



FIRE SAFETY POLICY & STRATEGY

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1. Introduction

- 1.1 KCTMO is committed to providing a safe and healthy environment for residents, employees and contractors. Fire safety is of paramount importance and is subject to intensive inspection, maintenance and assessment activity.
- 1.2 RBKC's housing stock consists predominantly of purpose-built flats and maisonettes principally located in medium- and high-rise blocks, but there are also a number of low-rise street properties and a few freehold houses.
- 1.3 Research indicates that residents in blocks of flats – particularly those with social landlords – face a greater risk of fire than residents in houses and so KCTMO takes all necessary steps to protect our residents and reduce the likelihood of fire in our blocks.
- 1.4 This strategy outlines the approach to fire safety and the measures we have put in place to comply with the legislation and to minimise the risk of fire outbreak and also of fire spread throughout the stock.

2. Fire Safety Legislation & Good Practice

- 2.1 Fire Safety in residential blocks is governed by -
 - the Building Regulations at time of construction (or substantial refurbishment)
 - the Housing Act 2004 – EHOs apply the Housing Health & Safety Rating System (HHSRS) to dwellings and communal areas and take enforcement action on “category 1” hazards
 - The Regulatory Reform (Fire Safety) Order 2005 (FSO) applies to the communal areas of residential blocks and to workplaces and is enforced by the London Fire & Emergency Planning Authority (LFB)
 - “Fire Safety in Purpose Built blocks of Flats” (from the Local Government Group) sets out best practice - adopted by KCTMO.
- 2.2 For the purposes of Fire Safety legislation (the FSO) RBKC and KCTMO are considered to be “responsible persons” and must ensure that “suitable and sufficient” fire risk assessments are undertaken in the communal areas of all blocks.

3. Enforcement

- 3.1 The LFB is the enforcing body for the FSO.
- 3.2 Further, a protocol signed by the LFB and RBKC confirms that fire safety enforcement in RBKC properties will be undertaken by the LFB.
- 3.3 LFB concerns about a block will initially be raised via telephone or e-mail but this may be followed up with a “Notice of Fire Safety Deficiencies” outlining specific areas of concern and giving a timescale for them to be addressed. An Enforcement or Prohibition Notice (both have legal status) will be issued where the LFB consider there is a serious breach of legislation which is presenting a significant potential risk to residents.

4. Responsibility for Fire Safety

- 4.1 Roles and responsibilities for health & safety are set out in the Company's H&S Policy Statement. In addition, with regard to fire safety -
 - The Health, Safety & Facilities Manager is responsible for the KCTMO Fire Safety Policy & Strategy, commissioning FRAs and allocating outstanding actions, coordinating fire

safety training, investigating fires, false alarms etc, monitoring compliance and advising senior managers & Executive Team, regular liaison with the LFB etc.

- The Head of Contract Management (Asset & Regeneration) is responsible for procuring, engaging & managing specialist ppm contractors who will inspect, service and maintain the fire safety equipment
- All teams will be responsible for progressing FRA actions allocated to them as per the required priority and timescale.

5. Management Arrangements for ensuring Fire Safety in blocks

5.1 This includes but is not confined to the following –

- Programme of regular estate inspection, risk assessments and monitoring by Neighbourhood and H&S Teams ensure that combustible items are not present, fire safety features (fire doors, emergency lighting, wet/dry risers, fire alarms, signage etc.) are operating effectively and storage is controlled. Defects are reported immediately and repairs prioritised.
- 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 (ppm) regime. PPM inspections of emergency lighting are supplemented by monthly checks by estate staff.
- Regular Fire Risk Assessments (FRAs) & reviews and a prioritised approach to progressing action plan items
- 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, regular articles in "The Link" (quarterly magazine to all residents), the Residents Handbook, an introductory letter to all new tenants etc. Additionally, specific fire safety information is available through regular Sheltered Housing Newsletters etc.
- Opportunity for residents and employees to report any concerns, defects, outstanding repairs etc. via our Freephone..
- Conditions of Tenancy prohibit the use Liquified 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 blocks. (Wall coverings analysed prior to redecorations 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 in compliance with the Gas Safety (Installation & Use) Regulations and regular newsletters to leaseholders encouraging them to service their gas appliances.
- Regular inspection / testing of individual electrical installations – dwellings and common parts – and installation of mains-powered fire alarms within dwellings.
- Fire safety – of residents, staff and contractors - will be considered at every stage of construction projects and will be 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 operatives are adequately trained to achieve this. Post inspections will also scrutinise this aspect of works.
- Investigate all reported fires within the stock, liaise with the LFB about cause and instigate any action to prevent a recurrence.
- Regular (bi-monthly) liaison meetings between TMO and LFB.

