

Draft Student Management Plan – Britannia Street, Kings Cross, London December, 2024

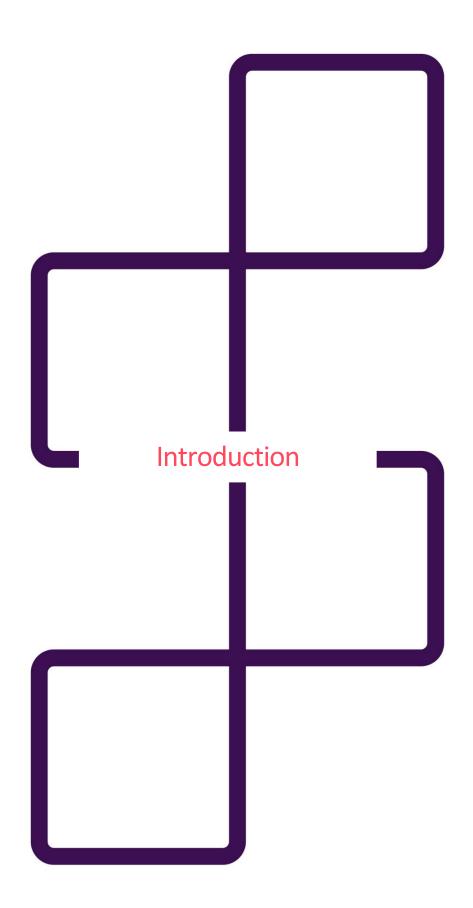
Fresh.

Contents

Where you belong.

1. Intro	duction	1
1.1	Our Experience	1
1.2	Our Approach	1
1.3	Accreditations	2
1.4	Our Staffing Model	3
1.5	The Fresh Difference	4
2. Gene	ral Management Plan	6
2.1	Site Details	6
2.2	Resident Profile	6
2.3	Service Delivery	6
2.3.1	Staffing	6
2.3.2	Front of House Services	7
2.3.3	Wellbeing Programme	7
2.3.4	Our Platform	8
2.3.5	Tenancy Agreement and Resident Handbook	9
2.3.6	Security	9
2.3.7	Out of Hours1	0
2.3.8	Maintenance1	0
2.3.9	Cleaning1	1
2.3.10	0 Post and Deliveries1	2
2.3.1	1 Management of Anti-Social Behaviour1	2
2.3.12	2 Complaints Procedure1	2
2.4	Third Party Services	4
2.4.1	Laundry1	4
2.4.2	Information Technology1	4
3. Trave	el Plan1	6
3.1	Key Benefits of the Travel Plan1	6
3.1.1	Benefits to the individual1	6
3.1.2	Benefits to the Universities1	7
3.1.3	Benefits to the Community1	7
3.2	On Site Resident Parking1	8
3.3	Start and End of Term1	8
4. Wast	te and Recycling Plan2	1
4.1	Overview2	1
4.2	Capacity2	1
4.3	Recycling2	1

5.	Health & Safety	Management	.23	,
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1. Introduction

This is a draft Student Management Plan that sets out the key principals by which Britannia Street will be managed should Fresh be appointed as the Managing Agent.

1.1 Our Experience

Fresh is a marketing leading operator of residential for rent properties with over 13 years of experience in the sector. We manage circa 19,000 units of accommodation in 27 locations across the UK and Ireland¹.



¹ As of December 2023.

1.2 Our Approach

Our overall objective is providing residents with an exceptional living experience. The properties are the start, but our people are the difference. We create great places to live, built on the simple principal that the people around you can make a huge difference to your way of life.

We are big enough to have a national infrastructure, but also smart enough to know that feet on the ground and local knowledge will really count. Therefore, each site will have a dedicated team overseeing the day-to-day operations supported by our large central team who are experts in their field. We manage properties from 100 beds to over 1,000 units in size providing full end to end services for our residents and the investors who own the buildings. We have created an operational framework that makes everything as easy as possible for our residents and staff. Our systems,

processes and software are created to liberate people from unnecessary tasks or make them much simpler. We tell our people, time spent with residents and the community is never a waste of time.

1.3 Accreditations



ANUK provides support, expertise and promotes best practice for scheme operators, through ANUKs National Codes for Large Student Developments, which ensures transparent and professional management of purpose-built accommodation.



