



TMO FIRE SAFETY STRATEGY

1. Introduction

- 1.1 The TMO Health & Safety Policy Statement acknowledges the company's commitment to providing a safe and healthy environment for residents, employees and contractors. The area of fire safety in particular is highlighted as being of significant importance in a residential setting and as such is an area which is subject to intensive inspection, maintenance and assessment activity.
- 1.2 The TMO manages RBKC's housing stock which is diverse in nature but consists predominantly of purpose-built flats and maisonettes which are principally located in medium- and high-rise blocks. However, there are also a number of low-rise street properties and a smaller number of freehold houses. Additionally, whilst many of these properties were constructed between the 1950s and the 1970s there are a number of properties which were built before these dates.
- 1.3 Statistics indicate that, compared to people living in houses, people living in blocks of flats – particularly those with social landlords – are at an increased risk of fire and so it is imperative that the TMO takes all necessary steps, not just to comply with the legislation but also to protect our residents and reduce the likelihood of them being a victim of fire in their own home.
- 1.4 This strategy document enables us to outline the measures we have put in place not just to comply with fire safety legislation and best practice but, more importantly, to minimise the risk of fire throughout the housing stock. Specifically, we are committed to reducing the risk of an outbreak of fire and also the risk of a fire spreading within a building but also spreading from one building to another.

2. Legislation

- 2.1 A range of legislation applies in relation to maintaining Fire Safety in residential blocks. This includes the following -
 - the Building Regulations – a building must be compliant with the Building Regulations that were in force at the time of its construction and must comply with the requirements of the current Building Regulations when it undergoes refurbishment. (Approved Document B of the Building Regulations covers the Fire Safety aspects of any building work.)
 - the Housing Act 2004 – this is enforced by Environmental Health whose Officers apply the Housing Health & Safety Rating System (HHSRS) to assess dwellings and common parts of blocks. Specifically, they assess 29 individual areas of potential hazard to establish whether any of these constitute a "category 1 hazard" which would require enforcement.
 - The Regulatory Reform (Fire Safety) Order 2005 applies to the communal areas of residential blocks and also to workplaces. The Local Fire Authority is the enforcing body for this legislation.
- 2.2 For the purposes of Fire Safety legislation, specifically the Regulatory Reform (Fire Safety) Order 2005 (FSO), RBKC and the TMO are considered to be "responsible persons" and as such must ensure that "suitable and sufficient" fire risk assessments are carried out in the communal areas of all the residential blocks on a regular basis and that

any significant findings and action plan identified in the assessment are progressed in a timely basis.

3. Enforcement

- 3.1 The Local Fire Authority is the enforcing body for the Regulatory Reform (Fire Safety) Order 2005. For TMO purposes the enforcing body is the London Fire Brigade (LFB).
- 3.2 Further, a protocol between the London Fire Brigade (LFB) and RBKC clarifies that fire safety enforcement in relation to RBKC properties will be undertaken by the LFB. (There remains a difference of view between the LFB and RBKC in relation to the enforcement of non-compliant leaseholder flat entrance doors. However, whilst RBKC reserves the right to challenge the LFB in the future in respect of its position, in view of the need to ensure the safety of residents, visitors, workers and others within the blocks in which there are non compliant doors, the TMO and the Borough are taking steps to pursue leaseholders whose doors are non compliant.)
- 3.3 If the LFB visit an RBKC block to carry out an inspection or an audit - this could be at the request of a resident, following a fire within the building or as part of a programme of inspections / audits – and where the LFB have no or only very minor issues or concerns they have agreed to issue a “broadly compliant” letter. If, however, they have concerns that the block falls short of the required standards, in the first instance these will be raised with the TMO by telephone or by e-mail. This may be followed up with a written “Notice of Fire Safety Deficiencies” outlining the areas of concern and giving a timescale within which these must be addressed. Where the LFB consider there is a serious breach of legislation which is presenting a significant potential risk to residents they may issue an Enforcement Notice or a Prohibition Notice – both of which have legal status.

4. Standards & good practice applied to residential Housing

- 4.1 In addition to the legislation outlined above there are a number of guidance documents, British Standards, Codes of Practice, good practice guides etc. that cover fire safety in a residential environment and the TMO is committed to complying with these. The most important of these is “Fire safety in purpose built blocks of flats” which was published in July 2011 by the Local Government Group following extensive consultation with all stakeholders including ALMOs and the Chief Fire Officers Association. This is currently considered to represent industry best management practice and the TMO has adopted the principles set out in this guidance.

5. Management Arrangements for Fire Safety

- 5.1 This includes but is not confined to the following –
 - Programme of regular estate inspection, risk assessments and monitoring by Neighbourhood Staff and Health & Safety staff. Specifically, inspections ensuring that obstructions, combustible items and excessive stored items are not present in the communal areas, fire doors are operating effectively and self-closing, emergency lighting is maintained, final exit doors are operational, signage has not been removed or defaced, wet / dry riser cabinets have not been tampered with or obstructed, any communal area repairs have been completed to a satisfactory standard etc. All defects and repairs are reported immediately - routine matters via a PDA and urgent matters by telephone to the Customer Services Centre who instigate the repair. Repairs to fire doors, self-closers etc. are given priority. (A copy of the inspection proformas routinely used by the Estate Services Assistant (ESAs) is available from the Estate Services Team Leaders.)