6. Fire Alarms & Automatic Fire Detection (AFD)

6.1 AFD within Dwellings

Smoke alarms installed correctly and regularly maintained are a cheap and effective way to protect people and property. Past initiatives saw estate staff install battery-powered alarms, however, mains-powered detection is now being installed as part of the electrical inspection programme.

6.2 Fire Alarms & AFD in communal areas

A fire alarm is fitted in the communal areas of a few blocks - mainly sheltered and temporary accommodation. These are subject to ppm inspections by specialist contractors. Generally, these systems are monitored by the local TMO staff during working hours and by our Community Alarm Service (CAS) out of working hours.

Zone plans are fitted adjacent to the alarm panels and in the sheltered blocks a secure box for "fire documents" has also been fitted. (Flat numbers of residents who would need assistance to evacuate, locations of any oxygen cylinders and any other relevant fire safety information is stored and available to the LFB.) The key for this box is stored in the adjacent key safe and the LFB can contact CAS for this code.

Staff test these fire alarms on a weekly basis and keep a written record.

6.3 Fire Alarms in TMO workplaces

In locations under TMO control the fire alarm is tested weekly and there is a fire drill every 6 months.

7. Fire Brigade's Home Fire Safety Visits (HFSV)

KCTMO publicises the HFSVs offered by the LFB and encourages residents to take up this offer. (HFSV - phone [REDACTED])

8. Provision of Fire Fighting Equipment

8.1 Handheld extinguishers in residential blocks

The only blocks where extinguishers are provided within the common parts are the sheltered and temporary accommodation blocks where there are shared facilities (communal / kitchen). LFB and Government guidance confirms that these are not required in the communal areas of the other blocks unless trained personnel are present. Additionally, the presence of extinguishers may encourage people return to their flat to tackle a fire when the safest course of action is to evacuate and alert the LFB. Further, TMO blocks have been assessed as having effective compartmentation and a "stay put / defend in place" strategy and the FRAs confirm that no extinguishers are required.

However, extinguishers are installed in areas of potentially enhanced fire risk used by staff and contractors as workplaces - plant rooms, lift motor rooms etc.

8.2 Extinguishers in Workplaces, clubrooms etc.

Provision of fire extinguishers within workplaces (offices, concierges etc.), residents clubrooms, resource centres etc. is also considered by the FRA.

8.3 Maintenance of Extinguishers

All fire-fighting equipment is maintained in line with the British Standard and is inspected / serviced by a competent contractor annually. Visual inspections by Neighbourhood and Health & Safety staff are also undertaken on a regular basis.

8.4 Water hose reels

Water hose reels are installed in a few locations. Where required for fire safety purposes they are maintained in line with BS requirements.

8.5 Sprinklers

Sprinklers are present in a small number of locations - a few underground car parks, storage areas and a small number of recently refurbished basement flats. These are inspected and maintained by competent contractors in line with the BS.

8.6 Dry & Wet Risers

Most blocks taller than eighteen meters (7 plus floors) have a dry rising firefighting main. Trellick Tower has a wet rising main fitted. All wet and dry risers are inspected and serviced on a six-monthly basis by our ppm contractor as per BS requirements. Any required repair or remedial work will be prioritised and the LFB informed of any restricted riser performance and interim measures..

9. Planned Preventative Maintenance (PPM) of Fire Safety Equipment

In addition to the PPM of the fire safety equipment and installations above contracts are also in place for regular maintenance of the following -

- Portable Electrical Appliances (PAT testing of TMO-owned appliances)
- Emergency Lighting
- Door entry systems (including FB release switches)
- Lightning protection systems

10. Definition of “high rise” block

- 10.1 There is no standard definition, however, it is generally accepted that blocks of six floors and more are considered to be “high rise”. (33 blocks in total).
- 10.2 Blocks have been prioritised according to risk and categorised as either High, Medium or Low Risk. (Criteria considers block characteristics and potential vulnerability of the residents.)

