

Appendix 1 - Fire Safety Consultation

0%

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 any persons lawfully on, or in the immediate vicinity of, said premises and who would be at risk from 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.

This 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. For ease of reference we have used a standard question structure throughout this document.

About You and Your Response

These first few questions in the consultation 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.

Please use this section to tell us about yourself. Please note you are completing this section voluntarily; your details will be held securely according to the data protection legislation. More information on what data we are collecting, why and how it will be looked after can be found here: <https://www.gov.uk/government/consultations/fire-safety>.

We have not asked you for any personal data, however your opinions may constitute personal data and by responding electronically we will have your IP address and/or your email address. These personal data will be deleted after the response to the consultation has been published.

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

About You and Your Response

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
- b. On behalf of an organisation
- c. Trade body or other representative group of individuals or organisations

Organisation

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

a. The name of the organisation you are representing.

County Durham and Darlington Fire and Rescue Se

b. How many people the organisation employs.

- a. Under 10
- b. 10–49
- c. 50–249
- d. 250–999
- e. 1,000 or more

Please select **all** the sections that you would like to answer from the options below:

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 (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.

- Tick here to complete Section 1

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.

- Tick here to complete Section 2

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.

- Tick here to complete Section 3

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 (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.

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 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
- 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?

Identifying the responsible person can be one of the most difficult elements in any enforcement action and can be extremely time consuming and complicated. Currently it is all too easy for people to hide behind company names and change directors on-line to avoid RP status. This will be an essential change to any legislation.

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 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.

The name of the responsible person and contact details should be included. A signed statement to say that the Responsible Person has read and understood the Fire Risk Assessment should also be included. Any actions that are highlighted as needing to be addressed to ensure compliance with the FSO should have an action plan / timeframe attached and agreed by the RP.

Q18. 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?

It could be onerous for small simple premises to have to employ a registered Fire Risk Assessor to complete an FRA, Currently a premises with 5 or less employees do not need to record an FRA however this is classed as 5 employees across all premises in the company so a company with 5 shops with 2 people in each would be expected to record the FRA, this could mean employing a

1.4 Provision of Information

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

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
to mitigate potential fire risk	measures in place to mitigate potential fire risk Strongly agree	measures in place to mitigate potential fire risk Tend to agree	measures in place to mitigate potential fire risk Neither agree nor disagree	measures in place to mitigate potential fire risk Tend to disagree	measures in place to mitigate potential fire risk Strongly disagree	measures in place to mitigate potential fire risk Don't know
c. The role and responsibilities of relevant RPs and dutyholders, including their name and contact details	<input checked="" type="radio"/> c. The role and responsibilities of relevant RPs and dutyholders, including their name and contact details Strongly agree	<input type="radio"/> c. The role and responsibilities of relevant RPs and dutyholders, including their name and contact details Tend to agree	<input type="radio"/> c. The role and responsibilities of relevant RPs and dutyholders, including their name and contact details Neither agree nor disagree	<input type="radio"/> c. The role and responsibilities of relevant RPs and dutyholders, including their name and contact details Tend to disagree	<input type="radio"/> c. The role and responsibilities of relevant RPs and dutyholders, including their name and contact details Strongly disagree	<input type="radio"/> c. The role and responsibilities of relevant RPs and dutyholders, including their name and contact details Don't know
d. The Fire Risk Assessment (available on request).	<input checked="" type="radio"/> d. The Fire Risk Assessment (available on request). Strongly agree	<input type="radio"/> d. The Fire Risk Assessment (available on request). Tend to agree	<input type="radio"/> d. The Fire Risk Assessment (available on request). Neither agree nor disagree	<input type="radio"/> d. The Fire Risk Assessment (available on request). Tend to disagree	<input type="radio"/> d. The Fire Risk Assessment (available on request). Strongly disagree	<input type="radio"/> d. The Fire Risk Assessment (available on request). Don't know

Note: 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.

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

Residents should definitely be able to see any information that could affect them in the case of a fire and the safety of the building in which they live.

