

## 1. Background and objectives

- 1.1. Residents of properties left unprotected against fire have a much higher than average chance of being injured or killed in their home.
- 1.2. In addition to this there have been high profile fires in social housing high-rise blocks which resulted in many tenants losing their lives.
- 1.3. Most fires are preventable. Those responsible for buildings to which the public have access can avoid them by taking responsibility for and adopting the right behaviours and procedures. In October 2006, the Regulatory Reform (Fire Safety) Order 2005 (FSO) came into force. This FSO places a duty on persons responsible for buildings to carry out fire risk assessments and implement adequate fire prevention and protection measures to their buildings. The Fire Safety Act 2021 clarified the parts of premises to which the FSO applies.
- 1.4. Alliance must establish a policy which meets the requirements of the Regulatory Reform (Fire Safety) Order 2005 (FSO) and the Fire Safety Act 2021. In addition to this, the policy must provide assurance to Alliance that measures are in place to identify, manage and/or mitigate risks associated with fire.
- 1.5. Alliance must also ensure that compliance with fire safety legislation is formally reported at Strategic Leadership Team (SLT) and Board level, including the details of any non-compliance and planned corrective actions.
- 1.6. The policy is relevant to all Alliance colleagues, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 1.7. It should be used by all to ensure they understand the obligations placed upon Alliance to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties (owned and managed).

## 2. Policy detail

### 2.1. Regulatory Standards, Legislation and Codes of Practice

- 2.1.1. Regulatory Standards – the application of this policy will ensure compliance with the regulatory framework for social housing in England, and the safety and quality standard (derived from the Social Housing (regulation) Act 2024) which were introduced by the Regulator of Social Housing (RSH).

- 2.1.2. Legislation – the principal legislation applicable to this policy is the Regulatory Reform (Fire Safety) Order 2005 (FSO) and the Fire Safety Act 2021. These regulations place a duty on Alliance to take general fire precaution measures to ensure, as far as is reasonably practicable, the safety of the people on their premises and in the immediate vicinity. Alliance is the ‘responsible person’ for the purposes of the legislation by virtue of the fact that they own and manage homes and buildings housing tenants/leaseholders through the tenancy agreement and lease obligations.
- 2.1.3. Code of Practice – the principal approved codes of practice and guidance applicable to this policy are:
- LACORS - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing
  - HHSRS Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9
  - National Fire Chief Council’s Guidance (NFCC) - Fire Safety in Specialist Housing – April 2017, covers sheltered schemes, supported schemes and extra care schemes
  - Building a Safer Future – Independent Review of Building Regulations and Fire Safety – Final Report – May 2018 (Dame Judith Hackitt).
- 2.1.4. Sanctions – Alliance acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation, and approved codes of practice, and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via action taken by the Regulator of Social Housing (RSH).
- 2.1.5. Customers – Alliance will use the legal remedies available within the terms of the tenancy and lease agreement should any customer refuse access to carry out essential fire related inspection and remediation works.
- Non-Access: We will agree an appointment with the customer to carry out the inspections or works. If the customer is not available, on the day, or refuses access, we will agree a second appointment. If this second appointment is not kept a ‘no access’ process will be initiated, which may result in legal action being taken to gain access.
- 2.1.6. Leaseholders – Alliance will use the legal remedies available within the terms of the lease agreement should any leaseholder or shared owner refuse permission and/or access to carry out essential fire safety related inspection and remediation works (as tested in the case Croydon Council v. Leaseholder 1st August 2014).

## 2.2. **Additional legislation**

2.2.1. This policy also operates in the context of the following additional legislation:

- Housing Act 2004
- The Health and Safety at Work etc Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Licencing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Gas Safety (Installation and Use) Regulations 1998
- Construction, Design and Management Regulations 2015
- The Furniture and Furnishings (Fire Safety Regulations 1988
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- Data Protection Act 2018
- The Social Housing (regulation) Act 2023
- RIDDOR 2013
- The Building Safety Act 2022
- The Building Regulations 2000: Approved Document B Fire Safety
- Electrical Equipment (Safety) Regulations 2015
- DSEAR 2002.