11. Fire Risk Assessments (FRAs)

- 11.1 KCTMO has adopted a risk-based approach to undertaking FRAs as per the criteria referred to above.
- 11.2 A competent specialist fire consultant with experience of assessing a range of residential blocks has been appointed to undertake “suitable & sufficient” FRAs & reviews.
- 11.3 The Consultant uses a PAS 79-compliant proforma (FRA guidance and methodology for carrying out FRAs published by BSI) and the Significant Findings & Action Plans are colour-coded to facilitate prioritising as follows -
- **Red** – required to comply with specific legal requirements in the FSO (plus any significant life risk that is found)
 - **Amber** – relating to recommendations of BS, good practice etc.
 - **Green** – could improve / enhance fire safety based on good practice etc. but of lesser priority.
- 11.4 Urgent issues are to the H&S Team immediately by telephone.

- 11.5 Shared Buildings – KCTMO will request a copy of the other user's FRA and will liaise over the completion of the Action Plan and Significant Findings.

12. Reviewing FRAs – frequency & arrangements

- 12.1 Comprehensive FRAs have been completed for every block. However, these are living documents which cannot remain valid indefinitely and must be reviewed and / or re-assessed periodically. In line with current best practice outlined in the "Fire safety in purpose-built blocks of flats" FRA reviews will be undertaken -
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
- 12.2 Generally, FRA frequency is determined by the block's risk rating, the inspection regime (management control), ongoing maintenance and the criteria set out above.
- 12.3 Comprehensive FRAs have been completed on all blocks. Therefore, where criteria 2. to 4. above do not apply then a shorter FRA review - primarily concentrating on progress with previous action plan and identifying any changes - will be undertaken on a regular basis with a new FRA completed less frequently. The lower level reviews will be carried out 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 - these will be undertaken by the specialist fire risk assessor.
- 12.4 Routinely high risk properties will have an annual lower level review and a new full FRA every 3-year whereas medium- and low-risk blocks will have a low-level review every 2 years and the FRA comprehensively re-visited every 4 years.

13. FRA Action Plans

- 13.1 Each FRA is submitted with (colour-coded) Significant Findings & Action Plan. Each action is allocated to the appropriate officer and statistics showing completed and outstanding actions for each team are regularly presented to the Operations H&S Group, the TMO's H&S Committee and Executive Team.
- 13.2 Where a high priority action cannot be progressed with the appropriate degree of urgency e.g. 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. These interim measures will be contingency plans instigated when fire protection measures are out of use, their repair is delayed etc.

14. Stay put / Defend in Place Strategy

With only a few exceptions a "stay put / defend in place" strategy has been adopted in KCTMO blocks. Only the residents in the flat where the fire breaks out are initially required to evacuate – all other residents are safe to stay put. This is permitted because the compartmentation - both between the flats and between the flats and the common

parts are considered to be sufficient to withstand fire for a significant period. This is confirmed in the FRAs and LFB are aware. (This is communicated to residents by Resident's Handbook, website, "The Link" etc.)

15. Storage of items in communal areas of residential blocks

15.1 Landlords have the following options on storage of items within communal areas - -

- "zero tolerance" - storage of any items within communal areas is not permitted OR
- "managed use" - permits a small amount of non-combustible items to be stored providing they do not obstruct the means of escape in any way.

15.2 KCTMO have adopted a "managed use" policy for the majority of our blocks and this is policed by our regular inspection regime and further supported by staff training and guidance on what stored items can be permitted.

16. Flat Entrance Doors

16.1 FRAs & Flat entrance doors

FRAs highlight any flat entrance doors or associated sidescreens or transom lights which are known/ suspected to be insufficiently fire-rated. These doors form part of the means of escape and so they are required to be self-closing and to provide 30 minutes of fire resistance. (KCTMO has completed a flat entrance door replacement programme of tenants doors requiring replacement.).

16.2 Leaseholders Flat Entrance Doors

The lease makes the leaseholder responsible for their flat entrance door. All leaseholders have been put on notice of these requirements and given details of the specific standard. Personalised letters and an information / guidance note is also sent to all residents whose doors had been specifically highlighted as potentially non-compliant. (See Appendix 1, 2 & 3)

Every effort is made to assist and encourage leaseholders to ensure their door is compliant. Specifically, free door assessments are available from our Fire Consultant, advice, letters, e-mail, phone calls, cold calling by assessor etc.