ARLA Propertymark is the UK's foremost professional and regulatory body for letting agents and the biggest and most influential body in the sector, ensuring that all members must follow a strict code of practice and be part of their Client Money Protection (CMP) scheme.



PRS Is a Property Redress Scheme authorised by the Government since 2014, to provide an impartial service that considers consumer complaints about a variety of property related issues. Their aim is to help everyone understand their position in relation to the problem by sharing our knowledge and working to reach a fair and reasonable outcome for both parties, quickly and efficiently, as an alternative to the option of going to court.



The UKAA is the leading association for the UK Build To Rent and Single Family Rental sectors.

We also work with the local councils or educational establishments to sign up to any local accreditation where appropriate.

In addition, we have our own Quality Assurance Framework which ensures that a broader range of service levels are achieved.

1.4 Our Staffing Model

Central Services Team – The on-site staff will be supported by the Central Services Team who are specialists in Marketing, Finance, Maintenance, Health & Safety and Customer Service. The Central Team creates the detailed framework for implementation at site level.

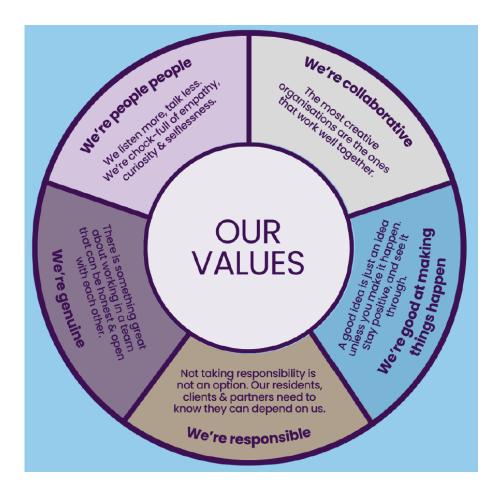
Site teams – Each site has a dedicated team of staff, the number of staff required on site is determined by the number of units under management.

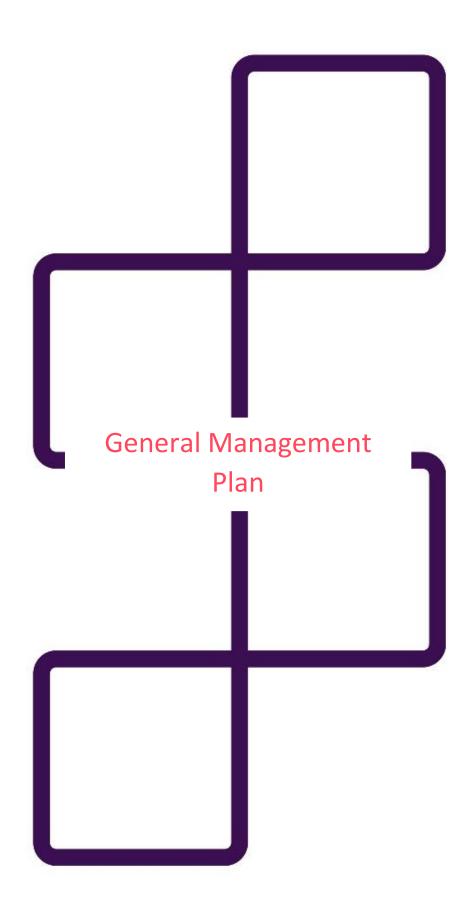
Our overall objective is to work with the owner to deliver well-designed buildings that are professionally managed. We provide a safe, secure home for residents, in an environment that is conducive to study, and integrates into the local community, contributing positively to the local housing provision for residents in the area. This provides reassurance to all stakeholders that:

- Residents have a safe and well-maintained place to live.
- Tenancy Agreements are correctly executed and enforced.
- Student deposits are registered and secure.
- There is an on-site team for face-to-face contact with the residents, neighbours, and other stakeholders.
- We have a commitment to developing strong relationships with the local Universities.
- Physical aspects of the estate are maintained to meet legislative compliance and to a high standard.

1.5 The Fresh Difference

The properties are the start, but our people are the difference. We create great places to live, built on the simple principle that the people around you can make a huge difference to your way of life.