- Inspection, testing and maintenance of all fire safety systems / plant / equipment as per the requirements of the relevant British Standard by competent contractors under a planned preventative maintenance regime. In the case of emergency lighting the maintenance contractor's regular checks are supplemented by monthly inspection and testing by the estate staff. (Records are maintained of all testing.)
- Regular comprehensive Fire Risk Assessments (FRAs) & reviews and a prioritised approach to progressing the Significant Findings and Action Plan items. Regular monitoring of progress with completion of these is undertaken by the Health & Safety Committee.
- Information to residents – general fire safety information on evacuation strategy, storage in communal areas, smoke alarms, LFB Home Fire Safety Visits etc. is provided via the TMO's website, in regular articles in the quarterly magazine to all residents ("The Link") and the Home Ownership Newsletter, in the Residents Handbook, in an introductory letter to all new tenants etc. Additionally, more specific fire safety information is available through regular Sheltered Housing Newsletters etc.
- A programme of installing Fire Action Notices in each block has commenced. The programme is risk-based with the potentially higher risk properties (high-rise, sheltered and temporary accommodation blocks) being completed in the initial stage of the programme.
- Installation of hard-wired (mains powered) smoke / heat alarms within dwellings when periodic wiring inspection and re-wiring is being undertaken. (As of June 2017, installation had been completed in 85% of tenanted dwellings.)
- Opportunity for residents and employees to report any concerns, defects, outstanding repairs etc. via our Freephone service. During working hours this is answered by KCTMO's Customer Service Centre staff and out of working hours by Pinnacle, KCTMO's contracted out of hours call monitoring service.
- Conditions of Tenancy prohibit the use of Liquefied Petroleum Gas (LPG)
- Use of fire retardant carpet, floor coverings and curtains in communal areas (in sheltered schemes)
- Upholstered furniture (provided in communal lounges or clubrooms) meets the Furniture & Furnishings Fire Safety Regulations 1988
- Achievement of "Class 0" spread of flame of the wall surfaces of the communal areas of blocks. (Ensuring that when redecorations are carried out wall coverings are analysed and multi-layers of paint which are not well adhered and able to achieve this rating are stripped back to the substrate.)
- Annual servicing of all council-owned individual gas appliances and inspection of installation pipework in compliance with the Gas Safety (Installation & Use) Regulations and regular newsletters to leaseholders encouraging them to service their gas appliances.
- Regular (5-yearly) inspection and testing of individual electrical installations – both within dwellings and within common parts of blocks
- During construction projects fire safety – of residents, staff and contractors - is considered at every stage and is reflected in construction stage plans, risk assessments and method statements. Compliance with Building Regulations is paramount. Engagement with contractors to reinforce the need to ensure that all works are "made good to a fire resisting standard" and that contractors adequately train their operatives in order to facilitate this. Post inspections will also scrutinise this aspect of works. Additionally, the TMO's fire consultant is regularly consulted during major works and liaises with contractors, consultants and undertakes inspection as requested.
- The services of a third party accredited specialist fire contractor have been procured and this contractor can be instructed to competently undertake work on any breaches of compartmentation.

- Investigation is undertaken into all reported fires within the stock. Close liaison with the LFB about the probable causes enables TMO to identify and instigate any action necessary to prevent a recurrence. A record of all fires is maintained, discussed with LFB at regular Liaison meetings with details reported to quarterly Health & Safety Committee meetings and a summary included in the TMO's Annual Health & Safety Report for that period.
- Regular (bi-monthly) Liaison meetings between the TMO Health, Safety & Facilities Manager and the London Fire Brigade's Fire Safety Team Leader for K&C plus local LFB Station Managers to discuss any recent fires, LFB audits, familiarisation visits, FRA issues, statistics on attendance at lift shut-ins, false alarm activations, LFB initiatives or any other issues or concerns etc.

6. Fire Alarms & Automatic Fire Detection (AFD)

6.1 AFD within Dwellings

Smoke alarms, when installed and maintained correctly, are a cheap and effective way to protect people and property. Available evidence suggests that some groups of people are more at risk from fire than others and that these groups are also more likely to live in flats (Local Authority or other) and are less likely to have a smoke alarm fitted in their home. Previously TMO had made attempts to install battery-powered smoke alarms within the homes of the most vulnerable residents and in the potentially higher risk properties. However, more recently it was accepted that the most effective method of ensuring that tenants had early warning of smoke or flames in their home was to fit hard-wired with battery back-up smoke and heat alarms. Therefore, TMO commenced an installation programme which has currently approximately 85% of tenanted properties. (It is anticipated that we will reach 100% of tenanted stock by the end of 2018.)

In addition, the LFB leaflets promoting Home Fire Safety Visits (which includes installation of battery-powered smoke alarm) are widely available so that tenants and leaseholders are aware of this free service from the LFB and clear on how it can be accessed.

