
Sanctuary Group

Title: Fire Safety Management - Group Procedure

Business Function: All Functions across Sanctuary Group

Authors: Building Safety

Other Contributors: Property Services

Authorised by: Group Director - Corporate Services

Sanctuary Group:
Sanctuary Group is a trading name of Sanctuary Housing Association,
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General Information

1. Objective of this procedure

1.1 This procedure supports the [Fire Safety Management - Group Policy](#). It contains in the main body of the procedure, the general requirements to support the following objectives, with specific procedures for each business area in the appendices.

1.2 Sanctuary Group (the Group) will ensure:

- the provision of suitable and sufficient general fire precautions, assessment of risk and management of necessary fire safety arrangements are in place;
- that all owned, occupied or managed premises have a suitable and sufficient Fire Risk Assessment (FRA), carried out by, or on behalf of, the Responsible Person (RP) for that premises in line with the requirements of the [Regulatory Reform \(Fire Safety\) Order 2005](#) (FSO) and [Fire \(Scotland\) Act 2005](#) (FSA);
- that preventative and protective measures are implemented on the basis of the Principles of Prevention specified in Schedule 1 Part 3 of the FSO;
- the safety from fire of all relevant persons in, or in the vicinity of a premises, by effective planning, organisation, control, monitoring and review of the preventative and protective measures;
- where a dangerous substance is present in or on premises, the RP/Duty Holder (DH) will ensure, that risk to relevant persons related to the presence of the substance is either eliminated or reduced as far as is reasonably practicable, and that emergency arrangements are in place to deal with any incident or emergency related to the substance;
- where necessary, in order to safeguard the safety of relevant persons, all premises are appropriately equipped with firefighting equipment, fire detectors and alarms. Non-automatic firefighting equipment will be easily accessible, simple to use and identified by signage;
- that all emergency routes and exits comply with the requirements of the FSO and FSA and the RP/DH will ensure that such routes are kept clear at all times;
- a suitable and sufficient fire emergency plan is prepared, regularly reviewed, and practiced by carrying out fire drills at least twice per year;
- all necessary systems, required as part of the general fire precautions (or other general systems or appliances required to be satisfactorily maintained to prevent the likelihood of fire), will be tested and maintained in accordance with manufacturer's instructions and the relevant current guidance, for example, British Standards or equivalent standards;
- the appointment of competent persons to assist in the undertaking of the preventative and protective measures used;
- the Statutory requirements as the minimum standard are adhered to and seek to further reduce fire risk by providing suitable and sufficient information, instructions, and training;

- all staff are trained to carry out the fire emergency plan relevant to their role and the premises to include regular fire drills and any other necessary actions to comply with the FSO and the FSA;
 - employees and other relevant persons are provided with comprehensive and relevant information regarding; the risks identified from the FRA and, the preventative and protective measures, the fire emergency procedure, and the identities of persons nominated to carry out the duties of the RP;
 - employers of any employees from an outside undertaking, who are working on Group's premises, will be provided with relevant fire safety information in relation to risks to their employees and protective measures;
 - any other person lawfully on ~Group's premises will be provided with the appropriate fire related information; and
 - liaison with the Group's Primary Authority Partnership Scheme (PAS) partner, Hampshire Fire and Rescue Service, on matters of fire safety.
- 1.3 The Building Safety Bill and recommendations from the Grenfell Tower Inquiry are introducing a fundamental change in the requirements relating to the design, build, operation and maintenance of high risk residential buildings. The Group progresses with a programme of change to ensure compliance with the changes. Up to date, accurate information is crucial when effectively carrying out an FRA of buildings.
- 1.4 The Group work to develop and maintain the quality of the building information held for its properties and will continue to monitor and address government recommendations and changes in legislation.

2. Legislative/Regulatory context

- 2.1 The following legislation has been considered throughout this procedure:
- [Health and Safety at Work etc. Act 1974](#) (HSWA 1974)
 - [The Management of Health and Safety at Work Regulations 1999](#) (MHSWR 1999)
 - [The Regulatory Reform \(Fire Safety\) Order 2005](#) (FSO)
 - [Fire \(Scotland\) Act 2005](#) (FSA)
- 2.2 The HSWA 1974 requires all employers 'to ensure, as far as is reasonably practicable, the health, safety, and welfare at work of all their employees'.
- 2.3 The MHSWR 1999 specify, in more detail, the general duties of HASAWA with regard to safety management requiring all employers to undertake a 'suitable and sufficient' assessment of the risks to the health and safety of their employees and others who may be affected by their work activities and environment. This includes the risks arising from fire.
- 2.4 The FSO and the FSA applies to all non-domestic premises in England, Wales, and Scotland, including the common parts of blocks of flats or Houses in Multiple Occupation (HMO).

- 2.5 The order states that ‘the RP must carry out a suitable and sufficient FRA, implement the findings and maintain a fire management plan’. However, the FSA extends the application to include housing licenced by the [Housing \(Scotland\) Act 2006](#), premises used to provide care, or school care accommodation
- 2.6 The functional requirements in the [Building Regulations 2010](#) applies to all new build properties and alterations to properties in which there are material changes to the original design.
- 2.7 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 procedure and can be found on the Health and Safety [Solis pages](#).

3. Responsibilities for implementation

3.1 Group Chief Executive - RP/DH (Scotland)

- 3.1.1 The Group Chief Executive is the role with responsibility for ensuring that current fire safety legislation is met, and where appropriate, current fire guidance is implemented in all premises owned or occupied by the Group.

3.2 Group Board

3.2.1 The Group Board is responsible for:

- overall accountability for all of 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 Group Director - Corporate Services

- 3.3.1 The Group Director - Corporate Services has delegated responsibilities for raising all fire related matters at Group Board level, and to take responsibility for fire on behalf of the Group Chief Executive. The Group Director - Corporate Services acts as the Authorising Person, to ensure that this procedure is followed so that the Group is compliant with legislative/regulatory requirements relating to FRA and 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 Technicians provide support and technical advice on relevant legislation/guidance regarding fire safety matters; and
- quality assuring the risk assessment process to ensure that the Group’s FRAs are regularly reviewed (in line with the risk associated with each premises) and comply with this procedure.