2. General Management Plan

2.1 Site Details

The property, Britannia Street, is situated in 13 Britannia Street and 146 and 146A Wicklow Street, Kings Cross, London and is comprised of a total of 121 studios.

There will also be a Reception with management suite, bike store, and amenities for the residents including quiet study space, gym, laundry, TV rooms. There will also be a 6th floor external roof terrace with private dining room and study spaces adjacent.

The property will be operational from September 2028.

2.2 Resident Profile

The property will be attractive to a wide range of universities based in London. The following institutions are now within an acceptable 40-minute walk commute time.

- University of the Arts, London
- London's Global University, UCL
- King's College, London
- City, University of London
- University of Westminster
- SOAS University of London

The Studio flats are ideal for undergraduates and international students looking for a secure, but social environment in which to live.

Studios are an attractive housing option for the mature 2nd, 3rd and 4th years, postgraduates and international students who are looking for independent, but well managed and secure environment to complete their studies.

2.3 Service Delivery

2.3.1 Staffing

The onsite team at the scheme will consist of a General Manager, Maintenance Technician & Housekeeper.

The customer facing services and day to day running of the site will be delivered by the on-site team who will be responsible for marketing, tenancy management, rent collection, health & safety and maintaining stakeholder relationships and building maintenance.

The on-site staff will be supported by the Central Services Team who are specialists in Marketing, Finance, Maintenance, Health & Safety and Customer Service. Our Central Team creates the detailed framework for implementation at site level.

The General Manager will report to the Operations Manager & all members of the Residents' Team will receive full training, comprising of an induction, a Management Development Programme, ANUK training in the National Code of Standards for Larger Developments, monthly 1-1's with their manager, probation review and annual appraisals. New managers are 'buddied' with existing site managers, who will offer practical guidance and support. The site team will also have regular communication with, and support from the Marketing and Facilities Team.

2.3.2 Front of House Services

The reception will generally be open Monday to Friday 9am till 5pm, providing a point of contact for:

- Reporting repairs.
- Delivery and collection of parcels.
- Resident disputes and complaints.
- Organising social events.
- Provision of general local information and signposting to specialist services.
- Marketing enquiries.
- General customer support and guidance

At key marketing and check in times, reception opening hours will be extended to provide weekend and evening cover.

2.3.3 Wellbeing Programme

The creation of a thriving, strong, healthy and vibrant community in this building is important for customer satisfaction and also retention.

Regular events through Fresh's <u>Be Wellbeing</u> programme will be organised for residents to help to create a sense of community. The following represents a non-exhaustive list of the types of events that will be organised:

- Book clubs
- Grow it Fresh.
- Bake off events.
- Movie nights
- Quiz nights
- Cultural celebrations such as Halloween/ Christmas/ Eid etc



All events will be organised and communicated by the onsite residents' team who will be available at the reception desk or contactable via telephone/ email/ WhatsApp and WeChat.

As well as creating a positive community inside the property, the residents' team will also look for opportunities to engage with and encourage our residents to seek employment and volunteering opportunities at local businesses, charities, and community groups. The residents' team will signpost residents to local groups and opportunities through social media posts and organised events.

2.3.4 Our Platform

To ensure that our service is transparent and accessible we use an online integrated Resident Portal and Tenancy Management System (Yardi).

Yardi provides the interactive resident portal and back-office tenancy management operating system.

The system provides an online service for residents allowing them to book their room, manage their booking, pay their rent, report repairs and complete and view the condition and inventory for their accommodation online 24 hours a day.

It highly automates key admin processes ensuring that on-site staff can focus on customer facing services, whilst still enabling central monitoring of activity.

2.3.5 Tenancy Agreement and Resident Handbook

In England and Wales our residents sign an Assured Short Hold tenancy agreement as prescribed by the Housing Act 1988. All the deposits taken for damages are registered with a government approved tenancy deposit property.

The Tenancy Agreement clearly sets out the responsibilities of the resident and Fresh as the managing agent.

In addition to the Tenancy Agreement, each resident is provided with an online residents' handbook. The handbook provides guidance and a range of useful information on things such as:

- Security.
- What to do in an emergency.
- House rules.
- Room inspections.
- Repairs and maintenance.

