

FSIGN 420**Purpose Built Blocks of Flats***Old Inst.: N/A**Issue date: Jan 2013**400 Series: Occupancy &
Hazards***Summary**

This Note is intended for internal use, providing information and guidance on how to deal with some of the common fire safety issues with regard to purpose built blocks of flats.

This Note is one of a series produced by Fire Safety Regulation HQ Policy Groups to provide additional advice and guidance to officers and Fire Safety Teams on various subjects related to their role.

Where appropriate this Note should be used for learning and staff development purposes.

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1 Introduction

- 1.1 Since the introduction of the Regulatory Reform (Fire Safety) Order 2005, known as the Order, there has been an overlap of the legislation applicable to residential buildings. The Housing Act 2004 is the primary piece of legislation for residential premises as it deals with the whole building, including the individual dwelling units. The Order only covers the common parts of such premises, apart from the use of Article 31(10). In this FSIGN, the term "common parts" is understood to mean a part that is "used in common by the occupants of more than one such dwelling".

2 Common Parts

- 2.1 The Order does not apply to domestic premises apart from that included within Article 31 (10). The term domestic premises is defined as premises occupied as a private dwelling and any associated parts not used in common by occupants of more than one such dwelling. The term "Common Parts", unlike other words and phrases in the legislation, is not defined in the Order (see 1.1 above)
- 2.2 However, definitions of the term "common parts" appears in a variety of documents that support the Housing Act such as:
- the "Management of House in Multiple Occupation (England) Regulations 2006",
 - the "London Fire Safety Guidance for Houses in Multiple Occupation" produced by Housing Officers from the London Borough of Westminster and the London Borough of Ealing
 - Section 1(5) of the Housing Act.
- 2.3 There is then a perceived difficulty with the use of the term "common parts" as the Order and Housing legislation have a different approach to the definitions. Of particular concern is the definitions as they are used to define fire doorsets to flat entrance doors. Whilst these doors are provided within the common parts of buildings they are not used in common by all users; issues then arise as to the suitability of doorsets which are there for individual dwelling users and as protection to the common areas. It is the Authority position, that dwelling entrance doors are covered by the Order as they are used to form part of the protection for the protected route and as such are critical to the life safety of all the occupants of the building.
- 2.4 The fire risk assessment (FRA) for the premises should take in to account the protection required for a protected route as noted in fire safety guidance documents. The assessor should ensure that flat entrance doors are included as part of that protection in any FRA.

3 Issues for Inspecting Officers

- 3.1 In purpose built blocks of flats there are a number of common issues that require a consistency of approach by Inspecting Officers as enforcers of the Order. These include :
- The front doors of flats
 - Smoke control/ventilation systems
 - Fire Lifts
 - The use and storage of Mobility Scooters
 - The storage of personal possessions in common parts
 - Information to Residents

4 Protected Routes

- 4.1 Staircases, corridors, lobbies, balconies and external areas may all be classed as protected routes. This term is fully explained in British Standard (BS) 4422:2005 in paragraph 3.635 on page 57. The definition is;
- 'Route, designated for use as an escape route, which is separated from the remainder of the building by fire resistant construction, kept clear of combustible items or materials, and which leads to a place of ultimate safety'.
- 4.2 From this definition and the definitions of the other terms in the phraseology, it is clear that walls, floors and ceilings have to meet the criteria for fire resistance as noted in any definition of this term. The standard for fire resistance of compartments is dealt with in a number of documents but most commonly in the guidance that supports the Building Regulations, Approved Document B (ADB). In particular those comments in B3 and Table A1 and A2 with regard to the performance criteria for those specified elements.
- 4.3 If the elements of structure are recommended to achieve a standard of fire resistance of up to 60 minutes then any openings in walls should meet a fire resistance of at least ½ of that element in accordance with Table B1 of ADB. Therefore, in order to protect the escape route and meet the definition of the term "Protected Route" openings in walls where "Stay Put" policy has been adopted should be protected by fire doorsets that provide at least 30 minutes fire resistance.
- 4.4 It is understood that older guidance documents may have reduced the criteria above to a lower standard, a "notional" fire door and that some existing fire doorsets may not have been tested to modern test criteria. In these cases, the fire risk assessment for the premises should take this into account and note their existence.
- 4.5 Any other openings in walls around the older types of doorsets should also be subject to the fire risk assessment process and be commented on accordingly in that document. Inspecting Officers (IOs) need to consider the information contained in an FRA, if available, and use their professional judgement as to the suitability of the FRA approach. If no FRA is available, IOs should use professional judgement to make informed decisions with regard to the audit being undertaken and the outcomes they require as regards enforcement action.

