
Sanctuary Group

Title: Fire Safety Management - Group Policy

Business Function: All Functions across Sanctuary Group

Author: Group Health and Safety Services

Other Contributors: Building Safety

Authorised by: Group Board

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

Uncontrolled copy if printed

CONTENT

Review Schedule	3
1. Policy	4
2. Fire Safety Arrangements	4
3. Roles and responsibilities	5
4. References and sources	16
5. Definitions	16
6. Impact on diversity	18
7. Resident consultation	19
8. Monitoring and compliance	19
9. Approval	19
10. Operational arrangements	19

Appendices

Appendix 1 - Sanctuary Fire Logbook

Appendix 2 - Fire Safety Management in Sanctuary Care

Appendix 3 - Fire Safety Management in Sanctuary Supported Living and Retirement Living

Appendix 4a - Fire Safety Management in Sanctuary Housing

Appendix 4b - Fire Safety Management Summary of Duties - Sanctuary Scotland

Appendix 5 - Fire Safety Management in Sanctuary Students

Appendix 6 - Fire Safety Management in Sanctuary Office Premises

Appendix 7 - Fire Safety Management in Commercial non-residential properties

Appendix 8 - Fire Safety Management in Development and Construction

Appendix 9 - Sanctuary Care Fire Logbook

Additional Guidance

AG01 - Fire Risk Assessment in Sanctuary

AG02 - Fire Safety Duties in Sanctuary

AG03 - Fire Safety Training in Sanctuary

AG04 - Customer Evacuation Plans (PCFRA and PEEPs)

AG05 - Fire Safety in High Rise Buildings.

Review Schedule

Date	Details
May 2026	<p>Formal review, with following changes made:</p> <p>Policy:</p> <ul style="list-style-type: none"> • Director of Compliance and Building Safety title changed to Director of Compliance, and role responsibilities reviewed as the National Head of Compliance - Fire and Security role has been removed. • Roles and responsibilities for Building Safety added. • Director of Health, Safety, and Fire role removed, as responsibilities for fire now moved to Building Safety. • Director of Fire and Technical Building Safety Role and Responsibilities added. • Definitions relating to External Wall Systems and Fire Risk Assessment (FRA) of External Wall Systems have been added. • Definition for Type 3 FRAs has been added. <p>AG01 - Fire Risk Assessment in Sanctuary:</p> <ul style="list-style-type: none"> • Process change whereby all over 18 metre buildings are to have an annual Type 3 FRA, which will be completed by an external contractor. • Building Safety Managers in over 18 metre plus buildings will be responsible for identifying 10 per cent of accommodation units to be visited as part of the Type 3 risk assessment and must liaise with tenants of the identified accommodation giving at least 28 days' notice of the visit to allow for access. <p>AG02 - Fire Safety Duties in Sanctuary:</p> <ul style="list-style-type: none"> • Additional text added in relation to Person-Centred Fire Risk Assessment (PCFRA) and residential Personal Emergency Evacuation Plans (PEEPs) requirements for relevant residents in buildings in scope. Cross references AG04 - Customer Evacuation Plans (PCFRA and PEEPs) guidance and process. <p>AG03 - Fire Safety Training in Sanctuary:</p> <ul style="list-style-type: none"> • Addition of PCFRA and PEEP Training E learning course added. <p>AG04 - Customer Evacuation Plans (PCFRA and PEEPs):</p> <ul style="list-style-type: none"> • New document detailing the requirements and Group process for completion of PCFRA and Residential PEEPs, as a result of The Fire Safety (Residential Evacuation Plans)(England) Regulations 2025 <p>AG05 - Fire Safety in High Rise Buildings:</p> <ul style="list-style-type: none"> • Fire Safety in High Rise Buildings - new document added. <p>Appendices:</p> <ul style="list-style-type: none"> • Appendices 1-5, and 7 - Process change whereby all over 18 metre buildings to have an annual Type 3 FRA, which will be completed by an external contractor. • Requirement for Residential PCFRA and Residential PEEPs to be completed for relevant residents in buildings in scope added. Cross references AG04 - Customer Evacuation Plans (PCFRA and PEEPs) guidance and process.