## 2.3. Obligations

2.3.1. The responsible person (Alliance) must carry out a fire risk assessment (FRA) for the purpose of identifying the general fire precautions and other measures needed to comply with the Regulatory Reform (Fire Safety) Order 2005 (FSO). Although under the FSO this requirement only applies to the common parts of premises, in practice the responsible person will need to take into account the entire premises - including, to some extent, the units of residential accommodation.

2.3.2. The responsible person (Alliance) must implement all necessary general fire precautions and any other measures identified by a fire risk assessment.

2.3.3. The responsible person (Alliance) must put in place a suitable system of maintenance and appoint competent persons to implement any procedures that have been adopted.

2.3.4. The responsible person (Alliance) must periodically review fire risk assessments in a timescale appropriate to the premises and/or occupation fire risk level. This timescale is determined by the fire risk assessor carrying out the fire risk assessment.

## 2.4. Statement of intent

- 2.4.1. Alliance acknowledges and accepts its responsibilities under the Regulatory Reform (Fire Safety) Order 2005 (FSO).
- 2.4.2. Alliance currently operates with a 'stay safe' fire safety strategy for all buildings unless the current or next fire risk assessment confirms that this fire safety strategy is no longer appropriate to adopt. The future fire safety strategy to be adopted will be confirmed on a building-by-building basis in accordance with the fire risk assessor's recommendation.
- 2.4.3. Alliance will hold accurate records against each property it owns or manages setting out the requirements for having a fire risk assessment in place.
- 2.4.4. FRA inspection and re-inspection dates, FRA surveys and FRA actions will be held on Keystone.
- 2.4.5. Alliance will hold accurate records against each property it owns or manages setting out the requirements for servicing, maintenance and repair of fire prevention, detection and fire-fighting equipment. These include fire alarm systems, emergency lighting, smoke/heat detectors, hose reels, dry and wet risers, auto window/door openers, fire extinguishers, fire blankets, sprinkler systems and any other equipment relating to fire safety.
- 2.4.6. Alliance will establish and manage programmes to deliver servicing and maintenance in accordance with all relevant British Standards and manufacturer's recommendations for all fire detection, prevention and fire-fighting systems and equipment within buildings owned or managed by the organisation.
- 2.4.7. Alliance will periodically (and at least annually) undertake an asset data review to ensure adequate assurance is provided that fire safety data held against the organisations' property assets is accurate and up to date.
- 2.4.8. Alliance will ensure that each property requiring a fire risk assessment has a fire risk assessment in place that is PAS79 compliant (Publicly Available Specification) from the British Standards Institute (BSI) and that has been carried out by a competent fire risk assessor.
- 2.4.9. Alliance will ensure that all fire risk assessments are reviewed no later than the review date set within the fire risk assessment and that this review is carried out by a competent fire risk assessor.
- 2.4.10. Alliance will ensure that the fire risk assessment to a building is reviewed following a fire, change in building use, change in working practices that may affect fire safety, following refurbishment works to the building or if required following an independent fire safety audit and that this review is carried out by a competent fire risk assessor.