All our residents are required to provide us with a guarantor who agrees to ensure that the resident complies with all the conditions required of them as set out in their Tenancy Agreement.

2.3.6 Security

Security provisions are tailored around the nature, size and location of each site. At Britannia Street, we aim to provide visible but unobtrusive security, through a combination of CCTV provision, access control and security personnel.

At Britannia Street there will be:

- Secure entrances which require a fob or card to gain access to the building thus ensuring that only authorised persons are on site.
- The door entry system will not allow access to be granted to the building from individual flats but will require residents to meet their visitors at the main door.
- Full colour, high definition, IP based CCTV is provided which will cover a range of areas, including as a minimum; the entrances, fire exits, external areas, lifts, office, reception, bin store, amenity spaces, laundry and resident foyer. The CCTV will be linked back to monitoring screens in the office, with the ability for remote internet log-in, and storage capacity for a 28-day period.

Fresh will work closely with the local Police, and community support officers, and become a known presence at Britannia Street. We will encourage active participation in any local Resident Watch Schemes and other initiatives to reduce crime and improved security for the residents.

All staff including Security Personnel undertake an induction to ensure they are fully aware of Fresh' procedures on site.

2.3.7 Out of Hours

It is proposed that out-of-hours management for the property is provided by a professional security company, ensuring the scheme is patrolled throughout the night. Residents will have access to a dedicated 24/7 contact number for assistance with issues such as lockouts or security concerns. This contact information will also be displayed prominently at the building entrance, ensuring it is accessible to members of the public if required. In the event of a significant incident, the security team will follow Fresh's established escalation procedure to ensure a timely and effective response.

2.3.8 Maintenance

Maintenance is a key area of resident dissatisfaction if not properly managed. We operate a tiered approach to maintenance to ensure a value for money response maintenance service.

We have an approved list of small local contractors which enables us to deal quickly and cost effectively with more minor issues creating good customer satisfaction.

For larger and more specialist jobs we work with approved regional or national contractors to carry out necessary works. Our Property Team are experienced in negotiating contracts and harnessing economies of scale across our portfolio to drive cost efficiencies that benefit our clients.

Residents can report repairs via our online portal, Rent Cafe, or direct to the Residents' Team. We then assess the situation and grade repairs as Emergency, Urgent or Routine.

We operate in accordance with the table of response times, which are fully compliant with the ANUK code.

Urgency	Timescale	Includes
Emergency Repairs	Within 24 hours of being reported.	An emergency repair is any repair required to avoid danger to the health and safety of residents. E.g., No power supply, overflow of sewage.

Urgent Repairs	Within 5 working days of being reported	An urgent repair is any repair which materially affects the comfort or convenience of the residents. E.g., Broken handrails, faulty electrical fittings such as the microwave.
Non-Urgent Repairs	Within 28 days of being reported	A non-urgent repair is any repair not falling into the two above categories. E.g. Single electric light or power point failure within room, sticking doors or windows.

We operate an online purchase order system, and no works or supply of goods or services are carried out without a purchase order. Contractors and suppliers email invoices which are automatically matched against the PO. Once an invoice is received the PO originator must confirm satisfactory receipt of goods and services via the PO system before the invoice is paid.

All contractors must be on our 'approved list' of contractors and their performance is monitored against response times, and in respect of quality and customer service.

2.3.9 Cleaning

Residents will be responsible for cleaning their own studio, including bedrooms and shared kitchen areas with Fresh responsible for cleaning of the common arears throughout the property (both internal and external). As a guide Fresh looks to clean all common areas in line with the below guidance, this information is also shared with residents..

Area	Frequency
Reception/foyer	Daily
Amenity spaces	Daily
Corridors	Weekly
Staircases	Weekly
Lifts	Daily
Windows	Annual
Deep cleans	Annual

Deep cleaning and window cleaning will be carried out by specialist contractors and tendered annually.

The annual deep cleaning of the rooms during the Summer is generally contracted out due to the high volume of work needed in a short space of time – we always tender early in the year to ensure we get the best contractors and secure the time slots we want, and when reviewing tenders, we focus on quality as well as price - as the effectiveness of this service will have a direct influence on the first impressions of the new intake.

