

BB7

# Fire Risk Management Audit Report

Southwark London Borough  
Council

24/10/2017

# Revision History

Version	Date	Author	Comments
01	02/10/2017	Ben Bradford	Draft issue
02	20/10/2017	Ben Bradford	Revisions following feedback from David Rowson
03	24/10/2017	Ben Bradford	Revisions following confirmation of job titles and hot works

Document Reference 3920

MSF 031 REV 4

## Key to Annotations:

Version 02 issue dated 20<sup>th</sup> October 2017 has been revised following feedback from Southwark Council's Dave Rowson received by email on 12<sup>th</sup> October 2017 copying in Tony Hunter, David Markham, Gerri Scott and Helen Williams.

Version 03 issue dated 24<sup>th</sup> October 2017 has been revised following an email from Helen Williams confirming the correct job titles, and also emails from Dave Rowson providing evidence of Hot Work Permit System and Method statements for Hot Works as recommended in section 7.2

## Items Requiring Attention

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# 1 Introduction

Following a major fire at Grenfell Tower in London on the 14<sup>th</sup> June 2017, there has been a renewed focus on fire safety across the UK. Southwark Council would like to undertake a review of its processes and procedures around the way it maintains governance over fire risk.

At an initial meeting held at Southwark Council offices on 29<sup>th</sup> June 2017, it was established that the organisation would like to undertake an audit of the way it manages fire risk specifically within its Housing and Modernisation Department. Following the meeting, BB7 were appointed to undertake a fire risk management audit on behalf of Southwark Council commencing July 2017.

An audit is a systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which the specified criteria are fulfilled. The specified criteria in this case will be PAS 7: 2013 – *Fire risk management system specification* as the national guidance. We will also observe and make reference to the requirements imposed upon the body corporate by the Regulatory Reform (Fire Safety) Order 2005.

## Key messages

Key message boxes like this one can be found throughout this report. They are a means of conveying important points it was felt the organisation should be mindful of. In some cases these points are a reminder of the relevant articles of legislation and in others we are simply sign-posting additional guidance documents.

This audit has compared Southwark Council's current system of fire risk management against PAS7 requirements, in order to determine the extent to which these requirements are being met.

The audit will provide information which Southwark Council can use in formulating plans for implementing and prioritising improvements to their fire risk management system.

## Recommendations

Recommendations have been made throughout this report and Appendix D includes a comprehensive list of recommendations in the form of an action plan from which to begin establishing a fire risk management system at Southwark Council.

The Council has a firmly established fire risk management system, but acknowledges it has not yet formalised its fire risk management system in accordance with the national guidance contained within PAS 7: 2013 – *Fire risk management system specification*. PAS 7 presents requirements for an organisational fire risk management system (FRMS). The system can be applied in organisations that operate on multiple sites, separate management divisions within an organisation, or individual premises within a single entity.

## 1.1 Audit criteria

BB7's task was to analyse the organisation's fire risk management system and provide practical advice on strategic fire risk management.

The following key areas have been explored:

**Table 1: Primary section headings within all management systems**

Heading	Section within this report	PDCA model
Context of the Organisation	Section 3	<b>Plan what to do and how to do it.</b>
Leadership	Section 4	
Planning	Section 5	
Support	Section 6	
Operation	Section 7	<b>Do what was planned</b>
Performance evaluation	Section 8	<b>Check things happened according to the plan</b>
Improvement	Section 9	<b>Act to improve next time</b>

Source: BB7

## 1.2 Audit methodology

The extent of this audit covered Southwark Council's Housing portfolio only and Fire Risk Management efforts of the Housing and Modernisation Department's Fire Safety Team. Key personnel were identified to assist BB7 in the audit process. A list of those we engaged with throughout the audit process is listed below:

**Table 2: Interviewees**

Name	Title	Interview date
Tony Hunter	Head of Engineering	1 <sup>st</sup> August 2017
Dave Rowson	Fire Safety Manager	1 <sup>st</sup> August 2017
Gordon McKay	Fire Safety Surveyor	3 <sup>rd</sup> August 2017
Earl Johnson	Fire Safety Surveyor	3 <sup>rd</sup> August 2017
Laura Davis	Senior Fire Safety Co-Ordinator	3 <sup>rd</sup> August 2017
Dave Markham	Director of Asset Management	3 <sup>rd</sup> August 2017
Paul Langford	Director of Resident Services	3 <sup>rd</sup> August 2017
David Eatwell	Area Manager	7 <sup>th</sup> August 2017
Andrew Rogers	Resident Services Manager	7 <sup>th</sup> August 2017
Kentura Dundas	Resident Services Officer	7 <sup>th</sup> August 2017
Cllr Stephanie Cryan	Cabinet Member for Housing, Deputy Leader of the Council.	7 <sup>th</sup> August 2017
Ferenc Morath	Head of Investment	7 <sup>th</sup> August 2017

Name	Title	Interview date
Gerri Scott	Director of Housing and Modernisation	8 <sup>th</sup> August 2017
Ade Adeite	Resident Services Manager	8 <sup>th</sup> August 2017
Modupe Somoye	Resident Services Officer	8 <sup>th</sup> August 2017
Christine Bramman	Head of Repairs	8 <sup>th</sup> August 2017
Sabdat Ibn-Ibrahim	Resident Services Officer	8 <sup>th</sup> August 2017
Nat Stevens	Resident Services Manager	8 <sup>th</sup> August 2017
Barry Hall	Emergency Planning and Resilience Officer	11 <sup>th</sup> September 2017
Eleanor Kelly	Chief Executive Officer	11 <sup>th</sup> September 2017
Shervin Nejand	Health and Safety Manager	11 <sup>th</sup> September 2017

Source: BB7

The audit team would like to thank all staff who participated in the audit.

### 1.2.1 Auditing the fire risk assessment programme

Fire risk assessment is the process of identifying fire hazards and evaluating the risks to people, property, assets and the environment arising from them, taking into account the adequacy of existing fire precautions, and deciding whether or not the fire risk is acceptable without further fire precautions. This is the cornerstone of the Regulatory Reform (Fire Safety) Order 2005.

Clause 7.4.3 of PAS 7: 2013 places a requirement on the organisation to audit the fire risk assessment programme following the delivery of fire risk assessments.

An on-site audit of the following fire risk assessments has been undertaken during the course of this audit:

- Adams Gardens Estate, 88 – 106
- Astbury Road, 104A - B
- Brawne House, 1 – 68
- Brook Drive, SHU
- Burchell Road, 51 & 53
- Copeland Road, 86 – 96
- Henley Close, 1 – 14
- Kirkwood Road, 55A – B
- Linden Grove, 66
- Locksfield
- Peterchurch House, 1 – 56
- Queens Road, 164B – C
- Regina Point, 1 – 80
- Renforth Street, 7 – 61
- Whorlton Road, 9 & 9A

A short on-site fire risk assessment audit report has been provided in Annexe B of this report for the above properties.

BB7 have endeavoured to complete the report as accurately as possible with the resources and information supplied by the various departments at Southwark Council.

## 2 Executive summary

BB7 have been appointed to undertake a fire risk management audit on behalf of Southwark Council. We have undertaken a number of interviews across the organisation and met with duty holders and key stakeholders. We have also audited the current fire risk assessment programme. We have made recommendations that relate to Type 4 fire risk assessments, and the way in which fire safety matters are communicated both internally and externally. We've recommended some additional training to ensure fire safety staff is aware of the latest national guidance applicable to specialised housing, and that the organisation determines the competency of those they contract with to maintain fire precautions. However, we conclude the overall level of fire safety knowledge and awareness of the requirements of legislation within the organisation is high. Southwark has a strong fire safety team and has a system of fire safety management.

The organisation has not formalised its fire risk management system in accordance with national guidance and it should do so. The structure of this audit and the recommendations will provide a starting point for Southwark Council should it wish to do so.

Southwark Council should consider the desirability of third party certification of conformity with PAS 7: 2013 once the system has been developed and implemented. Beyond this, Southwark Council may wish to consider integrated risk management system certification. This could be a really positive and commendable achievement, setting an example for others to follow.

Southwark has made considerable progress but in the longer term, Southwark will need to identify the links between its fire risk management policy, objectives and strategy with its wider risk management strategy, strategic objectives and the organisations tolerance to risk.

## 3 Context of the organisation

### 3.1 Understanding the organisation and it's context

The London Borough of Southwark is made up of 21 wards. Three councillors are elected from each ward, resulting in a total of 63 councillors. The Labour party currently has 48 councillors, the Liberal Democrat party has 13 and the Conservative party has two. Elections for the council are held every four years. The last election took place on 22 May 2014. The leader of the council is Cllr Peter John OBE (Labour). The council employs officers to carry out its policies and run services. Officers are managed by the Chief Executive. The council is made up of five departments.

Southwark has an ethnically diverse and youthful population. The mid-year population estimate for 2012 estimated the population of Southwark to be 293,530, with 58 per cent aged 35 or under. Southwark has the highest proportion of residents in the country who were born in Africa (12.9 per cent), as well as a significant population from Latin America, with 75 per cent of reception-age children from black and minority ethnic (BME) groups. Over 120 languages are spoken in Southwark, with 11 per cent of households having no member of the household who has English as a first language. Southwark has the 9th highest population density in England and Wales at 9,988 residents per square kilometre.

### **Experience of fire and its impact on culture**

In some respects Southwark Council is unlike other councils due to its experience of the risk to life posed by the threat of fire. Sadly, Southwark Council has had first-hand experience of a fatal fire. The Lakanal House fire occurred in a tower block on 3 July 2009 in Camberwell. Six people were killed, and at least twenty injured, when a high-rise fire developed and spread through a number of flats in the twelve-storey building.

