

BB7

The action plan detailed below sets out the recommendations including in the Fire Risk Management Audit report completed by BB7 and published on 24 October 2017. The plan identified each recommendation, includes an appropriate action and includes some commentary on progress to date.

p.6	Recommendation 3.2	Southwark Council should seek to establish, document, implement and maintain a fire risk management system in accordance with the national guidance contained within PAS 7: 2013 – Fire risk management system specification.		
Action: Gain PAS 7 certification and implement in full			Fire Safety Team	End March 2019
Comment: The Council accepts the overall finding of this review: that our FRMS needs to be fully documented and tested against PAS 7 as the appropriate form of accreditation. Quotes have been requested for the implementation of PAS 7.				
p.7	Recommendation 3.3	Southwark Council will need to formalise it's procedures for keeping up-to date with legal and regulatory requirements. This could be achieved quite simply by documenting the above within the organisations fire risk management strategy.		
Action: see rec 3.2 above			Fire Safety Team	End March 2019
Comment:				
p.7	Recommendation 3.4	There is benefit in ensuring a consistent approach to fire risk management organisation wide. Southwark Council should determine the boundaries and applicability of its fire risk management system, establish its scope and document the organisations fire risk management strategy.		
Action: see rec 3.2 above			Fire Safety Team	End March 2019
Comment:				
p.9	Recommendation 4.2	In accordance with PAS 7: 2013 – Fire risk management system specification, an organisation wishing to comply with the standard must establish a fire safety policy that satisfies clause 4.2, Notably this policy needs to be reviewed and include a commitment to continual improvement		
Action: Fire Safety Policy to be reviewed alongside review of FS strategy			Fire Safety Team	End March 2019
Comment: The Council agrees that a review of the Fire Safety Policy is due and this will be completed alongside the work to introduce a fully documented FRMS – see 3.2 above				
P.10	Recommendation 4.3	It is advisable to produce an organisation chart identifying key duty-holders and to review the job descriptions of each duty-holder within the organisation and ensure that fire risk management roles, responsibilities and authorities are clearly communicated to those in post.		
Action: The development of the organisation chart with associated roles and responsibilities will included in the Fire Safety Policy see 4.2 above.			Fire Safety Team	End March 2019
Comment:				

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p.13	Rec. 5.1.1	Southwark Council should develop a process diagram or procedure to ensure that fire safety information is captured at an early stage when considering a new project, and that there is a defined process for determining the fire strategy applicable to a particular building, updating it if necessary to an as built fire strategy and ensuring that all relevant permissions are sought.
Action: The Council agrees and this will be completed as part of the work to introduce a fully documented FRMS – see 3.2 above		Fire Safety Team Major Works
Comment: It is important for the in house fire safety team to be involved at design stage of all major works and new build projects. For major works projects the most recent FRA is referenced in the design stage		
p.72	Rec 5.1.2	Void premises provide an opportunity to inspect the internal parts of general needs blocks of flats and in particular should Type 4 fire risk assessments be required, an opportunity should be identified to undertake them without having to disturb residents. It should be worth Southwark Council documenting its void inspection process and including consideration of fire safety
Action: Review Voids Procedure		Area Manager (voids)/Head of Repairs and Maintenance
Comment: With immediate effect Type 4 surveys will be done in the blocks forming the three year major works programme (commencing 18/19) as and when voids become available.		
p.13	Rec 5.1.3	Void premises provide an opportunity to inspect the internal parts of general needs blocks of flats. If doubt exists as to the adequacy of compartmentation, then a void property will offer an opportunity to undertake them without having to disturb residents. It would be worth Southwark Council documenting its void inspection process and include consideration of Type 4 fire risk assessment. A suitable procedure should be formulated for the implementation of a Type 4 fire risk assessment.
Action: Review Voids Procedure		Area Manager (voids)/Head of Repairs and Maintenance
Comment: With immediate effect Type 4 surveys will be done in the blocks forming the three year major works programme (commencing 18/19) as and when voids become available.		
p.14	Rec 5.1.3a	We would recommend a formal procedure be produced for the consideration of security grilles on a case by case basis and that a specific security threat and risk assessment be undertaken. On estates where anti-social behaviour is high, there may be an opportunity to combine technological advances in fire and security to best effect.
Action: Review security gates and grilles procedure		Resident Services
completed		