- 2.4.11. Alliance will ensure that robust processes are in place to implement all mandatory fire precaution measures identified by fire risk assessments. Actions will be classified as immediate, (immediate or within 1 week) high (1 month), medium (3 months) or low (Programmed). Immediate level actions will be implemented either immediately or within one-week, high level actions identified will be implemented within one-month, medium level actions will be implemented within three months and low-level actions will be within a programme of works to be completed within a reasonable time scale.
- 2.4.12. Alliance will implement a programme of regular property inspections to all properties with a fire risk assessment in place to audit that all required management actions are taking place. These inspections will be carried out by the Community and Environment Team and be undertaken at regular intervals, with inspection records evidenced and kept against each property. In addition to this Alliance will ensure regular testing of all fire alarms and emergency lighting systems.
- 2.4.13. Alliance will ensure that robust processes are in place to record and action any 'near miss' reports with regard to fire safety. A 'near miss' is an unplanned event which does not result in an injury but had the potential to do so.
- 2.4.14. Alliance will test all hard-wired smoke alarms in domestic dwellings on an annual basis (or at void stage) and replace any broken alarms as required. The majority of properties can be done as part of the annual gas safety check visit. In the event that the hard-wired smoke alarm cannot be replaced at the time of the gas safety check, a battery-operated smoke alarm will be installed as an interim measure.
- 2.4.15. Alliance will ensure that all disabled residents and/or employees within buildings requiring a fire risk assessment, where there is a member of staff in residence (i.e. sheltered housing or supported housing schemes), will have a Personal Emergency Evacuation Plan (PEEP) and that this PEEP will be reviewed annually by a competent person. This will be kept in the Fire Safety Log held securely on site and made available to the fire service in the event of an evacuation. This is the responsibility of the care provider.
- 2.4.16. Where Alliance have been notified that a resident within a building requiring a fire risk assessment is storing Oxygen in their home for medical use the organisation will ensure that they have a Personal Emergency Evacuation Plan (PEEP) in place and that this PEEP will be reviewed annually by a competent person. This will be kept in the Fire Safety Log held securely on site and made available to the Fire Service in the event of an evacuation.
- 2.4.17. Alliance will ensure that only suitably competent fire risk assessors and fire safety engineers appropriately certified undertake fire safety assessments, or works, for the organisation.
- 2.4.18. Alliance will have a robust process in place to gain access should any tenant or leaseholder refuse access to carry out essential fire safety related inspection and remediation works.

- 2.4.19. Alliance will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.
- 2.4.20. Alliance is committed to working with relevant Fire Services to create safer places to live and work. Joint working may include sharing information, the fire service reviewing risk assessments and providing training to Alliance staff.
- 2.4.21. Alliance considers good communication essential in the safe delivery of fire safety and will therefore ensure that information about fire safety and fire prevention measures is available to residents and building users via appropriate channels (e.g. hard copy, website, etc.).

## **2.5. Compliance risk assessment / inspection programmes**

- 2.5.1. Risk assessment – Alliance will establish and maintain a risk assessment for fire safety management and operations. This risk assessment will set out the organisations' key fire safety risks together with appropriate mitigations.
- 2.5.2. CDM - to comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all void property, component replacement and refurbishment works. This plan will detail any fire safety installations and/or other fire prevention measures that may be affected by the works and detail all necessary work required to make safe and reinstate fire safety prevention installations and measures including any requirement for review of the fire risk assessment.
- 2.5.3. Fire risk assessments – Alliance will complete an initial programme of fire risk assessments to all non-domestic (communal blocks) and 'other' properties in its management and ownership.
- 2.5.4. Thereafter, Alliance will carry out a programme of new fire risk assessment ensuring that all fire risk assessments are reviewed no later than the review date set by the fire risk assessment and that this new fire risk assessment is carried out by a competent fire risk assessor (usually annually).
- 2.5.5. All future fire risk assessments will be Type 1 surveys as a minimum.
- 2.5.6. Alliance will ensure that each property requiring a fire risk assessment has a fire risk assessment in place that is PAS79 compliant (Publicly Available Specification) from the British Standards Institute (BSI) and that has been carried out by a competent fire risk assessor.
- 2.5.7. Alliance will carry out a programme of regular property inspections to all properties with a fire risk assessment in place to audit that all required management actions are taking place. These inspections will be undertaken at regular intervals by the Community and Environment Team and inspections records will be kept.

- 2.5.8. Alliance will carry out a programme of servicing and maintenance, in accordance with all relevant British Standards and manufacturer's recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings owned or managed by the organisation.
- 2.5.9. Alliance will carry out a programme of annual inspection and testing of smoke alarms where they are fitted within domestic properties.
- 2.5.10. Alliance will inspect fire doors on a regular basis. Communal doors will be inspected on a quarterly basis and flat front doors annually.

