

# Fire Safety Consultation: Questionnaire

This consultation is open to the public and is targeted at groups and/or individuals impacted or representing the interests of those affected by Regulatory Reform (Fire Safety) Order 2005, including but not limited to: 'Responsible Persons' being the owners, occupiers, or other persons in control of relevant premises, Fire safety professionals, Enforcing Authorities, 'Relevant Persons' being lawfully on, or in the immediate vicinity of, said premises and who is at risk of fire on the premises. We welcome responses from anyone else with an interest in or experience of the areas being consulted on within this consultation.

The consultation relates to England only.

There are three thematic sections in this consultation. Each section is divided into topical chapters which provide background information to the lead question(s).

Respondents can answer as many or as few questions as they wish. You do not have to comment on every section or respond to every question in each section but can focus on where you have relevant views and evidence to share.

If you wish to respond to all questions, you do not have to complete the whole form at once.

# About You and Your Response

This set of questions will be about the capacity in which you are responding to the consultation and also about some personal characteristics. This information will be used to support analysis and to help us to understand who is responding to this consultation and the context of their answers.

Every effort will be made to ensure individuals will not be identifiable in any reports or summaries of responses.

**Q1. Please select in what capacity you are responding to this consultation. Please select any that apply.**

- a) Responsible Person
- b) Dutyholder
- c) Enforcing Authority
- d) Resident
- e) Residential Group
- f) Local authority**
- g) Construction company
- h) Property company
- i) Building resident/tenant
- j) Building Control Body
- k) Trade Association
- l) Other - please specify.

**Q2. Please indicate whether you are responding as an individual or on behalf of an organisation.**

- a) Individual (If yes, move onto question 3)
- b) On behalf of an organisation (If yes skip to question 4)**
- c) Trade body or other representative group of individuals or organisations (If yes, skip to question 5)

**Q3. If you are responding as an individual, please specify in what capacity you are responding:**

- a) Responsible Person
- b) Dutyholder
- c) Resident
- d) Landlord
- e) Home Owner
- f) Employee

- g) Fire Safety Professional
- h) Other – please specify.

**Q4. If you are responding on behalf of an organisation, please provide details of:**

- a) The name of the organisation you are representing.**  
Richmond and Wandsworth Councils
- b) Your role**  
Policy and Performance Officer
- c) Your responsibilities in the organisation**  
Project officer leading the implementation of the new fire and building safety legislation.
- d) How many people the organisation employs.**
  - a. Under 10
  - b. 10–49
  - c. 50–249
  - d. 250–999
  - e. **1,000 or more**

**Q5. If you are responding on behalf of a trade body or other representative group of individuals or organisations, please provide:**

- a) the name of the group**
- b) Brief description of its objectives**
- c) Brief description of its membership**
- d) Number of members**
  - a. Under 10
  - b. 10–49
  - c. 50–249
  - d. 250–999
  - e. 1,000 or more

# Section 1: Strengthening the Fire Safety Order and Improving Compliance (for all Regulated Premises)

Proposals in this section seek to strengthen the Fire Safety Order (hereafter the FSO) and the tools available for Fire and Rescue Authorities to drive compliance, leading to greater competence and accountability for those with responsibility for buildings in scope. In a number of chapters, we are seeking views from those with experience of the FSO in relation to key areas which do not have specific proposal attached. These views will be used to further our understanding of the Order and inform future considerations. For ease of reference we have used a standard question structure throughout this document.