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

RP's should provide an action plan to all residents on any improvements required as set out in the Fire Risk Assessment. This should include timescales in which the work will be completed and any remedial work or procedures in place.

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' within:

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
a. multi-occupied residential buildings covered by the Order	<input type="radio"/> a. multi-occupied residential buildings covered	<input type="radio"/> a. multi-occupied residential buildings covered	<input type="radio"/> a. multi-occupied residential buildings covered by the Order Neither agree nor disagree	<input checked="" type="radio"/> a. multi-occupied residential buildings covered	<input type="radio"/> a. multi-occupied residential buildings covered	<input type="radio"/> a. multi-occupied residential buildings covered

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
	by the Order Strongly agree	by the Order Tend to agree		by the Order Tend to disagree	by the Order Strongly disagree	by the Order Don't know
b. all buildings covered by the Order	<input type="radio"/> b. all buildings covered by the Order Strongly agree	<input type="radio"/> b. all buildings covered by the Order Tend to agree	<input type="radio"/> b. all buildings covered by the Order Neither agree nor disagree	<input checked="" type="radio"/> b. all buildings covered by the Order Tend to disagree	<input type="radio"/> b. all buildings covered by the Order Strongly disagree	<input type="radio"/> b. all buildings covered by the Order Don't know

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

This could include any member of the public who is within a metre of the outside of a window if they could be affected by a fire on the premises and could make it very difficult for an RP to provide information to almost anyone who asks for it. This could be overly onerous.

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

Q28. In addition to fire risk assessments, is there any other information that should be shared between successive Responsible Persons?

Any evacuation plans or incomplete action plans relating to improvements to fire safety facilities / procedures. Test records for fire alarm / emergency lighting / firefighting facilities could also be shared

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

Any deficiencies that are highlighted within the FRA should be available to be viewed by all relevant people within a premises, either residents or employees.

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?

A small business would suffer due to a smaller fine but larger companies may choose to ignore the FSO if a fire risk assessment could cost them more than any fine that could be imposed on them.

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

Q38. 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?

Fire Authorities should be able to take more simple action such as on the spot 'tickets' that can be issued on the premises to enforce alterations and improvements to be made rather than the current situation that requires deficiencies letters or enforcement notices to be issued which are administratively complicated for less serious issues. Any enforcement notice can also be appealed and is put aside whilst the appeal is in progress.

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?

Fire Authorities should be able to take more simple action such as on the spot 'tickets' that can be issued on the premises to enforce alterations and improvements to be made rather than the current situation that requires deficiencies letters or enforcement notices to be issued which are administratively complicated for less serious issues. Any enforcement notice can also be appealed and is put aside whilst the appeal is in progress.

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 specify):

Lack of compartmentation in higher risk premises such as Care Homes.

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 specify):

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

Any building that could have members of the public present should have dedicated public evacuation fire wardens in place.
Mandatory compartmentation surveys in Care homes and residential buildings to ensure safe progressive horizontal evacuation can be carried out.

Q48. Do you have any other comments?

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).

In CDDFRS we have used cost recovery for a year now and have found a positive outcome in most circumstances where multiple charges have been levied. The majority of premises have worked with us to improve their alarm systems and minimise call outs to ourselves. Other businesses have put a delay and investigation time in place to also minimise call outs to ourselves, This included the NHS in their main hospitals which has led to a large reduction in unwanted calls to their estate.

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:

I feel that the areas we can charge for are appropriate.

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?

