

Fire Safety Policy

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Owner: Compliance & Building Safety	Next Scheduled Review: 17/06/2029

1. Purpose

- 1.1 This Policy outlines how Flint Housing will fulfil its statutory duties in respect of fire safety at premises for which it is responsible and seek to provide assurance that fire safety is adequately managed, whilst ensuring the safety of its residents, staff, contractors and the general public.
- 1.2 It is noted that Flint Housing does not act as the developer and does not engage in the design and construction of buildings. Flint Housing relies upon the developer to ensure that design and construction standards are achieved up to the point of Practical Completion.
- 1.3 For the purposes of this Policy, any reference to Flint Housing or “our” or “we” shall be relevant to all its associated entities and administered, where applicable, by its housing management provider(s).
- 1.4 Where Flint Housing enters into a service level agreement with third party contractors or housing management providers to deliver services on our behalf, we understand that the legal responsibility is ours. We will manage these relationships and establish robust systems to measure performance.

2. Scope

- 2.1 This Policy applies to all properties where Flint Housing as the landlord and/or building owner is in control of the premises and retains a responsibility to ensure fire safety.
- 2.2 In some cases, Flint Housing will not hold responsibility for some or all of the fire safety obligations detailed within this Policy (for example where in respect of communal blocks a property is owned and controlled by a third party and Flint Housing only holds a leasehold interest in specified units within the block) and this must be clearly established before any properties are excluded. In any event, where Flint Housing does not hold such responsibility e.g., where such obligations (legally or contractually) sit with a managing agent or a superior landlord, we will take reasonable steps available to us to obtain evidence of compliance and will retain copies within our electronic records.
- 2.3 Where Flint Housing is not an Accountable Person or a Principal Accountable Person, we will nevertheless cooperate with any Accountable/Principal Accountable Persons so far as we are required to do so by law and, in any event, as far as we reasonably can, so that building safety duties can be carried out effectively (to include the sharing of relevant information). Further information can be found in the Building Safety Policy.
- 2.4 We do not undertake testing, maintenance and/or replacement of any fire safety equipment for Shared Owners or Leaseholders, but we will periodically communicate with them to remind them of the importance of undertaking these checks.

3. Compliance and Adherence to Policy

- 3.1 Flint Housing’s staff and third-party contractors employed or engaged by Flint Housing shall comply with this Policy and any associated procedures and guidance and we will encourage Flint Housing residents to be safe and responsible when occupying Flint Housing accommodation or properties.

4. Communication

4.1 This Policy shall be:

- communicated throughout Flint Housing's organisation, and through relevant training understood by staff;
- made available to residents, contractors and stakeholders, as appropriate; and
- formally reviewed and revised as necessary in accordance with the review requirements detailed in this Policy.

5. Legislation and guidance

5.1 Flint Housing recognises and accepts its responsibilities under the following:

- Regulatory Reform (Fire Safety) Order 2005
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022
- Health and Safety at Work etc. Act 1974
- Landlord and Tenant Act 1985
- Housing Act 2004
- Housing Health and Safety Rating System (England) Regulations
- Housing Health and Safety Rating System & Smoke and Carbon Monoxide Alarm (England) Regulations 2015
- Building Safety Act 2022 and subsequent legislation and regulations as set out in the Building Safety Policy
- Social Housing (Regulation) Act 2023
- NFCC Fire Safety in Specialised Housing
- BS 9999: 2017, Fire safety in the design, management and use of buildings, Code of practice
- BS 9997: 2019. Fire Risk Management System, August 2019
- BS 9991: 2015. Fire safety in the design, management and use of residential buildings. Code of Practice. Second edition, October 2015

5.2 Flint Housing will have regard to any changes to existing (or introduction of new) legislation or regulation and any relevant issued guidance.

6. Commitments and obligations

6.1 Flint Housing is obliged under the Regulatory Reform (Fire Safety) Order 2005 (the Order) to:

- take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of any of its employees; and
- in relation to relevant persons who are not its employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe.

