

Review of Fire Safety Strategy

It is timely to review this strategy to ensure that our policies continue to comply with legislation and London Fire Brigade advice / guidance and requirements. Further, that they reflect best practice in the residential housing environment. It is imperative that procedures are in place to effectively control the fire risks that we face and that these take account of any lessons learned from fires within our own stock and fires within the stock of other housing providers.

The Health & Safety Committee is encouraged to provide their views on our current strategy and any changes that they feel are required. To assist with this process a copy of the current strategy is attached and some initial points for consideration are summarised below -

- Legislation , Enforcement, Best Practice Guidance etc. all remain the same
The Regulatory Reform (Fire Safety) Order 2005, Fire Safety in Purpose built blocks of flats and enforcement arrangement outlined in the current document remain in place
- Management Arrangements for Fire Safety
 - Timely to reconsider provision of fire safety information to residents and how this can be improved - how should this be conveyed, how frequently etc.
 - Strategy should reflect the significant progress that has been made with installation of hard-wired smoke alarms in tenanted properties and the regular electrical wiring testing that is now undertaken. Further, should consider how leaseholders can be encouraged to fit their own smoke alarms and undertake their own regular electrical wiring tests
 - Recruitment of an accredited fire contractor to undertake some of the more significant fire safety works?
- LFB Home Fire Safety Visits – can we do more work (jointly with the LFB) to promote these amongst our residents - especially the most vulnerable?
- Fire extinguishers, hose reels, dry & wet risers – location and servicing remains as set out
- Fire Risk Assessments – frequency of the regular reviews currently reflects that outlined in the best practice guide. However, bench marking with other similar organisations and acknowledging that there are risks which we are unable to control it is suggested that we increase the frequency of the FRAs as follows –
 - High Risk – comprehensive review 2-yearly (currently 3 yearly but commonly done annually by other housing providers) plus lower level review annually
 - Medium & Low Risk blocks – comprehensively reviewed 3-yearly plus annual lower level review
 - These should be supplemented by comprehensive reviews following any of the following - material alterations, significant changes to block or type of resident or major fire etc.
- Stay put evacuation strategy – better publicity?
- Communal Storage - Zero Tolerance v Managed Use – clarification of blocks where zero tolerance is in place, better guidance for staff on managed use to enable them to apply this – suggest this a dedicated appendix or a separate document preferably with photographs

- Flat Entrance door – now have a flat door assessment checklist & fire door specification that RD use – should be included or referred to and reproduced elsewhere. (Also a leaflet is available for leaseholders - still available)
- Leaseholder flat entrance doors – further engagement with Legal Services to clarify any possible action we can take when leaseholder refuse to replace a non-fire rated door??
- Fire safety training – about to use on-line package and supplement with practical training for staff who require it
- Mobility Scooters – this is becoming an increasing problem and so need to look to draft a procedure for how these can best addressed when they do come to light (and publicise procedure)
- Hoarders – this is a difficult problem to resolve and appears to be increasing in the stock. Now often involves a multi-agency approach (LFB, Social Services etc.). This should be reflected in the document. Also the LFB use a numerical “clutter scale” to assess this - photos distributed to Neighbourhood Teams - perhaps we should be using this consistently. Procedure?
- Premises Information Box – at Trellick
- Remove appendices and put in a supporting document with any other procedures that are required
- Use of candles is the cause of a number of fires in our stock – what action can we take to mitigate this risk?

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TMO Health & Safety

April 2016

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 but consists predominantly of purpose-built flats and maisonettes which are principally located in medium- and high-rise blocks. However, there are also a number of low-rise street properties and a smaller number of freehold houses. Additionally, whilst many of these properties were constructed between the 1950s and the 1970s there are a number of properties which were built before these dates.
- 1.3 Statistics indicate that people living in blocks of flats compared to houses – particularly those with social landlords – are at an increased risk of fire and so it is imperative that the TMO takes all necessary steps not just to comply with the legislation but also to protect our residents and reduce the likelihood of them being a victim of fire in their own home.
- 1.4 This strategy document enables us to outline the measures we have put in place not just to comply with fire safety legislation but, more importantly, to minimise the risk of fire throughout the housing stock. Specifically, we are committed to reducing the risk of an outbreak of fire and also the risk of a fire spreading within a building but also spreading from one building to another.

2. Legislation

- 2.1 A range of legislation applies in relation to maintaining Fire Safety in residential blocks. This includes the following -
 - the Building Regulations – a building must be compliant with the Building Regulations that were in force at the time of 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 (FSO), RBKC and the TMO are considered to be "responsible persons" and as such must ensure that "suitable and sufficient" fire risk assessments are carried out in the communal areas of all the residential blocks.

