

PAPER 5

KCTMO HEALTH & SAFETY COMMITTEE -19th January 2017

KCTMO Fire Safety Strategy – UPDATED DRAFT

FOR DISCUSSION

Financial Impact of proposed changes to Fire Strategy

The Fire Safety Strategy has been updated to reflect the feedback received from Committee members and discussions at the September meeting. The updated draft is attached. (Where there have been substantial changes or additions I have highlighted these in yellow for ease of reference.)

In particular, there are three areas where proposed changes will require additional resources and possibly also approval from RBKC and below are indicative costings for these.

1. Fire Action Notices (5.1 & 15.2)

To obtain self adhesive rigid vinyl Notices in A4 size (similar to those already installed at Adair & Hazlewood Towers and most of the Sheltered Schemes) for fitting in all blocks across the stock - **circa £3K**

Fitting has not been costed as the possibility of staff and our Fire Assessor fitting these is being investigated.

2. Programme of fitting self-closing devices to flat entrance doors (17.1.2)

The possibility of adopting a 3-year programme to undertake this work (commencing with the potentially higher risk properties) is being discussed with the RBKC. Cost of this programme is estimated to be **£620K**.

3. Increasing the frequency of the comprehensive Fire Risk Assessments (14.3.4)

The increased cost involved in increasing the frequency of the FRA would be **an additional £13K per year at current prices**.

TMO Fire Safety Strategy – FOR REVIEW JANUARY 2017

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 its construction and must comply with the requirements of the current Building Regulations when it undergoes refurbishment. (Approved Document B of the Building Regulations covers the Fire Safety aspects of any building work.)
 - the Housing Act 2004 – this is enforced by Environmental Health whose Officers apply the Housing Health & Safety Rating System (HHSRS) to 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 (LFB).
- 3.2 Further, a protocol between the London Fire Brigade (LFB) and RBKC clarifies that fire safety enforcement in relation to RBKC properties will be undertaken by the LFB. (There remains a difference of view between the LFB and RBKC in relation to the enforcement of non-compliant leaseholder flat entrance doors. However, whilst RBKC reserves the right to challenge the LFB in the future in respect of its position, in view of the need to ensure the safety of residents, visitors, workers and others within the blocks in which there are non compliant doors, the 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 and the Chief Fire Officers Association. 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 obstructions, combustible items and excessive stored items 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 or obstructed, any communal area repairs have been completed to a satisfactory standard etc. All defects / repairs are reported immediately - routine matters via a PDA and urgent matters by telephone to the Customer Services Centre who instigate the repair. Repairs to fire doors, self-closers etc. are given

priority. (Estate Staff Inspection proforma is available from the Estate Services Team Leaders.)

- Inspection, testing and maintenance of all fire safety systems / plant / equipment as per the requirements of the relevant British Standard by competent contractors under a planned preventative maintenance regime. In the case of emergency lighting the maintenance contractors regular checks are supplemented by monthly inspection and testing by the estate staff. (Records are maintained of all testing.)
- 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.
- A programme of installing Fire Action Notices in each block has commenced. The programme will be risk-based with the potentially higher risk properties (high-rise, sheltered and temporary accommodation blocks) taking priority.
- Installation of hard-wired (mains powered) smoke / heat alarms within dwellings when periodic wiring inspection and re-wiring is being undertaken.
- Opportunity for residents and employees to report any concerns, defects, outstanding repairs etc. via our Freephone service. During working hours this is answered by KCTMO's Customer Service Centre staff and out of working hours by Pinnacle, KCTMO's contracted out of hours call monitoring service.
- Conditions of Tenancy prohibit the use of Liquefied Petroleum Gas (LPG)
- Use of fire retardant carpet, floor coverings and curtains in communal areas (in sheltered schemes)
- Upholstered furniture (provided in communal lounges or clubrooms) meets the Furniture & Furnishings Fire Safety Regulations 1988
- Achievement of "Class 0" spread of flame of the wall surfaces of the communal areas blocks. (Ensuring that when redecorations are carried out wall coverings are analysed and multi-layers of paint which are not well adhered and able to achieve this rating are stripped back to the substrate.)
- Annual servicing of all council-owned individual gas appliances and inspection of installation pipework in compliance with the Gas Safety (Installation & Use) Regulations and regular newsletters to leaseholders encouraging them to service their gas appliances.
- Regular (5-yearly) inspection and testing of individual electrical installations – both within dwellings and within common parts of blocks
- Fire safety – of residents, staff and contractors - is considered at every stage of construction projects and is reflected in Construction stage plans, risk assessments and method statements. Compliance with Building Regulations is paramount. Engagement with contractors to reinforce the need to ensure that all works are "made good to a fire resisting standard" and that contractors adequately train their operatives in order to facilitate this. Post inspections will also scrutinise this aspect of works.
- The services of a third party accredited specialist fire contractor have been procured and this contractor can be instructed to competently undertake work on any breaches of compartmentation.
- 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, discuss with LFB at regular Liaison meetings, report details to quarterly Health & Safety Committee and incorporate a summary of 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, LFB audits, FRA issues, statistics on