6.2 Fire Alarms & AFD in communal areas

In a small number of residential blocks – most of which are sheltered housing and temporary accommodation blocks - a fire alarm and warning system has been fitted within the communal areas. Where installed, these systems are subject to regular inspection and maintenance by specialist contractors. Generally, these systems are monitored by the local KCTMO staff during working hours and by Tunstall Telecom out of working hours. (In locations such as Grenfell Tower Tunstall Telecom provide monitoring on a continuous basis.)

To assist the LFB respond effectively to a fire alarm activation, zone plans for each system are installed adjacent to the alarm panel. Additionally, in the case of our sheltered housing schemes we have now installed a secure "fire documents" box beside the fire alarm control panel close to the main entrance which can be readily accessed by the LFB. Information stored in this box includes details of the addresses of those residents who would need assistance to evacuate, locations of any oxygen cylinders present in the block and any other relevant fire safety information. This information is updated regularly by the Sheltered Housing Officer. The key for this box is stored in the adjacent key safe and out of working hours when the manager is not present at the block the LFB can obtain the code for this key safe by contacting the KCTMO's Community Alarm Service.

Staff are required to test the fire alarm on a weekly basis and maintain a record of this testing. Residents are advised of the regular testing day and time and the need to be familiar with the sound of the alarm as well as the fire procedure. Fire Safety is a regular feature in the newsletter produced for the Sheltered residents, in their regular resident meetings and familiarisation with the fire procedure forms part of the 6-monthly flat check undertaken by the Sheltered Housing Officer.

6.3 Fire Alarms in TMO workplaces

In workplaces under TMO control staff undertake and record a weekly fire alarm test. In shared locations where others have control we endeavour, as part of our quarterly workplace inspection / assessment, to ensure that the landlord fulfils their obligation in relation to regular testing, maintenance and instigating 6-monthly fire drills. (A copy of the Fire Risk Assessment is also requested.)

7. SMOKE ALARMS - LFB's Home Fire Safety Visits

- 7.1 TMO publicises the importance of fitting smoke alarms within the home as the best way to protect residents from injury and their home from damage. Specifically, a smoke alarm detects smoke at the very early stages of a fire, gives early warning and thereby provides extra time for residents to get out safely. TMO have made significant progress with the installation of hard-wired smoke alarms (with battery back-up) within tenanted properties and this programme continues. Leaseholders are also strongly encouraged to fit detectors within their homes. Additionally, the TMO publicises this service offered by the LFB which includes installation of a smoke alarm. People who request a Home Fire Safety Visit (phone 08000 28 44 28) will receive a home visit, be given specific fire safety information in relation to their home and the LFB will install a battery-operated smoke alarm.

8. LFB Proposed policy to recharge landlords for their attendance at false activations of automatic fire detection

- 8.1 The LFB have announced their intention to introduce a charging regime for their attendance at false activations of automatic fire detection (AFD). They intend to charge for every false activation they attend at a block once they have been called there ten times in a rolling twelve month period. Further, the charging will continue until that block shows fewer than nine visits in the preceding 12-month period. However, currently there appears to be no plan to extend this to include attendance at false alarms at sheltered premises.
- 8.2 The issue of LFB attendance at false fire alarm activations is a standing agenda item at the bi-monthly TMO / LFB liaison meetings. The LFB Fire Safety Team provides a breakdown of false alarms at KCTMO-managed properties since the previous meeting and this is interrogated for trends, shared with the Supported Housing Team and all reasonable efforts are made to reduce the incidence of further false alarms.

9. Provision of Fire Fighting Equipment

9.1 Handheld extinguishers

9.1.1 Provision in Residential blocks

There are no portable fire-fighting appliances provided within the common parts of the vast majority of our residential blocks. Historically, it was generally considered good

practice for extinguishers to be located along escape routes and in close proximity to fire hazard areas. However, in consultation with the LFB and in accordance with Government guidance it was agreed that these are not required in the communal areas of KCTMO residential blocks. Specifically, this is because –

- TMO blocks do not have any permanent staff based there and so in the event of a fire there will be no-one trained and competent to use the extinguishers.
- The presence of extinguishers may encourage people to stay in the building or return to their flat with the extinguisher to tackle a fire when the safest course of action is to evacuate and alert the LFB who are trained to deal with fires.
- The LFB operational crews have, unfortunately, had experience of extinguishers being used against them as weapons / missiles. Additionally, they can be stolen, or mis-used.

Therefore, where blocks of self-contained dwellings are considered by the Fire Risk Assessment (FRA) to present effective compartmentation - enabling a "stay put / defend in place" fire strategy to be adopted - and the FRA confirms that no fire extinguishers need be installed in the communal areas, then TMO policy is not to install these. Further, where extinguishers are already installed in the communal lobbies and corridors and the FRA for that block confirms they can be removed, contractors will be instructed to remove them.

In any location where the FRA recommends siting extinguishers in the communal areas these will, of course, be installed.