All hazardous substances are used and stored in compliance with COSHH regulations. A register is provided for each site and is reviewed during Health & Safety audits.

2.3.10 Post and Deliveries

For all deliveries the courier/postman will use the intercom call button for the address of the delivery. If the resident is at home, they will meet the courier/post person at the entrance to receive the delivery.

If the resident is not home the Residents Team will take in and sign for deliveries. All parcels received on behalf of the resident will be recorded on google sheets, which is shared with the residents online. The resident will be notified of the delivery and asked to come to reception with ID to collect it. The resident will sign the post book to confirm they have received the delivery.

2.3.11 Management of Anti-Social Behaviour

Fresh operates a 4-tier escalation process to deal with anti-social behaviour and will work closely with the universities and their disciplinary procedures.

The Residents and Security Team at the property will look to build a close professional relationship with the adjacent nightclub and be briefed on any localised management of the adjacent nightclub and will liaise with its management team to ensure that the arrival and departure of customers is complimentary to use of the building as student accommodation and mitigate against incidents of anti-social behaviour

2.3.12 Complaints Procedure

Fresh are determined to provide a high-quality service to all customers. Residents and neighbours are therefore encouraged to raise any complaints / grievances in person to a member of the onsite Residents' Team, either by telephone on the number provided at the main entrance or at Reception. We'll try our best to resolve any complaints at this initial point of contact. If this is not possible then complaints should be submitted in writing and will be dealt with in accordance with the stages set out below. Any complaints that are sent to Central Services will be re-directed to the relevant Residents' Team for them to investigate in the first instance.

We operate a three-stage approach to dealing with complaints:

Stage 1

All new complaints will be dealt with at Stage 1. The majority of complaints will be resolved at Stage 1 by our local staff. Where this is not the case, we will aim to acknowledge the receipt of a complaint within 24 hours. Should the complaint be received whilst our offices are closed, we will respond within 24 hours of our return. The acknowledgement to the complaint will include the name and contact details of the person who will be handling the complaint.

Stage 2

All Stage 2 complaints will be dealt with by a Senior Manager. There are some occasions where a complaint is complex where we may require more time to investigate to be able to properly respond to your complaint. When this occurs, we will communicate this, providing an update on progress and revised date when to expect to receive a full response. At Stage 2 and 3 of our complaints procedure we aim to provide you with a full response within 10 working days.

Stage 3

Stage 3 is the final stage of the complaint's procedure. At Stage 3 the complaint will be handled by another Senior Manager not previously connected to the complaint. This stage can only commence once stages 1 and 2 are complete. We will notify the complainant of Fresh's decision in writing, normally within 10 working days of receiving the request to escalate the complaint.

2.4 Third Party Services

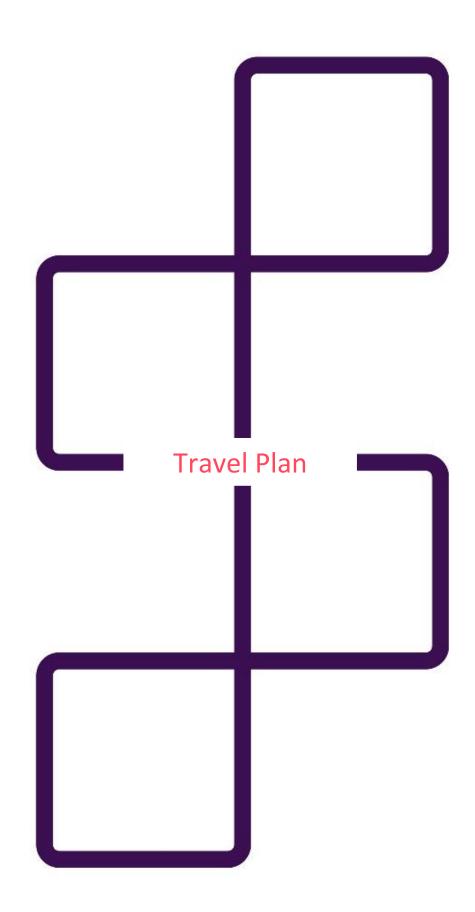
2.4.1 Laundry

The on-site laundries will be provided at Britannia Street, by a third-party provider on a lease basis. The laundries will be open to residents 24 hours a day, 7 days a week. The machines will be operated using a top up card which can be topped up online using a debit/credit card or via an app that residents can download to their smartphone. Residents can also view online how busy the laundry room is to ensure there is an empty machine before taking their washing down.

