

## **TMO Fire Safety Strategy**

### **1. Introduction**

- 1.1 As acknowledged in the TMO Health & Safety Policy Statement the company is fully committed 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 consisting 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 in the 1950s, 60s and 70s there are a number of properties which were built before these dates.
- 1.3 Statistics indicate that people living in blocks of flats – particularly those with social landlords – are at 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.

### **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

the Housing Act 2004 – Environmental Health Officers apply the Housing Health & Safety Rating System (HHSRS) to dwellings and common parts of blocks to identify whether any of the 29 separate potential areas of hazard constitute a “category 1 hazard” when enforcement would be required.

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 (RRO), 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.

### **3. Enforcement**

- 3.1 The Local Fire Authority is the enforcing body for the Regulatory Reform (Fire Safety) Order 2005.

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.

#### **4. Standards & good practice applied to residential Housing**

4.1 In addition to the legislation outlined above there are a number of standards, British Standards, good practice guidance 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, the Chief Fire Officers Association etc. This is currently considered to represent good 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 and monitoring by Neighbourhood Staff and Health & Safety staff. Specifically, inspections ensure that flammable obstructions are not present in the communal areas, fire doors are operating effectively, emergency lighting is maintained, final exit door are operational, signage has not been removed or defaced, wet / dry riser cabinets have not been tampered with, any communal area repairs have been made good etc. All defects / repairs are reported immediately by mobile telephone to the Customer Services Centre who instigate the repair. Repairs to fire doors, self-closers etc. are given priority.
- 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 contractors regular checks are supplemented by monthly inspection and testing by the estate staff.
- FRAs & reviews – action plans & significant findings
- Info to residents – evac strat, smoke alarms, Home Fire Safety Visits – website, link, handbook etc.

#### ***3.3 This document aims to set out an effective organisational plan for the control, monitoring and review of our fire safety arrangements.***

3.4 Whilst The TMO endeavours to comply with all statutory requirements and adhere to the good practice set out in the relevant British Standards etc. As the area of fire safety is so important to the organisation, this document seeks to set out the TMO's strategic objectives in this area.

## **2. Fire Alarms & Automatic Fire Detection (AFD)**

### **(a) 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. Therefore, in April 2003 the TMO changed the Conditions of Tenancy to ensure that the responsibilities and obligations of tenant and landlord in relation to the installation, cleaning, testing, maintenance and repair of smoke alarms is clear to both parties. In order to increase provision of smoke alarms within RBKC's housing stock it was agreed that the following be implemented -

- All re-wiring projects would incorporate the installation of mains powered smoke alarms with a battery back-up.
- All Capital Schemes which involve internal works within the dwelling but do not include rewiring would incorporate the installation of a battery smoke alarm (larger properties may require two smoke alarms.) Tenants obligations to clean, test, change the battery and report defects to the Customer Service Centre.
  - Where battery alarms have been installed and subsequently electrical rewiring works are proposed the battery models should be replaced with hard-wired models.
  - Battery alarms in void dwellings should have their battery replaced and the alarm cleaned as part of the void works and new tenants must be provided with written instructions – preferably at sign-up stage.
  - In addition the installation of alarms by the caretakers will be pursued. Dwellings will be prioritised in terms of risk and the higher risk properties will be targeted first. However, in addition to the vulnerability of the residents we should also consider the height of the blocks, the number of escape routes etc. Again clear written instructions will need to be issued at the time of installation.

### **(b) Fire Alarms & AFD in communal areas**

In a small number of residential blocks – most of which are sheltered properties - a fire alarm has been fitted. Where installed, these systems are inspected and maintained on a regular basis by specialist contractors. Generally, these systems are monitored by the local TMO staff. In one location a security guard (contractor) monitors some of the time. However, when these staff leave the site (and out of working hours) the monitoring of the systems is done by the Community Alarm Service (CAS).

Staff are required to test the fire alarm on a weekly basis and maintain a written record of this testing. (Staff attend annual fire safety refresher training to assist with this.) Residents are advised of the regular testing day and the need to be familiar with the sound of the alarm as well as the fire procedure.