## **2.6. Remedial work**

- 2.6.1. Alliance will ensure that robust processes are in place to implement all mandatory fire precaution measures identified by fire risk assessments. High level actions identified will be implemented either immediately or within one-month, medium level actions will be implemented within three months and low-level actions will be within a programme of works to be completed within a reasonable time scale.
- 2.6.2. Alliance will ensure that robust processes are in place to implement all fire precaution measures identified by the regular property inspections carried out by the community and environment team and housing staff.
- 2.6.3. Alliance will ensure there is a robust process in place for the management of any follow-up works required following the completion of servicing and maintenance checks to fire detection, prevention and fire-fighting systems and equipment.
- 2.6.4. Alliance will ensure they install if required new hard wired smoke alarms in all domestic properties as part of the annual gas safety check, or if recommended as part of any fire risk assessment. They will also test and renew any broken alarms as required as part of the annual gas safety check. In the event that the hard-wired smoke alarm cannot be replaced at the time of the gas safety check, a battery-operated smoke alarm will be installed as an interim measure.

## **2.7. Record keeping**

- 2.7.1. Alliance will establish and maintain a core asset register of the communal blocks and 'other' properties that require a fire safety risk assessment in Keystone. This register should also identify all fire safety equipment, systems and installations within each building.
- 2.7.2. The register must show the date of the previous and current fire risk assessment (where applicable), along with the due date of the next fire risk assessment. The register will also be used to record and track the progress of all fire safety actions required as identified from the fire risk assessments.
- 2.7.3. FRA inspection and re-inspection dates, FRA surveys and FRA actions will be held in an appropriate asset management system.

- 2.7.4. Alliance will establish and maintain a register against each property asset of any smoke/heat detection equipment contained within domestic dwellings.
- 2.7.5. Alliance will establish and maintain accurate records of all completed fire risk assessments, fire risk assessment reviews and associated completed remedial works from these reports and keep these for a period of not less than 10 years.
- 2.7.6. Alliance will establish and maintain accurate records of all completed servicing and maintenance checks on fire safety equipment, systems and installations and details of associated completed remedial works and keep these for a period of not less than 5 years.
- 2.7.7. Alliance will maintain an appropriate Fire Safety Logbook and keep it securely on site, where practical, for all communal blocks and 'other' properties where this has been identified as a requirement.
- 2.7.8. Alliance will establish and maintain records of all fire safety related training undertaken by staff.
- 2.7.9. Alliance will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all fire safety related data.

## **2.8. Key roles and responsibilities**

- 2.8.1. The Alliance Board will have overall governance responsibility for ensuring the FRA Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such the Board will formally approve this policy and review it every 3 (three) years (or sooner if there is a change in regulation, legislation, or approved codes of practice).
- 2.8.2. The Board will receive regular updates on the implementation of the FRA Policy and fire safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 2.8.3. The SLT will receive reports (from relevant forums) in respect of fire safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 2.8.4. The Group Chief Executive has strategic responsibility for the management of fire safety and ensuring compliance is achieved and maintained. The Head of Customer Safety will oversee the implementation of the FRA Policy.
- 2.8.5. The Head of Customer Safety will be responsible for overseeing the delivery of the agreed FRA programme and are also responsible for the prioritisation and implementation of any works arising from the FRA inspections.

2.8.6. Additional colleagues from relevant teams will provide key support in gaining access into properties where access is proving difficult and use standard methods to do so. They will also facilitate the controlled access or legal process to gain access as necessary.

## 2.9. Competent Persons

2.9.1. Alliance will ensure that the manager with lead responsibility for operational delivery should hold the NEBOSH National Certificate in Fire Safety and Risk Management (or an equivalent qualification). Alliance will fund training as necessary so they gain this qualification and membership, if they don't have it at the time of appointment. This will happen within 12 months of their appointment.

2.9.2. Alliance will ensure that only suitably competent fire risk assessors; certified by BAFE and on a UKAS accredited certification scheme that meets the competency criteria established by the Fire Risk Assessment Competency Council, are procured and appointed to undertake future fire risk assessments.

2.9.3. The operational team with responsibility for delivery will check the relevant accreditations for the work that they are carrying out. These checks will be undertaken as part of the procurement process and/or on an annual basis thereafter and evidenced appropriately.