17.3 LFB required standards for flat entrance doors within enclosed blocks

Discussions with LFB's Head of Enforcement and the KCTMO's Fire Consultant clarified standards required for entrance doors within enclosed residential blocks-

- documentation available confirming door is a certified FD 30?
- door is appropriately marked up confirm fire resistance standard?
- could the door be considered to be a "nominal" fire door – a solid door which is approximately 44mm thick, 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 the standards and requirements of the Building Regulations which are current at that time.

18. Fire Safety & KCTMO Lifts

18.1 Fire fighting lifts

As much of the housing stock is medium- and high-rise many of the blocks are served by one or more passenger lifts. Where appropriate “fire fighting lifts” are provided within TMO residential blocks. 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 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 the Council’s Insurers, Bureau Veritas, carry out 6-monthly inspections which include a full safety check.
9. Estate Staff and Health & Safety staff carry out regular estate inspections which include visual inspection of the lift car and testing of the lift alarm.

19. Workplace Fire Safety

New staff receive induction training including fire safety information and evacuation procedure etc.

Designated fire marshals are appointed in each workplace and attend annual fire safety training. Fire Marshals 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 go to the agreed assembly area. The Fire Marshal then reports his area cleared to the Fire Control Centre.

20. Fire Safety Training for Employees

To promote competence in the area of fire safety amongst staff the TMO provides annual fire safety training to all fire marshals and all staff who are required to carry out inspections throughout the TMO housing stock. The course content is regularly reviewed to incorporate any issues highlighted in the Fire Risk Assessments etc. but it always has an academic element and a practical element – agenda reviewed to take account of any issues brought up by the assessor. (Human Resources maintain a record of course attendees and attendance is mandatory.)

21. Workplace Inspections

In addition to the programmes of inspections/assessments throughout the housing stock there is also have a workplace inspection programme. Quarterly workplace inspections are carried out by the TMO Facilities Coordinator. In each case a local Unison

Representative is invited to attend. Reports of these inspections are sent to the H&S Committee who in turn report to the TMO Executive Team.

22. Security in offices – ID, controlled entry

To ensure the security of our staff and further enhance fire safety of these areas the main TMO offices have controlled entry systems accessible using a security fob.

23. Fire procedures

Staff who are not fully able-bodied and who may need assistance to be alerted to the fire alarm and / or require assistance to evacuate from the office are required to have a Personal Emergency Evacuation Plan (PEEP). This is a proforma clarifying their own 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 etc. The PEEP will be drafted by the H&S Team with the individual and will be reviewed regularly and when the needs/ability of the individual change. (A copy of the PEEP Proforma is available from the H&S Team.)

24. GERDA Locks

24.1 Gerda high-security locks have been fitted across the Borough to control access to roofs, plant areas, lift machine rooms, electrical intakes etc. Gerda keys are borough-specific and can only be obtained from Gerda via authorised officers in the TMO. (All Estate Services Assistants have a set of keys.)

24.2 Specifically, GERDA locks have been installed in the following locations –

H5 Electrical Intake Cupboards etc.
H10 Plant Rooms, Roof Access etc.
H12 Lift Motor Room doors only

25. Security Gates / Doors

25.1 Residents should seek permission to install metal security gates in front of their flat entrance door.

25.2 The Fire Risk Assessor highlights the locations of the existing security gates at each block within the FRA. In each case the LFB are informed of the location and the H&S Team writes to the resident advises that this will increase the time taken by the LFB to rescue them and recommending that they install a smoke alarm if they do not already have one installed.

26. Mobility Scooters

26.1 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, any resident wishing to park a mobility scooter in a communal area will be required to make a written request to their Neighbourhood Team. Applications will be considered on an individual basis and guidance will be sought from the TMO’s Fire Risk Assessor.

26.2 The London Fire Brigade enforces fire safety and so we will be guided by their requirements. Consideration will be given to situations where the scooter can be safely stored without causing an obstruction to the means of escape. However, to minimise the risk to all residents and in line with LFB policy permission will NOT be given for charging of any scooters within an internal communal area.

27. Policy on Furnishings in Sheltered Blocks

- 27.1 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 and are flame retardant etc..

