Fire Safety Policy

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1.0 Introduction

1.1 As a landlord, we are responsible for carrying out fire risk assessments, and taking action to identify, manage and mitigate risks associated with fire within the common areas of buildings we own and manage.

1.2 This policy sets out our responsibilities in complying with the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety Act 2021, the Fire Safety (England) Regulations 2022 and the Building Safety Act 2022 (Section 156) and all other relevant legislation and guidance to ensure we keep our customers safe within their homes.

1.3 The policy has been reviewed by an external Third Party to ensure that it covers all our responsibilities under current relevant legislation.

2.0 Purpose

2.1 The purpose of this policy is to ensure:

- Our homes and other buildings comply with health & safety legislation.
- Customers are safe in their homes.
- Customers affected by this policy are treated with respect and empathy.

3.0 Values

3.1 This policy is underpinned by the following values:

- Trust – being open and honest with customers by publishing our targets and performance.
- Respect – ensuring all customers are treated with respect, recognising the diverse views and needs of customers and accommodating these views and needs whenever possible.
- Innovate – continuous improvement to enhance the delivery of the electrical safety procedure.
- Work together – embracing customer feedback to further develop the electrical safety procedure.
- Own it – we will take ownership of our decisions and responsibilities, ensuring works are carried out professionally, ethically and in line with our standards.

4.0 Definitions

4.1 The key terms used in this policy are defined below.

BAFE	Is the indipendent register of quality fire safety service providers, who ae certified to ensure quality and competence to help meet fire sfatey obligations.
FRA	A fire risk assessment is an assessment involving the systematic evaluation of the actors that determine the hazard from fire, the likelihood that there will be a fire and the consequences if one were to occur.
FSO	Regulatory Reform (Fire Safety) Order 2005.
FRA Survey	The FSO states that an FRA is required, however, it does not prescribe how intrusive or destructive this should be. There are four types of FRA: • Type 1 – common parts only (non-destructive), basic level to satisfy the FSO. • Type 2 – common parts only (destructive), element of destruction on sample basis. • Type 3 – common parts and flats (non-destructive), considers means of escape and fire detection within at least a sample of flats. • Type 4 – common parts and flats (destructive).
IFSM	The institute of Fire Safety Managers.
PAS79	A publicly available specification published by the British Standards Institution which focuses on making sure that all the required information that pertains to both an FRA and its findings are recorded.
BS 9792:	Introduced in August 2025 as a full revision and formal upgrade of PAS 79- 2:2020, which was withdrawn in 2021. A clearer structure and templates, defined FRA types, the introduction of Person-Centred Fire Risk Assessments (PCFRAs), improved risk evaluation, and a stronger focus on fire safety management.
BS 8674	Framework for Competence of Individual Fire Risk Assessors – Code of Practice is a new British Standard, officially published on 15 August 2025
PEEP	A personal emergency evacuation plan is a bespoke escape plan for individuals who may not be able to reach an ultimate place of safety unaided or within a satisfactory period of time in the event of any emergency.

RPEEP	Residential Personal Emergency Evacuation Plans (RPEEPs) for any Customer who may require assistance to evacuate safely in higher-risk residential buildings in accordance with Residential PEEPs Regulations 2025 (in force April 2026).
UKAS	The National Accreditation Body for the United Kingdom, appointed by government to assess and accredit organisations that provide services including certification, testing, inspection and calibration.
Customer	Customers are defined as tenants and residents, living in our homes, that are eligible to access and receive services associated with fire safety.
Complaint	Any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, our own employees, or those acting on our behalf, affecting a customer or group of customers.
Operational Building	This refers to offices or buildings that are actively used but are not commercial building.
Non-operational Building	This refers to buildings where there is a communal area or shared space e.g. communal lounges or communal areas of flat blocks.

5.0 Scope

5.1 This policy applies to all flat blocks with a shared communal entrance and non-domestic properties (communal lounges, operational and non operational buildings).

5.2 This policy is relevant to all our employees, customers, contractors, stakeholders, and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.

5.3 The policy should be used by all to ensure they understand the obligations placed upon us to maintain a safe environment for customers and employees, within the home of each customer, and within all communal areas of buildings and other properties we own and/or manage. Adherence to this policy is mandatory.