## 1.1 Guidance

*Please refer to Chapter 1.1 of the Fire Safety Consultation document when responding to this set of questions.*

**Q6. To what extent to do you agree that Article 50 is a sufficient basis for providing guidance to RPs to support their compliance with their duties under the Order?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q7. To what extent do you agree that a strengthened legal basis for guidance under the Fire Safety Order is needed such as a Code of Practice?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q8: If you agree that a strengthened legal basis for guidance is required, then can you set out which specific areas or issues you think should be covered by an ‘Approved Code of Practice’?**

- a) Responsible Persons
- b) Enforcement and Sanctions
- c) Fire Risk Assessments
- d) Higher risk workplaces
- e) Provision of Information
- f) Other

**If ‘Other’ please outline what other areas should be considered to be covered by a code of practice and why:**

**Q9: If you do not agree that the legislative basis for guidance needs to change, to what extent do you agree/disagree that the format and style of Codes of Practice (such as the Health & Safety Executive’s) should be adopted for any new or revised guidance under the existing provisions within the FSO?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

## 1.2 Responsible Persons

*Please refer to Chapter 1.2 of the Fire Safety Consultation document when responding to this set of questions.*

**Q10. To what extent do you agree that a requirement for Responsible Persons to record who they are, the extent of their responsibility under the FSO, and their contact information will facilitate the identification of RPs?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q11. To what extent do you agree that the requirement set out in proposal 1 be extended to others that have control of the premises, such as dutyholders?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q12. To what extent do you agree that the information the Responsible Person is required to record should include a UK based contact address?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q13. To what extent do you agree that the duty to cooperate and coordinate (Article 22) should be amended to include a requirement for Responsible Persons to take steps to identify themselves to all other Responsible Persons (and where applicable Accountable Persons and/or Building Safety Managers as proposed under the Building Safety Bill) where they share or have duties in respect of the same premises.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q14. Do you have any other comments to further support your answers above?**

### 1.3 Quality of Fire Risk Assessments

Please refer to Chapter 1.3 of the Fire Safety Consultation document when responding to this set of questions.

**Q15. To what extent do you agree that the FSO (potentially by amendment to Article 18) should include a competency requirement for fire risk assessors and other fire professionals engaged by the RPs?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q16. To what extent do you agree that the name and contact information of an individual engaged by the Responsible Person to undertake any or all of the fire risk assessment, should be recorded within the completed fire risk assessment.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q17. Please set out any further information you think fire risk assessments should include.**

**Q.18 To what extent do you agree that a duty should be placed on all RPs to record their completed fire risk assessments?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q19. To what extent do you agree that all RPs should be required to record their fire safety arrangements (Article 11)?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q20. Do you have any other comments to further support your answers above?**

Placing more responsibility on individual Fire Risk Assessors could well affect their ability to obtain professional insurance, will impact on the cost of procurement and could result in a severe shortage of assessors, as many existing assessors may not come up to the new competency standard or be unwilling to undertake assessments under the new more onerous regime. One company confirmed that of the 60 assessors they employed, only one was able to undertake an FRA that encompassed an external cladding system.

### 1.4 Provision of Information

Please refer to Chapter 1.4 of the Fire Safety Consultation document when responding to this set of questions.

**Q21. To what extent do you agree that a new requirement should be placed on Responsible Persons to provide information to specific relevant persons (residents) on fire safety in multi-occupied residential buildings (excluding individual flats/private dwellings) in which they reside?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
✓					

**Q22. To what extent do you agree that a new requirement should be placed on Responsible Persons to take steps to provide the following information to residents in multi-occupied residential buildings:**

**a) Information on the risks identified by the fire risk assessment**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**b) The preventative and protective measures in place to mitigate potential fire risk**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**c) The role and responsibilities of relevant RPs and dutyholders, including their name and contact details**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**d) The Fire Risk Assessment (available on request).**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q23. Please note any comments you have on whether the information outlined above should be provided to specific relevant persons (residents).**

FRA's should be available to all relevant persons. It would be preferable to place them on a website rather than physically provide a copy on request. It may not be sensible to provide the personal details of the dutyholder, as these will change in large organisations, but there should be clarity as to how an RP can raise a query or report a problem.

**Q24. What other information, if any, should RPs be required to provide specific relevant persons (residents)?**

None, all information should be included in the FRA.