Additionally, fire extinguishers are provided in areas where there is shared provision or where the TMO provides cooking or electrical equipment etc. such as within the areas of potentially elevated risk in sheltered housing blocks - communal lounges, laundries, kitchens etc. - and within the temporary accommodation dwellings. Further, in areas of potentially enhanced fire risk used by staff and contractors as workplaces such as plant room, lift motor rooms etc. appropriate numbers and types of extinguishers will be provided. Again we will be guided by the FRA and where this indicates over-provision or under-provision in these areas this will also be addressed.

9.1.2 Provision in Workplaces, clubrooms etc.

Provision of fire extinguishers within workplaces (offices, concierges), Residents Clubrooms, Resource Centres etc. is also considered by the respective FRA. Generally, some appliances are required in these locations to take account of the potential fire risk from any kitchen areas or plant and equipment supplied by KCTMO.

9.1.3 Maintenance of Extinguishers

All handheld extinguishers and fire blankets are maintained in line with the British Standard and inspected and serviced by a competent contractor on an annual basis. Visual inspections are also carried out by Neighbourhood Management staff, Health & Safety staff and the Fire Risk Assessor on a regular basis and any concerns or defects highlighted and addressed as soon as possible.

9.2 Water hose reels

The TMO provides water hose reels in a limited number of locations. These are maintained by a competent contractor on an annual basis as per the requirements of the relevant British Standard. Additionally, regular visual inspections of the equipment are

carried out by Neighbourhood staff and H&S staff. The FRA takes account of any hose reels present in a property and where the assessment confirms that these are no longer required for firefighting purposes then they will be taken out of use.

9.3 Sprinklers

Again, sprinklers are installed in only a small number of locations - notably within a few underground garages, storage areas and within a few recently refurbished basement level flats. These are inspected and maintained by competent contractors as per the requirements of the relevant British Standard. Specifically, the following approach has been agreed with our Fire Risk Assessor in relation to the sprinklers installed within residential units -

Approach to domestic sprinkler maintenance agreed with Fire Assessor

1. Inspect and service the sprinklers in the flat
2. At the conclusion of these inspections place these systems on an annual contract
3. Advise the residents in writing of the need to report any leaks or signs of problems with the system immediately to the Customer Services Centre (CSC) and of the need to provide access for the annual inspection and servicing
4. Appraise the LFB of our approach.
5. Maintain records and certificates of the servicing / inspection on the Asset Management Database
6. Advise CSC and local Estate Services staff of this approach, details of contractors who will undertake servicing, maintenance and responsive work as necessary.

9.4 Dry & Wet Risers

The majority of the residential blocks of a height greater than eighteen meters (generally blocks of 7 plus floors) had a dry rising firefighting main incorporated at the time of construction. In the case of Trellick Tower a wet rising firefighting main is fitted. All wet and dry risers are inspected and serviced on a six-monthly basis by our planned maintenance contractor as per the requirements of the British Standard. Where necessary repairs are identified, defects found or where the test highlights that the pipework does not conform to the required standard then remedial action will be instigated as a matter of urgency. In situations where a period of restricted riser performance (or in exceptional circumstances non-performance) cannot be avoided then effective interim measures will be identified and the local LFB Station Manager notified and kept apprised of progress.

Wet Riser – Trellick Tower

In relation to the wet riser pump room at Trellick Tower in discussion with the LFB it was agreed that clearer signage would be installed to assist their staff in the event that they have to operate these pumps. This work has been completed to the LFB's satisfaction

10. Planned Preventative Maintenance (ppm) of Fire Safety Equipment

In addition to the ppm of the fire safety equipment and installations mentioned above TMO also has contracts in place to facilitate regular maintenance of the following - all of which have a direct or indirect impact upon the fire safety of our blocks

- Portable Electrical Appliances (PAT testing of TMO-owned portable electrical appliances)
- Emergency Lighting (units or systems)
- Door entry systems (including FB release switches)
- Lightning protection systems
- Automatic Openable Vents

In order to improve performance on the inspection and maintenance of fire safety equipment a new facilities management contractor has recently been appointed and is responsible for the ppm of all fire safety systems and equipment. Key Performance Indicators (KPIs) are being introduced to monitor compliance in relation to all fire safety systems and equipment and these form part of the quarterly performance report to Health & Safety Committee.

11. Definition of “high rise” block

- 11.1** Whilst there is no standard definition it is now generally accepted by social landlords and the LFB that blocks of six floors and more are considered to be “high rise”. In RBKC residential stock there are fifty-six blocks of heights of six or more floors.

12. Criteria for prioritising RBKC blocks on the basis of fire risk

- 12.1** A risk-based approach was initially adopted to enable blocks to be prioritised and FRA programmes to be drawn up. The LFB were consulted and criteria were agreed enabling us to categorise all blocks and allocate them to either the High, Medium or Low Risk FRA Programme. These criteria took account of the blocks (height, age, construction, whether purpose-built or conversion, use - sheltered housing, temporary accommodation, adequate means of escape etc.) and the potential degree of vulnerability of the residents. A copy of the criteria can be obtained from the Health & Safety Team.

