

Fire Safety Policy

1. Policy Scope

At the time of approval, Bernicia owns and manages approximately 14,000 properties, including houses, flats with communal areas, high-rise residential buildings, HMOs, offices, depots, shops, and community buildings. A number of these premises fall within the remit of fire safety legislation.

This policy explains how Bernicia meets its statutory, regulatory, and contractual obligations in relation to fire safety and how assurance is provided to the Board, as Duty Holder. The policy applies to all premises where Bernicia has responsibilities under fire safety legislation.

The scope of this policy includes Fire Risk Assessments (FRAs), reviews and reassessments, remedial actions arising from assessments, building safety case requirements, and all repair, maintenance, and refurbishment activity that may impact fire safety.

Where building condition issues such as dampness, condensation, or mould could affect fire safety, these are managed in line with the Dampness and Condensation Management Policy and Plan.

The inspection, testing, and maintenance of fire safety systems and firefighting equipment are addressed within the Electrical Safety Policy. Fire evacuation arrangements, fire wardens, drills, and liaison with the Fire and Rescue Service are covered within the Fire Safety Management Arrangement.

This policy is implemented in line with, but not limited to, the following:

Fire Safety and Health & Safety

- Regulatory Reform (Fire Safety) Order 2005
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Corporate Manslaughter and Corporate Homicide Act 2007

Housing and Building Safety

- Building Safety Act 2022
- Building Regulations
- Housing Act 2004 (Housing Health and Safety Rating System)
- Landlord and Tenant Act 1985
- Regulator of Social Housing – Homes Standard

Industry Standards and Guidance

- PAS 79 – Fire Risk Assessment (Guidance and recommended methodology)
- Relevant British Standards

- Approved Codes of Practice
- BAFE SP205-1 Fire Risk Assessment Competency Scheme

Failure to discharge these responsibilities may result in enforcement action, prosecution, regulatory intervention, reputational damage, and loss of stakeholder confidence.

2. Policy Standards

Standard 1: Process

At Bernicia, we have clear lines of responsibility for the management of fire safety, supported by written guidance in the Fire Safety Management Plan. Our colleagues follow well-defined procedures to ensure compliance with fire safety legislation and safe working practices.

We work with tenants and occupiers to arrange convenient appointment times for Fire Risk Assessments and essential fire safety works. Where possible, we use information provided by tenants, such as preferred contact times or communication methods, to make access arrangements easier.

If access to a property cannot be gained after several reasonable attempts, we may use legal powers to gain entry to carry out essential fire safety checks or works. This is always a last resort and is done to protect the health and safety of residents, neighbours, and others who may be affected by fire risks.

Standard 2: Fire Risk Assessment and Safety Works

At Bernicia, we are committed to keeping people safe from the risks of fire. We ensure that suitable and sufficient Fire Risk Assessments are carried out for all properties where we have responsibility under fire safety legislation. Fire Risk Assessments are completed by competent persons using a risk-based approach aligned with PAS 79 or equivalent recognised guidance.

Fire Risk Assessments are completed and reviewed throughout the life of a building. Reviews take place following a fire, near miss, arson incident, significant building changes, changes in use or occupancy, or where works may affect fire protection measures or means of escape. Fire Risk Assessments are also reviewed at intervals proportionate to the level of risk and will not exceed the maximum review periods set out in relevant legislation and recognised guidance.

Where Fire Risk Assessments identify actions or remedial works, these are prioritised based on risk and completed within timescales set by the competent assessor. All fire safety works are carried out in line with legislation, relevant British Standards, Approved Codes of Practice, and recognised good practice. Fire risks are actively monitored from assessment through to the completion of all required actions.

We work with tenants and other occupiers to gain access for essential Fire Risk Assessments and fire safety works. Where access is refused, we take a sensitive but firm approach and, where necessary, use proportionate enforcement action as a last resort to protect life safety. Fire Risk Assessments are reviewed or renewed following the completion of significant remedial works to provide ongoing assurance.

Where Fire Risk Assessments identify that individual resident needs, vulnerabilities, or mobility issues may affect fire safety or evacuation, Bernicia will ensure that these risks are considered and managed in line with relevant guidance and arrangements. This includes the use of person-centred assessments and Personal Emergency Evacuation Plans (PEEPs) where required, ensuring that fire safety arrangements are proportionate, inclusive, and focused on protecting those most at risk.

Where fire safety responsibilities are shared with other duty holders, Bernicia will cooperate and coordinate in line with Article 22 of the Regulatory Reform (Fire Safety) Order 2005 to ensure that fire risks are effectively managed.