3. Enforcement

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

4. Standards & good practice applied to residential Housing

- 4.1 In addition to the legislation outlined above there are a number of guidance documents, British Standards, Codes of Practice, good practice guides etc. that cover fire safety in a residential environment and the TMO is committed to complying with these. The most important of these is "Fire Safety in Purpose Built blocks of Flats" which was published in July 2011 by the Local Government Group following extensive consultation with all stakeholders including ALMOs, 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, risk assessments and monitoring by Neighbourhood Staff and Health & Safety staff. Specifically, inspections ensure that

combustible items and storage are not present in the communal areas, fire doors are operating effectively, emergency lighting is maintained, final exit doors are operational, signage has not been removed or defaced, wet / dry riser cabinets have not been tampered with, any communal area repairs have been completed to a satisfactory standard 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. (Estate Staff Inspection checklist used for these inspections is attached at [Appendix 1](#).)

- 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. Records are maintained of these checks.
- Regular Fire Risk Assessments (FRAs) & reviews and a prioritised approach to progressing action plan items
- Information to residents – general fire safety information on evacuation strategy, storage in communal areas, smoke alarms, LFB Home Fire Safety Visits etc. is provided via the TMO's website, in regular articles in the quarterly magazine to all residents ("The Link"), in the Residents Handbook, in an introductory letter to all new tenants etc. Additionally, more specific fire safety information is available through regular Sheltered Housing Newsletters etc.
- Installation of hard-wired mains powered smoke / heat alarms when periodic wiring inspection and re-wiring is being undertaken within a dwelling.
- Opportunity for residents and employees to report any concerns, defects, outstanding repairs etc. via our Freephone service. During working hours this is answered by the TMO's Customer Service Centre staff and out of working hours by Pinnacle, the TMO's contracted out of hours call monitoring service.
- Conditions of Tenancy prohibit the use of Liquefied Petroleum Gas (LPG)
- Use of fire retardant carpet, floor coverings and curtains in communal areas (in sheltered schemes)
- Upholstered furniture (provided in communal lounges or clubrooms) meets the Furniture & Furnishings Fire Safety Regulations 1988
- Achievement of "Class 0" spread of flame of the wall surfaces of the communal areas blocks. (Ensuring that when redecorations are carried out wall coverings are analysed and multi-layers of paint which are not well adhered and able to achieve this rating are stripped back to the substrate.)
- Annual servicing of all council-owned individual gas appliances in compliance with the Gas Safety (Installation & Use) Regulations and regular newsletters to leaseholders encouraging them to service their gas appliances.
- Regular inspection and testing of individual electrical installations – within dwellings and within common parts of blocks
- Fire safety – of residents, staff and contractors - will be considered at every stage of construction projects and will be reflected in Construction stage plans, risk assessments and method statements. Compliance with Building Regulations is paramount. Engagement with contractors to reinforce the need to ensure that all works are "made good to a fire resisting standard" and that contractors adequately train their operatives in order to facilitate this. Post inspections will also scrutinise this aspect of works.
- Investigate all reported fires within the stock, liaise with the LFB about the probable causes and identify and instigate any action to prevent a recurrence. Maintain a record of all fires and summarise those occurring in the reporting period in the Annual Health & Safety Report.
- Regular (bi-monthly) liaison meetings between the TMO Health, Safety & Facilities Manager and the London Fire Brigade's Fire Safety Team Leader for K&C plus local

LFB Station Managers to discuss any recent fires, audits, FRAs, statistics on attendance at lift shut-ins, false alarm activations, LFB initiatives or any other issues or concerns etc.

6. Fire Alarms & Automatic Fire Detection (AFD)

6.1 AFD within Dwellings

Smoke alarms when installed and maintained correctly are a cheap and effective way to protect people and property. Available evidence suggests that some groups of people are more at risk from fire than others and that these groups are also more likely to live in flats (Local Authority or other) and are less likely to have a smoke alarm fitted in their home. 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 appropriately located mains electrically powered smoke / heat 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 or more smoke alarms.) The tenants' obligations are 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 would be replaced with hard-wired models.
 - Battery alarms in void dwellings 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 following instruction by the LFB was pursued. Dwellings were prioritised in terms of risk and the higher risk properties and higher risk residents were targeted first. The risk was determined by the vulnerability of the residents, the height of the blocks, the number of escape routes etc. (Again clear written instructions were issued at the time of installation.)
 - The LFB leaflets promoting Home Fire Safety Visits etc are widely available so that tenants and leaseholders are aware of these and are clear how this free service from the LFB can be accessed.