### **(c) Fire Alarms in TMO workplaces**

In locations under TMO control staff carry out and maintain a record of the weekly fire alarm testing. In locations where others have control we endeavour to ensure that the landlord fulfils their obligation in relation to the regular testing and also maintenance.

## **Provision of Fire Fighting Equipment**

### **1.Portable Fire Fighting Equipment – handheld extinguishers**

#### **Provision in Residential blocks**

There are no portable fire fighting appliances provided within the common parts of the vast majority of our residential blocks. Whilst it is generally considered good practice for extinguishers to be located along escape routes and in close proximity to fire hazard areas, in consultation with the LFB it was agreed that these were not required in the communal areas of our blocks 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. (There are only a very few exceptions where we have a concierge but even in these locations this may not be manned 24 hours a day.)
- The presence of extinguishers may encourage people to stay in a 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, it is not uncommon for these to be stolen or mis-used

Therefore, in view of these considerations, where blocks of self-contained dwellings are considered by the Fire Risk Assessment to present effective compartmentation thus enabling a “stay put / defend in place” evacuation strategy to be adopted and the assessments confirms that no fire extinguishers are required to be installed in the communal areas, then TMO policy is not to install these or to remove them if there are some in the communal lobbies and corridors.  
fire extinguishers within the communal areas.

Any location where the fire risk assessment 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 communal areas of sheltered housing blocks where there are 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 lift motor rooms, other plant areas etc. appropriate levels of the necessary extinguisher (either carbon dioxide, dry powder, foam or water) will be provided. However, if the Fire Risk Assessment indicates over- or under-provision in these areas this will be addressed.

#### **Provision in Workplaces, clubrooms etc.**

Provision of fire extinguishers within workplaces (offices, concierges etc.), residents clubrooms, resource centres etc. is also considered by the respective FRA but in general these are required in these locations to take account of the potential fire risk from the plant and equipment supplied by the TMO.

### **Maintenance of Extinguishers**

This equipment is maintained in line with the British Standard and is inspected and serviced by a competent contractor on an annual basis and is also inspected by Neighbourhood Staff and Health & Safety staff on a regular basis and any concerns or defects highlighted and addressed as soon as possible.

## **2. Portable Fire Fighting Equipment – 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 inspection of the equipment are carried out by Neighbourhood staff and H&S staff. The Fire Risk Assessment takes account of any hose reels present in a property and where the assessment confirms that these are no longer required then TMO will consider taking these out of use.

## **3. Fixed Fire Fighting Installation - Sprinklers**

Again sprinklers are installed in only a small number of locations - notably within a few underground garages and a small number of recently refurbished basement level flats. These are inspected and maintained by competent contractors as per the requirements of the relevant British Standard.

## **4. Fixed Fire Fighting Installations - Dry & Wet Riser**

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 was fitted. The location of these risers is listed on the Asset Register of fire fighting equipment which forms part of our planned maintenance contract. All wet and dry risers are inspected and serviced on a quarterly basis by our planned maintenance contractor as per the requirements of the British Standard. Where necessary repairs are identified or where pressure rates fall below acceptable standards 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 need to be identified and the local LFB Station Manager notified and kept apprised of progress.

### **Definition of “high rise”**

Whilst there is no standard definition it is now generally accepted by social landlords and the LFB that blocks of six floors and above are considered to be “high rise”. In RBKC residential stock there are 33 blocks of heights of six or more floors.

### **Criteria for prioritising RBKC blocks on the basis of fire risk**

A risk-based approach was adopted to enable Fire Risk Assessments to be prioritised and programmed. It was, therefore, necessary to draft criteria to enable us to categorise all blocks and allocate them to either the High, Medium or Low Risk Assessment Programme. These criteria took account of the blocks (height, age, purpose-built, conversion, sheltered housing, temporary accommodation, adequate



means of escape etc.) and the potential degree of vulnerability of the residents and these are set out in detail at [Appendix 1](#).

