

Our approach to fire safety

1. Introduction

At Unite Students, health and safety is at the heart of all we do. We are committed to conducting all our activities in a safe and secure manner and to always learn and continually improve our health and safety performance. Fire safety is an integral part of this.

The way that we manage fire risk comes from the responsibility we have for the young adults living with us, many away from home for the first time. Our motivation is 'doing what's right' and 'keeping us safe' in line with our corporate values, leading to the development of a more proactive, risk-based approach to fire safety, embedded across our entire business.

The way that we manage fire risk has been enhanced and developed over the past three and a half years. New regulation and the availability of insight and knowledge following the tragic fire at Grenfell Tower have undoubtedly helped influence the improvements we have made. Our approach is also shaped by a clear drive to go further and faster whenever appropriate.

This approach and commitment extends beyond the way we operate our existing estate, to new buildings and those under construction. All new buildings will meet future and existing regulatory standards, including those in the Building Safety Bill and Fire Safety Bill, expected to pass through Parliament later in 2021.

This paper sets out the steps we have already taken and the continued efforts we are making, including how we are taking a lead for the purpose-built student accommodation (PBSA) sector on this important aspect of our business.

KEEPING us SAFE

Our driving force is always 'doing the right thing' to make a safe home for our students, and we will always consider going above and beyond regulation if it's the right thing to do.

2. A risk-based approach – how this works in practice

Fire safety has always been a critical part of our Health and Safety Strategy but in response to changes in regulation and industry practice, we have enhanced our systematic, risk-based approach, assessing the real and likely fire risks at each of our properties.

This involves checking whether the design and construction methods used still match regulatory requirements and best practice. It also now extends much deeper and includes looking closely at fire prevention technology and equipment and understanding how buildings are being used by students, so we can identify potential fire risks and tailor our activity to mitigate these.

Our Fire Strategy model



Planned maintenance and innovation

Our internal maintenance teams carry out a proactive programme of planned maintenance across all our properties. For example, important equipment such as fire doors, alarms, automatic opening vents (AOVs) which control smoke ventilation in a fire, fire extinguishers and other equipment are checked regularly and updated as part of a proactive rolling programme of work. Fire alarm tests and regular full evacuations are carried out at all our properties.

We work closely with a trusted external supply chain, developed over many years, to support our planned approach which involves detailed surveys of our properties and linking these with our lifecycle policy.

In areas of highest risk, we have replaced equipment with new innovations to reduce the risk of fire. For example, in kitchens we are implementing hob suppression systems which cut the power and screechers on kitchen fire doors to prevent them being wedged open by students.

INDUSTRY LEARNING

As a result of a balcony fire in residential accommodation in Barking, East London, we amended our management policies on the use of balconies for barbecues and furniture storage.

We systematically monitor compliance using our facilities maintenance system and provide monthly updates to the Group management board. In the event that action needs to be taken, an action plan with clear timelines and responsibilities is developed. Our regional teams, supported by the central estates team, have responsibility for making sure all remedial actions identified through fire risk and planned maintenance inspections are completed. When required, we provide specific training to our teams as a result of inspection findings.

Communicating with students

We recognise the importance of engaging with students on the part they can play in their own safety. Each year we conduct campaigns on fire safety, focusing on the areas of greatest risk. For example, we have worked with Avon Fire and Rescue Service on a video for students across all our properties about what can go wrong when cooking. We always take the opportunity to emphasise personal responsibility with our students. This year we launched our Home Charter which is designed to create safe, secure and harmonious homes for students living as a community. These messages are also reinforced by our local teams, through tenancy agreements and via our social media channels.

INDUSTRY LEARNING

A fire in 2019 in student accommodation operated by another provider in Bolton, highlighted potential dangers of HPL cladding even in low-rise buildings under 18 metres. As a result, we plan to replace HPL, even though this is not currently required by law.

3. Removal of cladding and other combustible materials

We were shocked by the tragic events at Grenfell Tower in 2017 and immediately took action to identify where similar cladding of Aluminium Composite Materials (ACM) existed on our properties. This was urgently replaced on six properties.