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
a. Malfunctioned	<input checked="" type="radio"/> a. Malfunctioned Strongly agree	<input type="radio"/> a. Malfunctioned Tend to agree	<input type="radio"/> a. Malfunctioned Neither agree nor disagree	<input type="radio"/> a. Malfunctioned Tend to disagree	<input type="radio"/> a. Malfunctioned Strongly disagree	<input type="radio"/> a. Malfunctioned Don't know
b. Misinstalled	<input checked="" type="radio"/> b. Misinstalled Strongly agree	<input type="radio"/> b. Misinstalled Tend to agree	<input type="radio"/> b. Misinstalled Neither agree nor disagree	<input type="radio"/> b. Misinstalled Tend to disagree	<input type="radio"/> b. Misinstalled Strongly disagree	<input type="radio"/> b. Misinstalled Don't know
c. Persistent	<input checked="" type="radio"/> c. Persistent Strongly agree	<input type="radio"/> c. Persistent Tend to agree	<input type="radio"/> c. Persistent Neither agree nor disagree	<input type="radio"/> c. Persistent Tend to disagree	<input type="radio"/> c. Persistent Strongly disagree	<input type="radio"/> c. Persistent 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.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
a. False alarms with good intent	<input type="radio"/> a. False alarms with good intent Strongly agree	<input type="radio"/> a. False alarms with good intent Tend to agree	<input type="radio"/> a. False alarms with good intent Neither agree nor disagree	<input checked="" type="radio"/> a. False alarms with good intent Tend to disagree	<input type="radio"/> a. False alarms with good intent Strongly disagree	<input type="radio"/> a. False alarms with good intent Don't know
b. Malicious false alarms	<input type="radio"/> b. Malicious false alarms Strongly agree	<input type="radio"/> b. Malicious false alarms Tend to agree	<input type="radio"/> b. Malicious false alarms Neither agree nor disagree	<input type="radio"/> b. Malicious false alarms Tend to disagree	<input checked="" type="radio"/> b. Malicious false alarms Strongly disagree	<input type="radio"/> b. Malicious false alarms Don't know
c. Equipment false alarms	<input checked="" type="radio"/> c. Equipment false alarms Strongly agree	<input type="radio"/> c. Equipment false alarms Tend to agree	<input type="radio"/> c. Equipment false alarms Neither agree nor disagree	<input type="radio"/> c. Equipment false alarms Tend to disagree	<input type="radio"/> c. Equipment false alarms Strongly disagree	<input type="radio"/> c. Equipment false alarms Don't know
d. Unwanted alarms	<input checked="" type="radio"/> d. Unwanted alarms Strongly agree	<input type="radio"/> d. Unwanted alarms Tend to agree	<input type="radio"/> d. Unwanted alarms Neither agree nor disagree	<input type="radio"/> d. Unwanted alarms Tend to disagree	<input type="radio"/> d. Unwanted alarms Strongly disagree	<input type="radio"/>

Q64. Please provide further information on your views.

Malicious alarms can be very hard to stop in certain premises and it may be unfair to charge for these. If alarms are used with good intent it would be unwise to charge for this as it may stop people using them when they are needed as they would be more concerned with a charge than with safety of occupants.

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 High-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?

Regulations should be kept as simple as possible and should all compliment each other as much as possible.

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?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree

- Don't know

Please explain:

it is vital that FRS 's are informed of risks associated with external construction as this can change over time and it would be extremely difficult for a fire service to have the resources to continually check all buildings in its area. RP's must hold the responsibility to know what the risks are in their premises and to ensure this is communicated to the FRS and fully explored in their Fire Risk Assessment.

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?

The relevant section of the fire risk assessment should be sufficient and minimise any duplication in paperwork.

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?

- Strongly agree
- Tend to agree

- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Please explain:

Electronic plans could be uploaded to mobile data terminals on fire appliances to assist in operational incidents as well as fire safety databases to assist in auditing any premises.

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

a. Dry risers

yes

b. Wet risers

yes

c. Location of the nearest fire hydrant

yes

d. Smoke control systems

yes

e. Suppression systems (including associated operating instructions)

yes

f. Lifts

yes

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?



2.4 Premises Information Boxes

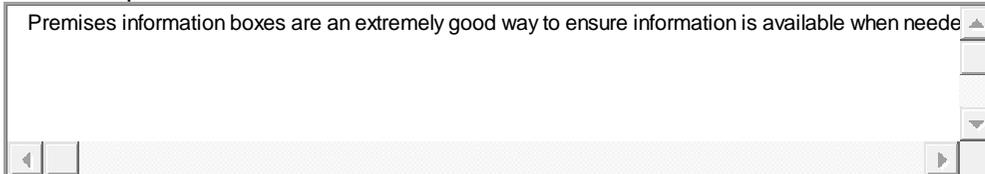
Please refer to Chapter 2.4 of the Fire Safety Consultation document when responding to this set of questions.