Standard 3: Additional Safety Measures

Bernicia ensures that responsive repairs, planned maintenance, and refurbishment works are managed so as not to compromise fire safety. Contractors are required to assess fire risks and maintain appropriate risk assessments and method statements, particularly where works affect fire stopping, compartmentation, fire doors, or means of escape. A proportion of works are inspected during and after completion to verify compliance.

Strict controls are enforced over communal areas and escape routes, prohibiting storage or obstruction without express permission. Furniture provided by Bernicia complies with the Furniture and Furnishings (Fire Safety) Regulations 1988. Residents are required to notify Bernicia of stored oxygen or alterations that may affect fire safety, with proportionate action taken where risks are identified.

Standard 4: Building Safety Case

At Bernicia, we ensure that our responsibilities under the Building Safety Act 2022 are met for all buildings within scope of the legislation. Where required, a Principal Accountable Person is appointed, and a Building Safety Case Report is prepared, maintained, and kept up to date.

The Building Safety Case identifies fire and structural safety risks and explains how those risks are being effectively managed and controlled to protect residents and others who may be affected.

Supporting information for the Building Safety Case is maintained in an accessible digital format and is made available to the Building Safety Regulator where required.

This ensures transparency, effective oversight, and ongoing assurance that building safety risks are being appropriately managed.

Standard 5: Competency

At Bernicia, we ensure that everyone involved in the assessment, management, and delivery of fire safety activities is competent and suitably qualified. Competency means having the right training, knowledge, experience, and professional judgement to carry out the role safely and effectively.

Fire Risk Assessments are completed by competent persons using PAS 79-aligned methodologies. Where external providers are used, they must be registered to BAFE SP205-1 or demonstrate equivalent competence, independence, and experience. Contractors undertaking fire safety works are assessed for competence before appointment and reviewed on a regular basis.

We also ensure that internal staff involved in delivering this policy are appropriately trained and competent. Training needs are identified and reviewed to ensure colleagues remain capable of fulfilling their fire safety responsibilities.

Standard 6: Data Management

At Bernicia, we will maintain a master database of all properties where we have a responsibility to manage fire safety. This database provides a single, accurate, and up-to-date record of our fire safety obligations across the housing portfolio.

We will record and maintain clear information confirming which buildings and fire safety arrangements fall within the scope of this policy and where responsibility for fire safety sits, including where responsibilities are shared with other duty holders.

Where a legal or regulatory requirement exists, we will retain fire safety data, records, and certification in line with legislative requirements, including for the lifetime of the building or relevant fire safety measure where applicable. Where a specific requirement does not exist, we will retain appropriate evidence to demonstrate how fire safety risks are being identified, managed, and controlled.

Where Fire Risk Assessments identify actions, repairs, or remedial works, these will be tracked from identification through to completion. Our records will include details of the property, the issue identified, the action required, priority level, responsible person, completion date, confirmation of sign-off, and evidence that the work has been completed.

Fire safety information is managed in a way that supports the maintenance of an accurate and accessible golden thread of information, in line with the Building Safety Act 2022. This ensures that reliable and up-to-date fire safety information is available

throughout the lifecycle of a building and can be shared with relevant duty holders and regulators where required.

Standard 7: Assurance

At Bernicia, we ensure that appropriate assurance arrangements are in place to confirm that fire safety responsibilities are being delivered effectively and in line with legal and regulatory requirements. We provide assurance that Fire Risk Assessments, remedial actions, and fire safety controls are being managed by competent persons and completed to the required standard.

We verify that fire safety activity has been carried out correctly through a range of assurance measures, including management checks, audits, and reviews of certification and records. A proportion of these assurance activities are undertaken by independent third parties to provide additional confidence and objectivity.

We keep the Fire Safety Policy and Fire Safety Management Plan under regular review to ensure they remain up to date and effective. Senior leaders and the Board receive appropriate reporting and oversight to enable them to fulfil their governance and duty-holder responsibilities and to act where improvements are identified.

Standard 8: Communication

At Bernicia, we are committed to providing clear and straightforward information to help tenants and other occupiers understand the importance of fire safety checks and to encourage their cooperation in allowing access for these essential visits.

We ensure that staff, contractors, and tenants are able to communicate easily and effectively with one another to share important fire safety information. This includes information about access arrangements, identified risks, and the actions being taken to keep people safe.

We have established simple and accessible routes for tenants and others to provide feedback or raise concerns about fire safety. These routes are designed to be user-friendly, and all feedback is taken seriously, with issues recorded, assessed, and addressed promptly and appropriately in line with the Fire Safety Management Plan.

