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**From:** Janice Wray [jwray@kctmo.org.uk]  
**Sent:** 23/12/2015 15:04:32  
**To:** Alex Bosman [abosman@kctmo.org.uk]  
**CC:** Barbara Matthews [bmatthews@kctmo.org.uk]; Sacha Jevans [sjevans@kctmo.org.uk]; Peter Maddison [pmaddison@kctmo.org.uk]  
**Subject:** FW: FRA  
**Attachments:** Contractors warned of fire door risks.pdf

Hi Alex

Please see Carl's responses to your queries in red type below. In the absence of the wording of the Enforcement Notice it is impossible to be definitive about LFB requirements. However, installing a self-closer and replacement hinges is considered to be remedial maintenance and not material alteration.

Please advise if you wish to discuss further

Regards

Janice

**Janice Wray**  
**TMO Health, Safety & Facilities Manager**

t: [REDACTED]



w: [www.kctmo.org.uk](http://www.kctmo.org.uk)

a: : The Network Hub, 300 Kensal Road, W10 5BE

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 23 December 2015 14:44  
**To:** Janice Wray  
**Subject:** Re: FRA

Janice

My comments on the e mail are below in red, please also see the attached.

I will respond to the attachments separately.

Carl

-----Original Message-----

From: Janice Wray <jwray@kctmo.org.uk>  
To: carlstokes <[REDACTED]>

Sent: Thu, 17 Dec 2015 16:21  
Subject: FW: FRA

Please see below and attachments – can I have your views please?

Janice

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**From:** Alex Bosman  
**Sent:** 17 December 2015 12:52  
**To:** Janice Wray; Barbara Matthews; Peter Maddison; Sacha Jevans  
**Subject:** FRA

Hi All,

It was really helpful to meet this morning and I feel the new approach to reviewing the FRA actions will enable us to progress them in a timely manor.

I have attached an update on the current FRA actions and there were a couple of items I would appreciate some guidance on:

FRA actions:

Of the outstanding FRA actions there are 20 queries which relate to 6 reoccurring issues which I feel we need to make a TMO management decision on. I have attached a spreadsheet which includes the original action and the management query which id appreciate guidance on.

Adair / Hazlewood FEDs:

As discussed briefly some clarity is required on the approach to the door repair / self closing issue. I have attached an example of the findings the team have identified for both Adair and Hazlewood. Form this there are a number of considerations:

1. Definition of existing doors – do we treat all doors which are currently fitted as existing doors? A number may have been renewed more recently; investigation of the repairs history would be required however we could say that all doors fitted since our current specification has been in place should be brought up to the current standard and all those prior to this are considered existing. If so; Janice can you confirm when the current specification was agreed within the TMO(I understand the clarification with RD is more recent).

The short answer is "Yes"

As a door, any door, is replaced the new door should meet all of the requirements of the Building Regulations in force at the time of installation, contractors should be familiar with current Building Regulations requirements as should any surveyors etc. Please see the attached information from the trade body warning contractors in 2011 that they face prosecution for not undertaking the job correctly. So as long as the responsible person has instructed that the correct door is fitted then it is up to the contractor to undertake the work in accordance with the specification given. There should be a quality control aspect but if the correct specification was given then the contractor is at fault.

So depending on when a door was fitted depends on the standard of the door, changes to the Building Regulations are not retrospective.

2. There is variation across the blocks with regard to hinges and closers/lack of. Technically I do not believe a perko should be installed in addition to rising butt hinges and other doors are fitted with incorrect or insufficient hinges to meet current standards.

The fitting of self closing devices along with any existing rising butt hinges is what appears to be the requirement of the LFB, but as the Notice from them has not yet been issued I cannot comment on this subject. If pushed on this question I would say that for the price of a pair of new hinges then as new self closing devices are fitted then new fire rated hinges are also fitted.

If you know that hinges are incorrect then they should be changed immediately for compliant fire rated ones meeting all of the British Standard requirements.

There is no standard on the number of hinges on a fire door, each manufacturer specifies the number of hinges that a fire door will have fitted and this comes from the fire test data and the fire door installation sheet of that door.

The query the team have raised is that if we are to renew hinges and install perkos to meet the LFB requirements for the particular towers can these be considered as repairs to the door (a large proportion are not certified & have no smoke seals) or would this level of works be considered as a material alteration in regards to Building Regulation and therefore the doors should meet current standards.

Installing new hinges and fitting self closing devices to a door is remedial maintenance, these are not repairs to a door as this is door furniture, just like fitting a new letter box to a door is, you would not change the door if the letter box was damaged. The doors are not being replaced so they do not need to have cold smoke seals etc fitted. If a new door was fitted then this new door should have cold smoke seals etc and comply with the requirements of the current Building Regulations. Again as far as I know this work is being undertaken to meet the LFB's requirements, as you have mentioned, the Notice has not been issued but it is not saying fit new flat entrance doors. as far as I know.

My recommendation is that if we were to renew hinges and install a perko this would be considered as a material alteration. A possible solution to this would be to renew/install rising butt hinges to all those doors we consider existing as per the point above (which would not be considered a material alteration and therefore no further upgrade would be required) and upgrade where possible or renew any remaining doors to current standards. Alternatively if we treat all doors as existing we could have rising butt hinges fitted to all which would provide self closing FEDs.

The LFB have said, I believe, fit self closing devices to the existing doors, so the above is I believe not an option. The current Building Regulations does not allow rising butt hinges. The fitting of self closing devices is the requirement of the Enforcement Notice, I believe. But again this Notice has not been issued, you could wait until it is.

Id appreciate your guidance on the above so I can clarify with the team and RD to progress works.

Thanks,

Alex

Alex Bosman

Head of Contract Management  
Kensington & Chelsea TMO  
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W10 5BE



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