5 The Front Door of Flats

- 5.1 Where the front doorset is part of the fire safety measures to safeguard the protected route, the Order applies to the front door and its surroundings including glazing or other partitioning above or to the side of the doorset.
- 5.2 The front doorset is a component part of the protected route which is part of the general fire precautions of the building. Article 17 details that the general fire precautions facilities need to be maintained and the Responsible Person may make arrangements with occupiers of other premises to ensure that this is undertaken. This applies even if the other premises are not premises to which the order applies. e.g. Domestic premises.
- 5.3 Where deficiencies in protection to escape routes are found during an audit, the Inspecting Officer should seek to have these rectified. This can be achieved by notifying the Responsible Person of the deficiency and having the work actioned at the time or where necessary by service of a notice. The terms of the notification or notice of the failure will be, "that parts of the common general fire precaution of the protected route, that extend into private domestic accommodation (i.e. private flats) does not provide the route with adequate protection in case of fire and that the responsible person has not taken appropriate action to ensure protection to the escape route".

The remedy will be for the Responsible Person to either make arrangements with the occupier of the flat, or to enforce the terms of any lease, or to utilise legal routes open to them to ensure the protected route is maintained in good working order. Notifications and notice schedule entries will be under Article 17 and a model text is provided for this purpose. FSR Central Enforcement Group should be consulted about use of the text.

- 5.4 Where the front doorset belongs to a leaseholder, or on the rare occasion a freeholder, then due to the control they can exercise over the front doorset, it is considered that under the Order they become a 5(3) person and those duties are placed upon them. In these cases the Authority can serve notices on them but before doing so any notice must be referred to the FSR Central Enforcement Group.

6 Smoke Control Systems in Residential premises

- 6.1 Recent fires and inspections of premises have demonstrated that in some cases automatic smoke ventilation systems installed in residential buildings are not operating correctly. For example vents on floors other than the one where a fire has occurred can open allowing heat and smoke to travel into that floor rather than out of the building. Brigade officers have also found that in some cases, natural ventilation of common corridors, lobbies and staircases by more simple means such as windows or permanent vents is also being removed, obstructed or otherwise compromised.
- 6.2 Ventilation of escape routes, combined with limitations on travel distance in the corridor, is designed to assist means of escape for both the occupants who have escaped from the flat that is on fire and for others who may choose to escape subsequently. Ventilation arrangements may also be there to assist firefighters to gain access to the floor of the fire incident. As a result it is extremely important to design and maintain these features so that they operate correctly and safely.
- 6.3 Depending on the number of stairs and the age of the property, ventilation is normally fitted into either the stair lobbies or corridors that form the common access area to the resident's flats. The systems used can range from a simple permanently open vent arrangement in older buildings through to manual and automatically opening windows in others. Some ventilation systems are operated by automatic fire detection which is not part of a fire alarm system but solely for use in opening the smoke control system to the building when smoke is detected in the areas where the detection has been installed.
- 6.4 In more recent buildings or those that have been upgraded, natural or mechanical smoke extract systems can be employed using smoke shafts or 'chimneys'. In some cases, where the building may have only one stair, or extended travel distances are present these can be mechanical single or two-speed systems with pressure sensors and override controls.
- 6.5 The expectation in purpose built blocks of flats is that if the smoke ventilation system is automatic and heat and/or smoke enters the common parts on the floor where a fire has started, the smoke ventilation system for the premises will vent that heat and smoke to allow the means of escape to continue to be safely used, at least for a reasonable period of time.
- 6.6 In the case of an automatically opening vent system into a smoke shaft, if smoke is detected, the door to the smoke shaft on that floor should open, together with a vent at the top of the shaft and also in the stair at the roof level. This creates a chimney effect allowing the smoke to vent to open air.
- 6.7 Refer to Appendix A of this FSiGN for further guidance relating to smoke ventilation measures and travel distances in the common areas of older purpose built blocks of flats.