5.4 Regulatory Reform (Fire Safety) Order 2005 (the FSO)

The Responsible Person (Livin) 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 FSO. Although under the FSO this requirement only applies to common parts of premises, in practice the responsible person will need to consider the entire premises, including units of residential accommodation.
- Consider who may be especially at risk, we will do this by checking customer vulnerability data every 6 months as part of the fire door inspection programme.
- Implement all necessary general fire precautions and any other necessary measures identified by an FRA to remove or reduce any risks.
- Implement a suitable system of maintenance and appoint competent persons to carry out any procedures that have been adopted.
- Periodically review FRAs 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 FRA.

5.5 Fire Safety Act 2021

The Act amends the FSO by clarifying that in buildings with two or more sets of domestic premises with a shared communal area, the FSO applies to: the structure and external walls of the building, including cladding, balconies and windows; and all doors between the domestic premises and the common parts, for example, entrance doors to individual flats which open on to common parts. The Responsible Person must ensure that FRAs comply with the criteria outlined above by appointing a competent person to review them (if the FRAs do not already comply). See Section 10 for competency requirements.

5.6 Fire Safety (England) Regulations 2022

The Responsible Person (Livin) is required to carry out the following under these regulations which have come into force:

- For All buildings with two or more sets of domestic premises with a communal shared area - provide customers with fire safety instructions and information on fire doors.
- For buildings over 11 metres - undertake quarterly checks of communal fire doors and annual checks of flat entrance doors.
- For buildings over 18 metres (as defined within the Building Safety Act 2022) - provide the fire and rescue service with building plans and other relevant information, install and maintain premises information boxes, install wayfinding signage and undertake checks on lifts for use by firefighters and other key pieces of firefighting equipment.

Currently we have no buildings that fall over 11 meters within our portfolio, however, should we have responsibility for any building that do fall within scope during the lifetime of this policy we will ensure to comply with these regulations.

5.7 Building Safety Act 2022- Section 156

Section 156 of the Building Safety Act amends the FSO and requires Responsible person to do the following:

- Record FRAs in full and record fire safety arrangements.
- Appoint a competent person to undertake/review FRAs and share the FRA with customers.
- Ascertain whether other RPs have duties in respect of the premises and share relevant information with them.
- Provide relevant easy to understand fire safety information to customers (for buildings with two or more domestic premises with a shared communal area).
- For higher-risk buildings (as defined in within the Act), ascertain if the premises has an Accountable Person and co-operate with them to enable them to carry out their duties under the Act.

6.0 Contribution to Plan A

6.1 This policy supports our 'Providing Quality Sustainable Homes' strategy and its strategic vision of 'Tenants living in warm, safe, high quality, sustainable homes in a place they are proud to live'.

7.0 Legislative and regulatory framework

7.1 Legislation - The principal legislation applicable to this policy is as follows:

- Regulatory Reform (Fire Safety) Order 2005 (FSO).
- The Fire Safety (England) Regulations 2022
- The Building Safety Act 2022- came into force on 1st October 2023 and amends the FSO.
- The Defective Premises Act 1972
- Health and Safety at Work Act 1974
- The Occupiers' Liability Act 1984
- Furniture and Furnishings (Fire) (Safety) Regulations 1988
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Gas Safety (Installation and Use) Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR)
- Housing Act 2004
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Building Regulations 2010: Approved Document B Fire Safety
- Homes (Fitness for Human Habitation) Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Electrical Equipment (Safety) Regulations 2016
- Data Protection Act 2018
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Social Housing (Regulation) Act 2023
- Consumer Standards 2024 Annex 3 The Safety and Quality Standards.

7.2 Guidance – The principal guidance documents applicable to this policy are:

- Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing (Local Authorities Coordinators of Regulatory Services), August 2008.
- Fire safety in purpose-built blocks of flats (hosted by the Home Office and to be read alongside the National Fire Chiefs Council's guidance on simultaneous evacuation), 2011. [note this guidance should be viewed as no longer comprehensive; the Home Office is currently working on a revised version but in the interim, it is continued to be made available as it contains relevant and useful information for purpose-built blocks of flats]
- Fire Safety in Specialised Housing (National Fire Chiefs Council), May 2017. This guidance covers sheltered schemes, supported schemes and extra care schemes.
- Housing Health and Safety Rating System Operating Guidance: Housing Act 2004 Guidance about inspections and assessment of hazards given under Section 9 (Ministry of Housing, Communities & Local Government), February 2006.
- Housing Health and Safety Rating System Operating Guidance: Addendum for the profile for the hazard of fire and in relation to cladding systems on high rise residential buildings (Ministry of Housing, Communities & Local Government), November 2018.
- Advice for Building Owners of Multi-storey, Multi-occupied Residential Buildings (Ministry of Housing, Communities & Local Government), January 2020.
- Simultaneous Evacuation Guidance: Guidance to support a temporary change to a simultaneous evacuation strategy in purpose-built blocks of flats (National Fire Chiefs Council), October 2020.
- Hazards in Social Housing (Prescribed Requirements) (Englanc Regulations 2025 (Awaab's Law)