**Q25. The intention of proposal 6 is to provide information to residents of all multi-occupied residential buildings subject to the FSO. To what extent do you**

agree that this information should be available on request to other ‘relevant persons’<sup>1</sup> within:

a) multi-occupied residential buildings covered by the Order

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

b) all buildings covered by the Order

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

Q26. Please note any additional information to support your answer to [Question 25]

Q27. To what extent do you agree that a new requirement should be placed on RPs to take steps to share all relevant fire safety information with subsequent RPs?

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

Q.28. In addition to fire risk assessments, is there any other information that should be shared between successive Responsible Persons?

Q29. Please note any other gaps in the FSO in relation to the provision of information and how they could be addressed.

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<sup>1</sup> Under the FSO, a relevant person is defined as any person who is or may be lawfully on the premises and any person in the immediate vicinity of the premises who is at risk from a fire on the premises.

**Q30. Do you have any other comments to further support your answers above?**

## 1.5 Enforcement and Sanctions

Please refer to Chapter 1.5 of the Fire Safety Consultation document when responding to this set of questions.

**Q31. To what extent do you agree that a level 3 fine (£1,000) provides a suitable deterrent and carries a suitable financial penalty?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q32 To what extent do you agree that a level 4 fine (£2,500) would provide a suitable deterrent and carry a suitable financial penalty**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q33. To what extent do you agree that a level 5 fine (unlimited) would provide a suitable deterrent and carry a suitable financial penalty**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q34. Do you have any other comments to further support your answers above?**

## 1.6 Maintenance, Including the Role of Residents

Please refer to Chapter 1.6 of the Fire Safety Consultation document when responding to this set of questions.

**Q35. To what extent do you agree that Article 17 makes sufficient provision for ensuring that premises and any facilities etc are subject to a system of maintenance and are maintained to an appropriate standard for the safety of relevant persons?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q36. To what extent do you agree that the Order sufficiently provides for the replacement of defective or substandard facilities, equipment and devices including fire doors?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q37. To what extent do you agree that Article 17 is effective in ensuring the occupier (of parts of a building to which the FSO does not apply) co-operates with the Responsible Person?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q.38. To what extent do you think that the occupier (of residential parts of a building to which the FSO does not apply) in buildings out of scope of the new regime should be under duties similar (in relation to fire safety) to those being considered under the Building Safety Bill?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q39. To what extent do you agree that the powers of enforcement available to Fire and Rescue Authorities are effective in ensuring remediation for breaches of Article 17?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q40. Do you have any other comments to further support your answers above?**

**Q41. To what extent do you agree that Article 38 makes sufficient provision for ensuring that premises and any facilities etc are subject to a system of maintenance and are maintained to an appropriate standard for the safety of fire fighters?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q42. To what extent do you agree that Article 38 is effective in ensuring that the occupier (of parts of a building to which the FSO does not apply) co-operates with the Responsible Person?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q43. To what extent do you agree that the powers of enforcement available to Fire and Rescue Authorities are effective in ensuring remediation for breaches of Article 38?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q44. Do you have any other comments to further support your answers above?**

The Fire Risk Assessment (FRA) should be looking at maintenance and servicing arrangements as a matter of course but there is no harm in making this a requirement under the FSO. We would welcome any changes that tightens up enforcement against individual leaseholders (non compliant front entrance doors being a good example). Placing a duty on a resident to report any breach of compartmentation would be welcome, as would a requirement that leaseholders in all multi-occupied buildings service their gas boilers annually).

### 1.7 Higher Risk Workplaces

*Please refer to Chapter 1.7 of the Fire Safety Consultation document when responding to this set of questions.*

**Q45. What risk factors are of most concern to you in higher risk workplaces (such as prisons, hospitals, sheltered and supported housing, residential educational buildings, care homes) and why? For example:**

- a) **Occupancy (who is on the premises: children, patients, the elderly, etc.);**
- b) **Use of premises (what activity is carried out);**
- c) Existing fire strategy;
- d) Design and construction of the building (e.g., layout, materials, size, etc.);
- e) Other – please indicate.