7 Fire-Fighting facilities

- 7.1 In premises where firefighting facilities have been provided, items such as dry rising mains should be maintained to British Standard 9990: Code of practice for non-automatic fire-fighting systems in buildings, which covers the servicing and maintenance of dry risers. The standard recommends that dry rising mains are checked every 6 months to ensure the valves are fully serviceable. A wet pressure test should be undertaken annually to ensure there is no leakage.
- 7.2 The terms 'Fireman's Lift' and 'Firefighting Lift' are often misunderstood and misrepresented within and outside of the Authority. These two terms, whilst similar, refer to lifts that differ in their electronics and engineering.

Fireman's lift

The term "fireman's lift" describes a normal lift, in which is fitted a "fireman's switch" at ground floor or at firefighter access level which is used to override the normal lift controls. These were normally installed in buildings prior to or around the 1980s. As a normal lift, it will not have all the structural protection, protected services and duplicate power services that a BS 5588 Part 5 or BS 9999 firefighting lift will have.

Where buildings have been provided with fireman's lifts, consideration should be given to recommending to the Responsible Person to upgrade these to fire fighting lifts which should be designed and installed to BS EN 81-72. This should be recommended where a significant finding has been made within the fire risk assessment about the suitability of the lift currently installed.

Firefighting lift

The term "Firefighting lift" describes a lift installed to BS 5588 part 5 or BS 9999 and is a lift fitted with additional protection and controls that enable it to be used under the direct control of the fire service when fighting a fire. The firefighting lift is a development of the type of lift known as a fireman's lift. Although existing fireman's lift installations may in some circumstances be refurbished, in new buildings and those under going significant changes, the aim should be to achieve lifts that comply with the current codes of practice. Further information can be sourced from BS EN 81-72 2003 –Lifts: Firefighters lifts.

- 7.3 When carrying out audits of buildings with these types of installations IOs should have an awareness of the differences between the two lift types. IOs should ensure that evacuation strategies and the fire risk assessment for the premises demonstrate an awareness of the use, and ability to use, a particular lift type.
- 7.4 In addition, maintenance regimes under Article 38 should be examined to ensure that the "functions for use" required by both types of lifts actually operate. In addition, that the lift will be available when called upon, either as part of the evacuation process from the building, or for firefighter access.

8 Mobility Scooters

- 8.1 There is an increase in use of mobility scooters throughout the United Kingdom and there are fire safety concerns and issues arising from this increased use. The Fire safety in purpose-built blocks of flats Guide 2011 (PBBF) issued by the Local Government Group gives some guidance on this as does BS 9991 201. Issues that can arise are with regard to storage of the scooter and the charging from the electricity supply of the scooter.

- 8.2 The charging of an electric mobility scooter should not be conducted within a protected route. However, due to space and building restrictions in many buildings it is often the case that people will, out of necessity, leave mobility scooters in protected routes and charge them through extension leads from their own flats. In these cases the Authority may accept the following as compensatory features.
- (a) A marked storage area that does not impede the means of escape with no charging facilities, or
 - (b) A 30 minute fire resistant store that does not obstruct the means of escape which incorporates a permanent charging point within the store area, or
 - (c) An appropriate fire suppression system.