7.3 Regulatory Standards:

- Consumer Standards 2024 Annex 3
- The Safety and Quality Standard.
- The Social Housing (Regulation) Act 2023

7.4 Sanctions – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including: prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; prosecution under any of the principal legislation listed in Section 4.1; and via a regulatory notice from the Regulator of Social Housing.

8.0 Policy Statements

8.1 We acknowledge and accept our responsibilities under all the legislation set out in section 7. We will endeavour to meet all the requirements of this legislation and set out how we will do this in our supporting procedures.

8.2 Each property requiring an FRA will have one in place which has been carried out by a competent fire risk assessor, and which is compliant with the British Standards Institution's PAS 79-1:2020 and BS 9792:2025 (Previously PAS 79-2:2020) specifications for non-residential and residential buildings respectively.

8.3 All FRAs will be reviewed no later than the review date set within the most recent FRA for that building.

8.4 The FRA for a building will be reviewed in the event of:

- A fire, fire safety incident or near miss.
- Change in building use.
- Change in working practices that may affect fire safety.
- Following refurbishment works.
- Change in applicable legislation.
- If required following an independent fire safety audit.

8.5 We will operate robust processes to implement all general fire precaution measures identified by FRAs.

8.6 To comply with Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, which came into force on 1st October 2022, we install, test and replace (as required) battery operated and/or hard-wired smoke alarms and carbon monoxide alarms as part of our quarterly alarm checks in communal areas.

8.7 Personal Emergency Evacuation Plans (PEEPs) will be carried out by a competent person, reviewed annually, and made available to the Fire and Rescue Service in the event of an evacuation for any employee within any building where we are the employer.

8.8 Although we do not currently manage any high-risk residential buildings, we recognise our responsibilities under the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, implemented no later than 6 April 2026 to ensure the safe evacuation of all customers in the event of a fire. We are committed to providing Residential Personal Emergency Evacuation Plans (RPEEPs) for any customer who may require assistance to evacuate safely in higher-risk residential buildings (HRB).

8.9 When letting properties, we will consider the suitability of the accommodation for the prospective customer in respect of fire safety.

8.10 We are committed to working with Durham and Darlington Fire and Rescue Service to create safer places to live and work. This joint working may include sharing information, having FRAs reviewed and employee training.

8.11 We will refer customers to County Durham and Darlington Fire and Rescue Service if there is a 'condition of property issue' or a concern is raised during a tenancy visit.

8.12 A 'stay put' policy is in place across all our flat blocks which is in accordance with the recommendations of the competent fire risk assessor and any guidance from County Durham and Darlington Fire and Rescue Service.

8.13 We will operate robust processes to gain access should any customer or leaseholder refuse access to carry out essential fire safety inspection and remediation works (as tested in the case Croydon Council v. Leaseholder 1st August 2014).

8.14 We will operate robust processes to gain access to properties where customer vulnerability issues are known or identified (including hoarding), whilst ensuring we safeguard the wellbeing of the customer.

8.15 We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.

8.16 We will operate a robust process to manage immediately dangerous situations identified during fire safety programmes.

8.17 We will adopt a sterile environment in all internal common areas, requiring customers to remove combustible materials from corridors and fire escape routes.

8.18 We will not permit the storage or charging of mobility scooters, e-bikes/scooters or other electrically or fuel operated means of transport within internal common areas.

8.19 We will have a robust process in place to manage properties with known hoarding issues, as well as new hoarding issues which arise.

8.20 We will establish and maintain a risk assessment for fire safety management and operations, setting out our key fire safety risks and appropriate mitigations.

8.21 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be in place in respect of all component replacement works and refurbishment projects to void and tenanted properties (at the start of the contract and reviewed annually thereafter). This plan will detail what is required to update the FRA if the building is affected by the works to ensure the safety of operatives and customers after the works have been completed and to continue to comply with relevant legislation.

8.22 To comply with the requirements of the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002, we will consider the safety of our workplaces and plant/boiler rooms of our residential blocks.