13. Regulatory Reform (Fire Safety) Order 2005 (FSO)

- 13.1** This fire safety legislation was introduced in October 2006 and specifically requires that “responsible persons” must ensure that “suitable and sufficient” FRAs are carried out in workplaces and the communal areas of all residential blocks. For our purposes the “responsible persons” are TMO and RBKC.

14. Fire Risk Assessments (FRAs)

- 14.1** In order to ensure compliance with the Fire Safety legislation, TMO, RBKC and the LFB worked jointly to agree TMO’s approach. Specifically, a risk-based approach was adopted and using the criteria outlined above blocks were placed on the appropriate FRA programme and the frequency of FRA review determined. Further, the Significant Findings and Action Plan are also prioritised in terms of risk which enables us to progress and complete them accordingly.

- 14.1.1** The criteria outlined at 12.1 above were used to identify a high, a medium and a low risk assessment programme and procurement was undertaken to appoint a competent specialist fire consultant to undertake “suitable & sufficient” FRAs, provide training and comprehensive fire safety advice and guidance.

14.1.2 FRA Proforma used is based on PAS 79 (FRA guidance and methodology for carrying out FRAs published by British Standards Institute) and the risk assessment guidance produced by the Health & Safety Executive (HSE).

- The Significant Findings & Action Plan produced alongside the FRA report uses a Red / Amber / Green colour coding to assist with prioritising the actions. Specifically -
 - **Red** – actions required to comply with specific legal requirements in the FSO (plus any significant life risk that is found)
 - **Amber** – actions relating to recommendations of BS, good practice etc.
 - **Green** – actions which could Improve / enhance fire safety based on good practice etc. but of lesser priority.
- Actions are progressed in order of risk – with priority being given to those with a Red or Amber rating. However, it must be recognised that where works require significant resources - such as capital funding - this is likely to lead to some delay whilst funds are secured and any necessary procurement is undertaken in compliance with our financial regulations. (In these circumstances the need for interim measures to mitigate the fire risk whilst the necessary works are being arranged will be considered and the LFB appraised.)

14.1.3 Further, in the course of carrying out the FRAs any issues / situations identified as requiring urgent attention are reported to the H&S Team immediately by telephone so that they can be addressed urgently.

14.2 Shared Buildings

14.2.1 Where a TMO building is shared with another user we will request a copy of the other user's FRA. The Action Plan and Significant Findings will be merged into one document and TMO will progress actions within their responsibility and will liaise with the other user requesting that they give priority to their actions.

14.3 Reviewing FRAs – frequency & arrangements

14.3.1 Comprehensive ("suitable & sufficient") FRAs have been completed for each block and are reviewed and / or reassessed periodically to ensure they remain valid and to ensure continued compliance with the FSO. TMO have adopted the current best practice guidance provided in the "Fire safety in purpose-built blocks of flats" guide and as such FRAs reviews will be undertaken as follows -

1. When "material alterations" take place within a block
2. When there is a significant change in the matters that were taken into account as the risk assessment was carried out – such as a widespread change in the type of residents occupying the block
3. When there is a reason to suspect that the original FRA is no longer valid (eg after a fire that occurred within, or spread to, the common parts)
4. After completion of significant works instigated to address shortcomings identified by the FRA
5. Regularly

14.3.2 It is important to clarify that a Review of a FRA is not the same as a repeat of the entire FRA process. In determining the required frequency of FRA Reviews in RBKC blocks we have considered the overall risk rating from the assessment, the inspection regime (management control) for the property, ongoing maintenance and the criteria set out above. Whilst this is not a completely prescriptive approach and there is room for flexibility it is important to have a framework within which to work and this is set out below.

14.3.3 Specifically, as thorough FRAs have been undertaken in all RBKC locations, in blocks where criteria 2. to 4. above do not apply then it is our intention to carry out a shorter review exercise on a regular basis with a comprehensive review resulting in a new FRA completed at less regular intervals. It is anticipated that the shorter, more regular reviews which will tend to concentrate primarily on progress with previous Action Plan and identification of any changes, will be carried out in-house by the TMO Health & Safety Team. However, where completely new FRAs are required – either because some of criteria 2. – 4. apply or on a recurring basis - the services of a specialist fire risk assessor will be used.

14.3.4 The FRA will set out the timescale within which the regular review (lower level) will be required – generally for properties assessed by us as being “potentially high risk” this will be required on an annual basis and we would aim to carry out a new FRA on a 2-yearly basis.

14.3.5 For blocks assessed by us as being either “potentially medium risk” or “potentially low risk” we aim to carry out a review on a 18-month basis and a new FRA every 3 years.

14.4 FRA Action Plans

14.4.1 On receipt of the Significant Findings & Action Plan (the “Action Plan”) the Health & Safety Team allocate each action (and set its priority) to the appropriate team via an electronic Workflow (on Microsoft CRM). Completion of FRA actions is monitored by the TMO's Health & Safety Committee and the Executive Team on a quarterly basis. To assist with this a report is submitted with a breakdown of all actions by team and an age profile of those which remain outstanding is also provided.