### **Regulatory Reform (Fire Safety) Order 2005 (RRO)**

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

### **Fire Risk Assessments (FRAs)**

In order to ensure that our approach to compliance with the RRO met with the approval of the enforcing body (the Fire Authority) the TMO, RBKC and the LFB worked closely to agree how we would progress this. Specifically, we proposed to adopt a risk-based approach which gave priority to the potentially high risk blocks and enabled them to be assessed at an early stage in the assessment programme.

The criteria outlined above (and documented at [Appendix 1](#)) were used to identify a high, a medium and a low risk assessment programme.

Procurement was undertaken to appoint a competent specialist fire consultant who could undertake “suitable & sufficient” FRAs for the high risk programme of properties.

At the LFB’s request, in advance of his starting the assessments, the successful consultant was introduced to the LFB’s Fire Safety Team who approved the draft proforma to be used and were further appraised of the following –

- Proforma based on PAS 79 (Fire Risk Assessment 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 will use a Red / Amber / Green colour coding to assist with prioritising the actions
- **Legal** – required by Regulatory Reform (Fire Safety) Order - to be annotated Red (plus any significant life risk that is found)
- **Recommended** – recommended by BS, good practice etc. - to be annotated Amber
- **Improvement** – considered to enhance fire safety - to be annotated Green
- Actions would be 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 to accomplish e.g they may require 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.

Further, it was agreed that in the course of carrying out the FRAs any issues / situations identified that required urgent attention would be reported to the H&S Team by telephone so that they could be addressed immediately.

### **Reviewing FRAs – frequency & arrangements**

Comprehensive (“suitable & sufficient”) FRAs have now been completed for each block, however, these are living documents which cannot remain valid for an unlimited length of time. Therefore, to ensure compliance with the RRO assessments need to be reviewed and / or and re-assessed periodically. TMO have adopted the current best practice guidance provided in the “Fire safety in purpose-built blocks of flats” (produced by the Local Government Group and published in July 2011) and as such FRAs reviews will be undertaken regularly -

1. Regularly
2. When “material alterations” take place within a block
3. 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
4. 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)
5. After completion of significant works instigated to address shortcomings identified by the FRA

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.

Specifically, as thorough FRAs have been undertaken in all RBKC locations, in blocks where criteria 2. to 5. above do not apply then it is our intention to carry out a shorter review exercise on a regular basis with a more fundamental 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. – 5. apply or on a recurring basis- the services of a specialist fire risk assessor will be procured.

The FRA will usually set out the timescale within which the regular review will be required – generally for properties assessed by us as being “potentially high risk” this will be required on an annual basis. We would aim to carry out a new FRA on a 3-yearly basis.

For blocks assessed by us as being “potentially medium risk” and also those assessed as “potentially low risk” we aim to carry out a review on a 2-yearly basis and a new FRA every 4 years.

### **FRA Action Plans**

On receipt of the Significant Findings & Action Plan (the “Action Plan”) the Health & Safety Team will update this allocating responsibility for each action to the appropriate team. The updated Action Plan is then sent to each team / individual with responsibility for progressing an action and they are asked to confirm the timescale

for completion plus any other relevant information so that the Action Plan can be further updated. (Responsible teams can clearly see the Red / Amber /Green status of their action and are able to address with the appropriate degree of priority / urgency.

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 out of use, their repair is delayed etc.

### **Stay put / Defend in Place Strategy**

In each case the FRA confirms the appropriate evacuation strategy for the block. Overwhelmingly in RBKC blocks “stay put / defend in place” has been highlighted as the appropriate strategy. 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 because the compartmentation both between flats and between the flats and the common parts of the block are considered to be sufficient to withstand fire for a significant period.

This is communicated to residents by a variety of means – Resident’s Handbook, website, “The Link” etc.