9 The Storage of Personal Possessions in Common Parts

- 9.1 With the space restriction for users in dwellings in residential blocks there is always the difficulty of where to store larger items of personal possessions such as bicycles, prams, pushchairs and toys. There is also the storage of refuse and waste to consider, particularly in areas where environmental and ecological concerns allow for separate collections of different items within different weekly cycles. There are two types of policy the Responsible Person can have on storage a "zero tolerance" policy or a "managed" policy. These are both covered in Section 44 pages 55-61 in the PBBF guidance document.

10 Information to Residents

- 10.1 Residents need to have an awareness of the evacuation strategy of the building in which they reside. To ensure this is in place, IOs should ensure that they confirm that the RP can demonstrate that they have provided continuing suitable and sufficient information about the strategy to the residents. In addition, where possible, IO's should confirm, whilst on site, that the residents have this information and that it has been made known to all people who reside or work in the premises.
- 10.2 Whilst it is clear that the Order does not apply to domestic premises, if it is made known to IOs through the above process that individuals are unable to self evacuate or are subject to care arrangements, then the Station Notification form should be utilised, where necessary, to inform others of any issues.

11 Vulnerable Persons Referral

- 11.1 IOs must have an awareness of the Safeguarding of adults at risk ([policy No.: 736](#)) and referral paths within that document.
- 11.2 A Camden borough learning package on safeguarding action can be accessed by IOs using this link: <http://www.kwango.com/lbcasalogin>. Use the following details to log on:
Username: camprobsa / Password: camsa31
- 11.3 Where an IO becomes aware of an individual who is at immediate risk of and from fire (such as a vulnerable person who has had repeated fires, or where evidence of carelessness with smoking materials is seen), the issue should be dealt with as a Serious Outstanding Risk.
- 11.4 IOs must also have an understanding of Home Fire Safety Visits (HFSVs) ([policy No.: 741](#)) and how the system is operated. They should know how they can make referrals, should evidence be found of a persons vulnerability that could require this service.

12 Refuse Chutes and Bin stores

- 12.1 Refuse chutes and bin stores must be properly separated from protected routes by at least 30 minutes fire resisting construction. Bin stores are a focus for arson and therefore should be kept locked shut.
- 12.2 Refuse chutes are prone to vandalism as well as wear and tear of the seals on the chute hatches. An inspection and maintenance programme should be put in place to identify and rectify and problems.

13 Emergency Lighting and Emergency Escape lighting

- 13.1 An Emergency Lighting or Emergency Escape Lighting system conforming to BS 5266 Part 1: 2011: Emergency lighting. Code of practice for the emergency escape lighting of premises, should be provided illuminating stairways, corridors, and other exit routes to allow persons to make their way out of the premises safely.
- 13.2 The system should be independent from the main supply in accordance with the recommendations of the standard and meet the requirements for duration and illumination in accordance with BS 1838:1999, BS 5266 Part 7:1999: Lighting applications. Emergency lighting. The testing and maintenance arrangements should be detailed as part of the Fire Policy and in accordance with BS EN 50172:2004, BS 5266 Part 8:2004: Emergency escape lighting systems.

14 Primary Authority Partnerships

- 14.1 Before any enforcement action is taken (enforcement notice or notification of deficiencies), it is essential that the Inspecting Officer determines if the business being audited is included in the Primary Authority Partnership scheme. The Primary Authority Register on the Better Regulation Delivery Office website contains details of all Primary Authority partnerships. See FSIGN 610 for further information.