The Regulatory Reform (Fire Safety) Order, 2005, came into force in 2006 and it is fair to say that its impact on organisations throughout England and Wales has been huge. A decade on, there are still plenty of organisations coming to terms with the full impact of this legislation.

In terms of maturity of approach to fire risk management, and from what we have read and understood from our experience as fire safety professionals, Southwark Council were at that time no different to any other Local Government organisation within London. The potential for fire occurrence and fire fatalities on the scale experienced exists and unfortunately, Lakanal House happened in Southwark.

This experience re-focused Southwark's commitment to the style and proficiency of the organisation's fire risk assessment programme. The Council completely reviewed its approach to fire risk assessment across its stock in the months following the tragedy. This culminated in the creation of an in-house fire safety team.

There is now a much improved fire safety culture at Southwark. In our experience, fire risk management does not sit neatly in one department and there are often a number of departments in any organisation that will have fire safety responsibilities. Communication between departments is therefore key and a common area where organisations fall short. Southwark Council took occupation of the Allford Hall Monaghan Morris-designed building at Tooley Street, London in 2009. Being in the same building has had a positive effect on communication amongst the various levels and departmental functions within the organisation. This move combined with the tragic fire experience has led to a much improved culture.

The tragic fire within Grenfell Tower London, on the 14th June 2017 has spurred a renewed focus on fire safety across the UK. Although this tragic fire did not occur within the London Borough of Southwark, it emphasises the need to review the organisations fire risk management efforts at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.

## **3.2 Understanding the needs and expectations of interested parties**

For many of the reasons set out in the previous section, Southwark Council has a good understanding of the interested parties that are relevant to the fire risk management system it operates. Interested parties can include stakeholders such as employees, tenants, leaseholders, Councillors, London Fire Brigade, Building Control and insurance companies. Having interviewed and reviewed the job description of the Fire Safety Manager, we can confirm this is the key role within the organisation and is responsible for managing specialist consultants and acting as the main lead for fire safety with outside stakeholders. We are also of the opinion that Southwark maintains a strong working relationship with London Fire Brigade. The council works closely with London Fire Brigade (LFB) and meets regularly with them, both on an operational and fire safety level, informing them of progress on the risk profile of the borough and other issues.

**Key message**

Article 8 – (1) of the Regulatory Reform (Fire Safety) Order 2005 states that ‘the responsible person must take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of any of his employees and in relation to relevant persons who are not his employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe.’

By formalising the system, and in turn considering the needs and expectations of stakeholders Southwark Council will better manage fire risk.

**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.

Our first recommendation above is a general statement concerning the establishment and maintenance of a formal fire risk management system within Southwark Council. “Establish” implies a level of permanency and the system should not be considered established until all its elements have been demonstrably implemented. “Maintain” implies that once established, the system continues to operate. This requires active effort on the part of Southwark Council. Many systems start well, but deteriorate due to lack of maintenance. Many of the elements of a formal fire risk management system (such as checking and corrective action and management review) are designed to ensure active maintenance of the system.

The level of detail and complexity of the fire risk management system, the extent of documentation and the resources devoted to it are dependent on the nature (size, structure, complexity) of an organisation and its activities.

**Key message**

Article 11 – (1) of the Regulatory Reform (Fire Safety) Order 2005, states that ‘The responsible person must make and give effect so such arrangements as are appropriate, having regard to the size of his undertaking and the nature of its activities, for the effective planning, organisation, control, monitoring and review of the preventative and protective measures’

Put simply, Southwark Council should seek to establish, document, implement and maintain a fire risk management system, then seek to identify the links between its fire risk management policy, objectives and strategy with its wider risk management strategy and the organisation’s tolerance to risk.

A documented fire risk management system provides a means of demonstrating that fire safety policy is translated into action to ensure that the fire risk to people and the business are reduced as far as reasonably practicable whilst ensuring that the legislative requirements are met.

By documenting the organisations fire risk management system and its processes one can provide an auditable trail demonstrating the organisations commitment to fire risk management and legislative compliance.

### 3.3 Legal and regulatory requirements

Southwark Council do have procedures for determining legal and other requirements relating to its activities and services that are relevant to the scope of the FRMS; however, they do not appear to be documented. We are aware that the Fire Safety Manager uses the Council's subscription to IHS as a source for engineering specifications, standards, manuals and technical publications.

#### **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.

### 3.4 Determining the scope of the FRMS

Southwark Council can choose to implement a fire risk management system with respect to the entire organisation, or to a subdivision of the organisation i.e. Housing. As discussed in section 3 of this report, the context of the organisation is such that the Housing & Modernisation Departments approach to risk management has matured due to the tragic fire experience it had in 2009, the journey it has been on since this fire, and the impact of recent events. The internal fire safety team is strong and knowledgeable yet it appears that other departments and duty holders with responsibility for fire safety in non-domestic premises are not benefiting from this internal knowledge and expertise, nor is the organisation's approach to fire risk management consistent across the entire organisation.

Throughout the interview process, it was apparent that people within the organisation would like to see Southwark Council determine the boundaries and applicability of the FRMS to establish its scope in a fire risk management strategy document and develop a set of procedures. For this purpose, PAS 7 offers some model pro-forma fire risk management system procedure templates within the annexes of the standard and these could be adopted.

#### **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.

Beyond this, we learnt that the organisations approach to Health and Safety is documented in the Southwark Safety Reference Manual. This document cascades down to the individual departmental safety management systems under the supervision of the Corporate Health and Safety Manager. Southwark Council's current Health and Safety Management System does

largely follow the principles contained within HSG 65. Beyond this, the organisation plans a review of the entire system in the near future.

Should the Housing and Modernisation department formalise its fire risk management system, in accordance with PAS 7 as per the recommendations within this report, then there may be some benefit in extending the scope organisation wide and in the medium term, seeking to implement an integrated risk management system.

Many organisations have adopted, or are adopting formal management system standards such as:

- BS EN ISO 45001 - International Standard for Occupational Health and Safety Management Systems
- BS ISO 22301- Business Continuity Management Systems
- BS EN ISO 27001- Information Security Management Systems
- PAS 7: 2013 – Fire Risk Management System Specification

Frequently these are operated as independent systems. In all management systems there are certain common elements which can be managed in an integrated way; the essential unity of all these systems within the overall management system of the organisation, can then be recognised and used advantageously.

#### Key message

British Standards publication, PAS 99: 2012 provides a specification of common management system requirements as a framework for integration. Further information can be found via the link below:

<https://www.bsigroup.com/en-GB/pas-99-integrated-management/>

#### Certification

Southwark Council should consider the desirability of third party certification of conformity with PAS 7: 2013 once the system has been developed and implemented. Beyond this Southwark may wish to consider integrated risk management system certification against PAS 99: 2012.

#### Key message

The first organisation to gain certification via a UKAS certificated TPCB, against PAS 7 is a London based Housing Association. It is worth mentioning that PAS 7 is set to move to BS 9997: 2018, part of the 999 series of standards on fire safety.

## 4 Leadership

### 4.1 Leadership and commitment

Southwark Council have demonstrated considerable leadership and commitment in their governance of fire risk. Ultimately, this stems from the Council's vision contained within the Council Plan. The council plan describes how Southwark will deliver on their vision of a fairer future for all, by making a series of promises and commitments to the people of Southwark.

In Southwark's words, these include:

- Treating residents as if they were a valued member of our own family;
- Being open, honest and accountable;
- Spending money as if it were from our own pocket;
- Working for everyone to realise their own potential; and
- Making Southwark a place to be proud of

Beyond this and specifically relating to fire risk management, the senior management within Southwark have done a good job communicating the importance of effective fire risk management and creating a positive culture of fire risk management.

## 4.2 Policy

Southwark Council senior management have demonstrated the leadership and commitment necessary for the fire risk management system to be successful and to achieve improved governance of fire risk and during the course of this audit we have reviewed the Housing Services Departments, fire safety policy.

A fire policy establishes an overall sense of direction and is the driver for implementing and improving an organisation's fire risk management system so that it can be maintained and potentially improve its risk mitigation efforts. It should enable persons under the control of the organisation to understand the overall commitment of the organisation and how this can affect their individual responsibilities. The responsibility for defining and authorising the fire policy rests with Southwark Council senior management. The ongoing and proactive involvement of senior management in developing and implementing a fire policy is crucial.

Having reviewed the current fire policy, we conclude that it should be reviewed at planned intervals and include a commitment to continual improvement. It could provide a framework for setting objectives and should be available to any interested parties, as appropriate.

### 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.

## 4.3 Organisation roles, responsibilities and authorities

It is important that the responsibilities and authorities for relevant roles are assigned and communicated within the organisation. This has been done and is documented under the heading 'Roles and Responsibilities' within Southwark's Fire Risk Assessment Procedure Document Version 5 dated December 2013. We have also reviewed the job descriptions of those with key fire safety responsibilities. These include:

- The Fire Safety Manager
- The Senior Fire Safety Surveyor
- The Fire Safety Surveyor

- The Senior Fire Safety Co-ordinator

Southwark Council should assign the responsibility and authority for ensuring that the FRMS conforms to the requirements of PAS 7 then report on the performance of the FRMS to someone in senior management.

#### **Key message**

The Regulatory Reform (Fire Safety) Order 2005 places numerous requirements on the 'responsible person'. In Article 3, it sets out the meaning of the responsible person in relation to a workplace, the employer, if the workplace is to any extent under his control.

Southwark Council as the body corporate is the 'Responsible Person' and there may be more than one 'persons that have control to any extent' which could include the Chief Executive Officer amongst others. Those with designated roles within the body corporate are considered to be 'duty holders'.