3.4 Group Director - Housing

3.4.1 The Group Director - Housing, has delegated responsibility for the implementation of this procedure in relation to Housing Management and Maintenance. This includes:

- ensuring sufficient funding and resources are made available for fire related matters;
- ensuring that there are sufficient resources in place to ensure the Group's fire procedure can be effective;
- ensuring that all staff comply with this procedure and the associated policy;
- ensuring robust procedures are in place to deal with issues raised by fire and rescue services within the allocated timeframe;
- ensure there is a system in place to monitor and manage fire safety related compliance; and
- ensuring that maintenance works do not affect the existing fire integrity of the premises, and that all fire stopping is reinstated.

3.5 Group Managing Director - Development

3.5.1 The Group Managing Director - Development, for both new build and regeneration of existing buildings, has delegated responsibilities to ensure systems are in place in relation to ensuring:

- good principles of design are employed in relation to fire safety, to assure compliance with current standards;
- appropriate consultation with enforcing authorities, building control, fire safety engineering advisors and Group Fire Technicians as part of the design stage in relation to fire safety measures;
- co-operation and communication with Group Fire Technicians and National Compliance team (NCT) in the design planning stage, for provision of advice and support in the production of initial FRAs, strategies and to agree fire safety design principles;
- framework contracts are in place with competent contractors to provide the roles of Principal Designer, Principal Contractor, and contractors;
- that construction materials and construction methods used in projects conform to current building regulation requirements in relation to fire safety; and
- adequate information, as referenced in General Procedure 1.3, is made available on completion of projects to enable safe occupation and future maintenance of buildings.

3.6 Head of Operations Fire and Security

3.6.1 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;
- ensuring that employees and contractors appointed to carry out FRAs are competent, and trained to carry out suitable and sufficient FRAs;

- ensuring robust procedures are in place to deal with the action points (significant findings) arising from FRAs, within reasonable timescales;
- providing regular updates to the Group Director - Corporate Services on the status of the FRA programme and associated works;
- working with procurement to ensure framework agreements are in place for the appointment of competent contractors to conduct fire related work;
- ensuring that, where new acquisitions are made, the NCT and the Group Fire Technicians are contacted to enable an assessment to be made of the existing level of fire precautions, and any further requirements, to ensure compliance with current legislation;
- ensuring that in respect of structural alterations to existing premises, the NCT and the Group Fire Technicians are contacted at the design planning stage;
- proposing programmes for works relating to fire safety for consideration as part of the annual business plan;
- support the review of existing processes and systems during the implementation of Building Safety Bill requirements; and
- ensure that asset data is collected and recorded that is suitable and sufficiently robust to inform FRA's and improvement programmes this data may include structural elements, façade details, and passive and active fire protection.

3.7 Operational Directors and Heads of Service

3.7.1 Operational Directors and Heads of Service have the delegated responsibility for the implementation of this procedure. This includes ensuring:

- this procedure and associated policy is communicated to all staff;
- this procedure and associated policy is followed by all staff;
- the necessary equipment and resources are available, to ensure compliance can be achieved;
- all staff attend the relevant fire-related training;
- day-to-day management of fire safety within their operational areas; and
- all staff, with day to day responsibility for premises, understand and carry out the duties of the RP.

3.8 Operations Managers - Fire and Security

3.8.1 The Operations Managers - Fire and Security are regional and have responsibility for their own areas, this responsibility extends to:

- line management of the FRA team
- Management of and reporting on specific FRA operations, including reviews and actions;
- day to day management of the fire safety 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 (PFE) and dry/wet risers;
 - carry out new installations of fire alarms, emergency lights, smoke vents (AOV and SHEV), fire extinguishers (PFE) and dry/wet risers;

- monitor contractor performance for emergency call out/responses;
- work with all areas of the business ensuring that the systems within the Group's properties are suitable, and compliant;
- carry out remedial works, which includes upgrades and urgent works to intruder systems, door access, closed circuit television (CCTV), and warden call systems; and
- carry out new installations of intruder systems, door access, CCTV, and warden call systems.

3.8.2 The Operations Managers - Fire and Security also have on-going involvement in the development and introduction of maintenance and repair programmes for other fire related equipment, such as fire hydrants.

3.9 Managers of Premises (RP/DH)

3.9.1 In relation to Group premises, any person who has control or part control of those premises is designated as the RP.

3.9.2 All Managers of Premises have the delegated responsibility for ensuring compliance with this procedure and associated policy. This includes ensuring:

- a suitable and sufficient FRA has been carried out for all premises that they are responsible for, excluding domestic premises, and that they have assisted the Compliance Assessor by providing relevant information relating to the building, on request. This will include the common parts of blocks of flats or HMOs;
- that if it is identified that there is no FRA in place, the NCT is informed so that an FRA can be arranged;
- in conjunction with the Compliance Assessor, they have an effective building 'Fire Evacuation Strategy' that is implemented, maintained, and reviewed, as necessary. This document will be held on site with the FRA;
- that where the findings should be resolved locally, they distribute significant findings from FRAs to the relevant people responsible for their implementation, ensuring sufficient funding is provided to enable those actions to be completed satisfactorily;
- they have advised the regional Compliance Assessor once actions have been completed, to allow contractors' works to be checked and to enable the Compliance Assessor to update the FRA, or ensure that it is updated by site staff on both the site copy and on the copy held by NCT;
- that Person Centred FRA (PCFRA) are completed for those persons in specified business areas, with fire risk factors arising from aspects of their vulnerability, which would contribute to the likelihood of fire or fire development; and
- that Personal Evacuation Plans (PEEP) are completed for those persons in specified business areas who may not be able to reach a place of ultimate safety unaided.

3.9.3 Managers will also ensure that:

- within their area of responsibility all staff, whether they be employees, agency, voluntary or employees from other employers, receive adequate and appropriate fire information during induction and complete further instruction or training identified for their role;
- Fire Wardens are nominated, where applicable, and receive adequate and appropriate training;
- any fire incident is reported via the Group's accident reporting line or directly into the Group event management online system, Radar, as soon as possible, and notified to Insurance team within 24 hours of an incident occurring, as all incidents must initially be investigated locally;
- unwanted fire signals (false alarms) are documented and investigated locally; and
- suitable arrangements are in place for the safe evacuation of all relevant persons.

3.10 Managers with responsibility for supervising Contractors (RP/DH)

3.10.1 Managers with responsibility for supervising Contractors have the delegated responsibility for ensuring compliance with this procedure. This includes:

- ensuring only approved contractors are used;
- ensuring that they are satisfied that the activity has been risk assessed, properly planned and will be carried out safely without risk to the contractors, Group employees or any other relevant person;
- ensuring that works being carried out on site do not compromise the fire exits, fire detection systems, or emergency procedures for the duration of the planned works;
- ensuring that the contractors are aware of any hazards in the workplace that may affect them and any site rules that apply;
- monitoring the work regularly throughout the course of the contract, to ensure that the contractors are working to their method statement; and
- checking the area on completion of the work, to ensure that all work has been completed satisfactorily and the area is free from hazards or obstructions.