Standard 9: Monitoring

At Bernicia, we maintain a detailed performance management framework, as defined within the Fire Safety Management Plan, to regularly monitor how well we are meeting our fire safety responsibilities. We use key performance indicators to track Fire Risk Assessment completion, progress of remedial actions, access outcomes, and assurance activity across the housing portfolio.

For any properties with overdue Fire Risk Assessments or outstanding actions, we provide clear and detailed commentary. This includes the date the activity became overdue, the number of days overdue, and the property’s position within the access or enforcement process to restore compliance. Where relevant, we also highlight any outstanding remedial actions and the steps being taken to address them.

Bernicia undertakes a programme of audit and assurance activity to provide confidence that fire safety controls are operating effectively. This includes internal audits, compliance testing, record reviews, and checks on the quality and completion of fire safety works. A proportion of these activities are carried out by independent third parties to provide additional scrutiny and objective assurance. Findings are formally recorded, tracked through to closure, and reported to senior management through established governance arrangements.

Bernicia ensures that Mandatory Occurrence Reporting (MOR) requirements under the Building Safety Act 2022 are met where applicable. Fire safety-related occurrences that meet reporting thresholds are identified, recorded, assessed, and reported in line with Bernicia’s MOR arrangements, including notification to the Building Safety Regulator where required. Learning from MOR, alongside performance monitoring, audits, and assurance activity, is used to drive continuous improvement in fire safety performance.

Performance, monitoring, audit findings, and assurance outcomes are reported through the appropriate internal governance routes, including senior leadership, relevant committees, and the Board, to support effective oversight and fulfilment of duty-holder responsibilities.

3. Definitions

Word/Phrase	Definition
Fire Risk Assessment (FRA)	A structured assessment that identifies fire hazards, evaluates risk to people, and sets out measures to reduce fire risk.
Responsible Person	The person or organisation with control of the premises and responsibility for complying with duties under the Regulatory Reform (Fire Safety) Order 2005.
Accountable Person / Principal Accountable Person	The individual or organisation with legal responsibility for managing building safety risks in higher-risk buildings under the Building Safety Act 2022.
Competent Person	A person with sufficient training, knowledge, experience, and professional judgement to carry out fire safety tasks safely and effectively.
PAS 79	Recognised guidance that sets out a structured and proportionate methodology for undertaking Fire Risk Assessments.
Mandatory Occurrence Reporting (MOR)	The process for reporting certain building safety-related incidents or risks to the Building Safety Regulator in accordance with the Building Safety Act 2022.

Fire Safety Remedial Works	Actions arising from Fire Risk Assessments to reduce or control fire safety risks.
Higher-Risk Building	A building that meets the definition set out in the Building Safety Act 2022 and associated regulations.
Assurance	Activities undertaken to provide confidence that fire safety arrangements are effective and that legal and regulatory duties are being fulfilled.

Version Number: 6.0

Effective From: September 2025

Applicable To: This policy applies to all properties Bernicia owns and manages.

Associated Documents:

The following resources support the Fire Safety Policy and Bernicia colleagues to deliver safe, compliant, and consistent services in line with legal requirements, regulatory standards, and recognised best practice. These documents can be found in the Resources, Documents, and Policies section in WorkVivo:

- Fire Safety Management Plan
- Fire Safety Operational Guidance
- Fire Safety Management Arrangement
- Fire Door Policy
- Dampness and Condensation Management Policy
- Dampness and Condensation Management Plan
- Mandatory Occurrence Reporting Arrangement
- Electrical Safety Policy
- Health and Safety Policy
- Repairs and Maintenance Policy
- Housing Management Compliance Access Policy
- Compliments, Comments and Complaints Policy

Equality, Diversity & Inclusion: An ED&I Assessment was completed in September 2024. Please contact the Governance team if you require a copy.

Approved By: Executive Director, Assets and Growth (Designate)

Policy Author: Head of Compliance

Policy Owner: Executive Director, Assets and Growth (Designate)

Next Review: September 2026

Reference Number: POL-0162

4. Change Control

Version Number	Effective Date	Amendment made by	Version approved by	Description of changes
1.0	September 2020	Head of Compliance	Executive Director, Assets and Growth	Scheduled review
2.0	September 2021	Head of Compliance	Executive Director, Assets and Growth	Scheduled review
3.0	September 2022	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
4.0	September 2023	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
5.0	September 2024	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
6.0	September 2025	Head of Compliance	Executive Director, Assets and Growth (Designate)	Scheduled review, transferred to new policy template, additional legislation added, policy statement changed to standards.