1. Policy

- 1.1 Sanctuary Group (the Group) recognises its duty as a Responsible Person (RP)/Duty Holder (DH) in the [Regulatory Reform \(Fire Safety\) Order 2005](#) (FSO), the [Fire \(Scotland\) Act 2005](#) (FSA), the [Fire Safety \(Scotland\) Regulations 2006](#) 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).

2. Fire Safety Arrangements

- 2.1 This policy acknowledges that the duties of a RP/DH 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.
- 2.2 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 - FRAs 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 [FRA Prioritisation Tool](#) will be used to prioritise the review of existing FRA's to include assessment of external walls systems.
 - 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.
 - End of life (demolition or disposal) - transfer of relevant fire safety related information for demolition or to a new RP.
- 2.3 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.

- 2.4 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 an FRM.
- 2.5 The Group has a Primary Authority Partnership Scheme (PAS) in place with Hampshire and Isle of Wight Fire and Rescue Service (HIWFRS), to access bespoke advice that meets the functional requirements of fire safety regulations through a single point of contact.
- 2.6 The Group has in place a [Building Safety - Group Policy](#) detailing its statutory and regulatory obligations under the [Building Safety Act 2022](#) to provide safe homes for its residents. To give residents a voice the Group will:
- Create, communicate, and maintain Resident Engagement Strategies for buildings in scope, including as a minimum, information required by the Building Safety Act 2022 and Fire Safety legislation.
 - Ensure essential information on fire and building safety is effectively communicated to residents through a range of methods and is kept up to date.
 - Develop a system to ensure residents requests for further relevant building safety information are responded to in a timely manner.
 - Embed in the complaints process a means for residents to raise complaints in relation to building safety.
 - Ensure processes are in place to provide residents, including leaseholders and their sub-tenants, with information on their duties in relation to fire safety within their dwelling and the mechanism for raising concerns or requesting advice on carrying out building work within their dwelling.

3. Roles and responsibilities

3.1 Group Chief Executive

- 3.1.1 The Group Chief Executive is the RP/DH for the Group and has the overall responsibility for Fire Safety Management across the Group, whilst this position maintains the accountability, the responsibilities are devolved to other Senior Directors, Officers and Managers across the Group, as identified in this policy.

3.2 Group Board

3.2.1 Group Board is responsible for:

- overall accountability for all the activities undertaken by the Group;
- defining and ensuring compliance with the Group's Values and Objectives;
- agreeing the strategic direction of the Group and making sure that policies and procedures are in place to achieve those objectives; and
- ensuring they have appropriate assurance that the requirements of the current fire safety legislation are met, and where appropriate, that the objectives of the Group are also met.

3.3 Executive

3.3.1 The Executive team is responsible for ensuring fire safety compliance and risk management across their operational areas, and devolve responsibilities through their operational management structures.

3.4 Executive Director - Corporate Services

3.4.1 The Executive Director - Corporate Services has delegated responsibility for raising all fire related matters at Group Board level, and to take responsibility for fire safety management on behalf of the Group Chief Executive.

3.4.2 The Executive Director - Corporate Services acts as the Authorising Person, to ensure that this policy and associated procedures are followed so that the Group is compliant with legislative/regulatory requirements relating to fire safety management. This includes:

- ensuring fire safety appears as an important topic on the Group Board agenda;
- giving assurance to the Group Board that fire safety is being managed throughout the Group;
- ensuring that Group Fire Safety Advisors provide support and technical advice on relevant legislation/guidance regarding fire safety matters; and
- provide second line quality assurance through the Director of Health and Safety, of the risk assessment process to ensure that the Group's FRAs are suitable and provide second line quality assurance through the Director of Health and Safety, of the risk assessment process to ensure that the Group's FRAs are suitable and sufficient in line with the specific FRA guidance for the premises assessed.

3.5 Chief Customer Officer (CCO)

3.5.1 The CCO, in addition to operational responsibility for fire safety management, also has delegated responsibility for the implementation of a robust FRA strategy across the Group, this includes ensuring:

- sufficient funding and resources are made available for fire related matters;
- that there are sufficient resources in place to ensure the Group's FRA procedures can be effective; and
- there is a system in place to monitor and manage fire safety related compliance.

3.6 Director of Building Safety

3.6.1 The Director of Building Safety has the following responsibilities:

- Provide strategic leadership and direction for all building safety and compliance activities across the Group, ensuring alignment with the Building Safety Act 2022 and all relevant fire safety legislation.

