

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.
- 1.4 This strategy document enables us to outline the measures we have put in place not just to comply with fire safety legislation 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.

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 it's 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.

3.3 If the LFB visit RBKC block to carry out an inspection or safety audit (at the request of a resident, to carry out a post-fire audit or as part of an inspection / audit programme) where they have no specific issues or concerns they will issue a "broadly compliant" letter. If, however, there are concerns in the first instance they will raise these with the TMO by telephone. 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 which has legal standing.

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 – prioritised approach to progressing action plan items
- Info to residents – evacuation strategy, smoke alarms, Home Fire Safety Visits etc. is provided via the company's website, it's quarterly magazine to all residents ("The Link"), the Residents Handbook etc.

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

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). (Zone plans for the fire alarm system are fixed adjacent to the alarm panels to assist LFB attending an activation etc.)

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.

LFB Proposed policy to recharge landlords for their attendance at false activations of afd

The LFB have announced their intention to introduce a charging regime for their attendance at false activations of automatic fire detection. A start date of 1st April 2013 has been given but further details have yet to be confirmed. However, it is anticipated that it may follow the British Standard in accepting that a small percentage of detector heads in any building will activate in any 12-month period after which every LFB attendance at a false alarm will incur a cost.

The H, S & Facilities Manager now has regular meetings with the LFB's local Fire Safety Team Leader and the issue of false alarms is now a standing agenda item at this meeting. The Team Leader provides the most recent information in relation to our properties and this is interrogated for trends and shared with the Supported Housing Manager and all reasonable efforts are made to reduce the likelihood of further false alarms.

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.

Planned Preventative Maintenance (ppm) of Fire Safety Equipment

In addition to the ppm of the fire safety equipment and installations mentioned above the 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
- Door entry systems (including FB release switches)
- Lightning protection systems

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.

LFB required standards for flat entrance doors within enclosed blocks

To ensure that our assessments are consistent with the standards required by the LFB the TMO’s Consultant Fire Risk Assessor has discussed with the LFB’s Head of Enforcement the standards for flat entrance doors located within enclosed residential blocks and these are the standards which are being applied to our blocks –

- In the first instance check whether documentation is available to confirm that the door is FD 30 etc
- Investigate whether door is appropriately marked up using the Trada marking system etc. ([details at Appendix 4](#)) to confirm fire resistance standard
- Could door be considered to be a “nominal” fire door - approximately 44mm thick solid doors which are close fitting and have a self closing device fitted to them (where no self-closer fitted one to be requested).
- In the case of an existing door the fitting of cold smoke seals will not be requested

- 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 the time of installation.

Fire Safety & TMO lifts

As much of the housing stock is medium and high rise the TMO have a large number of residential blocks which are served by one or more lifts. Not all of the criteria which define a "fire fighting lift" are appropriate to our lifts. Specifically, for example the requirement to have a trap door in the roof the lift car etc. could be detrimental to the safety of our lifts. However, TMO lifts serving blocks of a height greater than 18meters do meet a significant number of these fire-fighting lift criteria and these are 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. 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 that 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 Engineers 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. Neighbourhood Management staff (Estate Services Assistants, porters, inspectors and Estate Services 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.

Attached at **Appendix 7** is a comprehensive list of all TMO lifts (fire fighting lifts as described above are indicated by bold type).

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

Workplace Inspections

Security in offices – ID, controlled entry

Fire procedures - PEEPs – staff & residents – evac chairs

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

GERDA locks

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

Premises info boxes - Trellick

Thermal links

Sheltered scheme – fire safety newsletters

Annual H&S Report

Records of fires

Asbestos

Self-closers

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

Mobility scooters

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

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 and 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

Places of assembly – requirements

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.

C & M ISENMAN
FLAT 13
65 FINBOROUGH ROAD
LONDON
SW10 9DW

APPENDIX 2

292a Kensal Road
LONDON
W10 5BE


homeownership@tmo.org.uk

Property Ref: FLAT 13, 65 FINBOROUGH ROAD

Date: 11th 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 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

/

David Ward
Home Ownership Manager
Kensington and Chelsea Tenant Management Organisation

APPENDIX 3

292a Kensal Road
LONDON
W10 5BE


jwray@kctmo.org.uk

Date: 17th 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 30th 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 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, 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 and mobile phone [REDACTED]

Appendix 5

Fire Safety in Communal Areas – information for residents

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.