#### **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.



- Southwark continues to invest as necessary as part of the ongoing major works programme.
- The council works closely with London Fire Brigade (LFB) and meets regularly with them, both on an operational and fire safety level, informing them of progress on the risk profile of the borough and other issues.
- LFB assists the council in advising residents on fire safety and fitting smoke alarms inside their homes.
- In February 2015, all fire risk works to all high rise and lower/more complex housing were complete.
- Since then the council have completed a programme to fit state of the art smoke detection systems within the dwellings in these blocks, and has a rolling programme underway to introduce a similar system in all remaining blocks

### 5.1.1 Risks and opportunities

The following risks became apparent during our audit:

- The lack of a process to identify the need for type 4 fire risk assessments;
- The blanket policy on removal of security grilles for fire safety reasons;
- The lack of a defined process to ensure material alterations are referred to building control.

### 5.1.2 Process to ensure alterations to premises do not compromise fire safety

Whilst there was no evidence the following issue was not happening, it was clear that the current process relies on the individual having an awareness of the scope of the Building Regulations.

Throughout the interviews, it became apparent that there are no documented procedures that ensure that proposals to carry out alterations to fire precautions and fire safety systems (i.e. fire alarms systems, means of escape, smoke control arrangements, structural alterations and alterations to facilities for the fire and rescue service) are submitted to a Building Control Body. This is essential to determine if approval is necessary (and, if so, to obtain approval of proposals) under Building Regulations. Even if an alteration does not need approval under building regulations, care is needed to ensure that it does not undermine any specific requirements of an original fire strategy intended to address the vulnerability of residents.

**Recommendation 5.1.2**

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.

### 5.1.3 Type 4 Fire risk assessments

A Type 1 fire risk assessment is the basic fire risk assessment required for the purposes of satisfying the fire safety order. At present only Type 1 fire risk assessments are being undertaken in accordance with the LGA fire safety in purpose built blocks of flats guide. We would strongly recommend consideration is given to the production of Type 4 fire risk assessments.

Southwark Council will need to consider the adequacy of compartmentation within flats in general needs blocks of flats. The Type 4 assessments are the most comprehensive fire risk assessment, however, the nature of the work is destructive and will usually involve the presence of a contractor and therefore is best undertaken when a property becomes vacant. The purpose of the survey is to determine if suitable and sufficient separation is provided between each compartment (flat) and void areas which may connect the compartments.

During the audit, we reviewed the void inspection pro-forma and it became evident that there was no automatic consideration of fire safety or compartmentation.

It was apparent at the time of the audit that there was no defined procedure for undertaking a Type 4 fire risk assessment.

**Recommendation 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 including consideration of Type 4 fire risk assessment.

A suitable procedure should be formulated for the implementation of a Type 4 fire risk assessment.

**Key message**

Post audit we have now received confirmation from Southwark Council that Type 4 surveys are now being programmed into the system prior to any major works project.

### Removal of security grilles policy

Southwark have adopted a policy of denying the use of domestic security grilles which mitigate the risk of forced entry on the premise that the occupants may not be able to escape in the event of fire and/or the fire brigade will not be afforded access for rescue purposes.

London Fire Brigade – Fire safety guidance note GN11 on the topic of Security Doors and other security measures for residential premises confirms that the enforcing authority is sympathetic to the need for improved security so long as fire safety is not overlooked.

Our primary concern is that, for example, should an occupant be at risk of domestic violence or be exposed to any other form of serious crime and the Council have insisted the removal of additional security measures that either improve their safety or make them feel safer, the Council may expose themselves to unnecessary liabilities.

It would be sensible to undertake a very specific security threat and risk assessment - specific to the estate in question. A specific threat and risk assessment would identify the threat from crime, the impact on the local residents, the vulnerabilities of the housing estate e.g. weak front doors versus robust fire doors and the rationale behind the security grilles in the first place. For example; are they there out of necessity to prevent serious crime against a resident in their own home and what measures have been considered in common areas or around access control?

It would be worth involving the local DOCO/CPDA so that Southwark could:

- a) have accurate crime figures for the area; and
- b) obtain a written opinion from the police in relation to the grilles and the risks involved.

It would also be useful to include input from the estate manager, as often the official crime statistics bear no resemblance to the actual crime figures due to many crimes being unreported. It would be necessary to capture these other statistics and the views of the residents, perhaps a survey of each house with a grille and a rationale for its installation. This could be difficult as residents may not communicate openly, especially about crime, security, policing etc. The estate may also have to consider that some grilles are installed for nefarious reasons.

#### Recommendation 5.1.3a

We would recommend a formal procedure is 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 for optimum effect.

## 5.2 Fire safety objectives and planning to achieve them

The organisation should establish fire safety objectives that are; consistent with policy, measurable and take account of applicable requirements. These objectives should be monitored, communicated and updated as appropriate.

For example these may include objectives such as:

- Number of service user evacuation issues addressed;
- Number of evacuation drills completed annually;

- Number of fire risk assessments undertaken;
- Reduce the number of high risk items;
- Improve the organisations internal fire knowledge through training;
- Reduce the number of false alarms;
- Preventative maintenance servicing completed within required timescales;  
and
- Reduce number of enforcement notices from fire authority.

The process of setting and reviewing objectives, and implementing programmes to achieve them, provides a mechanism for Southwark Council to continually improve its fire risk management system and to improve its governance of fire risk.

#### Recommendation 5.2

Southwark Council should establish fire safety objectives as part of its FRMS

Acknowledging the above, on a micro level, we have seen copies of the Engineering & Compliance work-plan, which includes a performance management scheme. This document sets out what individuals within the fire safety team need to achieve and is linked to performance plan objectives. It provides an opportunity for the team member to identify what they intend to do to achieve their objectives and agree a deadline for achievement of these objectives. These are in many ways fire safety objectives, but it would be good to see a clear set of fire safety objectives for the team formalised within fire risk management system documentation.

## 5.3 Fire risk management strategy

Southwark Council do not have a documented fire risk management strategy. It was clear that many of those interviewed felt a more formalised structure is necessary. It is hoped that this audit report will identify the aspects of Southwark Council's activities that are relevant to the scope of the fire risk management system. Once the FRMS is documented Southwark Council will develop a greater understanding of the risks posed by the threat of fire which should in turn enable the organisation to optimise its underlying processes.

The fire risk management strategy should address the following seven factors:

### 1) Fire risk assessment

Southwark Council's efforts regarding fire risk assessment are discussed in more detail within section 7.4 of this report, however, it is worth noting that documenting Southwark Council's approach to the fire risk assessment programme and process of risk assessment itself, will significantly improve the chances of compliance with Articles 8 – 22 of the Regulatory Reform (Fire Safety) Order 2005.

### 2) Resources and authority

Southwark Council should consider the resources needed to establish, implement, maintain and continually improve its fire risk management system. This is discussed in detail within section 6.1 of this report. However it is worth noting that by considering available resources and in turn their authority, Southwark Council will significantly

improve the chances of compliance with Article 11 of the Regulatory Reform (Fire Safety) Order 2005.

### 3) Fire safety training

Southwark Council will need to ensure that its employees are competent on the basis of education, training or experience. This is discussed in section 6.2 of this report, however it is worth noting that The Fire Safety (Employees' Capabilities) (England) Regulations 2010, state that employers must take into account employees' capabilities as regards fire safety in entrusting tasks to them and Article 21 of the FSO, imposes a requirement on the responsible person to ensure that his employees are provided with adequate fire safety training.

### 4) Control of work on-site

Southwark Council will need to plan, implement, control and document the processes for the control of work on-site as part of its fire risk management system documentation which can be summarised or signposted within a fire risk management strategy. This is discussed in section 7.2 of this report, however, it is worth noting that by documenting the processes for the control of work on-site, Southwark Council will demonstrate compliance with Articles 19 and 20 within the FSO which relate to provision of information for employees and provision of information to employers and the self-employed from outside undertakings.

### 5) Maintenance and testing

Southwark Council will need to plan, document, implement and control the processes for maintenance and testing of fire safety systems to ensure that they operate correctly in the event of fire, as part of its fire risk management system. By documenting this, the organisation will demonstrate compliance with Article 17 of the Fire Safety Order.

### 6) Communication

Southwark Council should determine the need for internal and external communication and document this within the fire risk management strategy. This is discussed in detail within section 6.4 of this report. By documenting this, the organisation will demonstrate compliance with Articles, 19, 20 and 22 of the Fire Safety Order.

### 7) Emergency planning

Southwark Council has established well documented and maintained procedures for identifying and responding to any unplanned event, potential emergency or disaster. These should be sign-posted in the fire risk management strategy.

#### Recommendation 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.

## 6 Support

### 6.1 Resources

The quality and depth of the fire safety arrangements put in place for any given organisation will vary dependent on the context of the organisation, its size and scale and the nature of services offered.

#### Key message

Article 11 – (1) of the Regulatory Reform (Fire Safety) Order 2005, states that ‘The responsible person must make and give effect so such arrangements as are appropriate, having regard to the size of his undertaking and the nature of its activities, for the effective planning, organisation, control, monitoring and review of the preventative and protective measures.’

If management can demonstrate, in a recorded form (where required), that they have a strategy for the day-to-day running of the business, which includes recognition that fire safety is an important consideration; then they are going some way to complying with this article. Compliance with this article is likely to reflect many of the articles between articles 8-22 and article 24 with which responsible persons and duty holders have to comply, as a means of showing how those areas of compliance are arranged and brought into effect.

Southwark Council will need to determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the fire risk management system.

#### Recommendation 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. This could and probably should be the current fire safety manager, but whoever takes this role will ‘champion’ fire safety and report back to senior management on the performance of the system for review, including recommendations for improvement.

### 6.2 Competence

#### 6.2.1 General

Southwark Council will need to determine the necessary competence of person(s) doing work under its control and ensure that these persons are competent on the basis of appropriate education, training and experience.