- Act as the principal advisor to Executive, Board, and Committees on building safety risks, compliance assurance, and strategic priorities.
- Ensure that the management of fire safety in buildings in scope is considered as part of both Building Safety Act 2022, and relevant fire safety legislation requirements.
- Oversee the development, delivery, and maintenance of national compliance frameworks and policy frameworks to ensure all regulatory and legal requirements are met within budget.
- Ensure robust assurance mechanisms are in place to provide accurate reporting and analysis on building safety performance to governing bodies.
- Champion a culture of continuous improvement and a 'zero-tolerance policy to non-compliance' across all building safety functions.
- Provide strategic oversight of Building Safety, ensuring appropriate resources, competence, and development pathways are in place to fulfil statutory responsibilities.
- Engage with external regulators, including the Building Safety Regulator, at a strategic level to represent the Group's commitment to building safety.

3.7 Director of Fire and Technical Building Safety

3.7.1 Director of Fire and Technical Building Safety has the following responsibilities:

- ensuring operations comply with the relevant fire safety legislation, guidance and best practice;
- overseeing Group Fire Safety Advisor team in their guidance, advice, and support to the Group and its subsidiaries and operations to ensure effective fire safety management;
- management of the Group Senior Fire Safety Advisor;
- monitor and report on fire activities throughout the Group, including the collation of audit/inspections findings and outcomes;
- development, implementation, monitoring and review of Fire policies, procedures, and reporting systems;
- liaison with enforcing authorities on technical issues;
- providing competent advice to the Group on fire safety management;
- overseeing reporting to Board on serious fire related incidents and enforcement; and
- liaise with Head of Operations Fire and Security in order that any lessons learned may be applied.

3.8 Head of Building Safety

3.8.1 The Head of Building Safety has the following responsibilities:

- Lead the operational delivery of the building safety and compliance functions, ensuring that frameworks and policies are effectively implemented across the property portfolio.
- Manage the performance and development of the Building Safety Technical Leads and specialist compliance teams.

- Provide assurance to the Director of Compliance and Building Safety on the effectiveness of building safety management systems, including the status of remedial actions and risk mitigation.
- Oversee the quality and consistency of Building Safety Cases, ensuring they accurately reflect the risk profile of each building.
- Represent the Group in discussions with regulatory bodies regarding operational compliance and assurance

3.9 Building Safety Technical Lead

3.9.1 Building Safety technical Lead has the following responsibilities:

- Lead, manage, and develop a regional team of Building Safety Managers to ensure the effective delivery of building safety functions.
- Oversee the provision of clear technical guidance, advice, and support on building safety and fire practices to ensure compliance with Group policy, relevant legislation, and best practice to minimise risk to the organisation.
- Manage the delivery of complex surveys and detailed investigations into aspects of building safety on a priority basis across the Group's property portfolio.
- Monitor developments in building safety legislation and manage the delivery of complex surveys and detailed investigations into aspects of building safety.
- Work closely with other regional technical leads to develop and maintain robust building safety cases, policies, and procedures.
- Act as 'Client' representative by coordinating and monitoring the delivery of remediation projects by Building Safety Services team, contractors, and internal teams to ensure cost effective and efficient delivery of works.
- Manage and develop effective relationships with internal stakeholders (for example, compliance assessors, asset surveyors, development teams) and external customers (for example, consultants, building professionals, resident groups).

3.10 Building Safety Managers

3.10.1 In relation to Fire Safety, the Building Safety Manager's Role and Responsibilities are to support the Accountable Person by:

- Carrying out the day-to-day functions (as per para 167 of the Building Safety Act 2022) of ensuring that the building is safely managed with regard to fire and structural risks, acting as the primary point of contact for residents on building safety matters.
- Managing the overall safety of the buildings within your remit including monitoring and assuring maintenance, repairs, remodelling, and service work is undertaken to ensure compliance with Government legislation, Health and Safety legislation and Group policies and procedures.
- Promoting the openness, trust and collaboration with residents fundamental to keeping buildings safe.
- Providing expert knowledge to internal and external stakeholders (including contractors) to proactively manage any identified risk(s).

