safety at Work Regulations 1999.

11.8 Implement regular fire risk assessments in line with PAS 79-1:2020 for all non-residential spaces including academic and administrative areas to ensure all University buildings are managed to an appropriate level of fire safety, including reviewing external wall materials and fire door compliance where applicable.

11.9 Achieve continual improvement in the way fire safety is managed by reviewing and updating fire safety policies, procedures, and technologies as new best practices and legislative changes are introduced.

Fire Risk Management Strategy

12. The University may occupy premises within buildings managed by third-party landlords or managing agents, including the Leeds campus. In such circumstances, fire safety responsibilities are shared between the University and the building's Responsible Person or managing agent.

13. Typically, the landlord is responsible for:

13.1 Structural fire protection and compartmentation

13.2 Fire detection and alarm systems serving common areas

13.3 Maintenance of escape routes and stair cores

13.4 Building-wide fire safety systems and infrastructure

14. The University remains responsible for:

    14.1 Fire safety management within its demised premises

    14.2 Staff and student evacuation procedures

    14.3 Fire safety training and fire wardens

    14.4 Local fire risk assessments for University-occupied areas

15. The University will cooperate and coordinate with the landlord or managing agent to ensure fire safety arrangements across the building remain effective and compliant with fire safety legislation

16. The University's Estates and Facilities Committee will take a strategic overview of fire safety performance. It will ensure that relevant competence requirements are established.

17. and monitor that they are being met.

18. The Head of Facilities will ensure that the Terms of Reference of their Committee is appropriate to address fire safety improvement.

19. The Estates & Facilities Committee will monitor:

    19.1 That fire risk assessments are conducted and regularly reviewed for all buildings as required by the Regulatory Reform (Fire Safety) Order 2005 and ensure compliance with additional requirements introduced by the Fire Safety Act 2021, including the assessment of external wall systems and fire doors where applicable.

    19.2 That staff are trained for action in event of fire, with appropriate numbers of persons trained in fire prevention, fire protection and evacuation procedures and able to use fire extinguisher equipment.

    19.3 These systems effectively control work, in particular "hot works" and modifications, including temporary modifications to building structures and fire alarm systems.

    19.4 That arrangements have been established to provide regular maintenance, testing, and inspection of fire safety systems, including fire alarms, emergency lighting, fire doors, and evacuation systems, in accordance with BS 9999:2017 and relevant sections of the Fire Safety Act 2021. These arrangements will be managed in coordination with Estates and Facilities or Landlord where applicable and reviewed periodically to ensure continued compliance.

    19.5 That robust communications are in place including for alerting building occupants in the event of fire.

    19.6 The procedures for responding to fire emergencies are maintained and exercised.

19.7 That housekeeping standards and behaviours support fire prevention.

Risk Assessment

20. Fire risk assessments will be undertaken by a **competent fire risk assessor**, suitably qualified and experienced in accordance with recognised industry standards.

21. Where the University occupies premises within a multi-occupied building, the University will undertake a fire risk assessment covering its demised areas and cooperate with the landlord or managing agent responsible for the building-wide fire risk assessment. In addition, risk assessments must be conducted for all work activities, and these assessments must consider the risks of fire and explosion relevant to that specific work, in accordance with the Management of Health and Safety at Work Regulations 1999 and other applicable safety standards.

22. Building fire risk assessments will be conducted in accordance with PAS 79, ensuring compliance with current fire safety legislation. These assessments will:

    22.1 Identify potential fire hazards in the workplace, and who might be harmed.

    22.2 Evaluate the risks arising from the hazards and decide whether existing control measures are adequate or whether more should be done.

    22.3 Be recorded.

    22.4 Identify an action plan for the implementation of further control measures, with

    22.5 responsibilities clearly allocated.