### **Flat Entrance Doors**

One area where the assessor felt that many blocks were potentially not compliant was in relation to the flat entrance doors in some of our enclosed blocks. In every case where the assessor could not be confident that the flat entrance door met the required fire safety standard or where he was unable to ascertain that any glazed transoms etc. were adequately fire retardant then he highlighted these locations on the FRA. The significance of these doors is that in enclosed blocks the flat entrance doors effectively form parts of the means of escape and so they (and any associated panels above or adjacent to the door) are required to be self-closing and to provide 30 minutes of fire resistance.

A programme of replacement of non-compliant flat entrance door to tenanted properties was instigated and is nearing completion.

### **Leaseholders Flat Entrance Doors**

The flat entrance door is demised to the leaseholder in the lease. 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 ([Appendix 2](#)). This was followed up with a letter to all residents whose doors had been highlighted as potentially non-compliant within the FRA ([Appendix 3](#)). This letter was accompanied by an information / guidance note to assist to assess the compliance of their door ([Appendix 4](#)).

The Assessor offered a private arrangement to leaseholders who wanted him to assess their door and report.

Negotiations are ongoing with LFB and RBKC’s Environmental Health Department to clarify the responsibility for enforcement of any non-complaint doors that lessees are resistant to replace.



**Storage of items in communal areas of residential blocks**

Current guidance in this area sets out two options available to landlords in relation to storage of items within communal areas. These options are either “zero tolerance” which is self-explanatory and doesn’t allow any items within communal areas and “managed use” which the TMO have adopted. A “managed use” policy enables us to allow a small amount of non-combustible items– as opposed to zero tolerance – link to inspection regime, trg for staff, permitted items

**Workplace Fire Safety**

Fire marshals – roles & responsibilities

Annual fire safety training course – agenda reviewed to take account of any issues brought up by the assessor.

Training – annual refresher (who attends) and induction training & 1-2-1 briefing and records of trg stored where?

Competent persons – fire marshals, inspecting & post-inspecting staff, H&S staff

Record of fire drills - frequency

Fire alarms – zone plans

Signage

Shared premises – shared responsibility?

**monitoring progress of FRAs****Post inspections – specific to FRAs and generally**

Liaison with LFB – monthly meetings

PPM – emergency lighting

PAT testing

Inspection regime – neighbourhood staff, H&S staff, sheltered officer – proforma checklist & Estate Staff Handbook

Caretaker (Estate Services Assistant) monthly checks on Emergency Lighting

SOR timescales for dealing with faulty communal door closers, emergency lighting, fire alarms etc.

LFB Home fire safety visit – smoke detection

Fire procedures - PEEPs – staff & residents – evac chairs

This policy addresses our obligation under The Order that requires the College to:

- 1 Develop a policy to minimize the risks associated with fire
- 2 Reduce the risk of an outbreak of fire
- 3 Reduce the risk of the spread of fire
- 4 Provide a means of escape
- 5 Demonstrate preventive action
- 6 Maintain documentation and records in respect of fire safety management

GERDA locks

LFB drop keys

Override switches on door entry

Compliance with Building Regns

Pinnacle – out of hours cover

Annual gas servicing – records readily available from ..... Regular reminder to leaseholders of responsibility to service gas appliances in sub-let props & encourage to service in remainder

Regular testing of electrical installation

LPG – tenancy conditions

Lift trap-ins

LFB attendance at false alarms

#### **Lift Safety**

This is to advise you of the procedure to follow in the unlikely event that you become trapped in a lift.

As lifts are replaced their alarms are upgraded and linked to a dedicated telephone line which is manned 24 hours a day. In addition, a few of the lifts in larger blocks have also had this facility added. Therefore, if you were to become stuck/trapped in a new lift (generally those replaced within the last fifteen years) such as those now in operation at Worlds End estate, Silchester estate, Edenham Way, Trellick Tower, Grenfell Tower, Chesterton Square, Broadwood Terrace etc. please press the alarm and hold it until a member of staff responds. You will be asked for details of your location so please advise which estate and block you are in. If you live in a block with an older lift then please press the alarm and advise those who respond to contact the TMO on [REDACTED].