6.2 Fire Alarms & AFD in communal areas

In a small number of residential blocks – most of which are sheltered blocks and temporary accommodation - a fire alarm and warning system 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 with one location using a security guard (contractor) to monitor the fire alarm during certain periods. However, when these staff leave the site (and also out of working hours) the monitoring of the systems is done by the Community Alarm Service (CAS).

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

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.) 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. Fire Safety is a regular feature in the newsletter produced for the Sheltered residents.

6.3 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, as part of our quarterly workplace inspection / assessment, to ensure that the landlord fulfils their obligation in relation to regular testing, maintenance and instigating 6-monthly fire drills.

7. SMOKE ALARMS - Fire Brigade’s Home Fire Safety Visit

- 7.1 The TMO publicises the importance of fitting smoke alarms within the home as the best way to avoid injury or damage from fire. Specifically, a smoke alarm detects smoke at the very early stages of a fire, provides early warning and thereby provides extra time for residents to get out safely. Smoke alarms are known to be cheap, simple to install and widely available from DIY and hardware shops. However, we also publicise the service offered by the London Fire Brigade which includes installation of a smoke alarm. People who request a Home Fire Safety Visit (phone 08000 28 44 28) will receive a home visit, be given specific fire safety information in relation to their home and the LFB will install a smoke alarm.

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

- 8.1 The LFB have announced their intention to introduce a charging regime for their attendance at false activations of automatic fire detection (AFD). A start date of 1st April 2013 was originally given but further details have yet to be confirmed. The LFB intend to charge for every visit to a block once they have attended the block ten times in a rolling twelve month period. Further, the charging will continue until that block shows fewer than nine visits in the preceding 12-month period.
- 8.2 The Health, Safety & Facilities Manager 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 these meetings. The Team Leader provides the most recent information in relation to TMO-managed properties and this is interrogated for trends, shared with the Supported Housing Manager and all reasonable efforts are made to reduce the incidence of further false alarms.

9. Provision of Fire Fighting Equipment

9.1 Handheld extinguishers

9.1.1 Provision in Residential blocks

There are no portable fire fighting appliances provided within the common parts of

the vast majority of our residential blocks. Whilst it was 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 and in accordance with Government guidance it was agreed that these were not required in the communal areas of TMO residential blocks for the following reasons –

- 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 FRA to present effective compartmentation thus enabling a “stay put / defend in place” evacuation strategy to be adopted, and the assessments confirm that no fire extinguishers need be installed in the communal areas, then TMO policy is not to install any extinguishers in those areas. Further, where extinguishers are already installed in the communal lobbies and corridors and the FRA for that block confirms they can be removed, contractors will be instructed to remove them.

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

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

9.1.2 Provision in Workplaces, clubrooms etc.

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

9.1.3 Maintenance of Extinguishers

All fire-fighting equipment is maintained in line with the British Standard and is inspected and serviced by a competent contractor on an annual basis. Visual inspections are also carried out by Neighbourhood Staff and Health & Safety staff on a regular basis and any concerns or defects highlighted and addressed as soon as possible.

9.2 Water hose reels

The TMO provides water hose reels in a limited number of locations. These are maintained by a competent contractor on an annual basis as per the requirements of the relevant British Standard. Additionally, regular visual inspections of the equipment are carried out by Neighbourhood staff and H&S staff. The FRA takes account of any hose reels present in a property and where the assessment confirms that these are no longer required then TMO will consider taking these out of use.

9.3 Sprinklers

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

9.4 Dry & Wet Risers

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

10. 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 in TMO controlled areas)
- Emergency Lighting (units or systems)
- Door entry systems (including FB release switches)
- Lightning protection systems

11. Definition of “high rise” block

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

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

- 12.1** A risk-based approach was adopted to enable blocks to be prioritised and FRA programmes to be drawn up. Criteria were agreed enabling us to categorise all blocks and allocate them to either the High, Medium or Low Risk FRA Programme. These criteria took account of the blocks (height, age, purpose-built, conversion, sheltered housing, temporary accommodation, adequate means of escape etc.) and the potential degree of vulnerability of the residents and they are set out at **Appendix 2**.

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

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

14. Fire Risk Assessments (FRAs)

- 14.1** In order to ensure that our approach to compliance with the FSO met with the approval of the enforcing body (the Fire Authority) the TMO, RBKC and the LFB worked closely to agree 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.

- 14.1.1** The criteria outlined above (and documented at **Appendix 2**) were used to identify a high, a medium and a low risk assessment programme.