Machines will be provided on a minimum ratio of 1:75 residents and be fully DDA compliant.

2.4.2 Information Technology

Residents will receive a high-speed broadband and Wi-Fi service to ensure there is excellent internet connectivity for residents to complete their studies. The service also offers unlimited upload/download, data backup storage, Freeview TV, a dedicated resident portal and a free 24/7 helpdesk.



3. Travel Plan

This is the Fresh travel plan and should be read in conjunction with the framework Travel Plan provided with this planning application.

The Travel Plan has been prepared mainly for the residents living at the development and the majority of the measures proposed are intended to encourage residents to reduce their reliance on private car travel. Much of what is proposed in the Travel Plan will also apply to the small number of staff employed at the site.

The implementation and the management of the Travel Plan is the responsibility of the General Manager based at Britannia Street, and will be monitored by the Operations Manager.

3.1 Key Benefits of the Travel Plan

3.1.1 Benefits to the individual

In order to involve residents and successfully promote the Travel Plan it is important to outline the benefits to the individual. The use of non-car modes of transportation can bring several benefits, including:

• Improved Health

Walking and cycling can bring about a number of health benefits. According to the British Heart Foundation, half an hour of cycling or walking a day can reduce the risk of heart disease by 50%.

Cost Benefits

Promotion of the savings that can be achieved by using other forms of transport other than owning and running a car should appeal to residents who have increased pressures on their finances.

• Time Savings and Convenience

For the key journeys the residents will undertake, it will often be quicker to walk, cycle or use public transport than use a car.

It is often more convenient to be able to use a range of transport modes depending on the purpose or destination of the travel; e.g. travel to University, city centre or to enjoy the night life, it will be easier using a range of transportation other than the driving of a private car.

Environmental Awareness

Build awareness that the travel choice has an impact on the local and global environment and will enable the individual to appreciate their surroundings and contribute to its protection.

3.1.2 Benefits to the Universities

The benefits to the University will include:

• Increased Attendance

Residents who either walk or cycle more will have improved health and wellbeing and therefore will reduce absenteeism.

• Reduced Congestion and Pressure on Parking near or on Campus

Fewer trips by car and reduction of single occupancy trips travelling to and from campus and the site will lessen traffic levels and lessen the need for parking on or near the campus.

3.1.3 Benefits to the Community

The Travel Plan would be aimed at bringing benefits to the community as a whole including:

• Improved Air Quality

Fewer vehicles will result in less pollution and improved air quality. Cars are a major generator of pollutants according to the Department of Transport, emissions from road transport now constitute over 70% of all emissions of carbon monoxide and CO2 emissions. A reduction in car use will, therefore, lead to improvements in both local and global air quality.

• Reduced Traffic Levels

Reduced traffic levels provide the community with an environment that is less congested and improves the overall quality of environment. The site has been designed without car parking spaces, in order to discourage residents relying on this form of transport.

3.2 On Site Resident Parking

This scheme would not allow for any resident parking on or near the premises. The tenancy agreement and resident handbook will specify that the location is car free and that residents are not to bring their own cars to the accommodation. There will be a secure bicycle store within the property to encourage residents to cycle as an alternative to use of a private vehicle.

3.3 Start and End of Term

The following is the procedure employed by Fresh for the arrival and departure of the residents at the beginning and end of the academic year.

Prior to arrival, all residents are contacted by email to confirm the arrival arrangements and move-in procedure. They are provided with details of travel arrangements from key airports, the main line train stations, and the cost of taxis from these key arrival hubs. We will also provide information about the location and cost of public paid car parking facilities close to the site.

Fresh encourage residents to spread their arrival to the accommodation by offering the facility to arrive up to three days prior to the tenancy start date at no additional charge.

Residents are required to book their arrival online through the resident portal. Limited time slots are built into the system to avoid congested arrival periods.