14.4.2 Where a high priority action cannot be progressed with the appropriate degree of urgency - such as where significant resources and / or lengthy procurement are required - then interim measures to reduce the fire safety risk in the short-term will be implemented. Specifically, these interim measures will be contingency plans instigated when fire protection measures are out of use, their repair is delayed etc. The LFB will be advised of any interim measures and updated with progressed in reinstating the required fire safety measures.

15. Stay put / Defend in Place Strategy

15.1 The FRA confirms the appropriate fire strategy for the block. Overwhelmingly a “stay put / defend in place” has been highlighted as the appropriate strategy for our blocks and the LFB have been made aware of this. Specifically, this means that only the residents in the flat where the fire breaks out are initially required to evacuate. This is because the compartmentation - both between the flats and also between the flats and the common parts of the block - is considered to be sufficient to withstand fire for a significant period..

15.2 Fire Action Notices

Information on fire procedures has been communicated to residents by a variety of means – letter to new residents, information in Resident's Handbook, on website, articles in “The Link” magazine etc. However, this is now being supported by Fire Action Notices within the common parts of the block. A programme of fitting Fire Action Notices so that residents, visitors, and contractors are informed about the fire procedure is currently underway.

16. Communal Storage Policy

16.1 Current guidance sets out two options available to landlords in relation to storage of items within communal areas. These options are -

- "zero tolerance" which is self-explanatory and doesn't permit storage of any items within communal areas and
- "managed use" which permits a small amount of non-combustible items to be stored providing they do not obstruct the means of escape in any way.

16.2 The FRAs confirm that the TMO are able to adopt a managed use policy in relation to the majority of our blocks. Specifically, this permits resident to have items such as a doormat, a wall-mounted mirror, a plant etc. providing these do not cause an obstruction. This is policed by our regular inspection regime and further supported by staff training and guidance on what items and what volume of storage can be permitted. Further, a photo based guide is being produced to assist the Estate Staff with their assessment.

17. Premises Information Boxes

17.1 In liaison with the LFB several blocks have been identified as requiring Premises Information Boxes. Specifically, these have been installed within the sheltered housing blocks and within Trellick Tower. In each location the contents has been agreed with the LFB. In the case of the sheltered schemes information is stored which identifies the addresses of residents who would require assistance to evacuate and also highlights any addresses where oxygen cylinders are present. In the case of Trellick Tower two copies of plans and layout documents plus information on plant rooms etc. are stored for LFB use.

18. Flat Entrance Doors

18.1 FRAs & Flat entrance doors

Our Fire Risk Assessor is required to highlight any potentially non-compliant flat entrance doors for further assessment. In addition, access-permitting, he is required to assess a percentage of flat doors in each block to ensure that they are sufficiently fire-rated and self-closing. In every case where the assessor cannot be confident that the flat entrance door meets the required fire safety standard or where he is unable to ascertain that any glazed transoms etc. are adequately fire rated he is required to highlight these locations in the FRA Significant Findings & Action Plan. These doors effectively form part of the means of escape and so they are required to be self-closing and to provide 30 minutes of fire resistance (and any associated panels above or adjacent to the door are also required to provide 30 minutes fire resistance).

A flat entrance door replacement programme was completed in 2013 when approximately 1200 doors were replaced with fire-rated door sets fully compliant with current legislation. Flat doors are replaced as part of other planned work programmes and also responsively on a day-to-day basis as necessary (where these become damaged due to fire, forced entry or other cause). A specification for a compliant self-closing, fire-rated front door (an "FD30s") has been agreed with Repairs Direct and all replacement flat doors must meet these requirements. Additionally, information on the location of replacement doors is now recorded on our Asset Management Database.

18.1.1 Self-closing devices

Building Regulations require that -

- “all newly installed flat entrance doors must be self closing, certified 30 minute fire rated doors, it matters not whether they are on an open balcony or an internal staircase / corridor as they separate the flat from a “space in common use”. (If the flat is located off an internal staircase or corridor then the new door must also have cold smoke seals fitted to it.) and
- Self-closing devices are necessary on all flat entrance doors irrespective of the flats location within a building.

Therefore, all **new** flat entrance doors which open onto a common part of a building will comply with these requirements and will be fitted with a self-closing device.

In discussion with RBKC it has been agreed that the TMO will embark on an inspection / installation programme to ensure that entrance doors to all tenanted flats are fitted with a self-closing device. This programme take place over a period of no more than 5-years, will commence in this financial year and will be risk-based with the potentially higher risk properties featuring at the start of the programme. To ensure that access can be obtained to all tenanted properties to complete this installation work, an access procedure is being agreed with RBKC's Legal Services Team in advance of the work commencing. A copy of this access procedure will be available from the TMO H&S Team shortly.