3.11 Compliance Assessors

3.11.1 Compliance Assessors are required to complete a 'suitable and sufficient' FRA and fire evacuation strategy in accordance with the Group procedure, assisted by the site managers/RPs. This ensures that the structure, fire safety management, and fire controls for the premises are adequate and appropriate. In addition, Compliance Assessors must:

- ensure that appropriate and immediate action is taken, where intolerable fire safety risks have been identified, and make recommendations on corrective action for moderate and tolerable risks;
- once actions have been completed, ensure both the FRA and SAP record are updated to reflect this within the review period;

- where actions are assigned through Radar as a result of a notice or letter of deficiency, issued by the fire and rescue service or through the PAS, update the system when the actions are complete, to ensure that Group Board and the fire and rescue service can be updated; and
- update the Fire Evacuation Strategy and FRA as well as the premises manager and/or RP/DH prior to handover of new build properties.

3.12 Head of Building Safety

3.12.1 It is the responsibility of the Head of Building Safety to:

- ensure that any changes in fire safety and building safety legislation are identified and this procedure reflects the changes;
- provide support and advice to the Group and its subsidiaries and operations;
- respond to any notices or correspondence issued by fire and rescue services;
- liaise with enforcing authorities on technical issues;
- audit against this procedure;
- liaise with the Partnership Manager as part of the PAS;
- ensure that the Group Director - Corporate Services is regularly updated on all fire-related matters affecting the Group;
- ensure technical expertise is available to the Group and its subsidiaries in the interpretation and application of relevant Statutory Provisions, and other guidance in respect of fire safety relating to Group owned, occupied, or managed premises for their relevant area of the business;
- lead the building safety programme; and
- ensure that this procedure is regularly reviewed.

3.13 Group Senior Fire Technician

3.13.1 It is the responsibility of the Senior Fire Technician to:

- assist the Head of Building Safety in the development, implementation, and monitoring of Fire policies, procedures, and reporting systems;
- manage the Group's Fire Technicians 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/inspection and training statistics;
- liaise with enforcing authorities on technical issues; and
- liaise with the Partnership Manager, as part of the PAS.

3.14 Group Fire Technicians

3.14.1 The responsibilities of the Group Fire Technicians:

- to respond to communications from enforcing authorities on technical issues;
- support RPs/DHs on request;

- provide appropriate advice on the application and interpretation of fire legislation and fire safety guidance;
- provide support and guidance to any person carrying out an FRA;
- investigate fire related incidents and provide a suitable report;
- devise and deliver training to staff carrying out FRA's and or building strategies;
- undertake fire safety inspections of the Group's premises, as required;
- provide technical advice on new development, existing buildings, new acquisitions, and proposed alteration 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' and conduct an inspection with the relevant persons prior to building 'hand over';
- liaise with the Partnership Manager as part of the PAS; and
- undertake an annual audit programme of FRA's and conduct the audits.

3.15 The NCT

3.15.1 The NCT has the delegated responsibility to:

- manage the provision of a compliance service and maintenance via internal and external contractors; and
- provide information and updates to the Build Safety operational teams, the Group Fire Technicians, and Head of Building Safety to support them in responding to any notices or correspondence issued by fire and rescue services.

3.16 Employees

3.16.1 All employees have delegated responsibility for ensuring compliance with this procedure. This includes:

- reporting any defects that may affect the fire safety management of a building;
- using equipment such as evacuation chairs, provided for 'vertical' evacuation in line with the training and instruction provided;
- attending regular fire safety training;
- taking care to ensure that they do not put themselves or others at risk; and
- understanding and implementing the Fire Evacuation Strategy, applicable to the premises.

3.17 Contractors

3.17.1 Only approved contractors, including Maintenance 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 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/certifications.

4. What's new - What's different?

4.1 April 2022 - Updated to include reference to Building Safety Services team processes:

- New definition - External Wall System (EWS)
- Revision to Section 2.13 completion of FRA remedial works
- New section 2.15 review of EWS.

4.2 November 2021 - Formal review, with the following changes:

- Addition of reference to the draft Building Safety Bill and associated programme
- Update to role titles to reflect organisational changes
- Inclusion of Fire Technician accompanied audits of the conduct of FRA's by Compliance Assessors.

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 either, more than 18m in height or has more than 6 storeys, whichever is reached first.
<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>	As defined in PAS 9980 – fire risk appraisals of external wall systems (FRAEWS)
<i>FRA re-assessment</i>	A new assessment of a premises previously assessed either as a result of a change in circumstances such as building use, occupancy type, building structure or on the expiry of the original FRA.
<i>FRA review</i>	A review is a desk top exercise using the original FRA and must take into account any changes to the building or its occupancy which affect its use. Reviews should also be conducted after any fire incident. Any changes identified will require the FRA to be updated or re-assessed. Reviews should take place annually if the premises are not subject to an annual reassessment because of its property type.

Responsible Person (RP)/Duty Holder (DH) (Scotland)	<p>The Group identifies any person with full or part management control of a site as the RP/DH, this can include Scheme Managers, Care Home Managers, or housing Managers/Staff.</p> <p>The definition of the RP/DH is:</p> <ol style="list-style-type: none"> 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.
Sleeping Risk	The increased risk to life relating to the existence of sleeping accommodation within premises.
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.

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

Detailed Procedure

1. Development

- 1.1 In respect of new developments, the NCT and Group Fire Technicians must be contacted by the Assets team at the design planning stage.
- 1.2 This allows the team to support and provide advice, to enable Development to produce an initial/draft FRA, and/or strategy plan at the planning stage, ensuring compliance with the Regulatory Reform (Fire Safety) Order 2005 and the FSA.
- 1.3 Initial documentation must include:
 - the initial building fire strategy document, provided by the architect/designer, which will be used as the basis for the buildings FRA when occupied under the Regulatory Reform (Fire Safety) Order 2005 and the FSA. Furthermore, it will be a benchmark in respect of fire safety compliance throughout the life of the building;
 - handover of new developments will not be accepted without the fire strategy document being in place;
 - a set of drawings (A1) at the design planning stage, detailing the floor and general layout;
 - the following information which will be collected from the mechanical, electrical, and building drawings for the premises:
 - building fire compartmentation and the appropriate fire resistance, for example, 30, 60, 90 minutes, etc.;
 - fire door schedule;
 - disabled refuge and communication points;
 - fire alarm devices including call points, detection, sounders marked up with zone and device detail;
 - fire dampers, smoke ventilation and control points;
 - emergency lighting units;
 - fire hydrants, dry risers, and firefighting equipment;
 - detailed engineered solutions or systems provided, and any constraints or actions required if layout change;
 - suppression systems; and
 - any other relevant information.
- 1.4 All systems should have the relevant design, installation and commissioning certificates provided.
- 1.5 It is strongly recommended that both design and general fire strategy is discussed at design stage with the enforcing authority, building control, the buildings RP, and Property Surveyor, to ensure that the staff who intend to occupy the building are involved in the handover process.
- 1.6 All the above information must be maintained in a premises management system accessible for audit by all relevant authorities.