Once staff are notified they will contact our lift maintenance contractors to see if they have an engineer in the vicinity who can respond in a reasonable timescale (ideally no more than 15-20 minutes). If an engineer can respond promptly he will be instructed to attend immediately.

If the engineers are unable to attend within an acceptable timeframe our staff will contact the Fire Brigade, advise that our engineers are unable to respond on this occasion and the Fire Brigade will then attend and release you.

The Fire Brigade have asked that residents be reminded of this procedure as they will no longer be responding to direct calls from residents stuck/trapped in lifts, but will refer them back to their landlord in the first instance. Clearly in situations where the landlord is unable to arrange for quick release of residents the Fire Brigade will be informed and will respond.

I would also take this opportunity to reassure you that the lifts on your estate are maintained to a high standard. In particular, they undergo monthly inspection and maintenance by our lift contractors and daily inspections (visual checks, testing of alarm etc.) by the Neighbourhood staff. However, should you become aware of any defects please do report these using the repairs freephone [REDACTED]

### **Fire Safety in Communal Areas**

The TMO has commissioned a fire consultant to carry out fire risk assessments within the communal areas of the blocks. These assessments are required by law and the TMO has worked closely with RBKC and the Fire Brigade's fire safety team to ensure that these assessments will be as comprehensive as necessary. You will be advised by letter in advance of the assessment in your block. Whilst the assessment is concerned with the communal areas this does mean that the Consultants are required to inspect and assess a number of flat entrance doors within each block. If the Consultant does ask to inspect your front entrance door, if it is convenient for you then please do provide access.

It is clear from the assessments completed to date that in some blocks residents are storing items within the communal corridors, lobbies and sometimes even the staircase. As these areas form the primary means of escape from the block in the event of a fire or emergency within your flat it is imperative that these areas must be kept clear of obstructions at all times. Please do not store any items within the communal parts of your block.

Additionally, we would like to take this opportunity to remind residents that the communal areas are required by law to be No Smoking areas and we would urge you to please refrain from smoking in them.

### **Fire fighting lifts – criteria**

As part of the work that we have been undertaking on our fire risk assessments we have put together the following information which relates to TMO lifts serving blocks over 18 meters in height. Whilst it is acknowledged that our lifts do not fully satisfy all of the criteria for fire-fighting lifts we can confirm that they meet the following –

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. Firemans 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 than is not less than 16SWG thick and over 2 hours fire resistance.

Additionally, the TMO

6. has a comprehensive servicing and maintenance contract is in place for all lifts. This includes monthly inspections.
7. employs a dedicated Lift Engineer who is responsible for the supervision and monitoring of the contract / contractors.
8. has the Council's Insurers, [REDACTED], carry out 6-monthly inspections which include a full safety check.
9. Estate staff (caretakers, porters, inspectors) and Neighbourhood Officers carry out regular estate inspections which include visual inspection of the lift car and testing of the lift alarm.

I have also attached a copy of two spreadsheets – the first is a comprehensive list of all TMO lifts and the second lists all of our lifts which meet the above criteria

Premises info boxes - Trellick

Thermal links

Sheltered scheme – fire safety newsletters

Annual H&S Report

Records of fires

Asbestos

Enforcement - Deficiency Notices

Self-closers

Entrance door standards – ask Carl to pot down the result of his discussion with LFB at recent meeting

other responsibilities as set out in the lease (gas appliances etc.)

Mobility scooters



Reporting – ET, Ops, Board, Chief Housing Officer, Scrutiny, TCC

Broadly compliant letters

**Competence of assessor**

Multi-layer paint

Making good to a fire resisting standard – drilling thro slab etc.

Clubrooms – occupancy numbers

Implementing findings from fires elsewhere (Lakanal – scissor construction etc.)

Contractor safety whilst working in our premises – majority single staircase which is also the means of escape so no ambiguity. Locks on plant room doors. Cremorne basement boiler house etc.