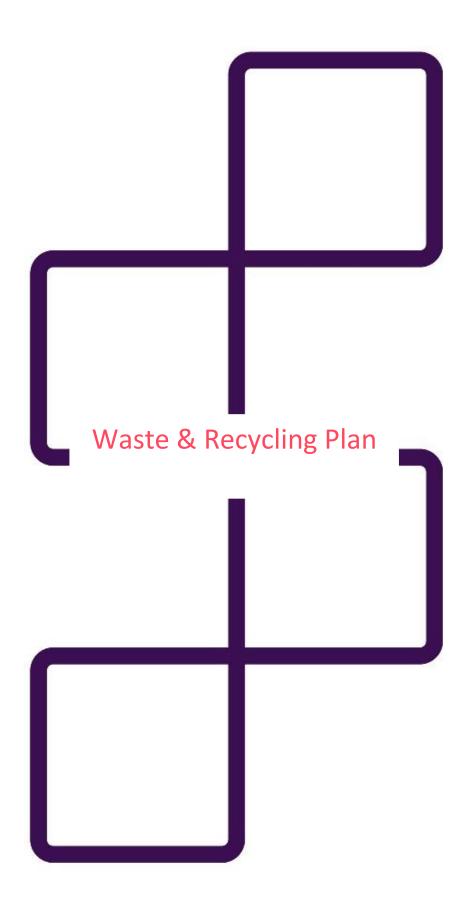
Residents who arrive by car with family and friends are given information about local car parks before they arrive. They are advised to park away from the site before they have been checked in. This avoids the reception area being congested with lots of family members and luggage blocking the entrance.

The residents are met at reception and in a couple of minutes they are checked-in and have been shown to their room. Once the resident has been shown to their room, and been given an induction of the building, they are advised of the nearest place they can park and unload their luggage.

To ensure the move-in process is managed efficiently, additional staffing resources are employed to manage the road congestion and for directing residents quickly to their accommodation.

We will liaise with the local police and traffic management bodies and agree a strategy to avoid blocked roads and parking problems.

The residents move-out period is managed in a similar fashion to the move-in process. Residents are expected to confirm with the Residents' Team their proposed move-out times and dates. However, move-out periods are unlikely as the residents tend to move out over an extended period. Additionally, unlike other traditional halls of residence, residents at Britannia Street, will not need to remove all their belongings at Christmas and Easter, therefore reducing the traffic associated with the site as residents are more likely to head home by train or coach, as opposed to a car.



4. Waste and Recycling Plan

The below section should be read in conjunction with the agreed Waste Management strategy for the site.

4.1 Overview

The management of waste can be expensive if not undertaken correctly, so we take a structured approach to minimise costs and environmental impact.

Residents will be responsible for putting their waste in the bin store. We will actively promote recycling and the use of specialist banks for clothing and other recyclables to avoid as much refuse going to landfill as possible.

Waste and recycling levels will be monitored, allowing us to identify trends and take corrective action when required.

Waste generated by residents will be stored within each studio or flat in refuse and recycling bins. It will be the responsibility of the residents to take their own refuse down to the ground floor main bin store using the lifts or staircase as and when required and place refuse in the wheeled Eurobins provided.

We minimise management staff handling of bins as this will add significant management costs. All waste and recycling is stored in a secure purpose built bin storage accessible from the ground floor.

4.2 Capacity

The bin stores at Britannia Street, have been designed to accommodate numerous wheeled Eurobins for mixed/recyclable and general waste.

4.3 Recycling

To assist in maximising the recycling and recovery of waste and thus minimise waste disposed to landfill, storage will be provided for mixed/recyclable waste within each studio and flat and also within the main bin store at ground floor level.

Recyclables including paper, cardboard, cans, plastics and bottles will be stored in a proportion of the bins provided. These will be clearly labelled to advise the occupants about what materials can be recycled in the mixed/recycle waste bins.



5. Health & Safety Management

The Health & Safety of the residents is paramount. Fresh have partnered with EDP Ltd to provide external and independent professional Health & Safety advice. EDP Ltd provide a 24/7/365 Health & Safety telephone helpline, allowing all Fresh staff to have access to Health & Safety professionals at any time it is required.

The fire alarm system will be monitored by a remote monitoring centre with an investigation delay programmed in, where permitted, to allow on-site staff to minimise false alarms. The cause-and-effect logic will balance the need for fire safety whilst avoiding unwanted fire signals.