- 1.7 Fire and Rescue Service access to premises - the Group must ensure compliance with [The Building Regulations 2010 Fire Safety Approved Document B](#), Volume 2 - Buildings other than dwelling houses Section B5, which deals with Access and Facilities for the fire service and states:
- the building shall be designed and constructed so as to provide reasonable facilities to assist fire fighters in the protection of life; and
 - reasonable provision shall be made within the site of the building to enable fire appliances to gain access to the building.
- 1.8 Further detailed information is available in technical note: Fire and Rescue Services access to premises available on [Solis | Fire Safety documents](#).

2. Fire Risk Assessments

- 2.1 The Group has a responsibility for ensuring that 'suitable and sufficient' FRAs are conducted in all workplaces and common parts of other premises, owned, or managed by the Group, and to co-operate with other occupiers and agencies, in accordance with the requirements of the FSO and the FSA.
- 2.2 With the exception of HMOs in Scotland this requirement does not extend to people's private homes. Except in communal parts of a building, for example, in a block of flats, those parts such as the doors and walls making up the means of escape and common areas and where services penetrate compartment floors/walls.
- 2.3 The objective of the FRA is to ensure all occupants can safely exit, or safely remain within the premises, as appropriate to the fire evacuation strategy for the premises. The NCT and the Compliance Assessor must ensure that the FRA is conducted and reviewed in accordance with this procedure.
- 2.4 The FRA will look at the following areas:
- life risk within the building and how it's affected (occupancy);
 - use of the building;
 - the building structure/design/protection;
 - impact of fire on the environment; and
 - fire safety management of the building.
- 2.5 When assessing the overall level of fire risk, both the likelihood and impact of fire on life risk will be considered.
- 2.5.1 Four categories of risk have been identified and are included in the FRA:
- **Intolerable - High Level Risk**
There is an impact on life safety such that actions to reduce risks are required immediately, for example, evidence of significant fire risk to the premises and occupants. Immediate action must be taken, or consideration must be given to evacuating the premises.
Note: In all cases, a management plan must be considered in the interim period.

- **Substantial Risk**
There is an impact on life risk, actions are required plus interim measures required until such actions are completed, for example, loss of fire alarm system to a building requires a management plan to be put in place.
 - **Moderate Risk**
There is an impact on life risk and therefore an action is required, for example, incorrect type of fire extinguisher in place.
 - **Tolerable - Limited Risk or Well Managed Conditions**
The level of fire risk is Low if there is minimal potential for outbreak of fire and/or the safety of individuals is reasonably well controlled. These risks will be recorded on the FRA with significant details recorded but will not be carried forward to the remedial action plan as the risk is 'tolerated' and it will be reviewed in line with the review frequency, or when there is a significant change to the property.
- 2.6 The FSO and the FSA are clear in that regular reviews of the FRA must be undertaken. The FRA is a live risk assessment document which must be reviewed immediately in the event of:
- a fire incident;
 - inspection by enforcing authority requesting that it is reviewed;
 - premises change of use; this would include temporary changes
 - change of occupancy type;
 - any situation where fire safety may be compromised, for example, building works, refurbishment; and/or
 - appointment of a new manager (RP) for the site.
- 2.7 An FRA re-assessment is a completely new assessment and will be undertaken in line with the frequencies cited in PAS 79 - 2 - Fire Risk Assessment Guidance. The frequencies as per property type are detailed on the guidance pages of the Group's FRA forms.
- 2.8 Where the property type does not require an annual re- assessment, the FRA must be reviewed annually by the RP. A review is a desk top exercise using the original assessment and must take into account any changes to the building or its occupancy which affect its use. Any changes identified will require the FRA to be updated or re-assessed. If the RP considers the FRA to no longer be valid, they must contact NCT and request a re-assessment.
- 2.9 Alongside the FRA process, the Group has in place appropriate arrangements for the inspection, maintenance, and servicing of the following, either managed at a local level by the RP or via the NCT:
- fire alarm systems - automatic and manual;
 - any device linked to the fire alarm panel (including smoke curtains and vents);
 - firefighting equipment - fixed and portable (wet/dry risers, etc.);
 - emergency/escape lighting;
 - control and isolating equipment;
 - internal and external fire escapes (to include escape routes, stairs, and signage);
 - fire dampers (where applicable);

- fire resistant walls, partitions, and cavity barriers (compartmentation);
 - fire doors (to include hardware, intumescent strips and cold smoke seals, automatic devices fitted to fire doors, etc.);
 - mechanical/natural extraction/smoke ventilation;
 - lifts (passenger/escape);
 - suppression systems;
 - portable electrical equipment;
 - mains electrical installation;
 - mains gas installation; and
 - evacuation aids.
- 2.10 Records of all maintenance carried out are to be kept and maintained within the NCT, and on the premises within the fire safety records and Premises Management System (PMS) for inspection by the enforcing authorities and/or audit should, the need arise.
- 2.11 All Notices or any other correspondence from the Fire and Rescue Service must be entered, upon receipt, onto the Group's online event management system, Radar, using the Contact from External Organisations category. Building Safety will liaise with Senior Fire Technician who will, in conjunction with the Fire Technicians, NCT, Legal Services, and Property Services co-ordinate responses via our PAS partner to the Fire and Rescue Service.
- 2.12 All formal notices must be brought to the attention of the relevant Senior Manager for the business operation to which it applies.
- 2.13 FRA process
- 2.13.1 Using the Group's FRA standard format, the FRA will be completed by a competent assessor (trained Compliance Assessor), who will be required to complete all relevant sections for the type of premises being assessed, for example, offices, housing for older persons, nursing, residential, supported living, and general housing premises with shared communal areas. The surveyor will be assisted by the RP/DH of the premises being assessed.
- 2.13.2 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 Part B.
- 2.13.3 Following determination of the evacuation strategy for premises the Fire Emergency procedures are developed by the RP and assessor, these procedures are communicated to those persons using premises by display of fire action notices, and their effectiveness tested by the carrying out of regular fire drills.