- Coordinating and monitoring contractor performance onsite, appropriately challenging where necessary and escalating any contractual issues as appropriate. Being informed and accountable for any remodelling that may impact the structural make-up of the building and updating relevant documentation accordingly.
- Identifying an appropriate number (for example, 10 per cent) of accommodation units to be assessed as part of Type 3 FRAs in relevant buildings and liaising with tenants at least 28 days prior to the assessment to allow for access to units.
- Coordinating and maintaining Emergency Evacuation Plans in High Rise Buildings (HRBs) in accordance with Section 5 of this policy.
- Ensuring that information held in secure information boxes (Red Boxes) and/or electronic format relating to the FRA and Emergency Plan is maintained up to date and accessible to the Fire and Rescue Authority.
- Assisting the Building Safety team in ensuring the Building Safety Case File is maintained and up to date, managing building data in line with Golden Thread requirements.
- Ensuring that the process is followed for the reporting of any damage or degradation to External Wall Systems identified by building inspections, including via the Mandatory Occurrence Reporting (MOR) system.
- Continuously reviewing the Fire Strategy to ensure maximum effectiveness considering the building structural design and resident requirements and implementing any legislative changes or amendments to Group best practice.
- Managing and maintaining an audit plan, conducting audits at the required intervals, and managing implementing actions in a timely and effective manner.
- Liaising with the Regional Fire Safety Advisor where there are any Fire related issues or concerns.

3.11 Group Senior Fire Safety Advisor

3.11.1 It is the responsibility of the Senior Fire Safety Advisor to:

- Assist the Director of Fire and Technical Building Safety in the development, implementation, and monitoring of Fire policies, procedures, and reporting systems, in addition to their duties.
- Manage the Group's Fire Safety Advisors in their support of the Group's staff, to ensure effective fire safety management.
- Provide guidance, advice, and support to the Group and its subsidiaries and operations.
- Monitor and report on fire activities throughout the Group, including the collation of audit/inspections findings and outcomes.
- Liaise with the Partnership Manager, as part of the PAS.
- Oversee second line quality assurance for FRAs collating data and feedback for reporting monthly to Director of Fire and Technical Building Safety for onward cascade; and
- Liaise with Head of Operations Fire and Security in order that any lessons learned may be applied.

- Providing and overseeing second line FRA quality and delivery, collation of data and feedback for reporting monthly to the Group Fire and Security team for onward cascade.
- Assisting with liaison with enforcing authorities on technical issues.
- Overseeing reporting to Board on serious fire related incidents and enforcement.
- Support Operational teams by providing Fire Safety Training through the Group Fire Safety Advisors, as required.

3.12 Group Fire Safety Advisors (Regional)

3.12.1 The responsibilities of the Group Fire Safety Advisors are:

- To ensure that their Regions are provided with the correct level of advice and support in line with the relevant fire safety legislation, guidance and best practice.
- To respond to communications from enforcing authorities on technical issues.
- Support RPs/DHs with FRA reviews, evacuation strategies and all operational fire safety related queries, as required.
- Provide support and guidance to Compliance Assessors conducting FRAs, when requested.
- Investigate fire related incidents and provide feedback and recommendations as appropriate, including liaison with Fire and Rescue Services, where required.
- Advise and support Learning and Development to devise and deliver training to staff carrying out FRA's and or building strategies.
- Undertake proactive fire safety audits of the Group's premises, as required.
- Provide technical advice on new development, existing buildings, new acquisitions, and proposed alterations to existing buildings when requested to do so.
- Monitor the fire precautions at various stages throughout the construction; witness the fire alarm system cause and effect.
- Conduct an inspection with the relevant persons prior to building hand over.
- Deliver second line quality assurance of FRA to gather qualitative data of the FRA process and provide feedback.
- To hold regular meetings with Fire Safety Project Managers, who are responsible for implementing line management feedback to Compliance Assessors for improvement of FRA quality.
- Support Operational teams by providing Fire Safety Training, as required.

3.13 Director of Customer Experience and Compliance

3.13.1 The Director of Customer Experience and Compliance (Housing and Property Services) has devolved responsibility for ensuring:

- that the Group's FRA processes and team structure is sufficiently robust and resourced to meet the needs of the Groups operational areas and ensure compliance with legislation and best practice; and

- ensuring property related FRA remedial works are appropriately funded, resourced and delivered.