    22.6 Be subject to regular review.

23. The Fire Risk Assessment should include the following elements:

    23.1 Section 1 Identification of hazards

    23.2 Section 2 People at risk

    23.3 Section 3 Hazard control measures

    23.4 Section 4 Escape route provision

    23.5 Section 5 Detection and alarm systems

    23.6 Section 6 Arson risk control

    23.7 Section 7 Fire safety management

    23.8 Summary of fire risks and of existing control measures

    23.9 (Approximate) Number of staff

    23.10 (Approximate) Number of students

    23.11 Gross floor area

23.12 Building Use e.g., academic, residential

23.13 Date of assessment

23.14 Identification of assessor

23.15 Priority issues within the building

23.16 Actions and recommendations

23.17 Building fire risk assessment score

24. The system is used to:

24.1 Confirm risk ratings (fire risk assessment score).

24.2 Identify improvement actions.

24.3 Track improvement actions and provide records for the purpose of monitoring, audit, and review.

24.4 Prioritise improvements and building upgrades, based on the overall risk rating.

4-point risk matrix				Likelihood			
				1	2	3	4
				Rare	Unlikely	Possible	Likely
				Has happened very rarely or never before	Where harm is unlikely to occur	Possible for harm to occur in the next year	Where it is certain or almost certain that harm will occur in the next year
Severity	1	Minor	Minor incident including injury to one or more individuals such as cuts, scrapes, minor bruising and skin irritation	1	2	3	4
	2	Serious	Significant Injury or illness causing short term disability to one or more person. For example, and Over 7 Day injury / incapacitation.	2	4	6	8
	4	Major	Major injury or illness/disease-causing long-term disability to one or more person including broken bones, occupational disease and ill-health	4	8	12	16
	8	Extreme	Fatality or life-threatening illness / disease to one or more persons	8	16	24	32

Risk Key	
	Low: No additional control measures are usually required. Consideration may be given to more cost-effective solutions or improvement that imposes no additional cost burden. However, control measures must be monitored to ensure effectiveness taking corrective action where necessary
	Medium: Further control measures are required to reduce the risk. Where significant resources are required, short term interim measures may have to be taken until long term measures are implemented. Where the severity is 'high' or there is a high likelihood of harm, urgent action should be taken
	High: Work should not be started or continued until the risk has been reduced

Review of Fire Risk Assessments

25. Fire risk assessments must be reviewed when there is reason to suspect that it is no longer valid, or there has been a significant change in the premises that has affected the fire safety precautions. Reasons for review could include:

25.1 Changes to work activities or the introduction of new equipment.

25.2 Alterations to the building, including internal layout.

25.3 Substantial changes to fixtures or fittings.

25.4 The introduction, change of use, increase in storage, or removal of hazardous

25.5 substances.

25.6 The failure of fire precautions e.g., alarm systems;

25.7 A significant increase in the numbers of people using the building.

25.8 The presence of disabled people.

25.9 A fire or significant 'near miss.'

26. Any person who proposes or introduces any change that could affect the building fire risk assessment, or the fire precautions must advise the Estates and Facilities department or Landlord where applicable.

27. The University currently operates a risk-based approach to review of fire risk assessments. 'High risk' and 'Medium risk' buildings will be reviewed annually; this will normally include all sleeping accommodation and buildings with other fire risks such as large quantities of flammable materials. Other 'Low risk' buildings will be reviewed every 2 years.

Fire Risk Review Meetings

28. The Estates and Facilities or designated staff member department will carry out monthly fire risk reviews and meet to review the fire risk assessment programme. The meeting will discuss and review the results of fire risk assessment monthly audits and efforts to address findings.

29. In addition, 'significant findings' of building fire risk assessments will be an agenda item under Health and Safety at the Estates and Facilities Committee meetings.

Support

30. Fire safety systems are maintained under the control of the Head of Facilities assisted by competent directly employed Estates and Facilities or designated staff. The procedures for assessing the competence, letting to contract, induction to site and continual performance monitoring of specialist contractors is determined by Estates and Facilities.

Training

31. The strategy and coverage of Fire Wardens will be determined by fire risk assessment. Fire drills will normally take place at least annually, with additional drills conducted where buildings present higher risk profiles or where significant changes to occupancy or layout occur. Where buildings are managed by a landlord or managing agent, fire drills will be coordinated with the building management team.

31.1 Testing and exercising the building fire evacuation plan and assessing the

31.2 performance of Fire Evacuation Team members.

31.3 Verifying the effectiveness of training.

31.4 Identifying weaknesses in emergency procedures and systems.

31.5 Identifying positive and negative responses from staff with designated responsibilities.

31.6 Assessing the reliability of fire emergency equipment such as fire alarms, evacuation lifts, evacuation chairs and emergency voice communications equipment.

Awareness

32. The University Fire Safety Management Policy will be disseminated to University staff on their arrival as part of the new starter induction process. Students will receive fire safety input as part of their induction process. Visitors to the University will be briefed on their arrival by the staff member responsible for them during their visit. All contractors working at the University will be briefed by a member of the Estates and Facilities team or designee.