2.13.4 Upon completion of the FRA, any significant findings identified must be transferred onto an action plan. This process will require:

- a description of the action needed to address the non-compliance;
- a time scale for completion;
- risk rating; and
- risk allocation.

2.13.5 The completed FRA and action plan will be sent to the NCT, to be uploaded to the compliance database (SAP), all identified outstanding actions will be visible on the Business Information (BI) reporting system.

2.13.6 The RP for the assessed premises and any persons identified to provide an 'action' for any of the significant findings will be forwarded a copy of the FRA and proposed action plan.

2.13.7 The person named on the front page of the FRA as having completed the assessment has the responsibility for ensuring that the action plan section is kept up to date, by notifying NCT when actions have been completed so that SAP can be updated. The closing of actions can only be completed by NCT, who will do so on receipt of the correct "Action Closure" document and supporting information.

2.13.8 Post inspections of actions that are the responsibility of the compliance assessor will be managed on a risk based approach and a proportionate view will be applied to the level of monitoring and closure of the action. **A post completion inspection may not be required on every occasion when any of the following apply:**

- Minor works that can be checked by a site based person, for example, adjustments to fire doors, replacement of signage.
- Work performed by contractors with whom there is a proven track record of good performance AND they are able to provide documentary and photographic evidence of completion to the required standard.

2.13.9 A post completion inspection will be completed if any of the following apply:

- High value works/significant replacement or compartmentation works.
- Cases when equipment/active systems are being commissioned and need to be handed over.
- Works relating to a notice or letter from a fire and rescue service (some minor works can be delegated to site staff, but fire ops to verify).
- All works where there is concern / evidence of previous poor contractor performance.

2.13.10 The records on SAP are maintained and regularly monitored by the NCT, to ensure that all significant findings identified on the FRA are addressed and completed within the allocated/required timescales.

2.14 Fire and Rescue Service Notifications

2.14.1 In respect of any Notices issued by the Fire and Rescue Service, these will be logged on Radar by the Operational business areas or if received centrally, by Building Safety, which will monitor progress:

- the Compliance Assessors undertake any required actions and update the appropriate FRA to reflect any comments made in the notice;
- the required actions are transferred to the action plan, and circulated to persons identified as responsible for their completion; and
- the significant findings and proposed actions are transferred to the compliance database.

2.14.2 On completion of any action relating to a Notice, the RP/DH or Compliance Assessor will update the action plan and inform Building Safety, to enable the team to update the Fire and Rescue Service and Group Board.

2.15 Assessment and Appraisal of EWS

2.15.1 The building safety team surveyors, in conjunction with compliance surveyors will record a basic assessment of any cladding on a building subject to an FRA. This will be done on a prioritised plan commencing with high risk residential buildings.

2.15.2 The building safety team surveyors will identify and manage the basic assessments for all the Group freehold and managed buildings that are over 11m (4 storeys) in height. The requirement for an EWS basic assessment for any other residential building below that height must be raised as an action on an FRA by the compliance assessor to be managed by the building safety team.

2.15.3 The outcomes of the basic assessments will confirm if a further detailed appraisal of the EWS is required by an external contractor. If the basic assessment confirms this is not required, it will record the factors and other fire mitigation measures upon which that conclusion relies.

2.15.4 The detailed appraisal and any recommendations arising from an appraisal will be implemented, but this will be on the assessed basis of priority.

2.16 Audit of FRAs

2.16.1 The Head of Operations Fire and Security will ensure that the quality of all FRAs is monitored using the following process:

- an electronic record of all FRAs completed each month is maintained on a central system accessible by the Group Fire Technicians, who will audit a total of five FRAs per month for documentary and physical accuracy in relation to the premises assessed;
- when selecting the FRAs to be audited the process will ensure that a variety of property types and each FRA assessor are audited at least once a year;

- the auditing Fire Technician will undertake a review of the documentation and a visit to the premises to which the FRA applies. Any anomalies identified will be recorded and the FRA referred back to the original Compliance Assessor's Operational Manager;
- the auditing Fire Technician will update the electronic central record with details of the findings, action taken and recommendations to establish an audit trail. On completion, the system then generates a letter template to the appropriate Regional Operations Manager and Head of Operations Fire and Security;
- accompanied audits of the conduct of FRA's by Compliance Assessors will be carried out by Fire Technicians at the direction of the Head of Operations Fire and Security
- the Head of Operations Fire and Security is responsible for ensuring that any 'lessons learnt' are shared and any identified training needs are addressed;
- the NCT is responsible for the monitoring the progress and closure of the audit recommendations made; and
- a monthly Dashboard will be completed by Head of Operations – Fire and Security and submitted to the National Head of Compliance. The report will detail the number of business audits completed, the business areas of the audits, and any recommendations/observations alongside the action plan.

2.17 Compliance Assessors Guidance

2.17.1 A series of Technical Notes written as guidance for Compliance Assessors can be found in Section 2 [Solis | Fire Safety documents](#).

3. Control of risk

- 3.1 All RP/DH will be required to apply the principles of prevention in order to reduce the risk of fire in their premises.
- 3.2 This is achieved by avoiding risk wherever reasonably practicable, evaluating any risk, and combating risks at source.
- 3.3 A series of technical notes are available on [Solis | Fire Safety documents](#) to give guidance on the management of potential risks such as furniture and furnishings, Christmas and festive occasions, hot works, barbecues, arson prevention.
- 3.4 Working with and co-ordinating contractors will require significant levels of communication, co-operation, and supervision. The premises manager or person responsible for the site or building will become the main point of contact. It will be their responsibility to monitor the works and in relation to fire safety to ensure that contractors:
- have attended a site induction and have been given health and safety information and site rules;
 - have had the emergency procedures of that site explained to them upon arrival;
 - park safely without obstructing access for emergency vehicles such as fire appliances;

- where practicable, are met on site by a Group employee to control and monitor the works;
- sign in and out, where applicable;
- have in place the necessary hot works permits, if required for the works.
- are made aware of any hazards they may come into contact with while on site;
- when in restricted areas, such as plant rooms, is accompanied by a staff member;
- report any accidents or incidents that happen on site to their own Manager, the Group's NCT, and Building Safety;
- leave work areas in a tidy, safe condition removing all waste; and
- advise the RP when they leave site.