8.23 We will operate robust processes to record and action any fire safety related near misses. A near miss is an unplanned event which does not result in an injury but had the potential to do so.

8.24 We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to fire safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

Programmes

8.25 FRAs - We will ensure all our communal blocks and non-domestic properties (communal lounges, operational and non-operational buildings), that we own or manage, have a FRA in place where we have the legal obligation to do so.

8.26 Thereafter, we will maintain a programme of FRA reviews, in a timescale appropriate to the premises and/or occupation fire risk level. This timescale will be determined by the fire risk assessor carrying out the FRA (between one and three years).

8.27 All FRAs are initially Type 1 surveys. Type 2, 3 and 4 surveys will be commissioned where it is deemed appropriate for a particular property or at the recommendation of the competent fire risk assessor.

8.28 We will ensure that a pre-occupation FRA is carried out on all new build schemes or new acquisitions where we have an obligation to do so, followed by a post-occupation FRA, a maximum of three months after the first customer moves in.

8.29 Properties managed by others – We will obtain FRAs where our properties are managed by a third party. If the third party does not provide the FRA, we will carry out the FRA and re-charge them for the cost of this work.

8.30 Fire door checks- For all communal blocks and other properties with common areas we will undertake a six-monthly check of all communal fire doors, and flat entrance doors.

8.31 Servicing - We will carry out a programme of servicing, maintenance and testing, in accordance with all relevant British Standards and manufacturer's recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings we own or manage.

8.32 Regular inspections – We will carry out a programme of regular inspections to all blocks with a fire risk assessment in place to audit that all required management actions are taking place.

Follow-up Work

8.33 We will ensure robust processes are in place to implement all general fire precaution measures identified by FRAs, in accordance with the following priorities and timescales:

- Intolerable risk – as soon as practicable (make safe within 4 hours)
- High risk – within one month.
- Medium risk – within three months.
- Low risk – within six months or delivered as part of a planned programme within 12 months. These recommendations will be reviewed by the Compliance and Cyclical Works Manager.

8.34 We will ensure that robust processes are in place to implement all fire precaution measures identified by housing officers or other employees. The standard procedure for reporting such issues will be through the accident/incident portal.

8.35 We will use the date the FRA was undertaken on-site as our timeframe to start completing FRA actions.

8.36 We will ensure there is a robust process in place to manage follow-up works arising from fire door audits, and servicing and maintenance checks to fire systems and equipment.

Data and Records

8.37 We will maintain a core asset register of all properties we own or manage, setting out which properties require an FRA. We will also set out which properties require fire safety servicing and maintenance regimes (for example, fire alarms, emergency lighting and smoke/heat detection).

8.38 We will utilise data held within our CX system to ensure we consider tenant vulnerabilities, access requests and any other arrangements as part of our required compliance visits.

8.39 We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from fire safety programmes and the programme remains up to date.

8.40 We will hold fire safety inspection dates, FRAs, FRA actions, and fire safety servicing records against all properties on each programme. These will be held in the MRI Asset system a shared spreadsheet and a shared drive.

8.41 We will keep fire safety logbooks securely on site for communal lounges and operational buildings on the FRA Programme.

8.42 We will keep all records and data, for the duration that we own and manage the property. This is in line with our document retention policy and will have robust processes and controls in place to maintain appropriate levels of security for all fire safety related data.

Diverse needs

8.43 We will make reasonable adjustments in how we deliver the service to customers' homes where a vulnerability would prohibit the works being carried out without adjusting the service. We will also make reasonable adjustments to how we communicate with customers based on their vulnerabilities.

Customer data and voice

8.44 The policy has been developed following consultation with our customers to ensure their voice is heard.

Communication

8.45 In line with the requirements of section 156 of the Building Safety Act, we provide all customers living in buildings, where we have completed a fire risk assessment, with a summary of the risk assessment and relevant information on fire doors. This information is provided annually and on the commencement of all new tenancies.

8.46 We consider good communication essential in the effective delivery of the fire safety programme, therefore we will ensure our communications support customers in their understanding of fire safety, advise them of how they can keep themselves and other customers safe, and encourage them to report any fire safety concerns.

8.47 We also aim to successfully engage with vulnerable and hard to reach customers. We will share information clearly and transparently and will ensure that information is available to customers via regular publications and information on our website.