Every building with cladding has been assessed

Our drive to do more to keep our residents safe led to a further review of façades across our estate. This included an audit of all buildings, looking at the potential fire risk of materials in addition to ACM and including buildings under 18 metres, which are not covered by new regulations on cladding.

With the help of independent external experts, we embarked on a thorough assessment to understand the fire risks at each property. This helped us to identify and plan a proactive programme of work to replace cladding and make other fire safety improvements. This approach developed two years ago provides the foundation for the way we now tackle fire safety improvements across our estate on an ongoing basis and it goes over and above current regulatory requirements.

This exercise highlighted the need to replace a less well-publicised type of cladding made of High Pressure Laminate (HPL) in a further 19 properties of over 18 metres in our portfolio. All remedial work identified through the audit will be achieved within a two-to-three-year period. The programme of works will be determined by the capacity of our suppliers and partners to complete this substantial volume of work.

All our buildings are independently confirmed as safe to operate by fire safety experts, even those awaiting the start or completion of remedial work. We have put in place proactive interim arrangements at each affected building, including increased safety patrols by our staff 24/7, full evacuation when a fire alarm is activated rather than phased evacuation and restriction on parking close to properties, while the work is procured.

Over the last three years, the business has invested £13 million in the replacement of cladding, with a further £80 million of planned spend provided for. We are pursuing claims against contractors but rather than wait for these to be resolved, we are progressing remedial works at our cost because this is the best way to ensure our students are safe.

4. Our fire safety expertise

To embed a clear step change across our business, we have worked hard to raise awareness of the importance of fire safety at all levels of our organisation. This is driven by clear leadership from our Group Main Board, its Health & Safety Committee and the Executive team. We have also broadened the specialist knowledge on fire safety by augmenting our team of experienced health and safety experts, who help us develop widespread ownership on issues and positive behaviours.

The expertise in our dedicated Fire Safety Team has been strengthened and is now led by Keith Sillitoe, who has experience at the British Safety Council, with HM Prison Service, the Ministry of Justice and a long career in the Fire and Rescue Service in London. This team acts as an expert sounding board and keeps the business abreast of changes in legislation, guidance, and best practice, particularly through our Fire Safety Policy and plans, training, simplified employee guides and advice to students. We have a Fire Safety Policy with supporting guidance and a Fire Safety Three Year Plan.