**Recommendation 6.2.1**

Having identified all employees with roles and responsibilities that have a bearing on the organisation 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. An example might be testing those responsible for undertaking fire risk assessments against the national competency standard for fire risk assessors.

Records of employee training should be kept. An enforcing authority may wish to verify whether or not the training is being carried out and if the training meets the requirements of legislation. While the enforcing authority cannot require that records be kept, a documented record of training does offer good practice because it can be audited and is a means by which an organisation can demonstrate compliance.

**Key message**

Article 21 – (1) of the RRFSO imposes a requirement on the responsible person to ensure that his employees are provided with adequate safety training.

All employees, including senior management, should receive relevant training. This may need to include, specific on-the-job training and training in fire safety or emergency procedures. An employee's competence will decline if skills are not used regularly (e.g. in emergency procedures, or carrying out a task). Training therefore needs to be repeated periodically to ensure continued competence.

Whilst there is no requirement to provide written records, there is a requirement to comply with the article and therefore a need (if required) to show compliance. Article 11 imposes a duty to record fire safety arrangements under prescribed conditions. These arrangements relate to the preventive and protective measures. Preventive and protective measures are synonymous with general fire precautions, which include within their meaning 'measures relating to the instruction and training of employees'. It is therefore a reasonable expectation that the arrangements for training, including effective: planning, organisation, control, monitoring, and review of training given will be recorded and available for audit by the enforcing authority i.e. London Fire Brigade.

Although written records / certificates indicating the results of individual training given and received cannot be expressly required under the Order, they will, if kept, be helpful to the responsible person when demonstrating compliance.

## 6.2.2 Fire safety competence

Southwark Council must seek to employer contract with people who are competent on the basis of education, training, skills and experience for the tasks assigned to them.

It became apparent throughout the audit that internally, there was a general lack of awareness of certain key national guidance documents that are pertinent to Southwark Council's work.

**Recommendation 6.2.2 (a)**

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.

It became apparent throughout the audit that the competencies of those with fire safety responsibilities that Southwark Council seek to contract with is not well defined. It may be worth considering a requirement to contract only with third party certificated contractors.

**Recommendation 6.2.2 (b)**

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.

The competency of those undertaking fire risk assessments will be discussed in section 7.4 of this document.

## 6.3 Awareness

Persons doing work under the organisations control must be aware of the fire safety policy, their contribution to the effectiveness of the fire risk management system, including the benefits of improved fire safety performance. There must also be implications for not conforming to the fire risk management system requirements.

**Key message**

Article 19, contained within the Regulatory Reform (Fire Safety) Order 2005, relates to the provision of information to employees. Article 20, contained within the same act relates to provision of information to employers and the self-employed from outside undertakings.

Southwark Council must provide its employees with detailed information regarding issues relating to fire safety, relevant to them and to their area(s) of work. Provision of information to employees should be identified as part of the fire risk assessment. Written records are ideal because they are more easily audited and offer a straight forward way in which the organisation can demonstrate compliance.

## 6.4 Communication

Southwark Council will need to determine the need for internal and external communications relevant to the fire risk management system and document this within its fire risk management strategy. Due consideration should be given to what it will communicate, when to communicate, with whom to communicate, and the method of communication.

### Recommendation 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.

### Community engagement

The manner in which fire safety information is relayed to residents can have both positive and negative effects on Southwark Council's community engagement efforts. For example the way in which a 'zero tolerance' policy covering communal areas of general needs blocks of flats is communicated to residents.

During the course of our audit Southwark Council's 'zero tolerance' policy was discussed. The policy is rigorously enforced and yet, not well communicated to staff or residents. Some of those interviewed felt door mats were a significant fire safety risk. Some felt that keeping pot plants in communal areas was a trip hazard to fire fighters. Residents and staff will question the zero tolerance policy if door mats, pot plants or bicycles are portrayed as a substantial fire risk.

Ultimately the decision to operate a 'zero tolerance' policy as opposed to a 'managed use' policy is a management choice with advantages and disadvantages. It is entirely within Southwark Council's right and arguably sensible for Southwark to have opted for a 'zero tolerance' policy on the basis that once the policy has prevailed for some time, it is the easiest and most efficient policy to manage. Most, if not all, tenancy and leaseholder agreements will clearly deny the storage of personal items in the communal areas and therefore we feel the decision to employ a 'zero tolerance' policy is first and foremost a tenancy or leaseholder agreement based decision. It is linked to fire risk management but more to do with the process of fire risk management than an individual item door mat, or bicycle presenting a significant fire risk. Clearly they do not.

**Recommendation 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 stair cases and communal areas are kept sterile, and then explain the reasons for adopting a 'zero tolerance' policy based on fire risk management rather than a specific fire risk.

## 6.5 Documented (fire safety) information

Southwark Council will require documented information as necessary for the effectiveness of the fire risk management system. A documented fire risk management system provides a means of demonstrating that fire safety policy is translated into action to ensure that the fire risk to people and the business are reduced as far as reasonable practicable, whilst ensuring that legislative requirements are met. The extent of the management system documentation required should be proportionate to the level of risk arising from the organisations activities and subsequent level of assurance sought.

Documentation of the fire risk management system and its processes will provide an auditable trail that demonstrates Southwark Council's commitment to fire risk management and legislative compliance. It should not result in undue bureaucracy.

**Recommendation 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.

# 7 Operation

## 7.1 Operational planning and control

Southwark Council will need to plan, implement and control the processes needed to meet requirements of legislation and adhere to the recommendations contained within national guidance documents. This will mean establishing a criterion for the processes, implementing control of the processes in accordance with the criterion and keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.

It is important to ensure that outsourced processes are controlled too.

## 7.2 Control of work on-site

Southwark Council should plan, implement, control and document the processes for control of work on-site as part of its fire risk management system. Work on-site can include, repairs to structure and, in particular, hot work, for example a hot-work fire-safe working system with clear

lines of responsibility, a permit system for logging and audit processes and routine checking and supervision.

#### Recommendation 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.

#### Key message

Post audit we have received evidence in the form of a permit to work – hot works produced by A&E Elkins Limited plus have also been provided with evidence of a risk assessment and method statement. We have also been provided with evidence of a permit, risk assessment and method statement for contractor Keepmoat. This is indeed strong evidence of a permit system that requires risk assessment and method statements to be produced. It is likely that Southwark Council's procurement process documents the overarching procedure for the control or work on-site and this evidence of the output is strong confirmation one exists.

## 7.3 Maintenance and testing

The organisation shall, plan, document, implement and control the processes for maintenance and testing of fire safety systems to ensure that they operate correctly in the event of fire, as part of its fire risk management system.

#### Key message

It is a legal requirement under Article 17 of the Regulatory Reform (Fire Safety) Order 2005, that where necessary, in order to safeguard the safety of relevant persons the responsible person must ensure that the premises and any facilities, equipment and devices provided are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and good repair.

Essentially this means that any equipment and devices provided to protect relevant persons from the dangers of fire, such as fire extinguishers, alarm systems and emergency lighting, etc. shall be subject to a suitable system of maintenance: they must be regularly checked and properly maintained (including inspection and testing by a competent person, as necessary) at suitable intervals and any faults found rectified as quickly as possible.

Enforcing authorities cannot impose frequencies on maintenance (e.g. requiring that the fire alarm must be maintained annually) though a recommendation to this effect may be made. Where fire safety systems have been provided and installed to a British Standard; it is reasonable

to expect that standard to be met by the responsible person, in terms of maintenance and recording systems etc., however, there is no requirement under the Order for records of test to be kept.

**Table 3: Typical maintenance list**

System	Test Interval	Nature of Test
Automatic fire detection and alarm system	Weekly	Operation of manual call point to ensure output to sounders
	Six monthly	50% test in accordance with BS 5839-1(26)
Emergency lighting	Monthly	Power failure simulation to ensure operation of each lighting unit
	Annual	Full discharge test to ensure correct operation over the full design duration (normally 3 hours)
Ventilation System (Automatic or Mechanical)	Monthly	Basic function check
	Six months	All moving parts checked and cleaned
	Annual	Full functional test
Fire Mains	Six months	Inspect the fire mains provided
	Annual	Test the system to ensure pressure is adequate
Fire Fighting Lifts	Weekly	Operation of Override Switches
	Monthly	Inspections of the lifts
	Annual	Testing and Maintenance
Gas Installation	Annual	Tested by a Gas Safe engineer
Lightning Protection	11 months	Tested in accordance with BS EN 62305
Fixed Electrical Wiring	Five years	Tested in accordance with BS 7671
Fire Extinguishers	Annual	Inspected in accordance with BS EN 3 and/or BS 7863
Common Areas	Daily	Inspection of the common areas (All Staff e.g. cleaners, maintenance workers, security and management)
Fire Doors	Weekly	General inspection of fire resisting doors
Fire Dampers	Two years	Tested to ensure they work

Source: BB7

It may be worth Southwark council incorporating table 3 above into its fire risk management system documentation and adding another column for the name of contractor or person responsible and then in turn consideration of competency requirements and third party scheme.

**Recommendation 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 of determining the competency of internal operatives and external contractors and storage of maintenance and testing documentation.

**Key message**

We have had post audit confirmation that this is already being done within the APEX system and maintenance dates appear automatically on FRA's.

## 7.4 Fire risk assessment

We have undertaken a site based audit of the current fire risk assessments across a range of archetypes. Generally the risk assessments are of a good standard. There were some very minor comments on each that we audited and those comments can be found in Annexe B of this report.

**Key message**

Article 9 of the Regulatory Reform (Fire Safety) Order 2005 places a requirement on Southwark Council to make a suitable and sufficient assessment of the risks to which relevant persons are exposed for the purposes of identifying the general fire precautions Southwark Council needs to take.