**Q46. What additional fire precautions requirements – over and above those already required under the Order – should apply to higher risk workplaces to increase fire safety?**

- a) Provision and maintenance of means of escape;
- b) Provision and maintenance of firefighting systems;
- c) Provision of employee training on fire safety;

- d) Provision of sufficient employees present on the premises to ensure means of escape can be safely and effectively used all times;
- e) **Annual review of the fire risk assessment;**
- f) Record keeping demonstrating the specific requirements;
- g) Other – please indicate.

**Q47. Based on the above, please also indicate what specific requirements should apply to what type of higher risk workplace building:**

**Q48. Do you have any other comments?**

## 1.8 Fees and Charges

*Please refer to Chapter 1.8 of the Fire Safety Consultation document when responding to this set of questions.*

**Q49. To what extent do you agree that the current provisions for prohibition of charging within s.18B(8) of the Fire and Rescue Services Act 2004 should be removed to align with the proposed approach to charging for enforcement action in the Building Safety Bill (the starting scope of the regime is proposed as HRRBs of 18m or more in height, or more than six storeys)?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q50. Alternatively to what extent do you agree that the current provisions for prohibition of charging within s.18B(8) of the Fire and Rescue Services Act 2004 should be removed in their entirety to enable charging for enforcement activity for all premises subject to the FSO?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q51. To what extent do you agree that the proposed ability to charge would incentivise compliance with the FSO?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q52. To what extent do you agree that FRAs should be able to charge for all unsatisfactory audits conducted under the FSO?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q53. To what extent do you agree that FSO Inspectors should be able to charge only for unsatisfactory audits that result in:**

**a) Informal notifications**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**b) Enforcement notices**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**c) Prohibition notices**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**d) Alteration notices**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q54. To what extent do you agree that there should be charging guidance for FRAs in relation to charging provisions in the Fire and Rescue Services Act 2004?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q55. Please share any thoughts you have on levels of charging and when and how these charges should be applied by FRAs if provision was made for charging in relation to FSO activity.**

**Q56. Do you have any other comments?**

We should support charging but only for formal enforcement not the low level work which results in Notice of Deficiencies (NODs) often containing minor deficiencies.

## 1.9 Charging for False Fire Alarms

*Please refer to Chapter 1.9 of the Fire Safety Consultation document when responding to this set of questions.*

**Q57. To what extent do you agree that charging can be a beneficial tool when attempting to reduce FFA and encourage behaviour change?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q58. Please provide further information on your thoughts around possible behaviour change (both positive and negative).**

We support charging, but only for formal enforcement not the low level work which results in NODs often containing minor deficiencies.

**Q59. To what extent do you agree that barriers to the current charging system for FFA exist?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q60. Please provide further information on your views**

**Q61. To what extent do you agree that the following terminology, under 18C(3) FRSA, in relation to charging for FFA are appropriate and clear?**

**a) Malfunctioned**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**b) Misinstalled**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**c) Persistent**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q62. Please provide further information on your thoughts around the following terminology, under 18C(3) FRSA, in relation to charging for FFA –**

- a) Malfunctioned
- b) Misinstalled
- c) Persistent
- d) Other *(Please note any other terminology you would like to comment on).*

**Q63. To what extent do you agree that FRA can charge for the following types of FFA?**

*FFA is defined into four categories under BS 5839-1: False alarms with good intent, malicious false alarms, equipment false alarms and unwanted alarms.*

**a) False alarms with good intent**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
		✓			

**b) Malicious false alarms**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**c) Equipment false alarms**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**d) Unwanted alarms**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q64. Please provide further information on your views**

No issue with charging for persistent false alarms but this should be defined ie x callouts within y period.