15 Enforcing The Order

- 15.1 The Housing Act and the Order have overlapping duties and the 'Housing Protocol' was designed to indicate who would be the lead agency on enforcement issues in certain types of premises. This information is included in the LACORS Guides and Authority policy. Where possible the protocol referred to in the FSIGN 402 should be followed and any required inter agency liaison take place.
- 15.2 The current protocol shows that the Fire Authority are the lead for fire safety issues in the common parts of purpose built blocks of flats and therefore the Authority will be the prime enforcer in this area.
- 15.3 In premises, the responsible person should be identified and any necessary enforcement action should be taken against them as required and not an individual tenant. However, where a leaseholder or freeholder is concerned, the advice given in paragraph 5.4 above should be followed.
- 15.4 Inspecting Officers are expected to use professional judgement in the application of best practice guidance. This guidance is that as detailed in the PBBF document and the CLG sleeping accommodation guide. It should always be borne in mind that existing premises may well have been designed to older non extant standards such as BS CP3, BS 5588 Part 1, Approved

Document B of the Building Regulations, older editions or to conform to local acts such as the London Building Acts (repealed on 9 January 2013, see FSIGN 528).

- 15.5 The type and provision of fire safety arrangements will therefore be different dependent on the age and design of the structure and any modifications or alterations that have been made. Where alterations have been made it should be ensured that they have not compromised the fire safety features included for the safety of people at design stage. The fire risk assessment for the premises should fully detail the measures required for fire safety to ensure that residents are protected from fire situations and firefighter access is not compromised.
- 15.6 It should also be borne in mind that it may not be possible or indeed feasible to apply modern standards to older buildings and the fire risk assessment will need to demonstrate that the building is safe for relevant persons.

16 How Can Local Housing Authorities (LHAs) Assist?

- 16.1 LHAs are the local borough councils who enforce the Housing Act. However, they cannot enforce against properties that they are the Responsible Person for. This is reflected in the protocol by other enforcing agencies having responsibility for those buildings falling into this category.
- 16.2 The Housing Act 2004 (the appropriate chapter and numbers have been included in bold below if you require further reading) introduced a new hazard rating system based on conditions of housing. This is the basis of enforcing the Housing Act with the LHAs as the enforcers. The Act introduced category 1 and category 2 hazards and is applied to residential premises. The methodology for assessing the hazard level and the outcome of whether an improvement or prohibition order is issued is the subject of guidance documents issued by the Government. (HHSRS Operating Guidance and HHSRS Guidance for Landlords and Property Related Professionals).
- 16.3 **Chapter 1 3(1)** states that local housing authority must keep housing conditions in their area under review to identify any action that may need to be taken.
- 16.4 **Chapter 1 4(1)** states if a local housing authority consider—(a) as a result of any matters of which they have become aware in carrying out their duty under section 3, or (b) for any other reason, that it would be appropriate for any residential premises in their district to be inspected with a view to determining whether any category 1 or 2 hazard exists on those premises, the authority must arrange for such an inspection to be carried out.
- 16.5 **Chapter 1 5 (1)** says that if a category 1 hazard exists that **they must take action** and there are a number of different sanctions they can take including improvement notice or prohibition order.
- 16.6 **Chapter 1 7** does not give any requirement for the LHA to act if a category 2 hazard is present but if they do they have a similar range of powers.
- 16.7 Improvement notices and prohibition orders have similar issues such as time limits, directions as how to comply and appeals as the Order and this is all detailed in **Chapter 2 paragraphs 11-30**

17 Powers of LHA Under The Housing Act and The Management of Houses in Multiple Occupation (England) Regulations 2006

- 17.1 **Chapter 2 paragraph 35** allows a court to order the occupier or owner to allow action to be taken on premises and this applies when a relevant person or representative is being prevented from carrying out works to comply with an improvement notice or prohibition order.

17.2 In this section—

“relevant person”, in relation to any premises, means a person who is an owner of the premises, a person having control of or managing the premises, or the holder of any licence under Part 2 or 3 in respect of the premises;

“representative” in relation to a relevant person or a local housing authority, means any officer, employee, agent or contractor of that person or authority

- 17.3 In **Schedule 3 part 2** the act gives the LHA power to carry out the work if they have served an improvement notice that has not been complied with. It also states what the LHA have to do to use this power and if they meet any obstruction in carrying out the work.