Southwark Council have documented its processes for establishing and implementing its fire risk assessment programme. It should consider the national competency criteria for fire risk assessors found here:

<http://firesectorfederation.co.uk/update/resources/fire-risk-assessment-competency-document-21-12-11-final-version-2.pdf>

There is also a guide to choosing competent fire risk assessors which can be found here:

<http://firesectorfederation.co.uk/update/resources/choosing-a-competent-fra-ver-2-1.pdf>

There is also a guide to the legal responsibilities of fire risk assessors which was produced for the Fire Industry Association by BB7, which can be found here:

<http://www.fia.uk.com/resourceLibrary/guidance-legal-responsibilities-of-a-fire-risk-assessor.html>

The council maintains a robust compliance process and having due regard to the nature and diversity of property portfolio under the organisations control. The council has developed the following risk based categorisation process.

**For example:****Category 1:**

- All premises of seven (7) storeys and above (including restricted common areas), temporary accommodation hostels and sheltered housing schemes.
- Storey height is calculated from the ground floor level to the height of the topmost floor level. Any public or open associated areas (e.g. garages, launderettes etc.) that form part of the premises.

**Category 2:**

- All premises of five (5) and six (6) storeys (same calculation methodology as Cat 1). This will include any public or open associated areas (e.g. garages, laundrettes etc.) that form part of the premises.

**Category 3:**

- All premises of four (4) storey's and below (except those listed in Cat 4), comprising both blocks and street properties (same calculation methodology as Cat 1). This will include any public or open areas (e.g. garages, laundrettes etc.) that form part of the premises.

**Category 4**

- This category includes TRA halls and any housing related commercial premises.

When thinking about the standard scope of a fire risk assessment itself, is worth drawing Southwark Councils attention to the following documentation produced by BB7 for the Fire Industry Association:

<http://www.fia.uk.com/resourceLibrary/fire-risk-assessors-standard-scope-of-services.html>

**Recommendation 7.4**

Southwark Council should document its processes for establishing and implementing its fire risk assessment programme. Southwark should give consideration to joining the FRACS (Company) Register.

FRACS Company is a quality assurance scheme aimed at companies who offer fire risk assessment services; who wish to demonstrate competence through an independent certification scheme.

The assessment procedure for certification not only examines the competence of the employees but it also assesses the quality management systems and procedures operated by the company. Thus assuring high standards of service and competence can be delivered by the certificated company to their clients on a reliable basis.

By using the same core competence assessment as the FRACS scheme for individual assessors, the company scheme provides a 'bench mark' comparison for all assessors and enables the certificated company to use subcontract assessors with confidence. It is increasingly important for the responsible person to be able to demonstrate due diligence when appointing a fire risk assessor and third party certification is one way of satisfying this requirement.

<https://www.warringtoncertification.com/fracs/company-register.html>

Some members of the fire safety team were not aware of the latest guidance on fire safety in specialised housing produced by the National Fire Chiefs Council NFCC. A link to this guidance is provided below.

[https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/NFCC\\_Specialised\\_Housing\\_Guidance\\_-\\_Copy.pdf](https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/NFCC_Specialised_Housing_Guidance_-_Copy.pdf)

All housing providers should take account of this guidance when determining the requirements of legislation and good practice in specialised housing. This guide advocates a person-centred fire risk assessment which relates to the safety of residents who are at high risk from fire in their own accommodation; as such, this risk assessment and measures identified by it, are outside the scope of the Fire Safety Order, but are strongly recommended as good practice.

#### **Recommendation 7.4 (a)**

Southwark Council should review the latest guidance on fire safety in specialised housing and adopt relevant recommendations.

## 7.5 Incident response communication

Southwark Council has well established documented and maintained policies and procedures for incident response communication. These can be found in Southwark Council's major emergency plan.

#### **Key message**

Southwark Council's efforts on incident response communication and emergency planning were well established and commendable.

## 7.6 Emergency planning

Southwark Council has established, documented and maintained procedures for identifying and responding to any unplanned event, potential emergency or disaster. These can be found in Southwark Council's major emergency plan and business continuity plan.

# 8 Performance evaluation

Southwark Council should have a systematic approach for measuring and monitoring its fire risk management performance on a regular basis, as an integral part of its overall management system. Monitoring involves collecting information, such as measurements or observations, over time. Measurements can be either quantitative or qualitative. Monitoring and measuring can serve many purposes in fire risk management system, such as:

- reducing false alarms in accordance with BS 5839-1: 2013 (Section 32; Acceptable rate of false alarms);
- tracking progress on meeting policy commitments;

- achieving objectives, targets, and continual improvement;
- monitoring exposures to determine whether applicable legal and other requirements to which the organisation subscribes have been met; and
- providing data to proactively and reactively measure the organisation's fire safety performance.

## 8.1 Monitoring, measurement, analysis and evaluation

Southwark Council should determine what needs to be monitored and measured as part of the fire risk management system and when this should be performed, analysed and evaluated. It would be beneficial for the Southwark Council to retain documented information as evidence of the results. Evaluating Southwark Council's performance is an essential element of an effective fire risk management.

## 8.2 Internal audit

Audits can be used by an organisation to review and evaluate the performance and effectiveness of its fire risk management system. 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 requirements of PAS 7.

Planned fire risk management system audits should be carried out by personnel from within the organisation and/or by external personnel selected by the organisation, to establish whether the fire risk management system has been properly implemented and maintained.

Individuals selected to conduct the fire risk management system audits should be competent and be selected in a manner to ensure objectivity and impartiality in the audit process.

### Recommendation 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 requirements of PAS 7.

NOTE: The general principles and methodology described in ISO 19011 are appropriate to management system auditing.

## 8.3 Management review

Southwark Council will need to establish a management review process.

At a strategic level they should seek to address the following questions:

- Is the system appropriate to the organisation?
- Is the system fully addressing the organisation's fire policy and objectives?
- Is it accomplishing the desired results?
- What is the vision for fire risk management in five years' time?

The fire risk management representative (or Fire Champion) should take responsibility for ensuring that reports on the overall performance of the fire risk management system are presented to top management.

In planning for a management review, the fire risk management representative should give consideration to the sample audit checklist offered in Annex I of PAS 7, but specific consideration should be given to the following:

- The fire risk assessment programme
- Resources and authority
- Fire safety training
- Control of work on-site
- Communication
- Emergency planning (it is recognised Southwark Council's Resilience Officer may be better placed to deliver feedback on this aspect).

#### **Recommendation 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.

## 9 Improvement

### 9.1 Nonconformity and corrective action

A formalised fire risk management system will require Southwark Council to take the following steps should a non-conformity arise.

- React to the nonconformity and as appropriate, take action to control and correct it and deal with the consequences;
- Evaluate the need for action to eliminate the cause to recur or occur elsewhere;
- Implement corrective action to address the root cause and review effectiveness;
- Update risks and opportunities planning and changes to the management system as appropriate;

**Recommendation 9.1**

Southwark Council need to implement a process for identifying nonconformities with the fire risk management system and take corrective actions.

## 9.2 Continual improvement

The overall level of fire safety knowledge and awareness of the requirements of legislation within the organisation is high. Southwark has a strong fire safety team and has a system of fire safety management.

If Southwark Council's fire policy includes a commitment to continual improvement and the organisation formalises its fire risk management system in accordance with PAS 7 then the system documentation and process of recording non-conformities and corrective actions will facilitate continual improvement. Continual improvement is the ongoing development of services and processes through incremental and breakthrough advances. This is the backbone of a strategic fire risk management approach. A strategic fire risk management approach is an integrated or holistic approach to understanding and managing the risks posed by the threat of fire which enables an organisation to optimise its underlying processes and achieve more efficient results.

**Recommendation 9.2**

Southwark Council should continually improve the suitability, adequacy and effectiveness of its fire risk management system.

## 10 Conclusion

The Council has a large portfolio of property under its control and is currently undertaking fire risk assessments in order to comply with the Regulatory Reform (Fire Safety) Order 2005. The fire risk assessment programme is undertaken internally and assessments are generally of a good standard.

Southwark Council have not formalised a fire risk management system in accordance with national guidance contained in PAS 7 and there is an opportunity to do so.

Due to work proposed within the Health and Safety function and the expertise that exists within the Business Continuity and Resilience functions, there is an opportunity to explore the formalisation of an integrated risk management system approach, throughout the entire organisation. This could be a fantastic opportunity for the council to demonstrate best practice and gain recognition from external stakeholders for doing so.

Southwark Council have invested considerable resources in the governance of fire risk following the Lakanal House tragedy. Whilst this is commendable, it is worth considering Southwark's future vision for fire safety bearing in mind the organisation does not possess unlimited funds and has a wide variety of risks to consider. No organisation, whether in the public sector or private sector, can achieve its objectives without taking risk. Risk cannot be reduced to zero; however, Southwark can at best hope to reduce risk as low as is reasonably practicable. In essence, making sure a risk has been reduced as low as is reasonably practicable is about weighing the risk against the sacrifice needed to further reduce it, i.e. how much safety can be achieved and at

how much cost, then where should Southwark spend money in order to make the biggest difference to the lives of people within the borough.

We hope that the recommendations made in this report are useful and provide a starting point on which to begin formalising the organisations fire risk management system and realising its vision for the future of fire safety in Southwark.

# Appendices

## A. Terms and Definitions

### **Active fire risk management**

Active fire risk management can be defined as being the management of the preventative and protective measures highlighted in the fire risk assessment, in combination with the day-to-day repairs, maintenance and management of the housing stock.

### **All Materials Times**

Where staff or relevant persons are in permanent or temporary residence within a building or part of a building that is under the control of KCL.

### **Audit**

Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

### **Competence**

Ability to apply knowledge and skills to achieve intended results.