Janice Wray
TMO Health, Safety & Facilities Manager

May 2015

Regulations

These Regulations relate to Fire Precautions. It is not an exhaustive list, but includes the main Regulations to which Tenants, Staff and Contractors should adhere:-

- a) The Health and Safety at Work Act 1974, particularly Section 3: - General duties of Employers and Self-employed persons other than their employees.
- b) Management of Health & Safety at Work Regulations 1999
- c) The Regulatory Reform (Fire Safety) Order 2005, which came into force in October 2006.
- d) The Housing Act 2004, which introduces the Housing Health and Safety Rating System (HHSRS)
- e) Building Regulations 2010: Part B: Fire Safety
- f) Gas Safety (Installation and Use) Regulations 1998
- g) Electrical Equipment (Safety and Use) Regulations 1994
- h) Furniture and Furnishings (Fire Safety) Regulations 1998

Approved Codes of Practices: -

- a) Fire Safety Risk Assessment – Sleeping Accommodation
- b) Fire Safety Risk Assessment – Small and Medium Places of Assembly


Guidance Notes

- a) Regulatory Reform (Fire Safety) Order 2005 Guidance Note No. 1: Enforcement Chief Fire Officers Association
- b) Collected Perceived Insights into and Application of The Regulatory Reform (Fire Safety) Order 2005 for the Benefit of Enforcing Authorities. Chief Fire Officers Association
- c) National Fire Safety Protocol. LACORS
- d) Fire Safety in Purpose-built Blocks of Flats. Communities and Local Government.
- e) Fire Safety in Housing. Chartered Institute of Housing

Regulatory Reform (Fire Safety) Order 2005 – A short guide to making your premises safe from fire

APPENDIX 2

292a Kensal Road
LONDON
W10 5BE


homeownership@tmo.org.uk

Property Ref:

Date: 11th October 2012

Dear ,

Re: Fire Safety and leasehold flat entrance doors

We write to you regarding fire safety in relation to your flat entrance door following a Fire Risk Assessment which has been carried out in your block.

Your flat entrance door is demised to you pursuant to the terms of your lease. It is therefore your responsibility to ensure your flat entrance door is fully compliant with fire safety regulations.

You will appreciate that compliance with fire regulations in blocks of flats is an important issue as it affects the safety and wellbeing not only of you and your family but of all of the residents in the entire block, as well as visitors and workers. Flat entrance doors are of particular importance because they protect the means of escape from the building in an emergency situation. This is especially important within blocks where the communal lobbies and walkways are enclosed and as such they are required to meet standards laid down by Building Regulations and Fire Regulations.

You are therefore required to ensure that your flat entrance door meets the required fire safety standards and is fully compliant with fire safety regulations. You must ensure that your flat entrance door is either:

1. CERTIFIRE / FIRAS approved (Warrington 3rd party certification scheme)
- OR
2. BM TRADA Q-MARK approved as complying with British Standards BS 476 Part 22 (FD30S) or equivalent standard, including door frame, self-closing device and door furniture and be fitted by an approved contractor.

If your door is not approved as indicated by one of the above you will need to replace your door with one which is so approved.

You may be required in the future to provide us with evidence that your flat entrance door meets the standards described above. You must also ensure that in the future should you alter or replace your flat entrance door that your flat entrance door meets with and is fully compliant with fire safety regulations.

We also bring to your attention that the London Fire Brigade are the enforcement body for fire safety legislation, and you may therefore also be contacted directly by London Fire Brigade.

We bring to your attention that legal proceedings will be taken against you if your flat entrance door does not meet the standards described above.

Please contact Home Ownership in the initial instance on the number detailed above if you have any queries or would like to discuss this matter further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Ward'.

David Ward
Home Ownership Manager
Kensington and Chelsea Tenant Management Organisation

APPENDIX 3

Is my flat entrance door fire rated? Or does it need to be?

Generally flat entrance doors need to be fire-rated if they are located internally. So –

- if your flat entrance is located off an internal / enclosed staircase or corridor it should be fire rated. Whereas,
- If your flat entrance door is located on an external / unenclosed balcony or walkway it would not need to be fire rated.

If you have not replaced your flat entrance door or any glazing located above or beside your flat door then you are required to take no further action at present unless you receive additional correspondence from the TMO.

If you replace your flat entrance door in the future then any door that you install or fit including any glazing in the door, above it or to the side of it must be to the requirements of the Building Regulations current at the time of the installation.

It is a Building Regulations requirement that Building Regulations approval is needed to replace a flat entrance door and also a requirement of your lease that you inform the TMO before the installation.