6.2 This legislation is extensive, but in summary, landlords (Flint Housing) are expected to identify the risk of fire (i.e., through a fire risk assessment) and suitably manage and control those risks, providing for example:

- measures to reduce the risk of fire occurring;
- measures to reduce the spread of any fire through the premises;
- measures in relation to the means of escape;
- measures to ensure the means of escape can always be safely used;
- firefighting measures;
- means of fire detection and warning;
- adequate training of staff; and
- mitigating the effects of fire.

6.3 Once any issues have been identified, they should be swiftly rectified, and suitable controls implemented. Information should be provided to the tenant. This should be communicated to the tenant at the start of the tenancy.

6.4 In respect of fire risk assessments, Flint will:

- ensure that they are undertaken in a timely manner on either a 1, 2, or 3 year anniversary date (as advised by the fire risk assessor);
- ensure that all FRAs are completed by accredited risk assessors who are listed on a recognised register of life safety risk assessors;
- ensure that those employed to undertake FRA's are competent and qualified to do so with the appropriate skills and knowledge;
- carry out a Fire Risk Appraisal of the External Wall System (FRAEW) (see paragraph 7.4 below). This may be carried out using the PAS 9980 methodology (noting that this is not a legal requirement);
- ensure that all fire installation maintenance and safety checks are conducted by a suitably qualified and registered engineer;
- ensure that all actions identified from FRAs are completed in accordance with recommendations made by the competent persons;
- keep a register of all FRAs completed, with date of last assessment and next date due;
- ensure that the findings of the FRAs are made available for residents to view, if requested;
- ensure that the FRA for a building is reviewed following a fire near miss, or any building change that may affect fire safety, or if required following an independent fire safety audit; and
- following a fire in a block or where there has been a material change in the building that impacts fire safety, where Flint is responsible for the FRA, undertake a new FRA.

6.5 In respect of buildings over 11 meters in height, Flint will:

- carry out annual inspections on flat entrance fire doors
 - carry out quarterly inspections of all fire doors in communal areas;
 - ensure any issues found are acted upon in a timely manner;
 - ensure that fire door information is provided to residents;
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6.6 In respect of occupied high-risk buildings (i.e. a building at least 18 metres in height or which has a least 7 storeys, and contains at least 2 residential units) as defined in the Building Safety Act 2022 (BSA), Flint will:

- ensure that it complies with its duties (where applicable) as the Principal Accountable Person and/or an Accountable Person as set out in the BSA and any subsequent legislation or regulations. Further detail can be found in Appendix 2 of the Building Safety Policy;
- ensure that it has an adequate resident engagement strategy in place;
- ensure there is correct wayfinding signage; and
- ensure there is a secure information box, which contains site and floor plans, information about the external walls, information about lifts and firefighting equipment and information about vulnerable residents.

6.7 In respect of its responsibilities generally, Flint will:

- ensure that all fire safety equipment and fire doors are inspected in accordance with statutory guidance and legislation;
 - keep detailed electronic information of all landlord inspections, maintenance, and statutory safety inspection records
 - engage residents in building safety, provide them with relevant information and respond to any complaints;
 - periodically inform residents of the importance of fire safety and emergency procedures, through the provision of information for example., via its housing management providers, website, newsletters, and leaflets;
 - comply with requests and recommendations from the fire service and Building Safety Regulator;
 - ensure fire safety within the common areas and relevant parts of our blocks, including (where applicable) doors, windows, and balconies;
 - ensure all relevant staff are appropriately trained and competent in their roles as they relate to fire safety and fire risk mitigation, and provide regular training;
 - provide and maintain fire-fighting equipment, wayfinding signage, fire safety information and plans and provide means of escape in all our blocks and to keep maintenance records for all relevant fire safety equipment;
 - where required in qualifying specified residential buildings, prepare personal and building emergency evacuation plans (EEPs) identifying residents with impairments affecting evacuation, preparing person-centred fire risk assessments for those individuals and providing necessary relevant information to local and fire and rescue authorities;
 - install and maintain smoke alarms and, where required, fire extinguishers;
 - appoint a health and safety lead and comply with statutory requirements for tenant safety including responding promptly to hazards;
 - comply with consultation and notification requirements (where applicable) to the regulator, local authority and the fire and rescue service (FRS); and
 - promptly comply with reporting and remediation obligations of relevant fire safety risks (where applicable) to the regulator, local authority and FRS.
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- 6.8 Flint Housing also recognises and accepts its responsibilities under the Health & Safety at Work Act 1974, and the Management of Health and Safety at Work Regulations 1999, and acknowledges its commitment to health and safety as set out in the Health & Safety Policy.
- 6.9 In addition to the requirement to undertake fire risk assessments and complete remedial actions, a programme of preventative maintenance and inspection may need to be completed in line with the relevant British Standards:
- Emergency light testing (BS5266)
 - Emergency light servicing (BS5266)
 - Fire alarm servicing (BS5829)
 - Fire alarm testing (BS5839)
 - Smoke alarm testing (communal areas and individual dwellings) (BS5839)
 - Dry Riser Testing (BS9990)
 - Sprinkler Testing (BS9251)
- 6.10 The introduction of the Fire Safety (England) Regulations 2022 imposes additional requirement in relation to fire safety. In all residential buildings with two or more domestic premises with common areas, information must be provided to residents about fire doors and the evacuation strategy for the building annually.