**Q65. To what extent do you agree that we should take steps to change the current approach to charging under 18C(3) FRSA?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

# Section 2: Grenfell Tower Inquiry Phase 1 Report Recommendations

The Grenfell Tower Inquiry Phase 1 Report recommendations call for new requirements to be established in law to ensure the protection of residents in multi-occupied high-rise buildings, with some proposals applying to such buildings of any height. This section sets out proposals to implement the recommendations in a practical, proportionate and effective manner.

## 2.1 Definition of Height for Hire-rise Buildings

*Please refer to Chapter 2.1 of the Fire Safety Consultation document when responding to this set of questions.*

**Q66. To what extent do you agree that we should apply the same height definition for high-rise residential buildings to that set out in the proposed Building Safety Bill (18 metres and / or more than six storeys whichever comes first) to any proposed-regulations made under the FSO?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q67. Do you have any other comments to further support your answers above?**

## 2.2 External Walls

*Please refer to Chapter 2.2 of the Fire Safety Consultation document when responding to this set of questions.*

**Q68. To what extent do you agree with the above proposal to make regulations as described above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

We support the recommendation, but would caution that this information is not readily available and would require significant resources and time to gather it. To avoid duplication the detail should be contained in the new FRA, which the London Fire Brigade can then access virtually.

**Q69. In your view, what form should the information in relation to fire risks linked to the design and materials of the external wall structures, and the mitigating steps, be provided:**

- a) A bespoke standard format, or
- b) The relevant section of the fire risk assessment that is related to external walls?**

**Q70. Do you have any other comments to further support your answers above?**

## 2.3 Plans

*Please refer to Chapter 2.3 of the Fire Safety Consultation document when responding to this set of questions.*

**Q71. To what extent do you agree with this proposed approach to make regulations as described above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q72. Please indicate what key firefighting equipment could be included in the building plans:**

- a) Dry risers
- b) Wet risers
- c) Location of the nearest fire hydrant
- d) Smoke control systems
- e) Suppression systems (including associated operating instructions)

- f) Lifts
- g) Other (please specify)

**Q73. Please indicate whether you think building plans should be provided for every floor of a building or only for those floors that are different in their layout?**

- a) Every floor of the building
- b) **Only for those floors that are different in their layout**

**Q74. Do you have any other comments to further support your answers above?**

We support the above recommendation. Information must be virtual, standardised and simple.

## 2.4 Premises Information Boxes

*Please refer to Chapter 2.4 of the Fire Safety Consultation document when responding to this set of questions.*

**Q75. To what extent do you agree with this proposed approach to make regulations as described above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q76. To what extent do you agree that the premises information box should include copies of the completed fire risk assessment?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q77. To what extent do you agree that the premises information box should include the contact details for the relevant Responsible Person?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q78. To what extent do you agree that there should be a consistent approach to Premises Information Boxes between the Fire Safety Order and the Building Regulation guidance?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q79. To what extent to you agree that Approved Document B should set the threshold at 18m top storey height only in relation to the PIB requirement?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q80. Do you consider that other recommendations should be provided? Please explain.**

The Fire and Rescue Service (FRS) can access this information in an electronic format virtually.

**Q81. Do you have any other comments to further support your answers above?**

We strongly oppose the use of Premises Information Boxes (PIBs). These boxes have to be fitted with an FB or similar lock and keys to these are widely available so the PIB would never be secure. Housing managers have attended numerous fires with the FRS and during fast moving emergencies there isn't time to locate a PIB and interrogate the information it contains. The FRS needs to be able to access this information virtually on their way to the incident or the key information should be displayed at the entrance to each block in a standardised format. The Fire Risk Assessment can be a lengthy document and will not assist the fire services in an emergency – they will need key information contained within it.

## 2.5 Lifts

Please refer to Chapter 2.5 of the Fire Safety Consultation document when responding to this set of questions.