3.14 Director of Compliance

3.14.1 The Director of Compliance has overall delegated responsibility for:

- Ensuring the operational delivery of all FRAs, including FRAEWs as applicable, and completion of associated property related FRA remedial actions, to specified standards in line with relevant fire safety guidance and best practice.
- Reporting to Board through the Executive Director - Corporate Services on status of FRA programme and associated Fire remedial works.
- The management of the Fire and Security team, ensuring the competency and continued professional and personal development of team members.
- The delivery of the FRA strategy including first line quality assurance, undertaken by the Quality Assurance Manager.
- Monitoring the progress and closure of the FRA audit process recommendations made.
- The delivery of inspection and maintenance of all fire safety systems within the Group premises, for example, fire detection, emergency lighting, etc.

3.15 National Compliance Team (NCT)

3.15.1 The NCT has responsibility to:

- Manage the provision of a compliance service and maintenance through internal and external contractors.
- Manage the FRAs reviews, maintenance plans and process the FRAs and identified actions
- Ensure that, when new acquisitions are made, notifications and management plans are set up in good time to allow appointment of a new FRA prior to occupation.
- Compilation of data on status of FRA programme and associated Fire remedial works for onward reporting.
- Update SAP records on completion of FRA remedial actions.
- Maintain and regularly monitor SAP to ensure that all significant findings identified on the FRA are addressed and completed within the allocated/required timescales; and
- Provide information and updates to the Build Safety operational teams, the Group Fire Safety Advisors and Head of Building Safety to support them in responding to any notices or correspondence issued by fire and rescue services.

3.16 Fire and Security team

3.16.1 The Head of Operations Fire and Security has delegated responsibility for:

- Ensuring that there is a suitable and sufficient FRA system in place for all Group premises, and that FRAs are conducted and reviewed in a timely manner, where they are required, and ensuring that first line quality assurance is undertaken in line with the relevant FRA guidance.
- Ensuring that employees and contractors appointed to carry out FRAs are competent and trained to carry out suitable and sufficient FRAs in line with the relevant guidance documents and agreed assessment documents.
- Ensuring robust procedures are in place to deal with the action points (significant findings) arising from FRAs, within reasonable timescales.
- Overseeing the quality assurance audit process completed by the Quality Assurance Manager (FRA) and the Group Fire Safety Advisors.
- Ensuring that any 'lessons learnt' from the second line quality assurance by Group Fire Safety Advisors are shared by the Quality Assurance and Fire Project Managers and any identified training needs are addressed.
- Ensuring remedial actions required by Fire and Rescue Services are prioritised and delivered within the required timescales so as not to expose the Group to potential for prosecution and legal actions.
- Providing regular updates to the Director of Compliance on the status of the FRA programme and associated works through their line management structure.
- Ensuring appointment of competent contractors to conduct fire safety related work and planned preventative maintenance works.
- Ensuring that asset data held is accessible to inform FRA's and improvement programmes this data may include structural elements, façade details, and passive and active fire protection.

3.16.2 Fire, Security, and Electrical (FSE) Operations Team overall responsibilities

- Ensure all fire safety systems (for example, alarms, detection) and related security equipment is installed, maintained, and serviced in accordance with the relevant British Standards, manufacturer's instructions, and legislative requirements.
- Support the compliance process by providing technical expertise and data on the condition and performance of fire safety systems, feeding into the overall Building Safety Case.
- Coordinate with all Operational Managers and the NCT to ensure that any system impairments, faults, or remedial works are prioritised, managed, and resolved in a timely manner to maintain resident safety.
- Maintain accurate and up-to-date records of all inspections, servicing, and maintenance activities for integration into the building's Golden Thread of information.