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

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Please explain:

Premises information boxes are an extremely good way to ensure information is available when needed



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.

Premises information boxes should be recommended in all premises other than simple premises to assist the fire service with operational incidents.

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

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?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree

- Strongly disagree
- Don't know

Please explain:

All equipment or facilities to assist in firefighting must be kept in full working order and this must be recorded to enable these checks to be audited.

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
- 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):

sprinkler systems / suppression systems

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?



2.6 Evacuation Plans

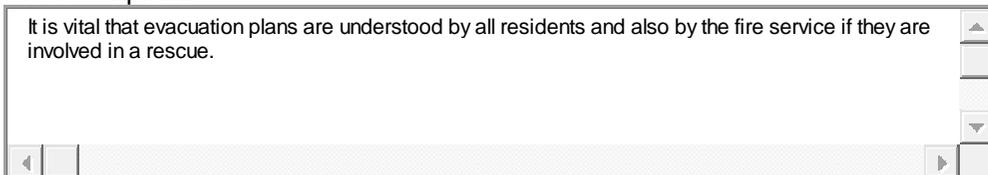
Please refer to Chapter 2.6 of the Fire Safety Consultation document when responding to this set of questions.

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

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Please explain:

It is vital that evacuation plans are understood by all residents and also by the fire service if they are involved in a rescue.



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

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Please explain:

This should not be limited to 11m or above but should be for any multi occupancy building over a certain number of residents. Eg. 10 residents or more over any number of story's.

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

How the alarm is raised, how the evacuation should be managed, ie. fire wardens responsibilities. Any firefighting facilities available to assist in an evacuation, ie. Firefighting lifts, smoke extraction systems, etc.

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

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?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Please explain:

The proposal for residents to self identify is the safest and most common sense route as it would be unfeasible for an RP to know the physical mobility of all residents in any given building.

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?

The type of assistance required, eg. Bariatric / blind, wheelchair user etc.

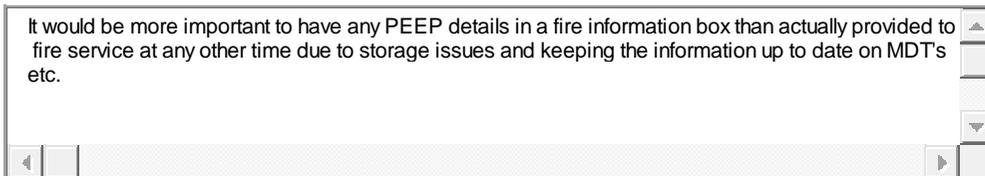
Q96. To what extent do you agree that a Responsible Person should notify their local fire and rescue service of any residents who cannot self-evacuate (subject to the resident engagement, resident self-identification and consent)?

- 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?

A large, empty text input field with a light gray background and a thin border. It includes standard scrollbars on the right and bottom edges.

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

A text input field containing the following text: "It would be more important to have any PEEP details in a fire information box than actually provided to fire service at any other time due to storage issues and keeping the information up to date on MDT's etc." The field has a light gray background and a thin border, with scrollbars on the right and bottom.

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?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Please explain:

It is vital that all residents know and understand how to evacuate the premises.

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

Any deficiencies that are identified during a fire safety audit or fire risk assessment along with a timescale of the deficiencies being remedied. Residents should also be notified if any fire safety systems are out of use.

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

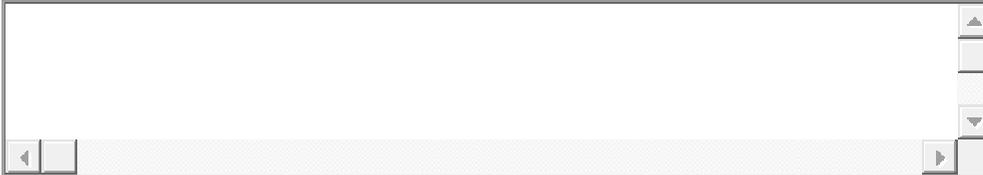
a. “nature of the building”

The building materials, type of residents, eg. Mobili

b. the RPs “knowledge of the occupants”?