4. Record keeping

- 4.1 Records must be kept at all premises to evidence all aspects of fire safety including details of testing, inspection and maintenance completed on the fire alarm system and fire equipment, evacuation drills, fire events, and fire training.
- 4.2 The records may be kept in one of a number of different formats depending on the operational business area. More detailed information can be found in the technical note: Fire Safety Records available on [Solis | Fire Safety documents](#).
- 4.3 The records must be clearly legible, up to date and readily available on request if required as a part of an inspection by the local Fire Authority or internal audit.
- 4.4 **Appendix 1** contains Sanctuary Group's Fire Logbook for use in operational areas except Sanctuary Care, the logbook for which is contained in **Appendix 2** of this procedure.

5. Risks from dangerous substances

- 5.1 Dangerous substances are any substances used or present at work that could, if not properly controlled, cause harm to people as a result of a fire or explosion or corrosion of metal. They can be found in nearly all workplaces and include such things as solvents, paints, varnishes, flammable gases, such as liquid petroleum gas (LPG), dusts from machining and sanding operations, dusts from foodstuffs, pressurised gases such as oxygen and substances corrosive to metal.
- 5.2 RP/DH of Group premises must:
- find out what dangerous substances are in their workplaces and what the risks are;
 - put control measures in place to either remove those risks or, where this is not possible, control them;
 - put controls in place to reduce the effects of any incidents involving dangerous substances;
 - prepare plans and procedures to deal with accidents, incidents and emergencies involving dangerous substances;
 - make sure employees are properly informed about and trained to control or deal with the risks from the dangerous substances; and

- identify and classify areas of the workplace where explosive atmospheres may occur and avoid ignition sources (from unprotected equipment, for example) in those areas.
- 5.3 RP/DH, when compiling [Hazardous Substances Assessment Forms](#) for substances held in premises, must ensure that the requirements of Section 5 of the manufacturers Safety Data Sheets (SDS), firefighting measures, are incorporated into the assessments and the emergency procedures for the site.
- 5.4 Advice, guidance and support is available to RPs from the Fire Technician team.

6. Fire alarms and detection

- 6.1 The Group must ensure that any fire alarm, detection, or warning system is appropriate to the premises in which it is installed.
- 6.2 A technical note entitled: Fire Alarm Systems and Detection Specifications is available on [Solis | Fire Safety documents](#) and provides details of the system requirements for various property categories.
- 6.3 Technical notes are also available on [Solis | Fire Safety documents](#), providing guidance applicable across the Group for the following:
- Silencing and resetting of Fire Alarm Panels.
 - Unwanted Fire Signals (UWFS).
 - Fire Alarm Systems Checks by Group employees.

7. Firefighting equipment

- 7.1 The number, type, and location of fire extinguishers and other portable firefighting equipment within the Group's premises will be based primarily on the FRA having identified that they are necessary, and that they will be provided for use by trained personnel.
- 7.2 Any new equipment purchased must be in line with BS5306 and should be obtained through the Group's approved fire service contractor (BAFE registered).
- 7.3 All firefighting equipment should be clearly indicated by signage that meets the requirements of [The Health and Safety \(Safety Signs and Signals\) Regulations 1996](#).
- 7.4 All firefighting equipment must be maintained in working order and be subject to twelve monthly maintenance by a qualified engineer, to ensure that they operate correctly in the event of an emergency.

7.5 Use of powder extinguishers

7.5.1 The discharge of a powder extinguisher within buildings can cause a sudden reduction of visibility and can also impair breathing, which could temporarily jeopardize escape, rescue, or other emergency action. For this reason, powder extinguishers will not be specified for use indoors, unless mitigated by a health and safety risk assessment.

Note: Dry Powder extinguishers are a requirement under HMO licencing in Scotland.

7.5.2 A technical note entitled: Fire extinguishers and fire blankets is available on [Solis | Fire Safety documents](#) and provides further details regarding the types of extinguishers available.

7.6 Sprinkler and misting systems

7.6.1 The Group, along with its building designers for all new buildings and major refurbishments, will, using a process of risk assessment during the planning stages, consider installing a sprinkler or misting system.

7.6.2 A technical note entitled: Sprinkler and misting systems is available on [Solis | Fire Safety documents](#) and provides further details regarding the types of systems available.

8. Means of escape (emergency routes and exits)

8.1 Regardless of the location of a fire, persons within premises should be able to make their way to a place of relative safety along a designated escape route on activation of the fire alarm.

8.2 The means of escape in the Group's premises will be reflected in the FRA for the site.

8.3 The means of escape routes in all premises must be kept clear of all obstructions and storage to be effectively used at all times.

8.4 For the means of escape to be suitable the time available for escape should be greater than the time it takes to evacuate from the point of greatest danger to a place of relative safety. This time factor will be dependent on the reaction and response of the persons occupying the premises.

8.5 All escape routes both internal and external must have sufficient lighting for people to see their way out safely, particularly in areas that have no natural light source (borrowed light) or are used at night; to enable this all premises should be provided with emergency lighting.

8.6 Fire Action Notices must be displayed at appropriate locations around the workplace, on all escape routes and at emergency exits. The notices must comply with [The Health and Safety \(Safety Signs and Signals\) Regulations 1996](#).

- 8.7 It may be necessary to protect the route or provide protected refuges for certain groups of people or in certain types of premises, for example those providing sleeping accommodation or care facilities.
- 8.8 Technical notes providing more guidance in relation to means of escape features and issues are available on [Solis | Fire Safety documents](#):
- Means of escape (corridors, stairwells, external escape stairs, final exit doors, signage, fire dampers, fire resistant walls and partitions, cavity barriers, fire stopping).
 - Fire doors basic information and guidance.
 - Fire door components.
 - Emergency lighting.
 - Smoke extraction and ventilation.
 - Lifts.
 - Mobility scooters.
 - Storage in corridors.
 - Evacuation routes-Permissible Items - General Needs and Housing for Older Persons.

9. Fire emergency evacuation

9.1 Fire evacuation strategy

9.1.1 The Group's FRA Part B document details the information which will determine the fire evacuation strategy for premises.

9.1.2 RP/DH must ensure that the evacuation strategy for their premises is in place, current and that all relevant persons are aware of its content.

9.1.3 The identified strategy will be one of the following types:

- Phased
- Simultaneous
- Progressive horizontal (only applicable to residential care, nursing homes and hospitals)
- Defend in place/stay put.