7. Implementation and risk management

- 7.1 Flint Housing will:
- Provide clear lines of responsibility for the management of fire safety;
 - Identify and implement a safe approach to commissioning, examination of systems and services, inspection and testing;
 - Implement a method of reviewing and monitoring fire safety compliance;
 - Set out a clear approach for the maintenance, refurbishment, renewal and upgrading of all installed fire safety systems and services in buildings;
 - Provide a prompt, efficient and cost-effective fire safety inspection, examination and testing service for fire precautions within buildings;
 - Maintain our legal compliance and promotion of good practice;
 - Deliver remedial works within appropriate timescales so that homes remain safe and domestic systems, services and installations are maintained to a high standard;
 - Detail a comprehensive fire safety examination, inspection testing and monitoring system;
 - Maintain comprehensive records and implement systems to monitor these records;
 - Undertake FRAs to all properties which require assessment, and take advice from its fire risk assessor as to the type of FRA to be carried out.
- 7.2 The following types of FRA apply to this Policy:

Type of Fire Risk Assessment	Description
Type 1	A non-destructive baseline assessment carried out on all small commercial premises, including purpose built flats.

Type 2	An invasive, destructive inspection of a building's common areas typically used to investigate potential structural fire safety failures, which can include opening up walls, ceilings or floors.
Type 3	A non-destructive assessment carried out on purpose-built blocks of flats and conversions, which will consider all means of escape (including those within individual dwellings), structures, and compartmentation between flats and any means of fire detection.
Type 4	An assessment to be completed in a limited number of cases for example, High Risk Buildings as defined in the Building Safety Act 2022 or where there is reason to believe that there are serious defects in both common parts of a building and individual dwellings.

7.3 Historically, the Order only applied to the internal common areas of premises. The Fire Safety Act 2021 (FSA) amended the Order so that in buildings with two or more sets of domestic premises, the Order 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 (e.g. entrance doors to individual flats which open on to common parts).

7.4 This means that the FRA of buildings with two or more sets of domestic premises need to take account of structure, external walls and doors. The Responsible Person and/or Fire Risk Assessor may consider that the FRAEW needs to be an in-depth assessment following the PAS 9980 methodology, for example where the external wall system contains combustible materials. This is something to be determined on a case-by-case basis.

7.5 Flint Housing shall take advice from its fire risk assessor as to the type of FRA to be carried out.

8. Timeframes

8.1 Type 3 FRAs are undertaken annually for high-risk buildings and bi-annually for all other buildings.

Type 4 surveys are undertaken where the FRA advises to do so, which may be in the case of unknown compartmentation or external wall insulation information.