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

14.1.3 At the LFB’s request, in advance of 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 (FRA guidance and methodology for carrying out FRAs published by British Standards Institute) and the risk assessment guidance produced by the Health & Safety Executive (HSE).
- The Significant Findings & Action Plan which would be produced alongside the FRA report would use a Red / Amber / Green colour coding to assist with prioritising the actions. Specifically, colour coding -
 - Red – actions required to comply with specific legal requirements in the FSO (plus any significant life risk that is found)
 - Amber – actions relating to recommendations of BS, good practice etc.
 - Green – actions which could improve / enhance fire safety based on good practice etc. but of lesser priority.
- Actions 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 are dependant upon significant resources such as capital funding, this is likely to lead to some delay whilst funds are secured and any necessary procurement is undertaken in compliance with our financial regulations.

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 immediately by telephone so that they could be addressed urgently.

14.2 Shared Buildings

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

14.3 Reviewing FRAs – frequency & arrangements

14.3.1 Comprehensive (“suitable & sufficient”) FRAs have now been completed for each block. However, these are living documents which cannot remain valid indefinitely. Therefore, to ensure compliance with the FSO assessments must be reviewed and / or 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 LGG and published in July 2011) and as such FRAs reviews will be undertaken -

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

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

14.3.3 Specifically, as thorough FRAs have been undertaken in all RBKC locations, in blocks where criteria 2. to 4. above do not apply then it is our intention to carry out a shorter review exercise on a regular basis with a 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. – 4. apply or on a recurring basis- the services of a specialist fire risk assessor will be used.

14.3.4 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.

14.3.5 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.

14.4 FRA Action Plans

14.4.1 On receipt of the Significant Findings & Action Plan (the “Action Plan”) the Health & Safety Team will allocate each action (and set its priority) to the appropriate team / individual via the Workflow on W2 (the TMO’s electronic document management system). Statistics on status of all FRA actions are presented to the Operations H&S Group, the TMO’s H&S Committee and the Executive Team on a regular basis.

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

15. Stay put / Defend in Place Strategy

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

16. Storage of items in communal areas of residential blocks

16.1 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 permit storage of any items within communal areas and
- “managed use” which permits a small amount of non-combustible items to be stored providing they do not obstruct the means of escape in any way.

16.2 The TMO have adopted a managed use policy in relation to the majority of our blocks and this is policed by our regular inspection regime and further supported by staff training and guidance on what items and what volume of storage can be permitted.

17. Flat Entrance Doors

17.1 FRAs & Flat entrance doors

17.1.1 One area highlighted in many FRAs was the need to investigate whether flat entrance doors in enclosed blocks were sufficiently fire resisting (and self-closing). 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 rated or resistant he highlighted these locations in the Action Plan. The significance of these doors is that in enclosed blocks the flat entrance doors effectively form part 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 currently nearing completion.

17.2 Leaseholders Flat Entrance Doors

17.2.1 In RBKC 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 in October 2012 ([Appendix 3](#)). This was followed up with a personalised letter ([Appendix 4](#)) to all residents whose doors had been highlighted in the FRA as potentially non-compliant. This letter was accompanied by an information / guidance note to assist leaseholders to establish whether their door was compliant ([Appendix 5](#)) and details of our Fire Consultant with whom they could engage privately to assess their door.

17.2.2 Following discussions with senior LFB officers and representations to DCLG a further "Before Action" letter ([Appendix 6](#)) was sent to lessees whose doors has been highlighted by the FRA as potentially non-compliant offering a one-off free assessment of their door by our Fire Consultant. At the conclusion of their exercise the list of addresses that remain non-compliant or potentially non-compliant will be referred to RBKC for enforcement.

17.3 LFB required standards for flat entrance doors within enclosed blocks

17.3.1 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 a certified 30 minute fire rated door (FD 30)
- Investigate whether door is appropriately marked up using the Trada marking system etc. (details at Appendix 5) to confirm fire resistance standard
- If no markings or documents are available then could the door be considered to be a “nominal” fire door – a solid door which is approximately 44mm thick is close fitting within its frame and has a self closing device fitted to it. Where no self-closing device is fitted it will be advised that one is fitted.
- In the case of an existing fire door the fitting of cold smoke seals will not be requested BUT
- If a new fire door is to be fitted then this will be required to meet the standards and requirements of the Building Regulations which are current at the time of installation.

18. Fire Safety & TMO Lifts

18.1 Lift Safety – information for residents who become shut in

18.1.1 Information is available on the TMO’s website and is periodically reproduced in the Link magazine. Copy is available at Appendix 7.