Power to take action without agreement

- 17.4 **3 (1)** The LHA may themselves take the action required in relation to a hazard by an improvement notice if sub-paragraph (2) or (3) applies.
- 17.5 **(2)** This sub-paragraph applies if the notice is not complied with in relation to that hazard.
- 17.6 **(3)** This sub-paragraph applies if, before the end of the period which under section 30(2) is appropriate for completion of the action specified in the notice in relation to the hazard, they consider that reasonable progress is not being made towards compliance with the notice in relation to the hazard. The LHA have suitable powers of entry to domestic premises. **Schedule 3** Part 3 explains how they can recover their costs.
- 17.7 This basically gives LHA the powers to physically change the doors to fire doors and then recover the costs.

18 How Does This Work in Practice?

- 18.1 Although both the Authority and LHA have powers to deal with any fire safety issues, it is only by working in partnership that the best ways of achieving safe and compliant premises can be achieved. Working practices should be drawn up between local teams and LHA and where possible the Housing Protocol should be the framework for this.

19 Further Information

- 19.1 This briefing note should be read in conjunction with
- FSR PN 400 - Occupancy & hazards
 - FSIGN 402 - Working with housing providers on residential and domestic premises
 - FSIGN 421 – Sheltered housing and other supported living
 - FSIGN 422 – Care Homes
 - FSIGN 528 – Repeal of Local Acts

Appendix A – Smoke ventilation measures and travel distances in the common areas of older purpose built blocks of flats

- A.1 There is a huge diversity across London in terms of the age, type and form of construction of blocks of flats, thus it must be appreciated that the assessment of smoke ventilation provisions (and related means of escape arrangements) in these buildings should be completed on a case by case basis. Indeed, fire risk assessments completed under the Regulatory Reform (Fire Safety) Order 2005 for such blocks of flats should be being conducted on a case specific basis (i.e. not a generic approach).
- A.2 Fire safety design guidance applicable to blocks of flats has varied significantly over the post-war period, and approaches to travel distance within and providing smoke ventilation to the common areas have varied between different guidance documents.
- A.3 It should be acknowledged that for existing, older building stock it is often impractical and unreasonable to fully impose current fire safety guidance retrospectively when assessing fire risks, and that there must be some consideration given to the design standards referred to at the time of a building's construction. However, current guidance provides a useful means of setting benchmarks against which a building can be compared in order to identify the adequacy of the fire safety arrangements present and whether there are any high risk features/inadequacies that need to be addressed as part of the premises fire risk assessment.
- A.4 The above points are acknowledged and discussed further within the Local Government Group produced '*Fire safety in purpose-built blocks of flats*' guidance document, which is one of the current benchmark standards referred to by housing providers, fire risk assessors, and Regulatory Authorities (amongst others). Additional relevant guidance can also be found in Approved Document B Volume 2, BS9991: 2011, and the DCLG produced '*Fire safety risk assessment: sleeping accommodation*' guidance document.
- A.5 With regards to smoke control methods applied in purpose built blocks of flats, the use of smoke dispersal strategies, utilising permanently open vents (POVs) to create cross-flow ventilation in the common areas, should be carefully assessed due to the limitations associated with this method. Indeed, this is acknowledged in the above mentioned Local Government Group guidance document. Cross-flow ventilation can be an unreliable means of smoke control, and the use of POVs can potentially permit the spread of smoke through a building, including to areas other than the floor of fire origin. In some cases it is also unclear whether the size or free venting area of existing POVs provided in blocks of flats actually allows for effective smoke control/ventilation (for example, vents could be much smaller than the typical 1.5m² free area associated with common corridors, as expected under current design guidance).
- A.6 Where smoke dispersal strategies have been employed in existing blocks of flats, common corridor travel distances can be in excess of what would be deemed acceptable under current design guidance, with no cross corridor doors being provided. Again, this aspect of the building design needs to be carefully considered. While occupants of blocks of flats may be expected to adopt a 'stay put' policy should a fire occur in their building, the building should still be designed to provide adequate egress routes so that if anyone does choose to make their escape then they can; in some cases, excessive travel distances in the common areas of existing blocks of flats may be too long to be considered reasonable.
- A.7 Where the use of a smoke dispersal strategy has been identified, it would be expected that the premises fire risk assessment considers specifically the appropriateness and effectiveness of the