Feedback and complaints

8.48 In line with the Complaints, Compliments and Feedback Policy, we will work with customers who have specific needs and vulnerabilities to make sure they can access the service, have their views listened to and receive their complaint response in a way that meets their needs.

8.49 Customers can provide feedback about the services they have received in respect of this policy. If a tenant is dissatisfied with the service they have received from us, they can make a complaint to us in line with our Complaints, Compliments and Feedback Policy.

Competent Persons

8.50 The competency of persons delivering this policy are outlined below.

Competent Person	Qualification/Accreditation Required
Operational Lead	NEBOSH National Certificate in Fire Safety and Risk Management (or equivalent) or Level 4 VRQ Diploma in Asset and Building Management.
Person completing FRA	NEBOSH National Certificate in Fire Safety and Risk Management (or equivalent) and be compliant with BS8674:2025 Framework for Competence of Individual Fire Risk Assessors.

Operatives working on fire safety equipment, systems and installations	Suitably competent and certified by BAFE and/or an IFSM member and be in line with Fire Sector Federations guidance.
3rd party technical auditor	Suitable competent and qualified.

9.0 Roles and responsibilities

9.1 Roles and responsibilities under this policy are outlined below.

Board	The Board has overall governance responsibility for this policy. As such, the Board will formally approve this policy and review it every two years, or earlier if there is a change in legislation or regulation. Board will receive quarterly performance reports containing high-level performance metrics measuring the effectiveness of this policy.
Audit and Risk Committee	The Audit and Risk Committee have a specific focus on Awaab's Law, compliance and disrepair, ensuring repair activity is supported by robust internal controls and risk management arrangements. The Committee provides independent oversight and assurance ensuring compliance with legislative andregulatory requirements. Any significant issues, risks outside of tolerance, or matters requiring strategic direction will be escalated to the Board for consideration and decision.
Executive Management Team	EMT will be notified of any significant, continued, non-compliance with this policy. EMT will receive at least quarterly performance reports containing high-level performance metrics measuring the effectiveness of this policy.
Executive Director of Finance and Investment	The Executive Director of Finance and Investment has strategic responsibility for the management of fire safety and ensuring compliance is achieved and maintained. The Executive Director of Finance and Investment will receive monthly performance reports containing high-level performance metrics measuring the effectiveness of this policy.

Executive Director of Corporate Services	The Executive Director of Corporate Services is designated as the health and safety lead as defined by the Social Housing (Regulation) Act 2023.
Director of Property Services	The Director of Property Services is responsible for overseeing the operational delivery of the policy, monitoring compliance performance, and providing assurance that effective arrangements are in place to manage radon risks and maintain compliance with legislative and regulatory requirements.
Head of Property Services	The Head of Property Services has operational responsibility for the implementation and oversight of this policy.
Compliance and Cyclical Works Manager	The Compliance and Cyclical Works Manager has operational responsibility for the management of fire safety and will be responsible for overseeing the delivery of these programmes.

9.2 This policy will be communicated to employees via our intranet and communicated to customers via our website and in other forms where needed. Those responsible for implementing the policy will, where required, receive appropriate training, advice, and/or guidance.

10.0 Related policies and procedures

10.1 This policy should be read in conjunction with the following documents:

Fire Safety Procedure (July 2026)	The Fire Safety procedure sets out the process we will follow to gain access and undertake FRA's and to raise and monitor any identified remedial works within the common areas of buildings we own and manage.

11.0 Monitoring, assurance and review arrangements

11.1 Assurance on compliance with this policy will be gained by the following methods and timescales:

Types of assurance	Key Source	Frequency
Management Assurance	Perfroance CX report Contract Performance meetings Pentnan performance dashbaords	Weekly Monthly Monthly
Corporate Oversight	Performance report Ladlord health and safety report	Monthly to Executive Director of Finance and Investment Quarterly to Board Quarterly to Audit and Risk Committee
TSM- dwelling units owned within properties that require an FRA or re-inspection	Performance report	Annually
Independent Assurance	Internal audit	Every 2 years

11.2 The following information will be included in the landlord health and safety compliance report to Audit and Risk Committee:

Data – the total number of:

- Properties – communal blocks and other properties.
- Properties with a valid and in date survey.
- Properties without a valid and in date survey.
- Properties due to be surveyed/re-inspected within the next 30 days; and Narrative - an explanation of the:
- Current position
- Corrective action required.

11.3 This policy will be reviewed every 2 years, unless there is significant development that would require a more urgent review e.g. new legislation or regulation.