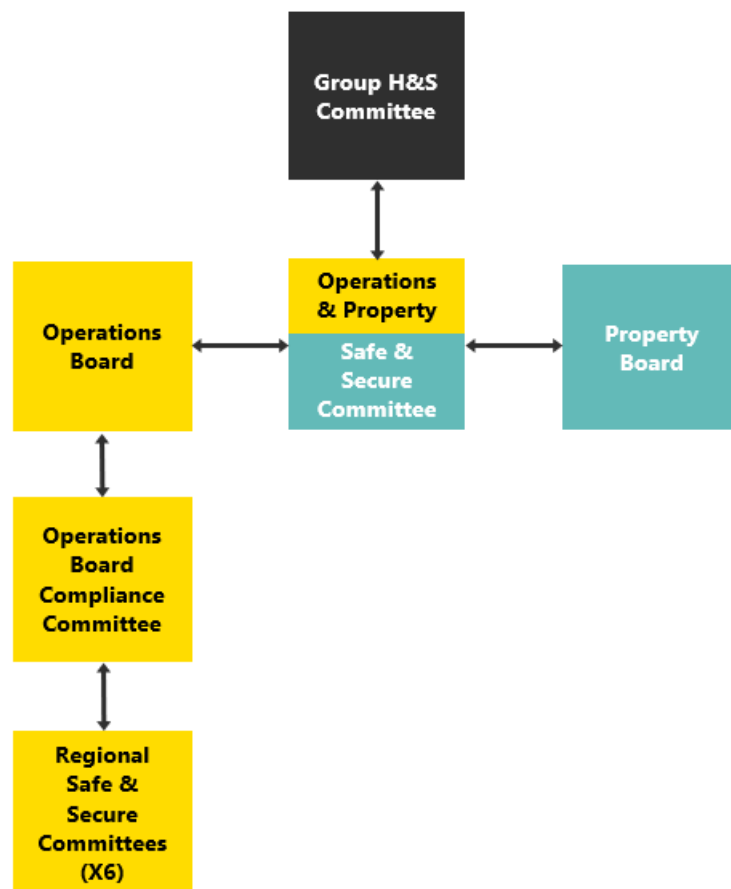
Safe and secure governance

Selected members of the Unite Main Board and Executive team make up the Health & Safety Committee, chaired by non-executive director, Sir Steve Smith. This committee has strategic oversight of all strategy and policy relating to safety and security, including fire safety.

Members of the Operations Board and Property Board, combining senior leaders from across the business, join forces to develop strategy, review performance, investigations, and major incidents, through the Operations and Property Safe and Secure Committee.

To support this, the operations team has a further six regional committees which focus on safe and secure topics at a tactical level, shaping and monitoring performance by the business in their geographical area and investigating any incidents.

The safe and secure governance structure (illustrated below)



5. Drawing on a wide breadth of external expertise

Given the significant speed of change over the past few years, we have extended the panel of experts available to provide advice and to assist with specific projects.

We have a strong partnership with Avon Fire and Rescue Service as a primary fire authority. This arrangement enables us to access assurance and advice, reducing duplication of documentation and inspections with other fire services across the country.

Specialist consultancy, TowerEight has helped us to carry out the audit of our portfolio to prioritise remedial work. BB7 provides expert assessment of cladding and we work with Axiom Architects, as well as other planning and structural engineering experts, to ensure correct interpretation of changing regulations.

We have appointed FCS-live to assess existing fire strategies and to undertake fire safety risk assessments at each property, in line with the anticipated requirements in the new Fire Safety Bill. FCS-live fire engineers liaise with the responsible person at each property and report to the business and to Avon Fire and Rescue Service, when required, on the implementation of remedial actions.



6. Examples of best practice on fire safety

We believe that we are leading the way in the PBSA sector on fire safety. This can be demonstrated as follows:

- A comprehensive Fire Safety Policy with six simplified operational guides for city and regional employees.
- A rolling three-year Fire Safety Plan in place.
- A systematic programme of training including level 2 Fire Safety certification for managers.
- Primary Authority Partnership Scheme with Avon Fire and Rescue Service since 2017, to support operational and technical functions in all regions.
- Assurance that all properties receive a Fire Risk Assessment, carried out by external experts FCS-live and with additional technical support for regional and health and safety managers.
- Clearly defined roles and responsibilities for managers and employees across the business, which comply with the requirements of the Building and Fire Safety Bill.
- Investment in technology and innovation, deployed on a risk-based basis e.g. door screeches and suppression systems to cut power on hobs.
- A systematic approach to inspection, planned maintenance and training.
- Fire assets, plans and emergency evacuation plans, including adaptations to allow for Covid-19 social distancing.
- All new properties reviewed and signed off by the Fire Safety Team to ensure compliance with latest and anticipated regulations.

External recognition on our practice and track record

There is growing recognition that we are developing a leading approach for the PBSA sector on a number of safety practices including on façade and fire safety. The business has secured a British Safety Council (BSC) 5 Star Audit and recently received the BSC's Sword of Honour for achievements in delivering outstanding health and safety and fire safety practice.

Our policies and processes are externally audited. NSF carries out safety audits and BSC is the body which provides our accreditation in this important area of our business.

We work with the British Property Federation and other student providers to share the good practice being developed.



7. Want to know more?

We know that both students and their parents place considerable importance on safety and security, which is why our purpose is to provide a Home for Success and one of our values is 'keeping uS safe'. Fire safety is an area where we have and will continue to push ourselves further and where we lead the PBSA sector in this respect.

The risk-based approach we now take on fire safety, combined with the depth of expertise from across our business and from external consultants who independently verify our assessments, mean that we are able to say with greater conviction than ever before that our buildings are safe and as always, we are placing the safety of our students first.

Please contact us using the contact details below if you are interested to find out more.

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