The TMO has a variety of ongoing methods of ensuring that self-closing devices remain in place and remain operational. These include but are not confined to -

- Included in works to **all** void (empty) properties in advance of new tenant moving in
- Included in six-monthly checks of all sheltered dwellings
- Included in monthly inspections of all temporary accommodation
- When undertaking comprehensive FRA reviews the assessor, access-permitting, will inspect a number of flat entrance doors and their self-closing devices

18.2 Leaseholders Flat Entrance Doors

18.2.1 In RBKC the flat entrance door is demised to the leaseholder in the lease. However, in order to raise the profile of the fire safety requirements for these doors and to put leaseholders on notice of these, RBKC and the TMO wrote to all leaseholders. All lessees whose doors are highlighted in the FRA as potentially non-compliant are contacted and initially asked to confirm that their door meets the required standard and to produce documentation such as the FD30 certificate, photograph of the label on the door header or the door receipt to confirm this. (To assist with this an information leaflet has been produced for leaseholders which clarifies the standard their door is required to meet.) Where leaseholders do not have the necessary certification and are unclear whether their door is compliant the TMO offer a free assessment of their door by our Assessor who will produce a report clarifying his findings. Where the door is confirmed as non-compliant and leaseholders are unwilling to fit a replacement this is referred to RBKC Legal Services to explore a “before action” letter or, where possible, other enforcement options. (In particular, where the LFB has issued an Enforcement Notice against the landlord, KCTMO Legal Services are able to use this as a means of persuading the leaseholder to upgrade / replace their door.)

18.2.2 To encourage leaseholders to consider fire safety and actively seek to mitigate the risks in their property regular articles are included in the Home Ownership Newsletter. These cover a variety of health and safety and fire safety issues such as “stay put” fire strategy,

12

the importance of having a self-closing, fire rated flat entrance door, fitting smoke and heat detection, undertaking regular electrical inspection tests and gas safety checks.

18.3 LFB required standards for flat entrance doors within enclosed blocks

18.3.1 To ensure that our assessments are consistent with the required standard and following consultation with the LFB the standards for flat entrance doors which open onto a communal area in a residential block are as follows –

- In the first instance check whether documentation is available to confirm that the door is a certified 30 minute fire rated door (FD 30)
- Investigate whether door is appropriately marked up using the Trada marking system etc. to confirm fire resistance standard
- If no markings or documents are available then could the door be considered to be a "nominal" fire door? A solid door which is approximately 44mm thick, is close fitting within its frame and has a self closing device fitted to it. (Where no self-closing device is fitted it will be advised that one is fitted.)
- In the case of an existing fire door the fitting of cold smoke seals will not be requested BUT If a new fire door is to be fitted then this will be required to meet current standards and requirements of the Building Regulations.

19. Fire Safety & TMO Lifts

19.1 Lift Safety – information for residents who become shut in lift car

19.1.1 Information is available on the TMO's website and is periodically reproduced in the Link magazine to advise residents that our lift engineers are contracted to attend lift shut-ins at all times – not just during working hours – and so the TMO should be alerted in the event of a shut-in so that the contractors can be instructed to attend. The LFB are anxious that landlords have effective arrangements in place to deal with lift shut-ins and advise that they should only be relied upon in extreme circumstances such as where people in the lift car are in medical distress.

19.2 Fire fighting lifts

19.2.1 As much of the housing stock is medium-rise and high-rise many of the blocks are served by one or more passenger lift. Where appropriate, "fire fighting lifts" are provided within TMO residential blocks to satisfy the requirements of the Building Regulations. When lifts are installed and when they are subsequently refurbished / replaced works are done to comply with standards which are current at the time of the work. The criteria for a TMO fire fighting lift is set out below-

1. Minimum car size (1100mm wide x 1400mm deep) for 8 persons capacity (630kg).
2. Dedicated power supply serving lift (3 phase). Additionally, ancillary items such as lift alarm, lighting etc. are also served by their own dedicated power supply
3. 2-way communication on new lifts includes connection to Customer Service Centre / out of hours monitoring service when the lift alarm is activated
4. Fireman's Control Switch fitted. When operated this causes the lift to return to ground floor (lower ground in the case of Trelick Tower as that is where the LFB enter the block) and open to allow the fire fighters access. It stops landing calls being registered and

allows the authorised person e.g. LFB operative to take control of the lift (by applying a constant pressure on any call button).

5. Lift car and landing doors are composed of stainless steel that is not less than 16SWG thick and over 2 hours fire resistance.

Additionally, the TMO

6. has a comprehensive servicing and maintenance contract in place for all lifts. This includes monthly inspections.
7. employs contract managers who are responsible for the supervision and monitoring of the contract / contractors.
8. has RBKC's Insurers, [REDACTED] carry out 6-monthly inspections which include a full safety check.
9. Neighbourhood Management staff (Estate Services Assistants and Team Leaders) and Health & Safety staff carry out regular estate inspections which include visual inspection of the lift car and testing of the lift alarm.

A comprehensive list of all TMO passenger lifts (highlighting those which are fire fighting lifts as described above) is available from the Health & Safety and the Asset & Regeneration Team.

20. Workplace Fire Safety

- 20.1 New staff receive induction training which includes general information on fire safety and details of the specific procedure they should follow in the event of a fire or emergency at their workplace.
- 20.2 Designated fire marshals are appointed in each workplace and are responsible for ensuring that, in the event of a fire alarm activation, their area is cleared, staff evacuate safely via the designated escape routes and make their way to the agreed assembly area. The Fire Marshal then reports his area cleared to the Fire Control Centre. (The Roles & Responsibilities of Fire Marshals are available on the TMO Intranet.)