method of the smoke control measures provided, along with the associated travel distances within the common areas. As part of this, it should be considered whether the introduction of additional measures to bring the smoke control strategy more in line with current design standards would be beneficial. These additional measures could include:

- The adoption of a smoke containment, rather than dispersal, strategy for the common areas.
- Upgrading or replacement of existing smoke ventilators or smoke control system (for example, the removal of POVs to be replaced with suitably sized automatic opening vents (AOVs)).
- Introduction of cross corridor doors to reduce travel distances and restrict smoke spread in the common areas.

The premises fire risk assessment should also take into account whether there are any other unusual building features that may have a bearing on how the smoke control strategy is viewed (for example, the presence of alternative, diverse means of escape routes from individual flats to separate floors).

- A.8 In addition to this, while fire fighters may not be deemed as 'relevant persons' under the Regulatory Reform (Fire Safety) Order 2005, the introduction of additional measures to improve the smoke control and travel distance arrangements can also help to improve fire fighter safety and fire fighters ability to conduct effective fire fighting operations within the building. This brings obvious benefits, and helps to support the 'stay put' principle often adopted in blocks of flats.
- A.9 Where appropriate, Inspecting Officers should recommend that the Responsible Person considers providing clear and concise premises information for fire fighters, including details in relation to smoke ventilation measures and fire service access routes, in a suitable manner (e.g. premises information box or similar arrangement).
- A.10 Where the introduction of additional control measures are deemed appropriate, it is acknowledged that works relating to the smoke control strategy of a building may have to be factored into a wider fire safety improvements programme, which could include the installation/ upgrade of both active (for example emergency lighting system) and/ or passive (for example, compartmentation, fire doors) measures.

In these cases a schedule of works may need to be agreed between all relevant stakeholders, including the Regulatory Authorities, to ensure that higher priority remedial works (such as ensuring all flat front doors are suitably self closing and fire resisting doors to the current standards) are completed as soon as possible, but yet ensuring that longer term works continue to be addressed through the premises fire risk assessment and are still intended to be acted upon within a reasonable period of time.

- A.11 Ultimately, if Inspecting Officers do not feel that upon auditing a purpose built block of flats under the Regulatory Reform (Fire Safety) Order 2005 that the method of smoke control or travel distances have been fully assessed and justified as part of the premises fire risk assessment, then they should be considering whether appropriate enforcement action needs to be taken.
- A.12 Unfortunately there is no generic solution that can be applied to resolving fire safety issues in purpose built blocks of flats, thus Area Fire Safety Teams should carefully consider the above mentioned issues on a case by case basis, and where appropriate, contact Fire Engineering Group for further technical guidance, or FSR Enforcement Team for advice in regards to enforcement action that may be being taken on a particular premises.

Document History

Impact assessments

An Equality or Sustainability Impact Assessment was completed on:

Equality Impact Assessment	xx/mm/yyyy	Sustainability Impact Assessment	xx/mm/yyyy
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Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

NB: This document MUST only be amended with consideration of content in FSiGNs 421 and 422 where there is a commonality of advice that must be harmonized to ensure consistent guidance.

Page/para nos.	Brief description of change	Date
Page 11 & 12	Appendix A added.	04/11/2014
Page 8	Reference to PAPs added	16/01/2015