18.2 Fire fighting lifts

18.2.1 As much of the housing stock is medium-rise and high-rise many of the blocks are served by one or more passenger lifts. Where appropriate “fire fighting lifts” are provided within TMO residential blocks. This is to satisfy the requirements of the Building Regulations which consider the height of the building etc. When lifts are installed they comply with the relevant standards at that time and when they are subsequently replaced the replacement lift is compliant with the standards current at the time of replacement. The criteria for a TMO fire fighting lift is set out below-

1. Minimum car size (1100mm wide x 1400mm deep) for 8 persons capacity (630kg).
2. Dedicated power supply serving lift (3 phase). Additionally, ancillary items such as lift alarm, lighting etc. are also served by their own dedicated power supply
3. 2-way communication on new lifts includes connection to Customer Service Centre / out of hours monitoring service when the lift alarm is activated
4. Fireman’s Control Switch fitted. When operated this causes the lift to return to ground floor and open to allow the fire fighters access. It stops landing calls being registered and allows the authorised person e.g. LFB operative to take control of the lift (by applying a constant pressure on any call button).

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

Additionally, the TMO

6. has a comprehensive servicing and maintenance contract in place for all lifts. This includes monthly inspections.
7. employs contract managers who are responsible for the supervision and monitoring of the contract / contractors.
8. has the Council's Insurers, Bureau Veritas, carry out 6-monthly inspections which include a full safety check.
9. 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 8** is a comprehensive list of all TMO lifts (fire fighting lifts as described above are indicated by bold type).

19. Workplace Fire Safety

- 19.1 New staff receive induction training which includes general information on fire safety and details of the specific procedure they should follow in the event of a fire or emergency at their workplace.
- 19.2 Designated fire marshals are appointed in each workplace and attend annual fire safety training. Fire Marshals are responsible for ensuring that in the event of a fire alarm activation their area is cleared, staff evacuate safely via the designated escape routes and go to the agreed assembly area. The Fire Marshal then reports his area

cleared to the Fire Control Centre. (The roles & Responsibilities of Fire Marshals is set out at **Appendix 9.**)

20. Fire Safety Training for TMO Staff

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

21. Fire Drills

- 21.1 Records of fire drills carried out within TMO offices etc. are maintained locally.

22. Workplace Inspections

- 22.1 In addition to the programmes of inspections/assessments throughout the housing stock we also have a workplace inspection programme. Quarterly workplace inspections are carried out by the TMO Facilities Coordinator. In each case a local Union Representative is invited to attend. Reports of these inspections are sent to the H&S Committee who in turn report to the TMO Executive Team.

23. Security in offices – ID, controlled entry

- 23.1 To ensure the security of our staff and further enhance fire safety of these areas the main TMO offices have controlled entry systems and are accessed by use of a security fob.

24. Fire procedures

- 24.1 Staff who are not fully able-bodied and who may need assistance to be alerted to the fire alarm and / or require assistance to evacuate from the office are required to have a Personal Emergency Evacuation Plan (PEEP). The H&S Team will meet with the individual and together they will complete a proforma clarifying their specific evacuation procedure (in some cases this involves the use of a lightweight “evac” chair and training of staff in it’s use) and any additional assistance they will be provided etc. The PEEP will be reviewed on a regular basis and when the needs / ability of the individual change in any way. (A copy of the PEEP Proforma is at **APPENDIX 10.**)

25. GERDA Locks

25.1 Gerda high-security locks have been fitted across the Borough to replace the Fire Brigade (FB) locks which controlled access to roofs, plant areas, lift machine rooms and electrical intake areas. This was done largely to address the problems associated with the wide availability of FB keys. Gerda keys are borough-specific and can only be obtained from Gerda via authorised officers in the TMO.

25.2 Specifically, **GERDA** locks have been installed in the following locations -

H5 Electrical Intake Cupboards & Cupboards where entry phone equipment is stored

H10 Plant Rooms, Roof Access etc.

H12 Lift Motor Room doors only

25.3 All Caretakers have been issued with their own set of Gerda keys and all LFB tenders have been supplied with a GERDA master key.

26. Mobility Scooters

26.1 The TMO is committed to supporting independent living and is mindful of complying with the Equality Act 2010 where there is no conflict with fire safety legislation. Specifically, with regard to storage of mobility scooters any resident who wishes to park these in a communal area will be required to make this request in writing to their Neighbourhood Team. Applications will be considered on an individual basis and advice / guidance will be sought from the TMO's Fire Risk Assessor.

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

27. Policy on Furniture & Sheltered

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

Janice Wray

TMO Health, **Safety & Facilities** Manager

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