2.9.4. Alliance will ensure that only suitably competent contractors and engineers (including Alliance in-house colleagues), certified by a UKAS accredited certification scheme, are procured and appointed (or utilised) to undertake works to fire safety equipment, systems and installations. The operational team with responsibility for delivery will check the relevant accreditations for the work that they are carrying out. These checks will be undertaken as part of the procurement process and/or on an annual basis and evidenced appropriately.

## 2.10. Training

2.10.1. This policy and the procedures that support it will be subject to a range of training across Alliance and will involve all relevant stakeholders. The training will be bespoke to the individual stakeholders and refresher training will be provided as appropriate.

2.10.2. Training will include team briefings for those colleagues who need to have a basic understanding and awareness of fire safety but who may not be actively involved in the delivery of the fire safety policy. This will be basic fire safety awareness training.

2.10.3. On the job training will be provided to those colleagues who will be responsible for managing the programme of fire risk assessments (FRAs), FRA reviews, and programmes of servicing and maintenance to fire safety equipment, systems and installations as part of their daily job.

- 2.10.4. Training will be provided to all Alliance employees with specific duties regarding fire safety.
- 2.10.5. Regular toolbox talks will be given to operatives and Alliance contractor partners will be required to do this in the form of appropriate fire safety training and evidence the same.
- 2.10.6. Monthly meetings will be held with those involved in the management and monitoring of performance in relation to fire safety, to brief on the current position and update and review the programme.

## 2.11. Performance reporting

- 2.11.1. Robust key performance indicator (KPI) measures will be established and maintained to ensure Alliance is able to report on performance in relation to fire safety.
- 2.11.2. KPI measures will be produced and provided to relevant forums on a monthly basis and Board level on a quarterly basis. As a minimum, these KPI measures will include reporting on:

### **Data – the total number of:**

- Properties – split by domestic properties, communal blocks and 'other' properties.
- Properties on the FRA programme
- Properties not on the FRA programme
- Properties with a valid 'in date' FRA. This is the level of compliance expressed as a number and a %.
- Properties where the survey / re-inspection has expired and is 'out of date'. This is the level of non-compliance, expressed as a number and a %.

### **Narrative - an explanation of the:**

- Current position
- Corrective action required
- Anticipated impact of corrective action
- Progress with completion of remedial works

In addition:

- Compliance with the fire safety equipment, systems and installations servicing and maintenance programme.
- The number of RIDDOR or enforcement notices issued regarding fire safety.

- 2.11.3. Alliance will carry out an independent audit of fire safety at least once every two years. This audit will specifically test for compliance with the regulation, legislation and approved codes of practice and identify any non-compliance issues for correction.
- 2.11.4. Alliance will collect and provide information to support effective scrutiny, by tenants, of fire safety management performance.
- 2.11.5. Alliance Homes will
- collect and process information specified by the regulator relating to their performance against the tenant satisfaction measures. The information must be collected within a timeframe set by the regulator and must meet the regulator's requirements in Tenant Satisfaction Measures: Technical Requirements and Tenant Satisfaction Measures: Tenant Survey requirements.
  - annually publish their performance against the tenant satisfaction measures. This should include information about how they have met the regulator's requirements set out in Tenant Satisfaction Measures: Technical requirements and Tenant Satisfaction Measures: Tenant survey requirements. This information must be published in a manner that is timely, clear, and easily accessed by tenants.
  - annually submit to the regulator information specified by the regulator relating to their performance against those measures. The information must be submitted within a timeframe and in a form determined by the regulator.

## **2.12. Non-compliance / escalation process**

- 2.12.1. Any non-compliance issue identified at an operational level will be formally reported to the Head of Customer Safety in the first instance.
- 2.12.2. The Head of Customer Safety will agree an appropriate course of corrective action with the Chief Operating Officer in order to address the non-compliance issue and the Chief Operating Officer will report details of the same to SLT.
- 2.12.3. The Director of Business Services, utilising relevant forums, will provide 'independent' oversight of the programme delivered by Home Repairs Service.
- 2.12.4. SLT will ensure the Board is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.
- 2.12.5. In cases of a serious non-compliance issue SLT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.