Coordination with Landlord

33. The Estates & Facilities department work closely with the landlord in Chiswick and Leeds to ensure fire safety management is up to date and valid. The buildings are equipped with fire detection systems. The fire system consists of the following:

33.1 Emergency fire break glass units

33.2 Klaxon warning siren

33.3 Smoke detector units

33.4 Heat detector units

34. In Chiswick the above systems are controlled and monitored from a master control unit, which is situated in the under-croft area of the building and remotely monitored 24/7 by Enjoy Work. All means of escape are maintained by the landlord. Reasonable Fire Fighting Equipment is provided in landlord areas e.g., Fire Extinguishers. Training is provided to all team members to ensure employees are aware of emergency procedures.

Documented Information

35. The following information is required to be documented to support effective fire safety management arrangements:

35.1 Fire Risk Assessments.

35.2 Fire Brigade Emergency Folders and an Emergency Management Plan.

35.3 Test records of building fire equipment and installations including but not limited to

35.4 fire alarms, emergency lights, extinguishers, fire shutters, refuge EVC, gas boilers, dry

35.5 risers, fire dampers, AOV, fire doors.

35.6 Permits to work in buildings including 'hot work' certificates.

35.7 Training records and details of course content for the relevant fire safety courses

35.8 such as fire wardens.

35.9 Replace Fire Risk Management System with fire safety management arrangements.

35.10 including records of calls made to the emergency services.

Control Of Work on Site

36. All construction and maintenance work at the University is strictly controlled by Estates and Facilities or Landlord where applicable. This includes all hot work permits. All hot work must be controlled via a documented permit-to-work system, issued by Estates and Facilities or Landlord.

37. External Contractors cannot work at the University unless they have been formally approved by Estates and Facilities or Landlord where applicable. All contractors must complete a site-specific fire safety induction, delivered by Estates and Facilities or the Landlord, before being permitted to commence work.

38. Estates and Facilities or Landlord where applicable are responsible for the specification, installation, commissioning, and maintenance of building fire protection systems within the demise. This includes fire separation, measures to limit fire spread, fire detection and alarm systems, fire suppression systems and emergency lighting.

39. Estates and Facilities or Landlord where applicable are responsible for the appointment of competent third parties (system designers, engineers, contractors) to specify, design, install and commission and maintain fire alarm, detection and suppression systems and emergency lighting.

40. The University's role is limited to appointing competent consultants and contractors, overseeing the design and construction process and accepting the building and associated systems at practical completion.

41. There should be a maintenance plan in place for fire safety systems that includes:

41.1 Fire Doors

41.2 Fire Alarms

41.3 Smoke Control Systems for Means of Escape

41.4 Emergency and Escape Lighting

41.5 Fire Fighting Hydrants

41.6 Fire Blankets and Extinguishers

41.7 Gaseous and Foam (wet chemical) Extinguishing Systems

41.8 Gas Boilers

41.9 Electrical Installation

41.10 Lightning Protection

41.11 Fire doors within University controlled areas will be inspected at least every six months, and more frequently in higher risk areas, with records maintained by Estates & Facilities. Defects should be recorded and remedial actions tracked to completion.

Incident Response Communications

42. The University has established documented and maintained policies and procedures for Incident Response Communication, which includes:

42.1 Means of being alerted to fire

42.1.1. All University Buildings will have means of alerting building occupants to a fire.

42.1.2. University buildings have a fire alarm system incorporating automatic fire detection.

42.2 Communications between management and between management and staff.

42.2.1. Communications with the Fire and Rescue Services

42.2.2. The University has in place procedures for calling out the fire and rescue services.

42.3 Fire action posters are displayed in all University buildings.

42.4 All fire system faults must be reported and logged immediately. Critical faults must be escalated to the Head of Facilities within 24 hours and tracked to resolution.

43. The University will ensure that its fire alarm systems are monitored in respect of false fire alarm activations.

44. All fire alarm signals from a University building are recorded by Estates & Facilities. False Alarm signals are brought to the notice of the Estates and Facilities or Landlord where applicable for their information and further action as required.

45. The incidence of fire alarm signals from a building is recorded by calendar year. The spreadsheets record the following information:

    45.1 The number of fire alarm devices in the building

    45.2 The totals of fire alarm signals from previous years

    45.3 The running totals of fire alarm signals for the current calendar year

46. The monitoring, measuring, analysing and evaluation of fire alarm signals will take place every 3 months and will be carried out by the Estates & Facilities Department.

47. Records of the above will be retained on file for 3 years by the University.

48. The Head of Estates & Facilities at the University is required to overview the effectiveness of the Fire Safety Management Arrangements. They will report quarterly to the Operations Committee.