Residents are required to complete an online induction using our Resident Portal prior to arrival. The induction contains a section on fire safety that requires residents to confirm that they will 1) make themselves aware of the evacuation point and the evacuation route upon their arrival, 2) immediately leave the building to the agreed evacuation point when the fire alarm sounds, 3) call the fire brigade (999) and activate a fire alarm call point (if available) should they discover a fire, 4) not tamper with the smoke detectors or fire safety equipment, and 5) not cause any obstructions in the shared flat corridors or the communal stairwells and corridors.

In addition, Fresh will invite the local fire service to attend the resident induction meetings where we will provide residents with information and guidance of the potential hazards within the home that could cause a fire. The Fire Service and on-site management team will also explain the consequences of raising false alarms.

The fire alarm system hardware will support our fire management plan.

To ensure compliance with legislation, we ensure that we carry out and record all necessary testing. With the guidance from our Health & Safety partners EDP Ltd, Fresh have introduced Health & Safety management software, Yardi Elevate. This system allows all Fresh management the ability to view live information from each site in regard to Health & Safety compliance actions required to be completed e.g. fire alarm tests, lift checks etc. It also allows the user to add additional actions onto the system.

Our on-site staff are responsible for carrying out and recording a range of routine tests, these include the following:

- Weekly fire alarm.
- Weekly call point/firefighting equipment inspection.
- Monthly emergency lights.
- Monthly water temperature.
- Weekly fire door inspections.
- Routine Health & Safety inspection and audit of the building.

We employ specialist contractors to carry out the following tests:

- Lift inspection
- Annual full system test for fire alarms,
- · Annual full duration tests for emergency lighting
- Water sampling for legionella, including an annual tank inspection and clean if required.
- CCTV/Security alarm maintenance.
- Automated gates/doors

A record of all testing will be kept ensuring we have an audit trail. Records of statutory testing and actions completed are stored within Yardi Elevate system and also within the onsite Health & Safety filing system.

We use external consultants to carry out a range of risk assessments following industry regulations to ensure legal compliance and the safety of our residents. We regularly review the guidance to ensure we are following best practice.

Risk Assessments include the following:

- Fire
- Legionella
- General health & safety

The Tenancy Agreement and handbook prohibits the use of candles, and any equipment or device that has a flame, generates heat or smoke. Smoking is not permitted anywhere within the building including resident bedrooms, kitchens and communal areas.

Termly evacuation tests will be undertaken to ensure all residents are aware of the procedures and assembly points. The on-site team undertake formal room inspections 3 times per year to check that all equipment is being used as designed and that there are no breaches of health and safety.

5.1 Building Safety Act

Whilst there is no specific legal duty under the Building Safety Act for Fresh to fulfill as part of our standard facilities management agreement, Fresh recognises the critical role we play in supporting the accountable person in meeting their obligations.

Fresh is committed to collaborating with our clients to ensure compliance by implementing robust systems for ongoing safety management, proactive monitoring, and meaningful engagement with residents.

5.2 Statement of Intent

Fresh Property Group believes that ensuring the health and safety of staff, residents, visitors and all relevant persons is essential to our success.

We are committed to:

- 1. Preventing accidents and work-related ill health.
- 2. Compliance with statutory requirements as a minimum.
- 3. Assessing and controlling the risks that arise from our work activities.
- 4. Providing a safe and healthy environment.
- 5. Ensuring safe working and management methods
- 6. Providing effective information, instruction and training.
- 7. Consulting with employees, residents and visitors on health and safety matters.
- 8. Monitoring and reviewing our systems and prevention measures to ensure their effectiveness.
- 9. Setting targets and objectives to develop a culture of continuous improvement.
- 10. Ensuring adequate resources are made available for health and safety issues, so far as is reasonably practicable.

A Fire Safety Management System will be created to ensure the above commitments can be met. Employees throughout the company must play their part in the creation of a safe and healthy working environment for all.

Revision History

Issue	Date of issue	Description	Author
1.0	12/01/2023	First Draft	Jonathan Burcham (JB)
1.1	05/12/2024	Second Draft	Mark Wakeham (MW)