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<p>Comment: The Council has adopted a formal procedure which includes a case by case assessment when residents have installed security grilles on our property without our consent. That assessment will include a review of alternative security solutions including the installation of a PAS 24 compliant security door if one is not present prior to the removal of the grille. As a rule the Council reviews procedures every three years or when there is a significant change to statutory or regulatory requirements.</p>		
p.15	Rec. 5.2	Southwark Council should establish fire safety objectives as part of its FRMS.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment:		
p.16	Rec 5.3	In accordance with clause 5.3 within PAS 7: 2013 – Fire risk management system specification, an organisation wishing to comply with the standard must define and document its fire risk management strategy.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment		
p.17	Rec. 6.1	We recommend that Southwark Council appoints a specific fire risk management representative(s), who, irrespective of other responsibilities, shall have defined roles and responsibilities and authority for establishing, implementing and maintaining the fire risk management system. They will ‘champion’ fire safety and report back to senior management on the performance of the system for review including recommendations for improvement.
Action: See rec 3.2 above		Fire Safety Team   End March 2019
Comment: Likely to be Fire Safety Manager, but see BB7 item 2 – this could be integrated into IRMS under Corporate H&S.		
p.18	Rec 6.2.1	Having identified all employees with roles and responsibilities that have a bearing on the organisational governance of fire risk, it would be worthwhile undertaking a training needs assessment for these roles. The outcome of these assessments will afford line managers or trainers a list of learning outcomes and an opportunity to test comprehension.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment: The development of an L&D plan for each member of staff is a key element of our performance management framework		
p.19	Rec 6.2.2a	Consideration should be given to the provision of training for key personnel on fire safety legislation such as the implications of the Regulatory Reform (Fire Safety) Order 2005 and the Housing Act 2004. Consideration should be given to the provision of training on the national guidance for Fire safety in purpose-built blocks of flats. Consideration should be given to the provision of training on the national guidance for fire safety in specialised housing such as sheltered and extra care.
Action: See rec 3.2 above		Fire Safety Team   End March 2019
Comment: Include in refresher training for key staff as above Review SHO and EC staff training needs		

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p.19	Rec 6.2.2b	In relation to specific fire risk management representatives (as mentioned in 6.1 above), we recommend that the competency criteria for fire risk managers offered in Appendix C is adopted.
Action: See rec 3.2 above		Fire Safety Team   End March 2019
Comment		
p.20	Rec 6.4	We recommend that Southwark Council documents its strategy with defined lines for internal communication amongst the various levels and departmental functions with the organisation and the strategy for receiving, recording and responding to communications from wider stakeholders that require assurance. This will include communication of the significant findings of fire risk assessments, and the need to maintain fire safety information that may be relied upon.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment:		
p.21	Rec. 6.4.1	We recommend that Southwark Council drafts a guidance note for the benefit of staff and residents as to the basic principles of fire safety that necessitate the staircases and communal areas are kept sterile, and then explain the reasons for adopting a 'zero tolerance' based on fire risk management rather than a specific fire risk
Action: The Council agrees and will develop guidance as part of technical FAQs		Fire Safety Team   End March 2018
Comment Technical FAQs have been drafted and review of zero tolerance approach underway		
p.21	Rec. 6.5	The Annexes within PAS 7 offer a model pro-forma for various fire risk management system procedures. These could be adopted by Southwark Council as a means of ensuring a consistent approach to standard processes.
Action: See rec 3.2 above		Fire Safety Team   End March 2019
Comment:		
p.22	Rec 7.2	Southwark Council should document its procedure for control of work on-site as part of its fire risk management system and communicate this to contractors. There may well be a need for method statements and an assessment of risks to relevant persons. The procedure will document the process of isolation and de-isolation.
Action: See rec 3.2 above		Fire Safety Team   End March 2019
Comment: Post-review, LBS provided documentation evidencing control of work on-site. See p 22 of report		
p.24	Rec 7.3	Southwark Council should document its processes for maintenance and testing to ensure they operate effectively in the event of fire. Due consideration should be given to the means for determining the competency of internal operatives and external contractors and storage of maintenance and testing documentation.
Action: In place		Engineering Team   Complete
Comment: Post-review LBS confirmed Apex system being utilised to record such information and drive programmes of maintenance.		

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p.25	Rec 7.4	Southwark Council should document its processes for establishing, implementing its fire risk assessment programme. Southwark should give consideration to joining the FRACS (Company) Register.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment: Consideration is currently being given to joining the FRACS (Company) Register		
p.26	Rec. 7.4a	Southwark Council should review the latest guidance on fire safety in specialised housing and adopt relevant recommendations.
Action: Complete		Fire Safety Team   Complete
Comment: The role of the Fire Safety Manager is to maintain expert knowledge in fire safety and liaise with operational managers across the Department to ensure their understanding of latest guidance in fire safety for their discipline.		
p.p.27	Rec 8.2	An internal fire risk management system audit programme should be established to review the conformity of Southwark Council's fire risk management system against the requirement of PAS 7.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment:		
p.28	Rec 8.3	Southwark Council should consider an integrated risk management system approach to management review. Clause 8.3 in PAS 7 places a requirement on the organisation to review the FRMS, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews should consider opportunities for improvement or the need for changes to the management system. These may be discipline specific i.e. fire, health and safety, or business continuity; or they may relate to general system changes or opportunities for improvement of the integrated risk management system. We believe the current Health and Safety Advisory Group and Bi-annual Health and Safety report could provide a vehicle for this process to be integrated once the FRMS has been developed and implemented.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment: : Likely to be Fire Safety Manager, but see BB7 item 2 – this could be integrated into IRMS under Corporate H&S.		
p.29	Rec 9.1	Southwark Council need to implement a process for identifying nonconformities with the fire risk management system and take corrective actions.
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment:		
p.29	Rec 9.2	Southwark Council should continually improve the suitability, adequacy and effectiveness of its fire risk management system
Action: see rec 3.2 above		Fire Safety Team   End March 2019
Comment:		