In respect of fire risk assessment actions, each action will be addressed within a reasonable period based on the level of risk. Flint endeavours to achieve the following timeframes for fire risk assessment actions:

Intolerable / immediate danger	Immediate action (same day if necessary)
High risk	Days to a few weeks
Medium risk	1 – 3 months
Low risk	3 – 12 months depending on nature of issue and complexity of action required

9. Roles and Responsibilities

- 9.1 Leadership of, and responsibilities for, the safe stewardship, management and control of risks relating to fire safety rests with the Compliance & Building Safety team who is supported by the Chief Executive Officer (CEO) and the Board of Directors (the Board).
- 9.2 There is a fundamental responsibility for all staff, employees and contractors to work safely in construction of new properties or refurbishment and to work safely in operations to maximise fire prevention, to minimise the risk of the outbreak of fire, to minimise the effects through good fire precautions and to notify and report fire hazards which they come across diligently to their line manager or director as necessary.
- 9.3 Flint Housing accepts its position as a Responsible Person, Accountable Person/Principal Accountable Person, Duty Holder and Landlord as defined in safety legislation. The Duty Holder is also responsible for defining and maintaining a register of properties which includes information relating to construction and building, property and built environment hazards and risks and a complementary fire risk management plan.
- 9.4 The Compliance & Building Safety team is responsible for:
- monitoring the consistent implementation of this Policy and ensuring adequate resources are made available to meet the policy objectives;
 - the delivery of the key policy objectives and for achieving the associated targets;
 - overseeing the operational delivery of this policy, including through its housing management provider(s) underpinned by the housing management agreements entered into by Flint Housing;
 - monitoring performance of the housing management provider(s) against this Policy;
 - ensuring this Policy is reviewed and updated in line with legislation; and
 - reporting any breaches in the regulatory standards to the Board and to the Regulator of Social Housing.

10. Monitoring & quality control

- 10.1 We will monitor implementation of this policy using the following performance measures:

Measure	Target	Reviewed by / interval
No. of blocks with valid FRA in place	100%	Monthly: Compliance & Building Safety Team
No. of blocks that have had an annual inspection of flat entrance doors and a quarterly inspection of communal fire doors	100%	Quarterly: Board of Directors
No. of blocks that have had weekly testing of fire safe systems to include AOV, sprinkler and fire alarms	100%	
No. of blocks that have had semi-annual servicing of fire safe systems to include AOV, sprinkler and fire alarms	100%	

11. Non-compliance and escalation

- 11.1 Any non-compliance issue identified at an operational level will be formally reported to the CEO, who will agree an appropriate course of corrective action with the Compliance & Building Safety team and other relevant stakeholders.
- 11.2 The local Fire and Rescue Service (FRS) can commence an enforcement process should Flint Housing be found to be non-compliant and carry out an audit of processes. Flint Housing colleagues will respond quickly to any Fire Service enquiries and work with them to provide information where requested.

12. Equality and Diversity

- 12.1 Flint Housing is committed to making sure all services are accessible to all our customers. Our staff will be trained to ensure they are communicating appropriately with our customers, and they are provided with relevant information.
- 12.2 This Policy will be applied in a way which makes sure we treat all customers with fairness and respect. We recognise our duty to advance equality of opportunity and prevent discrimination or victimisation on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and any other protected characteristic defined within the Equality Act 2010.
- 12.3 We recognise that some protected groups may be disproportionately impacted and will take additional steps in the application of this policy and make reasonable adjustments to ensure compliance with the Act. For example, Flint Housing will:
- Provide a tailored response to the policy according to individual circumstances.
 - Provide support to residents who have difficulty in understanding the contents of the policy.
 - Provide information on request, in languages other than English, in Braille, Large Print and Audiotape where required.

13. Review

- 13.1 This Policy will be reviewed in conjunction with our housing management providers to address legislative, regulatory, best practice or operational issues at least every three years, or more frequently where:
- Legislation/regulation or industry changes require otherwise, making sure that it continues to meet our aims and industry best practice; and
 - We identify any problems or failures in this procedure as a result of customer and stakeholder feedback, complaints, or findings from any independent organisations; and
 - We become aware of any other circumstances which may affect the content of this policy.

14. Associated Documents

- 14.1 This Policy is part Flint Housing's Health and Safety Strategy which includes the following:
- Health and Safety Policy
 - Gas Safety Policy
 - Electrical Installation Safety Management Policy
 - Portable Electrical Equipment Safety Policy
 - Water Hygiene Policy
 - Lift and Equipment Safety Policy
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