Appendix 6

Lift Safety – information for residents who become shut in TMO lifts

This is to advise you of the procedure to follow in the unlikely event that you become shut 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 or where those shut in the lift are in great distress or there is a medical emergency 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]

APPENDIX 7

Location of all TMO Lifts

Address	Equipment	lift no.	Location
Greaves Tower, Worlds End Estate, SW10	Passenger Lift	H001	R/H Even
Greaves Tower, Worlds End Estate, SW10	Passenger Lift	H002	L/H Odd
Whistler Tower, Blantyre Street, off Cheyne Walk, Worlds End Estate, SW10	Passenger Lift	H003	R/H Even
Whistler Tower, Blantyre Street, off Cheyne Walk, Worlds End Estate, SW10	Passenger Lift	H004	L/H Odd
Ashburnham Tower, Worlds End Estate, SW10	Passenger Lift	H005	R/H Even
Ashburnham Tower, Worlds End Estate, SW10	Passenger Lift	H006	L/H Odd
Dartrey Tower, Worlds End Estate, SW10	Passenger Lift	H007	R/H Even
Dartrey Tower, Worlds End Estate, SW10	Passenger Lift	H008	L/H Odd
Blantyre Tower, Worlds End Estate, SW10	Passenger Lift	H009	R/H Even
Blantyre Tower, Worlds End Estate, SW10	Passenger Lift	H010	L/H Odd
Chelsea Reach Tower, Worlds End Estate, SW10	Passenger Lift	H011	R/H Even
Chelsea Reach Tower, Worlds End Estate, SW10	Passenger Lift	H012	L/H Odd
Berenger Tower, Worlds End Estate, SW10	Passenger Lift	H013	R/H Even
Berenger Tower, Worlds End Estate, SW10	Passenger Lift	H014	L/H Odd
Blantyre Walk, Worlds End Estate, SW10	Goods Lift/Service Lift	H015	Goods lift
Jean Darling House, Milmans Street, SW10	Passenger Lift	H016	Passenger lift
King Charles House, Wandon Rd, SW6	Passenger Lift	H018	L/H

King Charles House, Wandon Rd, SW6	Passenger Lift	H019	R/H
Lacland House, Anne Lane, SW10	Passenger Lift	H020	Flats 1-16
Lacland House, Anne Lane, SW10	Passenger Lift	H021	Flats 17-32
Riley House, Anne Lane, SW10	Passenger Lift	H022	Flats 1-16
Riley House, Anne Lane, SW10	Passenger Lift	H023	Flats 17-32
Gillray House, Anne Lane, SW10	Passenger Lift	H024	Flats 1-16
Gillray House, Anne Lane, SW10	Passenger Lift	H025	Flats 17-32
Milman House, Anne Lane, SW10	Passenger Lift	H026	Flats 1-16
Milman House, Anne Lane, SW10	Passenger Lift	H027	Flats 17-32
Brunel House, 105 Cheyne Walk SW10	Passenger Lift	H028	Passenger lift
Nursery Lane, Highlever Road, 1 W10	Passenger Lift	H030	Passenger Lift
Mulberry Close, Beaufort Street, SW3 5AB	Passenger Lift	H031	Passenger Lift
Wiltshire Close, London SW3	Passenger Lift	H032	Flats 1-26
Wiltshire Close, London SW3	Passenger Lift	H033	Flats 35-60
Wiltshire Close, London SW3	Passenger Lift	H034	Flats155-180
Wiltshire Close, London SW3	Passenger Lift	H035	Flats 189-214
Wiltshire Close, London SW3	Passenger Lift	H036	Flats 69-146 6 Floors R/H
Wiltshire Close, London SW3	Passenger Lift	H037	Flats 69-146 6 Floors R/H
Curran House, Lucan Place, SW3	Passenger Lift	H038	Passenger lift
Keppel House, Fulham Road, SW3	Passenger Lift	H039	Passenger lift
Elm Park House, Fulham Road, SW3	Passenger Lift	H040	L/H Lift
Elm Park House, Fulham Road, SW3	Passenger Lift	H041	R/H Lift
Elm Park Gardens, 110, SW10	Passenger Lift	H042	Passenger lift
Elm Park Gardens , 104, SW10	Passenger Lift	H043	Passenger lift
Elm Park Gardens, 98,SW10	Passenger Lift	H044	Passenger lift
Elm Park Gardens, 93, SW10	Passenger Lift	H045	Flats 21-40