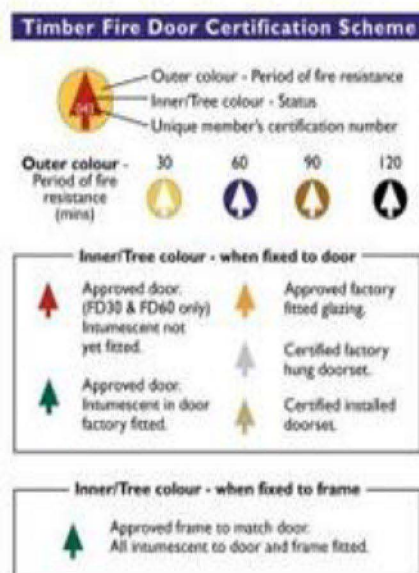
How do I know if my flat entrance door is fire rated?

UPVC covered or coated doors

If your door is a UPVC covered or coated door there will be no markings on the door to indicate that it is a fire rated door. When the door was purchased or fitted documentation will have been provided by the shop / merchant / contractor. This documentation could be in the form of a manufacturers certificate or just the sales receipt but it will state the fire rating of the door etc and have the relevant British Standards numbers, BS 476 Part 22 or BS 8214 etc.








Timber Fire Doors

A timber certified fire rated door could be marked with a colour coded plug or a label, so any one of the three different types of markings indicated below could be used, the plugs can be found inserted in the side edge of the door and the labels on the top edge of the door.



The British Woodworking Federation fire door marking schemes

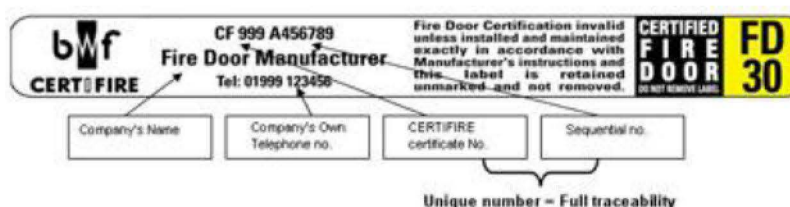
B.W.F. Scheme for identification of fire resisting door leaves in accordance with BS 476 Part 8: 1972.

Fire Resistant Ratings	Intumescent Necessary	Intumescent Not Necessary Green Core
30/20 (White background)		
30/30 (Yellow background)		
60/60 (Blue background)		
With specified Intumescent In frames or doors 30/30	White Background Blue Core 	

Remember – Red Core or Blue Core means Intumescent must be fitted in accordance with manufacturers instructions either in the door or frame. Green Core means you can carry on fixing as Intumescent has been fitted under lipping.

TRADA having similar coding system with a tree shape as centre core.

or the label



The fire rated standard required for a flat entrance door is 30 minutes, so your fire door should have either the label above with FD 30 on it or the red dot or tree.

Please provide a copy of any certification documentation or the sales receipt stating that the door is a fire rated one back to the TMO, this will include any glazing that may surround the door either in the transom light above the door or to the side of it.

If you do not have any documentation and the door has one of the above markings on it please can you provide a photograph of the door in situ and also one of the marking on the door.

If you have no documentation or there are no markings on the flat entrance door you could in the first instance contact the contractor who fitted the door and ask him to provide the required information. It has been a requirement of the Building Regulations that flat entrance doors fitted in protected staircases or on protected corridors should be fire rated since the early 1990s. Contractors undertaking the installation and replacement of fire rated doors should understand the requirements of the Building Regulations and implement them.

If this avenue does not provide the documentation required then you should seek advice from a competent person who can provide you with documentation stating that your flat entrance door is fire rated or not.

The Fire Consultant used by the TMO, Mr Carl Stokes, is professionally competent to carry out this inspection. He has advised that the cost of this service will be £50 including VAT. Should you wish to contact Mr Stokes his details are as follows – carlstokes@firesafety-consultant.co.uk and mobile phone [REDACTED]

Dear

RE: Letter Before Action - Fire Safety and Flat Entrance Door

We are instructed by the Royal Borough of Kensington and Chelsea ('the Borough') and Kensington and Chelsea Tenant Management Organisation ('the TMO').

A Fire Risk Assessment has been carried out at your block and your flat entrance door has been assessed as being of potentially high risk as it may not provide sufficient fire resistance. You were informed of this in the letter sent to you on 11th October 2012. If your door was highlighted at that time you would have received a further letter on 17th October 2012.