**Q82. To what extent do you agree with this proposed approach to make regulations as described above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q83. What would you suggest is a sufficient threshold for the reporting timeframe to the local Fire and Rescue Services?**

- a) Within 24 hours of the fault or issue being identified
- b) Within 48 hours of the fault or issue being identified
- c) Within 72 hours of the fault or issue being identified
- d) Other – please specify

**Q84. To what extent do you agree that the proposal should cover all lifts within a building?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q85. To what extent to you agree that the proposal should cover other pieces of key fire-fighting equipment?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	

**Q86. What other pieces of key fire-fighting equipment, excluding lifts and the mechanism with through which fire fighters can take control of the lifts, would you suggest should be included in this proposal (therefore tested or inspected**

**every month and reported to the local fire and rescue service in the event of failure)?**

- a) Dry risers
- b) Wet risers
- c) Smoke control systems
- d) Suppression systems (including associated operating instructions)
- e) Other (please specify)

**Q87. To what extent do you agree that the proposal should be extended to include a requirement for information about the monthly checks to be made visible to residents?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q88. Do you have any other comments to further support your answers above?**

Our lift contractors are contractually required to test the lift fireman’s switch on every occasion during their monthly service visit. Failures should be reported back to the Councils Lift Team, and a works order should be raised to rectify any failures.

Lift failures are likely to happen at any time and the implementation of these proposals would not guarantee that lifts will be in full working condition whatever reporting timeframe is set when the FRS arrive on site when there is a fire.

Making any information about available about failures on an ongoing basis to residents would be time consuming, costly and would serve little practical purpose. However we can provide this information to residents on request. The same rationale would apply to all other equipment checks

## 2.6 Evacuation Plans

*Please refer to Chapter 2.6 of the Fire Safety Consultation document when responding to this set of questions.*

**Q89. To what extent do you agree with the proposed approach to make regulations as described above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q90. Do you think this proposal should be extended to cover all multi-occupied residential buildings of 11m and above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q91. What information do you think should be included in an evacuation plan?**

**Q92. Do you have any other comments to further support your answers above?**

Where a residential block cannot be covered by a “stay put” strategy and needs to move to a “simultaneous evacuation” strategy then the plan should be shared with the fire service and be covered by clear notices in the common parts. Most residential blocks in the public sector are not staffed and therefore residents would have to self-evacuate or be evacuated by the emergency services, should this prove necessary. An evacuation plan would not be required for blocks covered by a “stay put” strategy.

## 2.7 Personal Emergency Evacuation Plans

*Please refer to Chapter 2.7 of the Fire Safety Consultation document when responding to this set of questions.*

**Q93. To what extent do you agree with the proposed approach to make regulations as described above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q94 has been removed.**

**Q95. What information, other than location, do you think should be provided to Fire and Rescue Services in relation to residents who cannot self-evacuate?**

Limited information on use of oxygen within a dwelling or details of residents who are permanently bedbound may assist, but nothing more, as they won't have time to analyse the information in an emergency situation.

**Q96. To what extent do you agree that a Responsible Person should notify their local fire and rescue service of any residents who cannot self-evacuate (subject to the resident engagement, resident self-identification and consent)?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q97. Please indicate what information you would like to see included in the supporting guidance?**

**Q98. Do you have any other comments to further support your answers above?**

PIB's are not secure and we would not wish to place any information about vulnerable residents in these boxes. There is obvious merit in undertaking Personal Emergency Evacuation Plans (PEEPs) for blocks with "Waking Watch" arrangements in place. However we would question whether information of residents with mobility issues in other blocks covered by a "stay put" strategy is of any practical use to the fire services. The information would never be current as residents relative mobility could change from week to week and it would not cover guests who had mobility issues and during an incident there would be no clear idea as to who is in the block and who isn't, which could result in firefighters being dispatched to empty properties. We would anticipate the FRS relying on real time information during an incident from residents and not be guided by inaccurate lists.