49. The Head of Estates & Facilities is required to monitor the effectiveness of the Fire Safety Management Plan throughout the year reporting issues as required.

50. The University's fire safety management arrangements will be subject to internal audit at planned intervals to assess whether:

    50.1 The arrangements conform to University fire safety requirements.

    50.2 The fire safety management arrangements are effectively implemented and maintained.

51. This internal audit may be carried out by members of the University Internal Audits team or another team member or an Estates and Facilities staff member.

52. The audit criteria will be to review and assess compliance with the University's fire safety management arrangements. and the effectiveness of the measures being taken. In particular, the audit will examine the following seven factors of strategic fire risk management:

    52.1 Fire risk assessments of buildings that are required to have them by the Regulatory Reform (Fire Safety) Order 2005 and Fire Safety Act 2021,

    52.2 Managers in place empowered and able to command sufficient resources to maintain the fire safety systems at the University.

    52.3 All staff trained in action in event of fire procedures with appropriate numbers of persons trained in fire prevention, fire protection and evacuation procedures, and able to use appropriate fire extinguishing equipment.

52.4 A management system in place to control work on site, e.g., repairs to building structure, and in particular 'hot work.'

52.5 Maintenance and testing of fire safety systems.

52.6 Robust communications procedures including means of staff being alerted to fire, management to management, management to staff, messages to occupants; and communications with the fire and rescue service in the event of a fire.

52.7 Established, documented, and maintained procedures for identifying and responding to any unplanned event, potential emergency, or disaster.

53. Audits of the Fire safety management arrangements. cannot be carried out by the University Fire Safety Advisor(s) and must be carried out by a person deemed to be 'competent' to carry out an audit internal of the organisation.

54. The results and reports of the audit will be sent directly to the Head of Facilities and sent on to others and results reported to Operations Committee. Audit records will be kept on file for a period of at least 3 years in accordance with the University's Data Retention Policy.

Management Review

55. The Head of Facilities will review this Fire Safety Management Policy annually. The management review will include, but may not be limited to:

55.1 status of actions from previous management reviews

55.2 changes in external and internal issues that are relevant to the Fire Safety Management arrangements.

55.3 information on the fire safety performance, including trends in:

55.3.1. Nonconformities and corrective actions

55.3.2. Monitoring and measurement results

55.3.3. Audit results

55.3.4. Interested party feedback

55.3.5. Evaluation of compliance with legal and other requirements

56. The outputs from the above management review will also consider and include decisions related to:

56.1 continual improvement opportunities

56.2 improvements related to interested party requirements

56.3 resource needs to enable improvement to the fire safety management arrangements and its processes

57. All fire safety documentation will be retained for a minimum of 3 years in accordance with the University's Data Retention Policy.

58. This policy will be reviewed annually or following significant legislative or operational changes.

59. Where possible, fire safety documentation will be maintained in secure digital systems to ensure accessibility, version control and auditability. This includes fire risk assessments, inspection records, maintenance logs, fire drills and training records.

VERSION MANAGEMENT

Responsible Department: Estates and Facilities			
Approving Body: University Board (on recommendation of Operations Committee)			
Version no.	**Key Changes**	**Date of Approval**	**Date of Effect**
1.0	First Version		
2.0	Revised to reflect the updated Fire Safety Act 2021, Building Safety Act 2022, and to clarify the responsibilities of landlords, not specific to Chiswick.	17 October 2024	17 October 2024
3.0	Explicit inclusion of the Fire Safety Act 2021 and Building Safety Act 2022, alongside the previously referenced Regulatory Reform (Fire Safety) Order 2005, Clarity added on application of the Management of Health and Safety at Work Regulations 1999 and the Equality Act 2010, Responsibility for Personal Emergency Evacuation Plans (PEEPs) formally assigned to Estates & Facilities, supporting Equality Act compliance, Inclusion of a mandatory permit-to-work system for hot work, to be issued and managed by Estates & Facilities or the Landlord, Requirement added that all contractors must complete a site-specific fire safety induction prior to starting any work on University premises. Formatted and reapproved for 2025-26 AY.	24 July 2025	September 2025
4.0	Revised fire safety governance, risk assessment, and incident response arrangements; updated responsibilities and terminology; added wording on multi-occupied buildings, alarm monitoring, and digital record keeping.	05 May 2026	September 2026
		Restricted Access? *Tick as appropriate*: Yes ☐ No X	