## 3. Equality and diversity

- 3.1. This policy is subject to a periodic Equality Impact Assessment (EIA).
- 3.2. The purpose of such an assessment is to consider the effect of the policy regarding the recognised protected characteristics of equality and ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Policy. Remedial action will be undertaken if a detrimental effect is identified.
- 3.3. The EIA also requires the policy author to consider whether the policy is likely to negatively impact on a person's Human Rights.
- 3.4. This policy and any other related Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

## 4. Complaints

- 4.1. If you would like to raise a complaint in relation to this policy, you can do this by calling us on **03000 120 120** or emailing us at [act@alliancehomes.org.uk](mailto:act@alliancehomes.org.uk).
- 4.2. All complaints will be handled in line with the latest Alliance Homes Complaint Handling Policy.

## 5. Associated documents

- 5.1. For further information see in particular:
  - No Access Procedure
  - Court Injunction Procedure
  - Onboarding New Properties Procedure (under development).

## 6. Version control and approval dates

Approval stage	Date completed
Equality Impact Assessment completed	09/01/24

EIA reviewed by specialist colleague within HR	15/01/24
SLT review / approval	22/01/24
Board or Committee approval	28/02/24
Minor amend made to insert standard complaints section, non-access paragraph and format for external publication	June 2025
Next review date	28/02/26

## 7. Appendices

Appendix 1 – Equality Impact Assessment

## Appendix 1

### Equality Impact Assessment

An Equalities Impact Assessment must be conducted alongside the review of an existing policy or the creation of a new one.

1. Name the Strategy, Policy, Procedure or Function (SPPF) being assessed and name of author.

Fire Risk Assessment Policy – T Kent Business Compliance Manager

2. Aims of the SPPF being assessed.

- *Whose need is it designed to meet?*
- *Are there any measurable elements such as time limits or age limits?*

The aim of this policy is to safeguard customers and colleagues and to ensure compliance with legislation, regulation and guidance.

3. Who has been consulted in developing the SPPF?

- *Make reference or links to consultation/evidence documents*

Members of the Landlord Safety Compliance Group

4. Does the SPPF promote equality of opportunity?

The policy has neither a positive or negative impact on the protected characteristics as shown below, but rather ensures that all fire issues are dealt with in a manner compliant with the relevant legislation, regulation and guidance.

**5. Identify potential impact on each of the diversity “groups” by considering the following questions (the list is not exhaustive but an indication of the sort of questions assessors should think about):**

- *Might some groups find it harder to access the service?*
- *Do some groups have particular needs that are not well met by the current SPPF?*
- *What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)?*
- *Have staff/residents raised concerns/complaints?*
- *Is there local or national research to suggest there could be a problem?*

Protected Characteristic	No impact	Negative impact	Positive impact	Information source/s **	Comments/evidence
Race	X				
Disability	X				
Gender	X				
Transgender	X				
Sexual orientation	X				
Religion or belief	X				
Age	X				
Marriage & Civil Partnership	X				
Pregnancy and Maternity	X				
Rural issue	X				
Social mobility	X				

**Was there a negative impact identified in question 5?** If yes go to question 6. if not go to question 7.

**6. If “negative impact” identified in table (4) above is it?**

<b>Legal -</b>	YES	NO
<b>What is the level of impact? -</b>	HIGH	LOW

If it is not legal and/or high impact – (i.e.: if you have highlighted **NO** to legal and **HIGH** to impact, then the document should be referred to Head of HR)

**7. If positive impact has been identified in table 4 above, how can it be improved upon or maximised, either in this SPPF or others?**

The policy aims to ensure a consistent and fair approach is taken in all cases regardless of protected characteristic.

**8. Full EIA (or if you decide full EIA is not necessary but some changes should be considered)**

- *Are there changes you could introduce which would make this SPPF work better for this group of people?*
- *Is further research or consultation required?*

**9. Does this proposal have any potential Human Rights implications?**

If yes, please describe (if necessary, please refer to the Alliance Homes Group Human Rights Policy)

No.