attendance at lift shut-ins, false alarm activations, LFB initiatives or any other issues or concerns etc.

6. Fire Alarms & Automatic Fire Detection (AFD)

6.1 AFD within Dwellings

Smoke alarms, when installed and maintained correctly, are a cheap and effective way to protect people and property. Available evidence suggests that some groups of people are more at risk from fire than others and that these groups are also more likely to live in flats (Local Authority or other) and are less likely to have a smoke alarm fitted in their home. KCTMO had made attempts to install battery-powered smoke alarms within the homes of the most vulnerable residents and in the potentially higher risk properties. However, in recent years it was accepted that the most effective method of ensuring that tenants had early warning of smoke or flames in their home was to fit hard-wired with battery back-up smoke and heat alarms and so KCTMO started a programme of installation. As of December 2016 approximately 85% of tenanted properties have had these hard-wired alarms installed and it is anticipated that we will reach 100% of tenanted stock by the end of 2018.

In addition, the LFB leaflets promoting Home Fire Safety Visits (which includes installation of battery-powered smoke alarm) 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 KCTMO staff during working hours and by Tunstall Telecom out of working hours. (In locations such as Grenfell Tower Tunstall Telecom provided monitoring on a continuous basis.)

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 (red) box for “fire documents” beside the fire alarm control panel close to the main entrance . 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 these boxes 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 KCTMO’s Community Alarm Service.

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

6.3 Fire Alarms in TMO workplaces

In locations under KCTMO 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. (A copy of the Fire Risk Assessment is also requested.)

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

- 7.1 KCTMO 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 [REDACTED]) 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). 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. However, currently there appears to be no plan to extend this to include attendance at false alarms at sheltered premises.
- 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 KCTMO-managed properties and this is interrogated for trends, shared with the Supported Housing Team and all reasonable efforts are made to reduce the incidence of further false alarms.

9. Provision of Fire Fighting Equipment

9.1 Handheld extinguishers

9.1.1 Provision in Residential blocks

There are no portable fire fighting appliances provided within the common parts of the vast majority of our residential blocks. Whilst, historically, 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 KCTMO residential blocks. Specifically, this is because –

- TMO blocks do not have any permanent staff based there and so in the event of a fire there will be no-one trained and competent to use the extinguishers.
- The presence of extinguishers may encourage people to stay in 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, these can be stolen, or mis-used.

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

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

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

9.1.2 Provision in Workplaces, clubrooms etc.

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

9.1.3 Maintenance of Extinguishers

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

9.2 Water hose reels

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

9.3 Sprinklers

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

Approach to domestic sprinkler maintenance agreed with Fire Assessor

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

9.4 Dry & Wet Risers

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

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

In addition to the ppm of the fire safety equipment and installations mentioned above KCTMO 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 KCTMO-owned portable electrical appliances)
- Emergency Lighting (units or systems)
- Door entry systems (including FB release switches)
- Lightning protection systems

In order to improve performance on the inspection and maintenance of fire safety equipment a new facilities management contractor is currently being procured. This contractor will be responsible for the ppm of all fire safety systems and equipment.