## 2.8 Information to Residents

*Please refer to Chapter 2.8 of the Fire Safety Consultation document when responding to this set of questions.*

**Q99. To what extent do you agree with this proposed approach to make regulations as stated above? Please explain.**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
✓					

**Q100. Other than the information already listed under Proposals 25 and 26, what other information or instruction should be provided to residents?**

We believe the proposals are sufficient.

**Q101. What factors should be taken into consideration in relation to the:**

**a) “nature of the building” and,**

Information needs to be simple and clear and contained in prominently displayed notices with instructions to residents. The FRA should be available to all residents, but we remain unconvinced that it is necessary to explain all risks identified in the FRA and how these are mitigated. This will result in confusion amongst residents.

**b) the RPs “knowledge of the occupants”?**

Information should be translated into other languages on request.

**Q102. Please indicate what information you would like to see included in the supporting guidance?**

**Q103. Do you have any other comments to further support your answers above?**

## 2.9 Fire Doors

*Please refer to Chapter 2.9 of the Fire Safety Consultation document when responding to this set of questions.*

*Referring to proposals 27 & 28.*

**Q104. To what extent do you agree with this proposed approach as described above?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
			✓		

**Q105. Do you have any other comments to further support your answer?**

With respect to fire doors in common parts we fully support checks every 3 months for all doors. With respect to front entrance doors (FED) the proposals should only apply where the FED forms part of the compartmentation of the escape route. We have buildings of height where the FED opens onto an open walkway.

**Q106. Please note any factors we should consider in the implementation of these proposals.**

The practicalities of checking every one of these doors more than once a year are immense with many residents not giving access. Wandsworth has 745 blocks of 11m or more containing 21,842 properties many of which are owned leasehold and sublet. If the proposals go ahead this would equate to 34,350 door checks per year. We would recommend annual checks for all front entrance doors in high risk blocks.

**Q107. Please provide any additional comments on the related matters on which we are seeking views.**

*Referring to proposals 29 & 30.*

**Q108. To what extent do you agree with this proposed approach as described above?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q109. Do you have any other comments to further support your answers above?**

**Q110. Please note any factors we should consider in the implementation of these changes in this proposal?**

**Q.111. Please provide any additional comments on the sufficiency of the Government's actions to date to address the Inquiry's concerns.**

## 2.10 Non-legislative Grenfell Tower Inquiry Phase 1 recommendations and alignment with Approved Document B

Please refer to Chapter 2.10 of the Fire Safety Consultation document when responding to this set of questions.

**Q112. To what extent do you agree that the installation of sprinklers in existing buildings should continue to be guided by the fire risk assessment process rather than be made mandatory under the FSO?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q113. To what extent do you agree that regulations should be made requiring wayfinding signage to be introduced in multi-occupied residential buildings?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
	✓				

**Q114. Should the requirement for wayfinding signage be introduced in:**

all multi-occupied residential buildings

or

multi-occupied residential buildings of 11m and above?

**Q115. To what extent do you agree any requirement for evacuation alert systems should be informed by the outcome of the programme of research and testing?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
				✓	



# Section 3: Building Control Bodies Consultation with Fire and Rescue Authorities

The proposals in this section will increase the effectiveness of the arrangements for consultation and information sharing between building control bodies and fire and rescue services in relation to the planning stage of a building’s lifecycle, and between building control bodies and Responsible Persons under the FSO.

## 3.1 Better Information

*Please refer to Chapter 3.1 of the Fire Safety Consultation document when responding to this set of questions*

**Q116a. To what extent do you agree that further guidance should be provided on the information which needs to be supplied?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
✓					

**Q116b. If you agree, please specify what information this should cover**

**Q117. To what extent do you agree that a standardised set of building fire safety information requirements describing what information is to be provided would be helpful?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
✓					

**Q118. To what extent do you agree that a standardised format for providing the above information would be helpful?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know
✓					

### 3.2 Plans Certificate

*Please refer to Chapter 3.2 of the Fire Safety Consultation document when responding to this set of questions*