9.1.4 A technical note entitled: Fire Evacuation, which gives detailed information on the above categories is available on [Solis | Fire Safety documents](#).

9.2 Fire emergency procedure

9.2.1 A written fire emergency procedure must be developed from the evacuation strategy and be available to all who use the premises, to ensure that all staff:

- understand what action to take on hearing the alarm;
- understand what action to take on discovering a fire;
- know how to contact the fire and rescue service
- can identify the correct location of an activation from the fire panel;
- are aware of specific responsibilities of individuals;
- understand the evacuation procedure including those at particular risk;

- know where the assembly point(s) are located;
- know how to isolate equipment (where necessary); and
- know the location and correct operation/selection of firefighting equipment.

9.3 Fire evacuation drills

9.3.1 The purpose of fire evacuation drills is to test the fire emergency procedures to be followed in the event of fire alarm activation.

9.3.2 All staff must have the opportunity to regularly practice safe evacuation.

9.3.3 A technical note entitled: Fire Drills, which provides more detailed information regarding fire drills in staffed and non-staffed sites is available on [Solis | Fire Safety documents](#).

9.4 Fire Wardens

9.4.1 Each Group workplace makes an assessment based on occupancy and staffing levels to determine the requirement for appointing a suitable number of Fire Wardens. If required as a result of the assessment, as a minimum there should be one Fire Warden per building/area for each shift. Fire Wardens are not expected to risk their lives to ensure that everyone is evacuated from the premises, but are expected to ensure that their area of responsibility has been evacuated, as far as reasonably practicable, once the cause of the activation has been verified.

9.4.2 Fire Wardens may be required to take charge of an incident in the absence of a senior person and also to ensure that the Fire and Rescue Service are called and met on arrival at the premises.

9.4.3 Fire Wardens are required to attend the Fire Warden training course as detailed in Section 13 - Training.

9.5 PCFRA

9.5.1 PCFRAs must be completed for those persons living in supported living, age defined or housing for older persons premises where there is an awareness of mobility impairment or where the resident is unable to self-evacuate regardless of the evacuation strategy.

9.5.2 PCFRAs are also required where there is an awareness of greater risk of fire due to heavy smoking, ill-health, hoarding, mental capacity, substance misuse or where a Group Fire Technician has recommended a PCFRA is undertaken.

9.5.3 Guidance can be found in the National Fire Chiefs Council Fire Safety in Specialised Housing document, which is accessible via the Health and Safety, Fire Safety guidance page on Solis. [Solis | Fire Safety documents](#).

9.5.4 The assessment should be completed on Group PCFRA, available on Solis [Pages - Health and Safety](#).

Note: PCFRA do not apply to residents in Residential Care/Nursing Homes, however London Fire Brigade may request them for homes in their area, in this situation advice and guidance should be sought from the Group Fire Technician team.

9.6 PEEPs

9.6.1 Do not apply to general needs or other properties where the residents are required to be capable of independent living, such as Housing for Older Persons schemes. There may be a requirement in student accommodation where advised by university partners following a declaration on a student application.

9.6.2 PEEP is a bespoke 'escape plan' for individuals who may not be able to reach a place of ultimate safety unaided, or within a satisfactory period of time, in the event of any emergency.

9.6.3 The plan should be developed with the person who needs the PEEP, using the template available in Solis [Pages - Health and Safety](#).

9.6.4 If a member of staff has a temporary health condition that compromises their ability to move to a place of safety, a PEEP is to be completed to record the preferred method and route to be used to safely evacuate their place of work in the event of a fire.

9.6.5 The summary sheet available on Solis [Pages - Health and Safety](#) should be completed for each site, and kept in the Fire folder or grab bag, and made available to the Fire Brigade when requested where sites are staffed.

9.6.6 Technical notes for PCFRA and PEEP are available on [Solis | Fire Safety documents](#).

9.7 Business continuity plan

9.7.1 All business areas must prepare a contingency plan that gives clear guidance on the actions to be taken if the service can no longer continue within the premises; this can be a consequence of not only a fire but, power failure, flooding, chemical spillage, or act of terrorism etc. Contingency plans must be made accessible at all times and not locked in a filing cabinet or office.

9.7.2 For further guidance, please refer to the [Business Continuity - Group Policy and Procedure](#).

10. Maintenance and testing

10.1 All fire related systems and equipment within Group's premises are adequately inspected, tested, and maintained, at the frequencies, and to the standards specified in the relevant current British Standards.

- 10.2 Testing, maintenance and inspection may be completed by either identified Group staff on site, by one of the Group's approved accredited contractors appointed by NCT or by internal Maintenance staff (Fire Safety Team). Inspection is completed by the accredited contractors.
- 10.3 All persons completing such checks, testing, maintenance, or inspection must complete the details in the Fire Safety Records retained on site. The evidence must contain the date and details of the actions completed.
- 10.4 Technical notes providing further guidance are available on [Solis | Fire Safety documents](#):
- Testing and maintenance of fire alarm systems.
 - Fire alarm system checks by Group employees.
 - Fire equipment maintenance and testing.

11. Competent advice

- 11.1 The Group ensures that it has access to competent advice on matters of fire safety in its premises by the employment of a Group Fire Technicians team, reporting to the Head of Building Safety, to provide technical advice, guidance, and support to the Group's operational teams.
- 11.2 Senior Building Safety Surveyors support the Fire Technicians team by conducting building risk surveys of high risk residential buildings (over 18m residential buildings) and providing advice on the application of emerging building safety legislation.
- 11.3 Under the PAS, the Group has entered into a partnership with Hampshire Fire and Rescue Service. The scheme allows businesses with premises in different fire authority areas to form a partnership with one fire authority that will provide the business with assured advice for other authorities to consider when dealing with matters of compliance.
- 11.4 Liaison with Hampshire Fire and Rescue Service on behalf of the Group is undertaken by the Head of Building Safety and the Senior Fire Technician.
- 11.5 The Group ensures that inspection, testing, and maintenance of fire systems and equipment in its premises is conducted by qualified accredited contractors.
- 11.6 In the design of new builds and the specifications for refurbishment programmes the Group will be supported by appropriately qualified competent persons.

12. Provision of Information to employees

- 12.1 All staff must be provided with
- information regarding the risks to them from fire, as identified in the FRA;
 - the preventive and protective measures in place to control the risks;
 - the procedures to be followed in the event of a fire alarm activation;

- details of any dangerous substance within the premises including risk assessments, safety data sheets, and emergency procedures; and
- details of any risks to them which may arise from a third party's undertakings as a consequence of working in shared premises.