11. Definition of “high rise” block

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

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

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

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

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

14. Fire Risk Assessments (FRAs)

- 14.1 In order to ensure compliance with the FSO, KCTMO, RBKC and the LFB worked jointly to agree KCTMO’s approach. Specifically, a risk-based approach was adopted in relation to the properties (assessed using criteria outlined above) and their place in the initial FRA programme and the frequency of their FRA reviews but also in relation to the FRAs significant findings and how these would be prioritised .

- 14.1.1 The criteria outlined at 12.1 above were used to identify our high, a medium and a low risk assessment programme.

- 14.1.2 Procurement is undertaken as necessary to appoint a competent specialist fire consultant who can undertake “suitable & sufficient” FRAs, provide training and comprehensive fire safety advice and guidance.

- 14.1.3 FRA 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) is used to document our FRAs.

- The Significant Findings & Action Plan produced alongside the FRA report uses 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 are progressed in order of risk – with priority being given to those with a Red or Amber rating. However, it must be recognised that where works 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.

14.1.4 Further, in the course of carrying out the FRAs any issues / situations identified as requiring urgent attention must 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 been completed for each block. However, these are living documents which cannot remain valid indefinitely. Therefore, to ensure compliance with the FSO, FRAs 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 comprehensive review resulting in a new FRA completed at less regular intervals. It is anticipated that the shorter, more regular reviews which will tend to concentrate primarily on progress with previous Action Plan and identification of any

changes, will be carried out in-house by the TMO Health & Safety Team. However, where completely new FRAs are required – either because some of criteria 2. – 4. apply or on a recurring basis - the services of a specialist fire risk assessor will be used.

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

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

14.4 FRA Action Plans

14.4.1 On receipt of the Significant Findings & Action Plan (the “Action Plan”) the Health & Safety Team allocate each action (and set it's priority) to the appropriate team / individual via an electronic Workflow. Statistics on status of all FRA actions are presented to the TMO's Health & Safety Committee and the Executive Team on a quarterly 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. The LFB will be advised of any interim measures and updated with progressed in reinstating the required fire safety measures.

15. Stay put / Defend in Place Strategy

15.1 The FRA confirms the appropriate 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 - is considered to be sufficient to withstand fire for a significant period..

15.2 Fire Action Notices

Information on fire procedures has been communicated to residents by a variety of means – letter to new residents, information in Resident's Handbook, on website, articles in “The Link” magazine etc. However, this will now be supported by a Fire Action Notice within the common parts of the block.

A programme of fitting Fire Action Notices so that residents, visitors, and contractors are informed about the procedure to following in the event of a fire within the communal parts of the block and also within a dwelling.

16. Storage of items in communal areas of residential blocks

16.1 Current guidance 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 FRA confirms that the TMO are able to adopt 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. Further, a photo based guide is being produced to assist the Estate Staff with their assessment.

17. Flat Entrance Doors

17.1 FRAs & Flat entrance doors

17.1.1 Our Fire Risk Assessor is required to highlight any potentially non-compliant flat entrance doors for further assessment and access- permitting to assess a percentage of doors in each block to ensure that they are sufficiently fire-rated and self-closing. In every case where the assessor cannot be confident that the flat entrance door meets the required fire safety standard or where he is unable to ascertain that any glazed transoms etc. are adequately fire rated he is required to highlight these locations in the Action Plan. The significance of these doors is that they 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 large flat door replacement programme was completed in 2013. Flat doors are replaced as part of other work programme and responsively as necessary. A fire door specification (FD30s) has been agreed with Repairs Direct and all replacement flat doors must meet these requirements. Additionally, information on the location of replacement doors is now recorded on our Asset Management Database.