Elm Park Gardens, 93 ,SW10	Passenger Lift	H046	Flats 1-20
Elm Park Gardens, 92 ,SW10	Passenger Lift	H047	Passenger lift
Elm Park Gardens, 86 , SW10	Passenger Lift	H048	Passenger lift
Elm Park Gardens, 74 SW10	Passenger Lift	H050	Passenger lift
Elm Park Gardens, 71 SW10	Passenger Lift	H051	Passenger lift
Elm Park Gardens, 68 , SW10	Passenger Lift	H052	Passenger lift
Elm Park Gardens, 68 ,SW10	dustbin hoist	H053	Goods Lift
Elm Park Gardens, 67 SW10	Passenger Lift	H054	Flats 21-40
Elm Park Gardens, 67 , SW10	Passenger Lift	H055	Flats 1-20
Elm Park Gardens, 55 SW10	Passenger Lift	H056	Passenger lift
Elm Park Gardens, 40 ,SW10	Passenger Lift	H057	Passenger lift
Elm Park Gardens, 35 ,SW10	Passenger Lift	H058	Passenger lift
Elm Park Gardens, 34 ,SW10	Passenger Lift	H059	Passenger lift
Elm Park Gardens, 28 ,SW10	Passenger Lift	H060	Passenger lift
Elm Park Gardens, 22 ,SW10	Passenger Lift	H061	Passenger lift
Elm Park Gardens, 16 SW10	Passenger Lift	H062	Passenger lift
Elm Park Gardens, 10 SW10	Passenger Lift	H063	Passenger lift
Elm Park Gardens, 7 ,SW10	Passenger Lift	H064	Flats 21-40
Elm Park Gardens, 7 , SW10	Passenger Lift	H065	Flats 1-20
Elm Park Gardens, 5 , SW10	Passenger Lift	H066	Flats 21-40
Elm Park Gardens, 5 ,SW10	Passenger Lift	H067	Flats 1-20
Fulham Road, 361 , SW10	Passenger Lift	H068	Passenger lift
Fulham Road, 437 , SW10	Passenger Lift	H069	Passenger lift
Cecil Court, Fawcett Street, SW10	Passenger Lift	H070	Passenger lift
Broadwood Terrace Pembroke Rd W8	Passenger Lift	H071	Passenger lift
Chesterton Square, Pembroke Road, W8	Passenger Lift	H072	"A" L/H lift

Chesterton Square, Pembroke Road, W8	Passenger Lift	H073	“B” R/H lift
Ingelow House, Holland Street, W8	Passenger Lift	H074	Flats 1-16
Ingelow House, Holland Street, W8	Passenger Lift	H075	Flats 17-32
Campden Houses, Peel Street, W8	Passenger Lift	H076	Flats 1-17
Campden Houses, Peel Street, W8	Passenger Lift	H077	Flats 18-34
Campden Houses, Peel Street, W8	Passenger Lift	H078	Flats 35-53
Campden Houses, Peel Street, W8	Passenger Lift	H079	Flats 54-72
Campden Houses, Peel Street, W8	Passenger Lift	H080	Flats 73-91
Campden Houses, Peel Street, W8	Passenger Lift	H081	Flats 92-108
Campden Houses, Peel Street, W8	Passenger Lift	H082	Flats 109-125
Hesketh Place, 6-16 ,W11	passenger Lift	H083	Passenger lift
Runcorn Place, 7-12 , W11	Passenger Lift	H084	Passenger Lift
Carton House, Henry Dickens Court, W11	Passenger Lift	H085	Big lift
Carton House, Henry Dickens Court, W11	Passenger Lift	H086	Small lift
Marley House, Henry Dickens Court, W11	Passenger Lift	H087	Big lift
Marley House, Henry Dickens Court, W11	Passenger Lift	H088	Small lift
Treadgold House, 25 Bomore Road, W11 4HD	Passenger Lift	H089	Passenger lift
Grenfell Tower, W11	Passenger Lift	H090	“A” L/H lift
Grenfell Tower, W11	Passenger Lift	H091	“B” R/H lift
Grenfell Tower, W11	Passenger Lift	H092	S.S. Office
Dixon House, Darfield Way, W10	Passenger Lift	H093	Even floors
Dixon House, Darfield Way, W10	Passenger Lift	H094	Odd floors
Frinstead House, Shalfleet Drive, W10	Passenger Lift	H095	Even floors
Frinstead House, Shalfleet Drive, W10	Passenger Lift	H096	Odd floors
Markland House, Darfield Way, W10	Passenger Lift	H097	Even floors
Markland House, Darfield Way, W10	Passenger Lift	H098	Odd floors

