
Sanctuary Group

Title: Fire Safety Management - Group Policy

Business Function: All Functions across Sanctuary Group

Author: Building Safety Services

Authorised by: Group Board

Sanctuary Group:
Sanctuary Group is a trading name of Sanctuary Housing Association,
an exempt charity, and all of its subsidiaries.

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1. Policy statement

- 1.1 Sanctuary Group (the Group) recognises its duty as a Responsible Person/Duty Holder in the [Regulatory Reform \(Fire Safety\) Order 2005](#) (FSO), the [Fire \(Scotland\) Act 2005](#) (FSA), and subordinate legislation.
- 1.2 The Group will comply with the requirements of the FSO and FSA in relation to any workplace and other premises (and parts of) where it has control. Where workplaces are classed as construction sites the Group will ensure compliance with the relevant parts of the [Construction \(Design and Management\) Regulations 2015](#) (CDM).
- 1.3 This policy acknowledges that the duties of a Responsible Person/Duty Holder apply to the life of a workplace, and other premises under the Group's control, and recognises the need to embed fire safety arrangements into each stage of the life-cycle to a level that is relevant, reasonably practicable and sustainable.
- 1.4 To enable this, the Group will establish, implement, and maintain procedures covering the following life-cycle stages:
 - Design (new build, refurbishment and renovation) - incorporation of fire safety design principles at concept design stage.
 - Construction (including, repair, renovation and handover) - inclusion of suitable and sufficient fire safety arrangements in construction phase plans and health and safety files, operation and maintenance manuals, and ensure these are made available to those who will manage activities including use of the premises.
 - Use - management of workplaces and other premises, including implementation of evacuation strategies, , provision of relevant information and training, and management of change.
 - Maintenance - testing and maintenance requirements for structural elements, passive and active fire assets, and safety critical safety devices. Fire Risk Assessments (FRA's) will be conducted to a suitable and sufficient level and reviewed at a frequency commensurate with the risk presented by both the design of the premises and its occupancy. The Fire Risk Assessment Prioritisation Tool will be used to prioritise the review of existing FRA's to include assessment of internal doors and External Walls.
 - End of life (demolition or disposal) - transfer of relevant fire safety related information for demolition or to a new Responsible Person.
- 1.5 The Group will ensure occupants of premises under its control are engaged in decisions relating to their safety and are informed of relevant fire safety information.
- 1.6 The Group is committed to developing and maintaining a Fire Risk Management System (FRM) which will be based on the BS9997:2019 framework. This applies the 'plan, do, check, act' model to implementing, maintaining, and improving a Fire Management System.

2. Roles and responsibilities

- 2.1 All Directors and Managers (or equivalent) are responsible for ensuring adoption of, and adherence to, this policy.
- 2.2 The Executive Director - Development, Operations Director - Property Services and Director of Customer Experience and Compliance have additional responsibilities to develop, implement, and maintain documented procedures to ensure this policy statement is adhered to.
- 2.3 The Group Head of Building Safety has responsibility for setting the minimum standards for compliance, ensuring these are embedded in the fire risk management procedures, and monitoring that they are implemented and maintained.
- 2.4 Group Fire Safety Advisors are responsible for providing appropriate advice and assurance on the application and interpretation of fire legislation and fire safety guidance, including Fire Risk Management (BS9997).
- 2.5 Operations Health and Safety Business Advisors shall liaise with the Fire Technicians in order to provide competent and current fire safety advice. Advisors shall conduct inspections to confirm procedures are being implemented and maintained; any fire safety issues found to be reported to the Fire Technical team.
- 2.6 Local Responsible Person/Duty Holders are those who have delegated responsibility for ensuring compliance with this policy and [Fire Safety Management - Group Policy](#) in relation to any premises they manage.

3. References and sources

- [Fire Safety Management - Group Policy](#)
- [Regulatory Reform \(Fire Safety\) Order 2005](#)
- [Fire Safety Act 2021](#)
- [Fire Safety \(England\) Regulations 2022](#)
- [Fire \(Scotland\) Act 2005](#)
- [Construction \(Design and Management\) Regulations 2015](#)
- [BS 9997 Fire Risk Management Systems](#)
- [BS 9999 Fire Safety in the Design, Management and Use of Buildings](#)
- [Fire Sector Federation - Fire Safety and Sustainability in Building Design](#)
- [National Fire Chiefs Council Fire Safety in Specialised Housing](#)
- [Pulse: Fire Safety Documents](#)

4. Impact on diversity

- 4.1 The Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with the '[Sanctuary Inclusion for All Strategy 2024-2026](#)'.

5. Resident consultation

- 5.1 This policy is for internal use only and is in place to state the Group's approach to statutory requirements placed upon it; therefore, residents have not been consulted.

6. Monitoring and compliance

- 6.1 The implementation of this policy will be monitored and audited in line with the requirements within BS 9997 Integrated Fire Risk Management

6.2 Period of review

- 6.2.1 Until a new policy is formally adopted this document will remain in force and operational.
- 6.2.2 This policy will be reviewed in accordance with the policy review programme agreed by Executive Committee.
- 6.2.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Executive Director - Corporate Services/ Group Head of Building Safety will initiate an immediate review.

7. Approval

- 7.1 This policy is approved by the Group's Executive Committee.

8. Operational arrangements

- 8.1 This policy is to be read in conjunction with the [Fire Safety Management - Group Policy](#) and associated documents.