3.17 Quality Assurance Manager - FRA Audits

3.17.1 The Quality Assurance Manager - FRA audits has responsibility for:

- Undertaking First Line Quality Assurance audits of FRAs completed in the across all regions by the Compliance Assessors delivery team, to assess business performance against regulatory and service delivery requirements and provide an accurate assessment of the service provided.
- Planning, managing, and implementing audit review programmes.
- Ensuring reviews are undertaken consistently, using appropriate techniques to ensure audit and assessment tools are aligned to legislative, regulatory and business changes to monitor service delivery, performance and compliance levels.
- Ensuring managers and staff are provided with a clear and accurate assessment of their compliance status and actions required to address shortfalls.
- Managing the development of action plans, in accordance with review outcomes and good practice to assist operations in improving service delivery and performance.
- Monitoring and trends analysis to mitigate areas of risk to the business.
- Leading on the Quality Assurance issue investigations in relation to FRAs to assess compliance impact, root cause, and resolution for the compliance assessor operational delivery team.
- Providing high quality management information to the Senior Management Team to support on-going operational planning, identifying issues and recommending improvements to services.
- Contributing to the development of policies, safeguarding the organisations interests by meeting regulatory compliance including reviewing and making recommendations for systems and process improvements as appropriate in line with the most up to date legislation requirements; and
- Undertaking site audits with the Compliance Assessors and feedback any improvements and positive comments.

3.18 Operations Managers - Fire and Security

3.18.1 Operations Managers - Fire and Security are regional and for their regions have responsibility for:

- Day to day management of the fire safety and security team, the role of which is to:
 - carry out routine maintenance, repairs, and remedial works, which includes upgrades and urgent works on fire alarms, emergency lights, smoke vents (AOV and SHEV), fire extinguishers (FFE), and dry/wet risers;
 - carry out new installations of fire alarms, emergency lights, smoke vents (AOV and SHEV), fire extinguishers (FFE);
 - monitor contractor performance for emergency call out/responses; and
 - work with all areas of the business ensuring that the fire safety related systems within the Group's properties are suitable, and compliant.

- Ensuring, together with the Fire Safety Project Managers, that required actions assigned through Radar because of a notice or letter of deficiency, issued by the Fire and Rescue Service or through the PAS, are progressed and delivered, and Radar and SAP are updated accordingly.

3.19 Operations Manager - Fire Projects

3.19.1 Operations Manager Fire Projects has responsibility for:

- Line management of the Fire Safety Project Managers and the Quality Assurance Manager, by nature of which also has devolved responsibility for managing delivery of FRAs, FRA actions and Quality Assurance.
- Ensuring, together with the Fire Safety Project Managers, that required actions assigned through Radar because of a notice or letter of deficiency, issued by the Fire and Rescue Service or through the PAS, are progressed and delivered, and Radar and SAP are updated accordingly

3.20 Fire Safety Projects Managers

3.20.1 The Fire Safety Projects Managers are regional and have responsibility for their own areas, this responsibility extends to:

- Line management of the Compliance Assessors team conducting FRAs.
- Conducting sample quality audits of the completed FRAs within their region ensuring they are suitable and sufficient and comply with compliance FRA guidance and best practice.
- Regularly meeting with their regional Group Fire Safety Advisor to receive feedback from second line assurance and implementing improvement of the FRAs following this.
- Management of and reporting on specific FRA operations, including new and reassessment FRAs and actions.
- Together with the Operational Manager - Fire Projects ensuring that required actions assigned through Radar because of a notice or letter of deficiency, issued by the fire and rescue service or through the PAS, are progressed and delivered.

3.21 Compliance Assessors

3.21.1 Compliance Assessors are required to complete a 'suitable and sufficient' FRA and fire evacuation strategy in accordance with the Group processes, assisted by the Local RP/DH, ensuring that the structure, fire safety management, and fire controls for the premises are adequate and appropriate. In addition, Compliance Assessors must:

- Undertake FRA, audits, and inspections across the Group's property portfolio in line with organisational policies, procedures, and legislative requirements, using their competency and professional judgment, to assess identified fire risks using the current fire risk matrix of tolerable, substantial, moderate and low and make recommendations on corrective actions required.

- Ensure that their onsite FRA process, uses External Wall system as built drawings and other related building plans and documentation to appraise/ assess if a FRAEW is required.
- Ensure that appropriate and immediate action is taken, where intolerable fire safety risks have been identified i.e.: risk of fire with danger to life or property is imminent.
- Once actions have been completed, ensure receipt of appropriate evidence of completions and update of the FRA and SAP records; and
- Update the Fire Evacuation Strategy and FRA as well as the premises manager and/or local RP/DH prior to handover of new build properties.
- Produce and maintain high-quality reports and documentation for FRA specifications, ensuring that all remedial actions are identified, specified, and tracked to completion against key performance indicators.
- Support the fire safety team by carrying out secondary inspections of pre- and post-remedial works to verify their effectiveness and ensure high standards of safety are maintained.