Whitstable House, Silchester Road, W10	Passenger Lift	H099	Even floors
Whitstable House, Silchester Road, W10	Passenger Lift	H100	Odd floors
Whitchurch House, 3 Kingsdown Close, W11	Passenger Lift	H101	Passenger lift
Talbot House, 10 Ladbroke Crescent, W11	Passenger Lift	H102	Passenger Lift
Lowerwood Court, Ladbroke Grove, W11	Passenger Lift	H103	L/H Odd floors
Lowerwood Court, Ladbroke Grove, W11	Passenger Lift	H104	R/H Even floors
Tavistock Road, 70-80 ,W11	Passenger Lift	H105	Passenger Lift
Clydesdale House, 255 Westbourne Park Rd, W11	Passenger Lift	H106	Passenger lift
Ledbury House, Lonsdale Road, W11	Passenger Lift	H107	Passenger lift
Lonsdale House, Lonsdale Road, W11	passenger Lift	H108	Flats 1-16
Lonsdale House, Lonsdale Road, W11	passenger Lift	H109	Flats 17-32
Lonsdale House, Lonsdale Road, W11	passenger Lift	H110	Flats 33-48
Lonsdale House, Lonsdale Road, W11	passenger Lift	H111	Flats 49-64
Lonsdale House, Lonsdale Road, W11	passenger Lift	H112	Flats 65-80
Longlands Court, Westbourne Grove, W11	passenger Lift	H113	Flats 1-12
Longlands Court, Westbourne Grove, W11	passenger Lift	H114	Flats 13-24
Longlands Court, Westbourne Grove, W11	passenger Lift	H115	Flats 25-36
Longlands Court, Westbourne Grove, W11	passenger Lift	H116	Flats 37-48
Longlands Court, Westbourne Grove, W11	passenger Lift	H117	Flats 49-81
Acklam Road, W10	Passenger Lift	H118	3 Floors
Acklam Road, W10	Passenger Lift	H119	2 Floors
Edenham Way, W10	Passenger Lift	H120	Flats 15-50 L/H
Edenham Way, W10	Passenger Lift	H121	Flats 15-50 R/H
Edenham Way, W10	Passenger Lift	H122	Flats 51-80 L/H
Edenham Way, W10	Passenger Lift	H123	Flats 51-80 R/H
Trellick Tower, 5 Golborne Road, W10	Passenger Lift	H124	L/H lift

Trellick Tower, 5 Golborne Road, W10	Passenger Lift	H125	Middle lift
Trellick Tower, 5 Golborne Road, W10	Passenger Lift	H126	R/H lift
Adair Tower, Appleford Road, W10	Passenger Lift	H127	L/H lift
Adair Tower, Appleford Road, W10	Passenger Lift	H128	R/H lift
Hazlewood Tower, Appleford Road, W10	Passenger Lift	H129	L/H lift
Hazlewood Tower, Appleford Road, W10	Passenger Lift	H130	R/H lift
Manchester Drive, Southern Row, W10	Passenger Lift	H131	Block 1/2
Manchester Drive, Southern Row, W10	Passenger Lift	H132	Block 3/4
Raymede Tower, Treverton Street, W10	Passenger Lift	H133	L/H lift
Raymede Tower, Treverton Street, W10	Passenger Lift	H134	R/H lift
Treverton Tower, Treverton Street, W10	Passenger Lift	H135	L/H lift
Treverton Tower, Treverton Street, W10	Passenger Lift	H136	R/H lift
St. Quintins Avenue, 69 ,W11	Passenger Lift	H137	Passenger lift
Portobello Road, 375, W11	Passenger Lift	H138	Passenger Lift
Oxford Gardens, 34, W10	Passenger Lift	H139	Passenger Lift
Burgessfield, 57 Wornington Road, W11	Passenger Lift	H147	Passenger lift
Cambridge Gardens, 118, W10	Passenger Lift	H149	Passenger lift
Oxford Gardens, 36, W10	Passenger Lift	H150	Passenger Lift

Key

Lifts in bold text are fire-fighting lifts