12.2 Information may be imparted in the form of instruction, information and training for staff, risk and COSHH assessments, safe systems of work, Group policies and procedures, and local operational procedures.

13. Training

13.1 Fire Safety related training is provided for all staff across the Group at a variety of levels commensurate with both job and nominated roles on site.

13.2 Fire Safety RP (e-learning)

13.2.1 This e-learning course is designed for managers and nominated persons that have a responsibility for the management of fire safety within a building, and for contributing to the FRA process.

13.3 Fire Warden training

13.3.1 This two-and-a-half-hour course is designed for all nominated Fire Wardens and shift leaders with a responsibility for the control and safe evacuation of persons within a building. This course includes the roles and responsibilities of a Fire Warden and will also provide theoretical advice, supported by a video presentation, on when and how to use fire extinguishers safely.

13.3.2 This course is also available in a Webinar version for all business areas.

13.4 General fire awareness training

13.4.1 General fire safety awareness is delivered within the Core Essentials induction programme.

13.4.2 Additional training appropriate to the business area and services provided will be delivered within the business areas during the new starter induction process and by Toolbox Talks.

13.4.3 Fire Awareness training and progressive horizontal evacuation training will be provided to all staff working within Care Homes.

13.4.4 All training providers and training material must be approved and audited by the Building Safety team.

13.4.5 All training must be recorded on the local training event form and forwarded to HR Services.

13.5 Fire door training

13.5.1 This workshop provides staff with the knowledge and understanding of the importance, role, and regulations behind fire doors and doorsets, including best practice regarding installation, inspection, and maintenance.

13.5.2 This training course is aimed, predominantly at maintenance operatives and their supervisors who carry out day to day repairs, remedial works, maintenance, and installations of new fire doors. Other persons who should attend include maintenance staff from Care, Retirement living, Student and Commercial, who would be responsible for minor works and the maintenance of on fire doors.

13.6 Fire doors (e-learning)

13.6.1 This course is mandatory for anyone with responsibility for fire doors.

13.6.2 The purpose of this course is to provide guidance to those staff who:

- have responsibility for managing and maintaining the fire safety provisions within their properties;
- carry out safety checks and maintenance;
- any member of staff that may have to carry out fire door checks; and
- new Asset Surveyors as part of the induction process.

13.7 Fire Safety Guidance - Local Operations (e-learning)

13.7.1 This course is mandatory for anyone with responsibility for a Housing Scheme, once completed delegates will be able to:

- identify what onsite checks and inspections should be carried out;
- provide advice on procedures in the event of a fire;
- recognise defects in relation to fire; and
- explain different evacuation policies.

13.8 FRA training

13.8.1 This three-day training is designed for all persons responsible for carrying out FRAs and is delivered by an external provider. This course provides delegates with 18.5 hours Continuing Professional Development (CPD) approved by the Institution of Fire Engineers. CPD is maintained by attendance on two full CPD days per year run internally.

13.8.2 All Compliance Assessors will have achieved level 3 as a minimum competency standard.

13.8.3 The Group acknowledges that with an increase in the number of complex buildings within its property portfolio there is a need to develop the knowledge and competency of the Compliance Assessors, to this end, the Group is working towards all Compliance Assessors achieving Level 4/5 Certificate in Fire Safety.

13.9 Vertical evacuation equipment training

13.9.1 This training is designed for staff nominated to provide assistance to those persons with mobility issues who are unable to evacuate unaided, this training can be provided either by internal trainers or an external provider (depending on business stream and equipment on site).

14. Provision of information to employers of others and self-employed persons

14.1 Employers of employees from an outside undertaking who are working in or on Group's premises must be provided with relevant information regarding:

- the risks to their employees; and
- the preventive and protective measures taken by the RP/DH to control those risks.

14.2 The RP/DH must ensure that any person working on their site who is not an employee is provided with relevant information and appropriate instruction regarding any risk to that person.

14.3 In both of the above cases this information must include sufficient detail to allow the person working on site, and their employer, to identify any person nominated by the RP/DH to implement evacuation procedures in the event of an emergency.

15. Co-operation and co-ordination

15.1 Where the Group shares premises, either as the Landlord, leaseholder, or service provider, with another undertaking the RP/DHs must co-operate with each other as far as is necessary to both comply with the requirements of the FSO.

15.2 This is achieved by taking all reasonable steps to:

- inform the other RP/DH of the risks to relevant persons arising out of the Group's activities; and
- co-ordinate the measures the Group takes to comply with the requirements of the FSO with the measures being taken by the other RP/DH.

16. Information for tenants

16.1 Information for tenants is available at <https://www.sanctuary-housing.co.uk/safety-in-your-home>.

16.2 Two fire safety information documents are available, which provide tenants with guidance on their responsibilities and good practice in relation to fire safety, to protect themselves, their families, and homes:

- Fire Safety in communal areas
- Fire Safety in the home.

Supporting Information

1. Responsible Person/Duty Holder

1.1 The duties of the RP/DH for premises are to:

- have suitable and sufficient fire safety arrangements;
- ensure that a suitable and sufficient FRA is carried out and recorded. Any significant findings are reviewed as required;
- reduce the risk of fire and its spread in buildings and mitigate the effects of a fire;
- eliminate or reduce the risks from dangerous substances and have additional emergency measures in place for them;
- ensure fire-fighting and fire detection equipment is suitable and sufficient;
- ensure that suitable and sufficient means of escape are available and can be safely and effectively used at all material times;
- ensure there are procedures in place for incidents involving serious and imminent danger and for dangerous areas;
- ensure maintenance is carried out and recorded as necessary;
- ensure suitable safety assistance is available (competent persons);
- provide information to employees, employers and the self-employed from outside undertakings;
- ensure that suitable fire actions instruction and training are provided;
- co-operate and co-ordinate with other organisations; and
- follow this procedure and business area operational procedures.

1.2 Details of how these duties are to be executed in the operational business areas are contained in **Appendices 3 - 8** of this procedure.

2. Additional support and guidance

2.1 For further information and advice regarding fire safety management please contact Building Safety - buildingsafety@sanctuary.co.uk.

3. Period of review

3.1 Until a new procedure is formally adopted this document will remain in force and operational.

3.2 This procedure will be reviewed in accordance with the policy review programme agreed by Executive Committee.

3.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this procedure, as a result of complaints or findings from any independent organisations, the Group Director - Corporate Services/ Head of Building Safety will initiate an immediate review.