Your flat entrance door is demised to you pursuant to the terms of your lease. It is your responsibility to ensure that your flat entrance door is fully compliant with fire safety regulations.

This letter is a letter before action and is notice to you as follows:

1. By 15th October 2013, you are required to provide us with written confirmation and evidence that your flat entrance door meets the required fire safety standards and is fully compliant with fire safety regulations. Such written confirmation and evidence will need to be assessed by the TMO's appointed Fire Consultant who will confirm whether your evidence is accepted.
2. By 15th October 2013:
 - 2.1 If you are unable to provide such evidence, you are required to contact Janice Wray on telephone number [REDACTED], to arrange for an inspection by Mr Carl Stokes, the TMO's appointed Fire Consultant, on one of the following dates. Mr Stokes will inspect your premises to ensure fire safety compliance; this inspection is free of charge as the cost will be met by the TMO.

Thursday 3rd October 2013
Tuesday 8th October 2013
Thursday 10th October 2013
 - 2.2 You are further required to ensure that such inspection is to have been carried out by 21st October 2013. The cost of this inspection will be borne by the TMO.
3. By 4th November 2013, you are required to have replaced your flat entrance door if it continues to fail to comply with fire safety standards. You will need to replace your flat entrance door with one which is approved and compliant with fire safety regulations. The costs of such replacement will need to be borne by you. We refer you to the information provided in the letters of 11th October and 17th October 2012. We attach an Information Sheet for you. You must ensure that your flat entrance door is either (1) CERTIFIRE/FIRAS approved (Warrington 3rd party certification scheme), or (2) BM TRADA Q-MARK approved as complying with British Standards BS 476 Part 22 (FD30S) or equivalent standard, including door frame, self closing device and door furniture. Such approved flat entrance door must be fitted by an approved contractor.
4. If you refuse to replace your flat entrance door with a door which is compliant with fire safety legislation by 4th November 2013, a request will be made to the Council's Environmental Health Department to take further action. This could result in enforcement action being taken against you under Part 1 of the Housing Act 2004. For your information, any enforcement action is likely to proceed along the following lines:
 - 4.1 The Council will write to you, requesting that you give access to your home to carry out an inspection of your property to identify any deficiencies/defects that may cause significant

hazards, emphasis will be placed on the fire hazard i.e. the absence of a fire resisting door) to you and other residents.

- 4.2 If access is not allowed or is refused, environmental health may apply to the local Magistrates Court for a warrant to enter your premises.
- 4.3 If the warrant is granted, an officer from the Council will enter your home with the Police and locksmith in attendance. Your property would be left in a secure manner once the officer has completed the inspection.
- 4.4 Upon completing the inspection an assessment will be made to assess the hazards and determine if enforcement action is appropriate and necessary.
- 4.5 If so, a legal notice will be served on you requiring works to be carried out to the property within a specified timeframe. You will be charged a fee to cover the costs of enforcement. You will have a right of appeal against the notice. The notice will be recorded on the local land charges register.
- 4.6 If works are not started or completed within the specified timeframes, the Council may undertake the works themselves (works in default) and you may be prosecuted for non compliance.
- 4.7 If access to the property is denied to undertake these works, the Council, if appropriate, may apply to the local Magistrates Court for a further warrant to enter your premises as in paragraph 2 above to carry out works in default.
- 4.8 Any works in default will be subject to a 30% administrative fee to cover the Council's costs.
- 4.9 Any sums outstanding will be recovered as a debt.

As relayed to you in the above referenced earlier correspondence, compliance with fire regulations in blocks of flats is an important issue as it affects the safety and wellbeing of not only of you and your family but of all of the residents in the entire block, as well as visitors and workers. Flat entrance doors are of particular importance as they protect the means of escape from the building in an emergency situation. This is especially important within blocks where the communal lobbies and walkways are enclosed. The doors in these locations are required to meet standards laid down by Building Regulations and Fire Regulations.

Please contact Janice Wray, TMO Health and Safety Team on email jwray@kctmo.org.uk or by telephone on [REDACTED] if you would like to discuss this matter further.

However, we confirm that the dates by which we require compliance must be adhered to by you. Failure to do so could result in enforcement action against you as detailed above.

Yours sincerely

Solicitor (Housing and Litigation)