This would have to be self identified by the resident

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

A large, empty rectangular text input field with a light gray border and a scroll bar on the right side.

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

A large, empty rectangular text input field with a light gray border and a scroll bar on the right side.

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?

Flat front doors should be subject to annual checks in buildings of any height when they open into communal areas. The height restrictions mentioned would not include blocks under 11m which could still provide a huge risk to any residents if the flat doors were substandard and ill maintained.

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

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?

The enforcement of suitable fire doors to front doors of flats should not be limited to high rise buildings. Any multi occupied premises without adequate fire doors to flats will provide a degree of risk to all residents who may need to use the communal areas as an escape route and as such should be included in this proposal.

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

Q111. 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?
- 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

3.1 Better Information

Q116b. You agree that further guidance should be provided, please specify what information this should cover:

It should be mandatory for the building control body to include their findings / schedule to the Fire Service. It should also be mandatory that plans are provided to the Fire Service prior to any building work being started. Cases have been found where sprinklers or other fire safety facilities were required in buildings that had already been built.

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:

Any building works that could affect fire safety should be checked by the fire service prior to any work being carried out. Currently it feels as though the fire service is almost an inconvenience for building approved inspectors although Local Authority building control bodies do appear to use the FRS as more of a source of expertise and advice. FRS 's have a wealth of knowledge of how buildings actually behave in a fire situation rather than just theoretical knowledge from studies. This should be utilised as

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?

No building work should be able to be started before the plans are passed as satisfactory by the Fire Service, currently it is too easy to build an entire building and then plead ignorance when fire safety issues are neglected such as sprinklers, it is then often impossible to retrofit them and less effective fire engineered principles have to be utilised to substitute them

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 that it should be:

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
15 calendar days	<input type="radio"/> 15 calendar days Strongly agree	<input type="radio"/> 15 calendar days Tend to agree	<input type="radio"/> 15 calendar days Neither agree nor disagree	<input type="radio"/> 15 calendar days Tend to disagree	<input checked="" type="radio"/> 15 calendar days Strongly disagree	<input type="radio"/> 15 calendar days Don't know

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
21 calendar days	<input checked="" type="radio"/> 21 calendar days Strongly agree	<input type="radio"/> 21 calendar days Tend to agree	<input type="radio"/> 21 calendar days Neither agree nor disagree	<input type="radio"/> 21 calendar days Tend to disagree	<input type="radio"/> 21 calendar days Strongly disagree	<input type="radio"/> 21 calendar days Don't know

Other, please specify:

Q126b. Please explain your response:

15 calendar days can be restrictive during periods of leave and busy periods for fire service's. Licensing consultations are given 28 days so 21 days would be more appropriate for BR consultations. Some BR consultations can also be complicated fire engineered designs which can require lengthy study or even rerunning of computational fluid dynamic programmes to prove fire strategies.

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.

CDDFRS have not had an issue where an agreement has not been able to be reached with a building control body but I would imagine that other FRS 's may have had issues especially with approved inspectors so a mediation panel in these circumstances could be a useful addition.

Q130. Which bodies should be involved?

It would be sensible to that the panel would have to be cross party with an independent chair who has professional competence in the building control sector.

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 you agree 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.

Any alterations that have an affect on the fire safety provisions or means of escape to a building should be included.

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
- None

Please explain the reason/s for your preference:

A formal notice would be a signpost that this information has been passed and also ensure that it was done as a final certificate could not be issues without this.

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.

Any strengthening in the requirements for building control bodies to consult in a timely fashion with fire service's on key fire safety issues during alterations and building works to premises has to be a step forward. It is currently too easy for buildings to be altered with little or no consultation with the FRS. Late consultations are frequent and cause issues with sub-standard fire safety precautions being included to save money by developers.

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

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Q139b. Please specify how.

The fire service should not incur costs through these changes.