21. Fire Safety Training for TMO Staff

- 21.1 To increase knowledge, awareness and promote competence amongst staff the TMO requires all staff to complete a comprehensive on-line fire safety training course. Additionally, practical training sessions on the use of fire extinguishers are run annually for fire marshals, estate staff, sheltered housing officers and other relevant staff. Further, staff who are required to undertake regular communal inspections are also given additional more specialised training to cover fire safety systems and features in residential blocks, stay put strategy, communal storage issues, other issues highlighted by the FRAs etc. to ensure they are clear on what to escalate. This training is also provided annually – with ongoing refresher training at team meetings and on-site briefings with the H&S Team and the Fire Consultant.

22. Fire Drills

- 22.1 Records of the 6-monthly fire drills carried out within TMO offices etc. are maintained locally.

23. Workplace Inspections

- 23.1 In addition to the programmes of inspections/assessments throughout the housing stock the TMO have a workplace inspection programme. Quarterly workplace inspections are carried out by the TMO Facilities Coordinator and the local Safety Representative. The outcome of these inspections is reported to the H&S Committee and then to the TMO Executive Team.

24. Security in offices – ID, controlled entry

- 24.1 To ensure the security of our staff and further enhance fire safety of the workplaces the main TMO offices have controlled entry systems installed and access is via a security fob.

25. Fire procedures

- 25.1 For staff who are not fully able-bodied and who may need assistance to be alerted to the fire alarm and / or to evacuate from the office a Personal Emergency Evacuation Plan (PEEP) will be drafted. The H&S Team meet with the individual and together they will complete a proforma clarifying their specific evacuation procedure (in some cases this involves the use of a lightweight "evac" chair and training of staff in it's use) and any additional assistance they will require. The PEEP will be reviewed on a regular basis and when the needs / ability of the individual change in any way. (A copy of the PEEP Proforma is available from the H&S Team.)

26. GERDA Locks

- 26.1 Access to authorised areas of the stock is controlled by the fitting of Gerda high-security locks. These have been installed across the Borough and control access to roofs, plant areas, lift machine rooms, electrical intake areas etc. Gerda keys are borough-specific and are strictly controlled. They can only be obtained from Gerda when authorisation is provided by TMO officers.
- 26.2 Specifically, the following GERDA locks have been installed in the following locations –
- H5 Electrical Intake Cupboards & other Cupboards where plant is stored
 - H10 Plant Rooms, Roof Access etc.
 - H12 Lift Motor Room doors only
- 26.3 All Estate Staff have been issued with their own set of Gerda keys and all LFB tenders have been supplied with a GERDA master key so access to the LFB is readily available.

27. Mobility Scooters

- 27.1 The TMO is committed to supporting independent living and is mindful of complying with the Equality Act 2010 where there is no conflict with fire safety legislation. Specifically, with regard to storage of mobility scooters, any resident who wishes to park these in a communal area will be required to make this request in writing to their Neighbourhood

Team. Applications will be considered on an individual basis and advice / guidance will be sought from the TMO's Fire Risk Assessor.

- 27.2 The London Fire Brigade enforces fire safety legislation and so we will be guided by their requirements. In general, consideration will be given to situations where the scooter can be safely stored without causing an obstruction to the means of escape. However, in line with LFB policy and specifically to minimise the risk to all residents, permission will NOT be given for charging of any scooters within an internal communal area. Draft guidance recently produced by the Chief Fire Officers Association advocates that mobility scooters should never be stored within means of escape. If this draft guidance is introduced then it will be necessary for TMO to review their approach to mobility scooter storage.

28. Hoarders and vulnerable residents

- 28.1 Within the stock there are a number of residents with hoarding tendencies and this can cause an elevated level of fire risk in the property. When the TMO become aware of these individuals we will instruct our Fire Assessor to undertake a joint visit to the property with Neighbourhood Management to undertake an assessment of the level of hoarding (using the LFB's Clutter Scale). This assessment will identify any action required to mitigate the risk such as extending the automatic detection throughout the flat, isolating cookers or fires.
- 28.2 Our staff will actively participate in the multi-agency Self Neglect and Hoarding Panel in an effort to improve the fire safety of all of our residents.
- 28.3 Efforts are made to capture information about residents' vulnerability at sign-up, as part of routine Neighbourhood Management work, tenancy auditing process, tenancy profiling process and as part of our regular ongoing contact with residents. This information is used to offer the resident a service which better meets their needs and this includes fire safety. (Residents with sensory impairment will be offered the appropriate detection etc.)

29. Policy on Furniture & Sheltered

- 29.1 All communal furniture, curtains, carpets etc. in sheltered housing schemes is now purchased through the Sheltered Housing Residents Group. This Group has been instructed to ONLY seek quotations from suppliers who can ensure that their furnishings / fabrics meet fire safety standards with regard to flame retardance etc.

Janice Wray

TMO Health, Safety & Facilities Manager

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