Hot works permits – who is responsible

Post inspection procedures, sign off handover etc. In relation to large an small projects

Refer to Business Continuity Plan and Emergency Plans

Auditing of arrangements – by who, and frequency

Responsibility for reporting defects – staff and residents

Construction phase plans – who is responsible in org for checking

Freephone number for tenants to report repairs, fires etc. – publicised widely

Location of vulnerable residents – info where? Collated how

Tenants security gates / grilles

Fire retardant carpet, floor covering & curtains in communal areas (& sheltered schemes). Also upholstered furniture in communal lounges to meet Furniture & Furnishings fire safety Regns 1988

Gas Safety Regns

Liaison with Crime Prevention / Safer Neighbourhood etc. To ensure any improved security measures do not have detrimental effect on fire safety

Workplace inspections – Cyril

Places of assembly – requirements

Security in offices – ID, controlled entry

## APPENDIX 1

### Fire Risk Assessments - Criteria for prioritising RBKC blocks

#### High Risk

1. High rise
2. Blocks where original secondary means of escape are considered no longer viable by FB
3. Sheltered Schemes
4. Temporary Accommodation
5. Blocks which have undergone conversions of a questionable standard
6. Blocks over 4 stories with only one means of escape
7. Blocks where specific areas of concern have been raised by the Fire Brigade
8. Lack of adequate compartmentation
9. Storage of hazardous substances

#### Medium Risk

1. Medium-rise blocks which are not enclosed (communal walkways are open access ) and may also have an alternative escape route.
2. Blocks over 4 stories with a viable and operational primary and also a secondary means of escape.
3. Blocks of 4 stories and less which were purpose-built as self-contained flats and where significant alterations have not been undertaken.
4. Medium or low-rise blocks which are designated for the use of the over-50-year-olds.

#### Low Risk

1. Low-rise blocks – unenclosed (where communal walkways are open access).
2. Low-rise blocks – purpose-built, self-contained residential dwellings.
3. Low-rise & medium-rise blocks of purpose-built, self-contained residential dwellings with very limited communal areas e.g. staircase only, no lobbies / landings, refuse chambers etc.

## APPENDIX 2

C & M ISENMAN  
[REDACTED]

292a Kensal Road  
LONDON  
W10 5BE

[REDACTED]  
homeownership@tmo.org.uk

Property Ref: [REDACTED]

Date: 11<sup>th</sup> October 2012

Dear C & M ISENMAN,

**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 3<sup>rd</sup> 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

/

David Ward  
Home Ownership Manager  
Kensington and Chelsea Tenant Management Organisation

**APPENDIX 3**

292a Kensal Road  
LONDON  
W10 5BE



  
jwray@kctmo.org.uk

Date: 17<sup>th</sup> October 2012

Dear

**Re: Fire Safety and your flat entrance door**

We write to you regarding fire safety in relation to your flat entrance door.

A Fire Risk Assessment has been carried out in your block and your flat entrance door has been assessed as being of potentially high risk as it may not provide sufficient fire resistance.

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 the doors in these locations are required to meet standards laid down by Building Regulations and Fire Regulations.

By 30<sup>th</sup> November 2012, you are therefore 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. You must provide us with evidence that your flat entrance door is either:

1. CERTIFIRE / FIRAS approved (Warrington 3<sup>rd</sup> 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, or if you are unable to provide us with such evidence, you will need to replace your door with one which is so approved. You will then need to provide us with evidence that the replacement door meets the standards described above. I have enclosed some guidance to assist should you need to assess your door.

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

Legal proceedings will be taken against you if you fail to comply with the fire safety regulations.

Please contact the TMO Health & Safety Team on the e-mail address or telephone number detailed above if you would like further information on the specific concerns the assessor has raised in relation to your door or if you would like to discuss this matter further.

Yours sincerely

Janice Wray  
Health, Safety & Facilities Manager  
Kensington and Chelsea Tenant Management Organisation

## APPENDIX 4

**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

!

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](mailto:carlstokes@firesafety-consultant.co.uk) and mobile phone [REDACTED]