17.1.2 Self-closing devices

All **new** flat entrance doors which open onto a common part of a building, be that an internal staircase, corridor, landing or an open external balcony, are required to be fitted with self-closing devices. However, in line with LFB requirements KCTMO is keen to proactively retro-fit these devices to existing nominally fire rated flat entrance doors. Indicative costings have been obtained for a 3-year installation programme.

17.2 Leaseholders Flat Entrance Doors

17.2.1 In RBKC the flat entrance door is demised to the leaseholder in the lease. However, in order to raise the profile of the fire safety requirements for these doors and to put leaseholders on notice of these, RBKC and the TMO wrote to all leaseholders. All lessees whose doors had been highlighted in the FRA as potentially non-compliant are contacted and initially asked to confirm that their door meets the required standard and to produce documentation to confirm this such as the FD30 certificate. (Our assessor has produced a leaflet that will assist with what is required.) Where leaseholders do not have the necessary

certification and are unclear whether their door is compliant we offer a free assessment of their door by our Assessor. Where the door is confirmed as non-compliant and leaseholders are unwilling to fit a replacement the address will be referred to RBKC Legal Services to explore a “before action” letter or other enforcement options. (Where the LFB has issued an Enforcement Notice against KCTMO Legal Services are able to use this as a means of persuading the leaseholder to upgrade the door.)

- 17.2.2 To encourage leaseholders to consider fire safety and actively seek to mitigate the risks in their property regular articles are included in the Home Ownership Newsletter. These cover a variety of health and safety and fire safety issues such as “stay put” fire strategy, the importance of having a self-closing, fire rated flat entrance door, fitting smoke and heat detection, undertaking regular electrical inspection test and has safety checks.

17.3 LFB required standards for flat entrance doors within enclosed blocks

17.3.1 To ensure that our assessments are consistent with the required standard, following consultation with the LFB the standards for flat entrance doors which open onto a communal area in a residential blocks being applied to our blocks are—

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

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 and Team Leaders) and Health & Safety staff carry out regular estate inspections which include visual inspection of the lift car and testing of the lift alarm.

A comprehensive list of all TMO lifts (fire fighting lifts as described above are indicated by bold type) is available from the Health & Safety and the Asset & Regeneration Team.

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 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 are available on the KCTMO Intranet.)

20. Fire Safety Training for KCTMO Staff

- 20.1 To promote competence in the area of fire safety amongst staff the TMO requires all staff to complete a comprehensive on-line training course. Additionally, practical training courses in the use of fire extinguishers are arranged for fire marshals, estate staff, Sheltered housing officers etc on an annual basis. Staff who are required to undertake regular inspections in blocks will also have more specialised training to cover fire safety systems and features in residential blocks, stay put strategy, communal storage issues, other issues highlighted by the FRAs etc. to ensure they are clear what needs to be escalated and this is also provided annually – with ongoing refresher training at team meetings as well.

21. Fire Drills

- 21.1 Records of the 6-monthly 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 KCTMO Facilities Coordinator. In each case a local Safety Representative is invited to attend. Reports of these inspections are sent to the H&S Committee who in turn report to the KCTMO 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 available from the H&S Team.)

25. GERDA Locks

- 25.1 Gerda high-security locks have been fitted across the Borough to replace the Fire Brigade (FB) locks which previously controlled access to roofs, plant areas, lift machine rooms and electrical intake areas. Gerda keys are borough-specific and can only be obtained from Gerda via authorised officers in the TMO and so offer greater security than FB keys which are readily available.

- 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 KCTMO'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.
- 26.3 Bids recently submitted to the LFB for external charging points at three sheltered schemes. If successful these will be evaluated and possibility of further work to identify additional suitable charging points on estates to be considered.

27. Hoarders and vulnerable residents

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

28. Policy on Furniture & Sheltered

- 28.1 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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