3.22 Contractors

3.22.1 Only approved contractors, including Sanctuary Property Services Operatives, will be used. Where contractors are used for maintenance and testing of equipment, or any other activities, they must provide, in advance:

- method statements stating how the work is to be carried out and the materials and equipment that is to be used;
- risk assessments covering all risks; and
- proof of competence for the task they are contracted to carry out, and the equipment to be used in the form of third-party accreditation/certification.

3.23 Operational Management Roles

3.23.1 Operational Management Roles responsibilities are detailed in the operational business area appendices attached to this policy.

3.24 Local Responsible Person/Duty Holders (RP/DH)

3.24.1 Local RP/DH are those persons who have delegated day to day responsibility for control of a premises or site and as such are responsible for ensuring compliance with this policy, fire safety guidance and best practice in relation to any premises they manage.

3.24.2 Local RP/DH responsibilities are as below:

- Ensure FRAs undergo periodic review in line with set timeframes.
- Ensure they liaise with the allocated Building Safety Manager for their location on all matters relating to building and fire safety.
- Must follow the requirements of the appropriate operational appendix of this policy.

4. References and sources

- [Fire Safety Management - Group Procedure](#)
- [Regulatory Reform \(Fire Safety\) Order 2005](#)
- [Fire Safety Act 2021](#)
- [Fire Safety \(England\) Regulations 2022](#)
- [Fire \(Scotland\) Act 2005](#)
- [Building Safety Act 2022](#)
- [Construction \(Design and Management\) Regulations 2015](#)
- [Fire Safety \(Residential Evacuation Plans\)\(England\) Regulations 2025](#)
- [BS 9997 Fire Risk Management Systems](#)
- [BS 9999 Fire Safety in the Design, Management and Use of Buildings](#)
- [PAS 9980:2022 Fire Risk Appraisal of External Walls \(FRAEW\) and Cladding of Flats](#)
- [Fire Sector Federation - Fire Safety and Sustainability in Building Design](#)
- [National Fire Chiefs Council Fire Safety in Specialised Housing](#)
- [Pulse: Fire Safety Documents](#)

4.1 The functional requirements in the [Building Regulations 2010](#) apply to all new build properties and alterations to properties in which there are material changes to the original design.

4.2 Other regulations also apply depending upon the nature of the work being undertaken. These are the subject of separate procedures but should be read in conjunction with this policy and can be found on the [Pulse : Policies and procedures pages](#).

5. Definitions

5.1 The following definitions support users' understanding of this procedure:

<i>Building Safety</i>	The assessment, prevention or mitigation of significant events that may impact on the structural and fire safety of an in scope residential building in a manner that presents a risk to multiple residents and others in the vicinity. A building in scope is one that has two or more residential units and is at least 18 metres in height or has at least 7 storeys.
<i>Common Area</i>	Shared facilities or amenities provided within a building used by occupants, for example, corridors and stairwells
<i>Domestic Premises</i>	Premises occupied as a private dwelling, excluding those areas used in common by the occupants of more than one such dwelling.
<i>External Wall System (EWS)</i>	An external wall system (EWS) is the combination of all the materials on the outside of a residential building, including cladding, insulation, fire-break systems, and other attachments like balconies and external walkways. These systems are designed to provide weather protection, thermal insulation, and a finished appearance