**Q119. To what extent do you agree that plans certificates should be mandated for FSO buildings?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q120. To what extent do you agree that plans certificates could allow for conditions to be set?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q121. To what extent do you agree that plans certificates should be mandated only where building work affects fire or structural safety matters?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q122. As an alternative, to what extent do you agree that further guidance would be sufficient?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q123. Please explain your views on plans certificates further:**

### 3.3 Timely Consultation

Please refer to Chapter 3.3 of the Fire Safety Consultation document when responding to this set of questions

**Q124a. To what extent do you agree that there are additional consultation points that could be specified in legislation or guidance?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q124b. If yes, please specify what these points are and whether these should be specified in legislation or guidance?**

### 3.4 Appropriate Response Times

Please refer to Chapter 3.4 of the Fire Safety Consultation document when responding to this set of questions.

**Q125. To what extent do you agree that there should be a fixed statutory timeframe in legislation for response by Fire and Rescue Authorities (upon receipt of the appropriate information from building control bodies)?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q126a. If a statutory timeframe were to be introduced in legislation, to what extent do you agree/disagree that it should be:**

a. 15 calendar days

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

b. 21 calendar days

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

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c. other – please specify.

**Q126b. Please explain your response**

**Q127. To what extent do you agree that there should be a flexible arrangement where all parties involved including developer, building control body and Fire and Rescue Authority are able to agree an extension to the timeframe to meet the need/s of the specific project?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q128. Please note any other factors we should consider relating to introducing statutory timeframes for consultation between building control bodies and Fire and Rescue Authorities.**

### 3.5 Enabling Dispute Resolution

*Please refer to Chapter 3.5 of the Fire Safety Consultation document when responding to this set of questions.*

**Q129a. Are there problems with resolving disputes between building control bodies and Fire and Rescue Authorities which could benefit from a mediation panel with appropriate representative bodies providing advice on resolving disputes?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q129b. Please explain your answer**

**Q130. Which bodies should be involved?**

### 3.6 Better Guidance

Please refer to Chapter 3.6 of the Fire Safety Consultation document when responding to this set of questions.

**Q131a. To what extent do you agree that standing advice, separate to but complementing Approved Document B and the Procedural Guidance, for use at the local level would be helpful?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q131b. If so, please specify all areas it would be helpful to address**

### 3.7 Fire Safety Information (Regulation 38)

Please refer to Chapter 3.7 of the Fire Safety Consultation document when responding to this set of questions.

**Q132a: To what extent do you agree that the application of Regulation 38 should be extended to material alterations and/or other types of building work?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q132b. If you agree, please specify which types of work.**

**Q133. To what extent do you agree that the building control body should have to approve the fire safety information to be handed over?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q134. To what extent do you agree that a review of the Regulation 38 information should be included in any formal consultation requirements between the building control body and the Fire and Rescue Authority prior to the issue of a completion or final certificate?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q135. To what extent do you agree that there should be a requirement for the developer to provide a formal notice to the building control body that fire information has been handed over (including confirmation from the Responsible Person to that effect)?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q136. To what extent do you agree that further guidance would be useful, for example through a British Standards such as BS 8644?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q137. Overall, please state which of the three options is your preference. Option 1, Option 2, Option 3 or none.**

**Please explain the reason/s for your preference:**

### 3.8 Impacts

*Please refer to Chapter 3.8 of the Fire Safety Consultation document when responding to this set of questions.*

**Q138a. If implemented, to what extent do you agree that the changes would provide benefits to your work?**

Strongly agree	Tend to Agree	Neither agree nor disagree	Tend to Disagree	Strongly disagree	Don't know

**Q138b. Please specify how**

**Q139a: If implemented, what extent do you agree the changes would result in any additional costs to your organisation?**

<b>Strongly agree</b>	<b>Tend to Agree</b>	<b>Neither agree nor disagree</b>	<b>Tend to Disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>

**Q139b. Please specify how**

**Thank you for participating in this consultation.**