Fire Risk Appraisal External Wall System (FRAEW)	FRAEW stands for Fire Risk Appraisal of External Walls, a specific assessment required for multi-occupied residential buildings to evaluate the risk of fire spreading over or through their exterior construction, particularly cladding, following the methodology in <u>PAS 9980:2022</u> . It identifies hazards, assesses risks, and recommends solutions, informing overall building safety, funding applications (like the Building Safety Fund), and sometimes insurance, and must be done by a competent professional.
FRA onsite review	An onsite review is a desk top exercise using the original FRA and must consider any changes to the building including refurbishments, or its occupancy which affect its use. Reviews should also be conducted after any fire incident. Any changes identified will require a new FRA to be completed. Reviews are completed by the local RP/DH (Scotland), when notified by NCT, if the premises are not subject to an annual FRA because of its property type or contractual obligations.
Primary Authority Scheme Support	As part of the PAS, the Group request that the Primary Authority Partner carries out audits throughout the year and as part of these the suitability and sufficiency of the FRA is assessed.
Responsible Person (RP)/Duty Holder (DH) (Scotland)	The definition of the RP/DH is: a) <i>The employer</i> , if the workplace is to any extent under his control. Where the buildings are a workplace, the RP must ensure that any duty imposed by the Fire Legislation is <i>complied with in respect of those buildings</i> . b) Any duty imposed by the Fire Legislation on the RP in respect of buildings shall <i>also be imposed on every person</i> , other than the RP, who has, <i>to any extent, control of those buildings</i> so far as the requirements relate to matters within their control. c) Where a person has, by virtue of any <i>contract or tenancy</i> , an obligation of any extent in relation to <i>maintenance or repair</i> of any buildings, including anything in or on buildings.
Local RP/DH	The Group identifies any person with full or part management control of a site as the local RP/DH, this can include Scheme Managers, Care Home Managers, or Housing Managers/Staff.
PAS 9980:2022	The methodology which recommends action to address life safety fire risks presented by the external wall system.
Quality Assurance 1st Line	An initial Quality Assurance process to establish confidence that all FRAs are suitable and sufficient. As overall responsibility for the adequacy and accuracy of the FRA, and the information contained therein, is held by the Fire and Security team, a combination of Peer Review and Quality Assurance verification of all FRAs is to be carried out and the name of the reviewer recorded on the FRA.

Quality Assurance 2nd Line	As part of the Group's overall fire risk management strategy, further analysis of the quality of its FRAs is carried out objectively and independently to the Fire and Security team. These audits are carried out by the Group Fire Safety Advisors to evaluate and monitor the ongoing standards of the FRA Process carried out within the Group and is a dip sample of FRAs using guidance from BS 9997 annex C and D.
Relevant Residents	For the purposes of The Fire Safety (Residential Evacuation Plans)(England) Regulations 2025 , A relevant resident is one for whom the domestic premises in which they reside is in a building in scope, is their only or principal residence, and their ability to evacuate the building without assistance in the event of a fire is compromised because of a cognitive or physical impairment or condition.
Sleeping Risk	The increased risk to life relating to the existence of sleeping accommodation within premises.
Site Specific Fire Evacuation Strategy	A site-specific fire evacuation strategy is an overview of a premises fire safety systems and operational fire procedures which will determine the evacuation method for the building in the event of a fire and is required for all premises (excluding general housing). This will be completed as part of the FRA process and is detailed at FRA Fire Evacuation Strategy.
Suitable and Sufficient	A Risk Assessment would be considered suitable and sufficient if it has addressed all the issues for all parts of the premises, subject to the legislation and has produced an action plan with timescales and either the works have been completed, or the timescale has not elapsed.
Type 3 Fire Risk Assessment	A Type 3 FRA is a detailed, non-destructive survey of multi-occupancy buildings that covers both common areas and a minimum of 10 per cent of the individual dwellings , assessing escape routes, internal layouts, fire doors, alarms, and compartmentation, typically triggered by identified risks within flats, requiring access to units. It provides a more comprehensive view than basic assessments and helps ensure compliance

5.2 For further definitions please see technical note: Terminology and Definitions available on [Pulse: Fire Safety Documents](#).

6. Impact on diversity

6.1 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](#)'.

7. Resident consultation

- 7.1 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.

8. Monitoring and compliance

- 8.1 The Group is working towards implementing and aligning its Fire Safety Policy, processes, monitoring and auditing to the principles within BS 9997 Integrated Fire Risk Management.
- 8.2 Period of review
- 8.2.1 Until a new policy is formally adopted this document will remain in force and operational.
- 8.2.2 This policy will be reviewed in accordance with the policy review programme agreed by Executive Committee.
- 8.2.3 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/Director of Building Safety will initiate an immediate review.

9. Approval

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

10. Operational arrangements

- 10.1 The operational fire safety roles and responsibilities and fire safety management requirements are contained within the appendices of this policy, together with additional guidance documents to inform and assist the reader.