### **Competent Person**

A person with the right level of education, training and experience to enable a required task(s) to be carried out correctly

### **Corrective action**

Action to eliminate the cause of a nonconformity and to prevent recurrence.

### **Documented information**

Information required to be controlled and maintained by an organisation and the medium on which it is contained.

NOTE Documented information can be in any format and media and from any source.

NOTE Documented information can refer to;

- the management system, including related processes;
- information created in order for the organisation to operate (documentation);
- evidence of results achieved (records).

### **Fire risk assessment (FRA)**

A legally required process of identifying fire hazards and evaluating the risk to people arising from them, taking into account the adequacy of existing fire precautions, and deciding whether or not the fire risk is acceptable without further fire precautions.

### **Fire risk management strategy**

Tactical document which defines an organisations fire risk management system, and method of implementing the overarching policy.

### **Fire risk management system (FRMS)**

Set of interrelated or interacting elements of an organisation to establish policies and objectives and processes to achieve those objectives and manage fire risk.

**Fire safety policy**

Intentions and direction of an organisation, in respect of fire safety, as formally expressed by its senior management

**Management of fire safety**

Task(s) carried out by a defined individual or individuals with the appropriate powers and resources to ensure that the fire safety systems, passive, active and procedural, within the building are working properly at all times

**Organisation**

Person or group of people that have their own functions with responsibilities, authorities and relationships to achieve its objectives.

**Outsource (verb)**

Make an arrangement where an external organisation performs part of an organisation's function or process.

**Preventive action**

Action to eliminate the cause of a potential nonconformity or other undesirable potential situation

**Responsible person** *(as defined by the Regulatory Reform (Fire Safety) Order 2005)*

- (a) in relation to a workplace, the employer, if the workplace is to any extent under his control;
- (b) in relation to any premises not falling within paragraph (a)—
  - (i) the person who has control of the premises (as occupier or otherwise) in connection with the carrying on by him of a trade, business or other undertaking (for profit or not); or
  - (ii) the owner, where the person in control of the premises does not have control in connection with the carrying on by that person of a trade, business or other undertaking.

**Top management**

A person or group of people, who directs and controls an organisation at the highest level.

## B. Audit of fire risk assessments

On-site audits require a degree of interaction between the auditor and the premises management. This is considered necessary in order to identify and verify the significant findings documented in the FRA report at the time of the original assessment.

The on-site audit requires the auditor to carry out an inspection of all areas they consider to be 'risk critical' e.g. escape routes, final exits, areas of non-conformity highlighted in the assessment, etc.

If situations have been justified, either rightly or wrongly in the opinion of the auditor, and providing the justification is not so far wide of any benchmarking standards as to cast serious doubt over the competency of the assessor, then the auditor needs to apply fair and reasoned judgment on the situation and any decision given should be fully justified and documented.

### 10.1 Adams Gardens Estate, 88 - 106

#### Summary of audit

Access was not available to the roof space and electrical intakes due to keys not being available.

Access was not available to any of the flats.

The premises are a 4 storey purpose built block of open balcony flats/maisonettes.

The fire risk assessment is comprehensive.

Identified risks have been given the appropriate rating.

The overall risk rating is given as moderate. It is considered that this would be reduced to tolerable if the recommendations contained in the assessment were implemented.

The risk assessment is considered suitable and sufficient.

A review period of 2 years was recommended. For an open balcony block of flats this is considered reasonable. It was noted that a similar block, 7-61 Renforth Street, also a moderate risk had a review date of 3 years, and 1-14 Henley Close, also similar and a moderate risk had a review date of 2 years. It is suggested that some consistency is sought.

1. Relevant information about the premises, including the areas listed in the table below. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A

<b>Assessor considers FRA to be suitable and sufficient</b>	Y
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Comments:

There is a clear description of the property. It was unclear if the assessor had obtained information about previous incidents although arson prevention measures were taken into account. There is no real need to interview a representative of management as the information gathered is readily apparent.

2. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
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Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
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Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		
Hot works	Y		
Housekeeping	Y		

<b>Assessor considers FRA to be suitable and sufficient</b>	Y
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Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made. Considerable storage of resident's effects was located on the open balconies; this was noted by the assessor.

3. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
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Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire	Y		

Means for fighting fire	Y	
Other relevant firefighting systems and equipment; if provided	Y	
Maintenance of facilities to assist fire-fighters	Y	
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?		N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y	

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment.

It was noted that a recommendation had been made to ensure that the wooden boxing containing services at ground and 1st floor level affixed to the soffit above, should be replaced with a 30min rated alternative. As this is at high level, it is considered that this is not necessary. NB. In a fire risk assessment carried out on a similar block (7-61 Renforth Street) on 4th January a similar condition was present. The assessor in that case did not make any recommendations as to the fire rating of the box work.

4. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment.

A review period of 2 years was recommended. For an open balcony block of flats this is considered reasonable. It was noted that a similar block, 7-61 Renforth Street, also a moderate risk had a review date of 3 years, and 1-14 Henley Close, also similar and a moderate risk had a review date of 2 years. It is suggested that some consistency is sought.

## 10.2 Astbury Road, 104A - B

### Summary of audit

The premises are a 2 storey converted house  
The fire risk assessment is comprehensive.  
Identified risks have been given the appropriate rating.  
The premises are given a moderate rating overall.  
There is an issue identified with regards to the standard of conversion, the alarm and detection system installed and the appropriate evacuation strategy. This is discussed further in section 3.  
The risk assessment is considered suitable and sufficient, subject to the matters in section 3 being resolved.

1. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

#### Comments:

There is a clear description of the property. There is a minor error in the prose description of the property where it is described as 3 storey, although this does not detract from the assessment. It was unclear if the assessor had obtained information about previous incidents although arson prevention measures were taken into account. There is no real need to interview a representative of management as the information gathered is readily apparent.

2. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		

Cooking	Y
Lightning	Y
Hot works	Y
Housekeeping	Y
<b>Assessor considers FRA to be suitable and sufficient</b>	Y

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

- Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire	Y		
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment. Flat A entrance door was accessed during the assessment. During the audit it was noted that the self-closing device to flat B was defective. This should be repaired or replaced. (N.B. this would not have been apparent at the time of the original assessment)

- Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
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Emergency action plan	Y	
Staff training and fire drills	Y	
Testing and maintenance of fire protection measures	Y	
Record keeping	Y	
Cooperation & coordination	Y	
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management		N./A
Has an appropriate review period been advised?	Y	
<b>Assessor considers FRA to be suitable and sufficient</b>	Y	

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment. See comments in section 3 above regarding the provision of automatic fire detection and the appropriate evacuation strategy.

A review period of 2 years was recommended. For a converted property this is considered reasonable.

## 10.3 Brawne House, 1 - 68

<b>Summary of audit</b>	<p>The premises are an 18 storey purpose built block of flats. There was no access to the roof area, lift motor room, ground floor stores, electrical intake, services cupboards or the 17th floor penthouses due to nonstandard keys being fitted. Therefore, this audit does not take into account improvement measures recommended for this floor.</p> <p>The entry doors to flats 37 &amp; 61 were assessed.</p> <p>The fire risk assessment is comprehensive.</p> <p>Identified risks have been given the appropriate rating and appear consistent with other assessments undertaken.</p> <p>The overall risk rating is given as MODERATE.</p> <p>The risk assessment is considered suitable and sufficient.</p>
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5. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by			N/A

interviewing a relevant representative(s) of the management?

<b>Assessor considers FRA to be suitable and sufficient</b>	Y
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Comments:

There is a clear description of the property. It was unclear if the assessor had obtained information about previous incidents although arson prevention measures were taken into account. There is no real need to interview a representative of management as the information gathered is readily apparent.

6. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		
Hot works	Y		
Housekeeping	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

7. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire		N	

Means for fighting fire	Y	
Other relevant firefighting systems and equipment; if provided	Y	
Maintenance of facilities to assist fire-fighters	Y	
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?		N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y	

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. The majority of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

The assessor stated that the internal decoration of the stairwell was painted textured walls and painted ceiling which is considered acceptable. The lift lobbies are the same. However, it is unknown if there are multiple layers of paint on the walls in the stairwell or lift lobbies: Consideration may wish to be given to having the paint covering examined by a competent person to ensure multi-layer paint condition does not exist (If not already done so). Multiple layers of conventional paint accumulated on walls and ceilings over a period of time, in addition to over painted graffiti, anti-graffiti finishes and unofficial re-paints can present a significant potential fire risk.

The stair is open on all floors from the 1st to 16th floor. A recommendation has been made that the stairwell doors all had gaps and several are bowed. Replacement was recommended with FD30S doors. However, there is another fire-resisting door (Described as replacement FD60S) between the stairwell door and the lift lobby. (However, these doors contain Georgian wired glazing. This is normally considered to give 30 minutes fire resistance (integrity). There are no markings on the glazing to indicate otherwise. The doors are 55mm thick so may give 60 minutes fire resistance if the correctly rated glazing is installed. This does not affect the suitability of this assessment as this is considered acceptable.)

This gives at least 60 minutes protection to an open stair; this is considered more than adequate. It is felt that the replacement of these doors is not proportionate to the risk posed.

It was noted in the assessment that there were excessive gaps between the door and frame of the lift lobby doors. In this assessor's opinion the gaps did not appear excessive. It may be that the required remedial works have been undertaken.

8. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		

Could it be identified if information was obtained by interviewing a relevant representative(s) of the management		N/A
Has an appropriate review period been advised?	Y	
<b>Assessor considers FRA to be suitable and sufficient</b>	Y	
<p>Comments:</p> <p>It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment.</p> <p>A review period of 1 year was recommended. For a high rise block, this is considered reasonable.</p>		

## 10.4 Brooke Drive, SHU

<b>Summary of audit</b>	<p>The premises are a 3 storey purpose built sheltered housing unit. Limited access was available to the roof space. There was no access to the 2nd floor riser due to the lock being defective.</p> <p>Access was available to one of the flats.</p> <p>The fire risk assessment is comprehensive.</p> <p>Identified risks have been given the appropriate rating.</p> <p>The overall risk rating is given as tolerable.</p> <p>The risk assessment is considered suitable and sufficient. Clarification should be sought on the testing/inspection of the external stairs and the inspection of the loft space. This is dealt with in section 3.</p>
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9. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.		N	
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

There is a clear description of the property. The scheme manager Sandra Josiah-Dadzie gave information during the assessment and audit. There was a list of residents available onsite with notes on their needs. Several residents have mobility issues and use mobility scooters. This

has been noted by the assessor in the Summary section, however in section 5, 'Escape Routes & Fire Spread', a statement is made that 'there are no known disabled persons on-site, the premises box contains residents that may require assistance in an emergency'. Evidently, this statement is contradictory. However, consideration should be given to The National Fire Chiefs Council Guidance- Fire Safety in Specialized Housing, especially in regard to personalized fire risk assessment for residents.

10. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		
Hot works	Y		
Housekeeping	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The scheme manager Sandra Josiah-Dadzie gave information during the assessment and audit. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

11. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire	Y		
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		

Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y
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<b>Assessor considers FRA to be suitable and sufficient</b>	Y
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Comments:

The scheme manager Sandra Josiah-Dadzie gave information during the assessment and audit. All of the areas indicated above appear to have been considered during the assessment. A stay put evacuation policy is employed within the flats with a simultaneous evacuation policy in the common areas.

It is unknown if the loft area was inspected during the assessment. It appears that Southwark Council have an ongoing inspection program of inspections of loft areas, so this may be undertaken as part of the program. During the audit, limited access was available to the loft space. It was noted that the loft space had been divided, however the door in the partition was open. Also, the extent of fire detection within the loft area was not clear. Consideration should be given to this.

There are external metal escape stairs from the lounge areas. It is unclear if the testing/inspection of these has been considered as there is no specific heading under the testing and maintenance section. It should be ensured that the external stairs are inspected on a regular basis and results recorded (typically 3 years).

12. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management	Y		
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The scheme manager Sandra Josiah-Dadzie gave information during the assessment and audit. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

A review period of 1 year was recommended. For a sheltered housing scheme this is considered reasonable.

## 10.5 Copeland Road, 86 - 96

### Summary of audit

The premises are a 3 storey purpose built block of flats, now used as temporary accommodation and classed as an HMO. There was no access to the roof space. There was no access to any of the resident's flats as there was no Housing Officer present during the audit, although Earl Johnson attended to give access to some areas with non-standard locks fitted.

The fire risk assessment is comprehensive.

Identified risks have been given the appropriate rating.

The overall risk rating is given as moderate.

The risk assessment is considered suitable and sufficient.

13. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
Comments:			
There is a clear description of the property. The Housing Officer, Mr. Adam Tizroutine provided information during the assessment.			

14. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		

Hot works	Y
Housekeeping	Y
<b>Assessor considers FRA to be suitable and sufficient</b>	Y

Comments:

The Housing Officer, Mr. Adam Tizroutine provided information during the assessment. All of the areas indicated above appear to have been considered during the assessment. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

15. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )		N	
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire	Y		
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The Housing Officer, Mr. Adam Tizroutine provided information during the assessment. A simultaneous evacuation policy is employed.

The assessor stated that there was a reasonable limitation of internal linings that might promote fire spread. However, it is unknown if there are multiple layers of paint on the walls in the common areas: Consideration may wish to be given to having the paint covering examined by a competent person to ensure multi-layer paint condition does not exist (if not already done so). Multiple layers of conventional paint accumulated on walls and ceilings over a period of time, in addition to over painted graffiti, anti-graffiti finishes and unofficial re-paints can present a significant potential fire risk.

It was noted during the audit that the intumescent strip and cold smoke seal was missing from the head of the fire-resisting door to the laundry at ground floor level by unit 1. This should be replaced. It was likely to be in situ at the time of the assessment.

16. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management	Y		
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The Housing Officer, Mr. Adam Tizroutine provided information during the assessment All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

A review period of 1 year was recommended. For a hostel/HMO this is considered reasonable.

## 10.6 Henley Close, 1 - 14

### Summary of audit

Access was not available to the roof space, ground floor store, room on firstfloor and electrical intakes due to keys not being available. Access was not available to any of the flats.

The premises are a 2 storey purpose built block of open balcony flats.

The fire risk assessment is comprehensive.

Identified risks have been given the appropriate rating.

The overall risk rating is given as moderate. It is considered that this would be reduced to tolerable if the recommendations contained in the assessment were implemented.

There are three minor issues that need consideration. These are detailed in section 3.

The risk assessment is considered suitable and sufficient.

A review period of two years was recommended. For an open balcony block of flats this is considered reasonable. It was noted that a similar block, 7-61 Renforth Street, also a moderate risk had a review date of 3 years, 88-106 Adams Gardens Estate, also similar and a moderate risk had a review date of 2 years. It is suggested that some consistency is sought.

17. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
<p>Comments:</p> <p>There is a clear description of the property. It was unclear if the assessor had obtained information about previous incidents although arson prevention measures were taken into account. There is no real need to interview a representative of management as the information gathered is readily apparent.</p>			

18. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		
Hot works	Y		
Housekeeping	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
<p>Comments:</p> <p>It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.</p> <p>Some storage of resident's effects was located on the open balconies and stairwell. This was noted by the assessor.</p>			

19. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )		N	
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire	Y		
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>		N	

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment. A stay put evacuation policy is employed.

It was stated by the assessor that the rear door to the premises, which is the egress route for ground floor residents was openable by a fob system. This door is opened by a key from the enclosed garden area. It is recommended that the door is easily openable from the enclosed garden area without the use of a key or fob. (task 4)

It was stated by the assessor that a small grid on the floor outside the main entrance was a potential passing risk and the grid should be removed and infilled. It is this assessor's opinion that this is a trivial risk and no further action is required (task 5).

It was stated by the assessor that the electrical intake cupboard's doors at ground floor level are fire-resisting. However, there are 2 x 25mm holes in each door, (probably for ventilation purposes). It is recommended that these holes are infilled to preserve the fire resisting integrity of the door. This is considered low risk.

20. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		

Cooperation & coordination	Y	
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management		N/A
Has an appropriate review period been advised?	Y	
<b>Assessor considers FRA to be suitable and sufficient</b>	Y	

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

A review period of 2 years was recommended. For an open balcony block of flats, this is considered reasonable. It was noted that a similar block; 7-61 Renforth Street, also a moderate risk had a review date of 3 years, 88-106 Adams Gardens Estate, also similar and a moderate risk had a review date of 2 years. It is suggested that some consistency is sought.

## 10.7 Linden Grove, 66

<b>Summary of audit</b>	<p>The premises are a 2 storey purpose built sheltered housing unit, now used as temporary accommodation and are considered general needs use. There was no access to the roof space or some locked common rooms that are no longer in use. There was no access to any of the resident's flats as there was no Housing Officer present during the audit, although Earl Johnson attended to give access to some areas with non-standard locks fitted.</p> <p>The fire risk assessment is comprehensive.</p> <p>Identified risks have been given the appropriate rating.</p> <p>The overall risk rating is given as moderate.</p> <p>The risk assessment is considered suitable and sufficient.</p>
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21. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

There is a clear description of the property. The Housing Officer, Mr. Adam Tizroutine provided information during the assessment.

22. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		
Hot works	Y		
Housekeeping	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The Housing Officer, Mr. Adam Tizroutine provided information during the assessment. All of the areas indicated above appear to have been considered during the assessment. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

23. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire	Y		
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		

<b>Assessor considers FRA to be suitable and sufficient</b>	Y
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Comments:

The Housing Officer, Mr. Adam Tizroutine provided information during the assessment. A simultaneous evacuation policy is employed.

The assessor stated that there was a reasonable limitation of internal linings that might promote fire spread. However, it is unknown if there are multiple layers of paint on the walls in the common areas: Consideration may wish to be given to having the paint covering examined by a competent person to ensure multi-layer paint condition does not exist (If not already done so). Multiple layers of conventional paint accumulated on walls and ceilings over a period of time, in addition to over painted graffiti, anti-graffiti finishes and unofficial re-paints can present a significant potential fire risk.

A recommendation was made (Task 28) within the assessment that: Corridor doors near unit 5, stair door near unit 11 were warped and required replacing. These doors were found to be satisfactory during this audit. However, the door to the cleaners store and the cross corridor doors by unit 3 were found to be warped and should be replaced.

There is a locked area at both floor levels, believed to old common rooms. Access is not available to residents. In the ground floor room there were items of old furnishings. It is recommended that this unnecessary fire load is removed.

24. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management	Y		
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The Housing Officer, Mr. Adam Tizroutine provided information during the assessment. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

A review period of 1 year was recommended. For a hostel this is considered reasonable.

## 10.8 Locksfield

### Summary of audit

The premises are a 4 storey purpose built sheltered housing unit. There was no access to the roof space or any of the resident's flats

The fire risk assessment is comprehensive.

Identified risks have been given the appropriate rating.

It was noted that there are several matters that may not have been considered during the time of the assessment. None of these are of a significant risk. They are detailed in the appropriate section.

The overall risk rating is given as tolerable.

The risk assessment is considered suitable and sufficient.

25. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.		N	
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

#### Comments:

There is a clear description of the property. The assistant scheme manager Colette Jackson gave information during the assessment and Addis Bayley, the scheme manager gave information during the audit. There was a list of residents available on-site with notes on their needs. Several residents have mobility issues and use mobility scooters. One resident is bedbound and several are housebound. Reference has been made by the assessor in the 'Summary and Escape Routes & Fire Spread' sections of the assessment by the assessor. However, consideration should be given to The National Fire Chiefs Council Guidance- Fire Safety in Specialized Housing, especially in regard to personalised fire risk assessment for residents.

26. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
Arson	Y		

Electrical faults		N
Smoking	Y	
Portable heaters, etc.	Y	
Cooking	Y	
Lightning	Y	
Hot works	Y	
Housekeeping	Y	
<b>Assessor considers FRA to be suitable and sufficient</b>	Y	

Comments:

The assistant scheme manager Colette Jackson gave information during the assessment and Addis Bayley, the scheme manager gave information during the audit. All of the areas indicated above appear to have been considered during the assessment. However, there were several items in the ground floor kitchen that were not PAT tested (an urn and dishwasher included). It was rightly stated that this area is rarely used.

27. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices		N	
Emergency escape lighting	Y		
Means to limit fire spread and development of fire		N	
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The assistant scheme manager Colette Jackson gave information during the assessment and Addis Bayley, the scheme manager gave information during the audit. A stay put evacuation policy is employed within the flats with a simultaneous evacuation policy in the common areas. There were a number of replacement fire – resisting doors recently installed as noted in the assessment. It was noted during the audit that the intumescent strip around the hinges on the rear store and electrical cupboard by the day room (both at ground floor level) were poorly installed. In addition, the cold smoke seal at the head of the door frame was missing from the door to the kitchen, the store opposite the toilets and the door between the lobby and office

corridor at ground floor level.

The chute room door at 3rd floor level required attention to close properly onto its hinges. The intumescent strip and cold smoke seal were defective. (It is likely that these matters were not apparent at the time of the assessment).

It was noted that there was signage indicating the actions to be taken in the event of fire. This instructs resident/visitors to call the Fire Service by using the 1st floor telephone. This may not be accessible in the event of a fire. This instruction should be amended.

The assessor stated that there was a reasonable limitation of internal linings that might promote fire spread. However, it is unknown if there are multiple layers of paint on the walls in the common areas: Consideration may wish to be given to having the paint covering examined by a competent person to ensure multi-layer paint condition does not exist (If not already done so). Multiple layers of conventional paint accumulated on walls and ceilings over a period of time, in addition to over painted graffiti, anti-graffiti finishes and unofficial re-paints can present a significant potential fire risk.

28. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management	Y		
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

The assistant scheme manager Colette Jackson gave information during the assessment and Addis Bayley, the scheme manager gave information during the audit. All of the areas indicated above appear to have been considered during the assessment.

A review period of 1 year was recommended. For a sheltered housing scheme this is considered reasonable.

## 10.9 Peterchurch House, 1 - 56

### Summary of audit

The premises are a 14 storey purpose built block of flats. There was no access to the roof area, lift motor room, ground floor stores, electrical intake or services cupboards due to nonstandard keys being fitted.

Flat entry doors to 34 & 35 were assessed.

The fire risk assessment is comprehensive.

Identified risks have been given the appropriate rating and appear consistent with other assessments undertaken.

The overall risk rating is given as HIGH MODERATE.

29. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
<p>Comments:</p> <p>There is a clear description of the property. It was unclear if the assessor had obtained information about previous incidents although arson prevention measures were taken into account. There is no real need to interview a representative of management as the information gathered is readily apparent.</p>			

30. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		

Hot works	Y
Housekeeping	Y
<b>Assessor considers FRA to be suitable and sufficient</b>	Y

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

31. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire		N	
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. The majority of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

The assessor stated that 'The paintwork on the stairwell is delaminating and should be scraped off and repainted'. However, it is unknown if there are multiple layers of paint on the walls in the lift lobbies: Consideration may wish to be given to having the paint covering examined by a competent person to ensure multi-layer paint condition does not exist (if not already done so). Multiple layers of conventional paint accumulated on walls and ceilings over a period of time, in addition to over painted graffiti, anti-graffiti finishes and unofficial re-paints can present a significant potential fire risk.

Compartmentation was noted as being suitable with several exceptions where the paneling concealing services was damaged or noted as being non fire resisting. There appeared to be wooden paneling concealing services in the lift lobbies. This paneling is of undetermined fire

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resistance. It is unknown if the assessor has previous knowledge of the block or records are held that confirm the required fire separation has been achieved.

The building is 'H' shaped. On each of the upper floors there is a lift lobby that gives access to 2 flats in each of the long arms of the 'H'. There are secured access doors, surrounded by mesh panels that give access from the lift lobby to the flats. The lobby to the flats has a small permanent opening vent and openable windows. It was noted in the assessment that the ventilation area in the panels should be increased to allow adequate ventilation to the lift lobby. It is felt by this assessor that further consideration should be given to this recommendation. As a fire is likely to occur within a flat then smoke from any fire in a flat could affect both lobbies and the lift lobby. It may be better to actually block the mesh panels and contain any likely fire/smoke within the entrance lobby to the pair of flats.

It was stated that the entrance doors to flats 21, 22, 23 & 53 were examined and found to be a minimum of notional doors with only flat 53 having an intumescent strip installed. It also stated that they were fitted with Perko self-closing devices, and that these are not considered to be to the current standard and should be replaced by closers that comply with BS EN 1154. (Section 7.8.6.) It is this assessor's opinion that these devices are acceptable. It was stated that this is Southwark Council's policy. The recommendation was made that all flat entry doors should be upgraded to FD30S SC standard.

This assessor inspected the doors to flats 34 & 35. The former was fitted with an intumescent strip and cold smoke seal, whereas the latter had no intumescent strip but had a cold smoke seal.

The assessor appears to be recommending an upgrade to the doors. In the published flats guide, it recommends that doors should be replaced. As the doors installed appeared to be of the same type, with the difference between them being the fitting of an intumescent strip then an upgrade may be suitable.

It has been recommended that the doors to the stairs are FD30S SC and are required to be replaced with FD60S SC doors. It would appear that these doors were replacement doors several years ago. It is likely the original doors to the stairs only gave a notional period of fire resistance. The published flats guide states.

71.4 In other than very unusual circumstances, there should be no requirement to provide fire-fighting facilities in an existing block of flats or upgrade any facilities if these were not required at the time of construction to comply with the standards of the day.

It is felt that it may not be proportionate to the risk to replace these doors. Consideration should be given to repair (a number of cold smoke seals are missing, there is Perspex instead of fire resisting glazing on the 13th floor, and a metal panel instead of fire resisting glazing on the 11th floor).

Further recommendations have been made regarding replacing: riser doors, electrical intake doors and a drying room door with FD60S doors, and a room on the 12th floor with an FD30S door. It was noted that in another block, recommendations have been made to replacing unsuitable doors with FD30S. It is recommended that some consistency is applied.

The assessor correctly identified that there were cracked Georgian wired glazing adjacent to the door to Flat 1 and that it should be replaced by fire-resisting glazing. This has been done. However, the replacement glass does not appear to be fire resisting and is poorly fitted.

NB

These flats are patrolled by fire wardens due to there being potential breaches of compartmentation between the flats. During the audit, it was noted that there were bags of rubbish within the common areas. Consideration should be given to instructing the fire wardens to take action if this occurs.

It was also noted that the wardens carry klaxons to warn residents of a fire and that a simultaneous evacuation strategy is currently employed. Fire action notices are on display

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throughout the building instructing a 'stay put' evacuation strategy. There are some signs on some floors adjacent to or covering some of the fire action notices that advise residents to evacuate their flat in the event of a fire and inform the wardens. It is recommended that all the instructions referring to the 'stay put' evacuation strategy are removed or covered up whilst the current arrangements are in force.

32. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management			N/A
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment.

A review period of 1 year was recommended. For a high rise block this is considered reasonable.

## 10.10 Regina Point, 1 - 80

<b>Summary of audit</b>	<p>The premises are a 21 storey purpose built block of flats. There was no access to the roof area, ground floor stores, electrical intake, basement area or services cupboards due to nonstandard keys being fitted.</p> <p>Flats no 17 &amp; 43 entrance doors were seen.</p> <p>The fire risk assessment is comprehensive.</p> <p>Identified risks have been given the appropriate rating and appear consistent with other assessments undertaken.</p> <p>The overall risk rating is given as moderate.</p> <p>The risk assessment is considered suitable and sufficient.</p>
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33. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
<p>Comments:</p> <p>There is a clear description of the property. It was unclear if the assessor had obtained information about previous incidents although arson prevention measures were taken into account. There is no real need to interview a representative of management as the information gathered is readily apparent.</p>			

34. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		
Hot works	Y		
Housekeeping	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
<p>Comments:</p> <p>It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.</p>			

35. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with

management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire		N	
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

**Comments:**

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. The majority of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

The assessor stated that there was a reasonable limitation of internal linings that might promote fire spread and that the internal decoration of the stairwell appeared to be emulsion paint onto a plastered surface. It was also noted that the peeling paint will have to be removed when decoration takes place. However, it is unknown if there are multiple layers of paint on the walls in the lift lobbies: Consideration may wish to be given to having the paint covering examined by a competent person to ensure multi-layer paint condition does not exist (If not already done so). Multiple layers of conventional paint accumulated on walls and ceilings over a period of time, in addition to over painted graffiti, anti-graffiti finishes and unofficial re-paints can present a significant potential fire risk.

Compartmentation was noted as being suitable. There appeared to be wooden paneling concealing services in the lift lobbies and paneling at ceiling level. This paneling is of undetermined fire resistance. It is unknown if the assessor has previous knowledge of the block or records are held that confirm the required fire separation has been achieved.

It was stated that flats entrance doors are fitted with Perko self-closing devices, and that these are not considered to be to the current standard and should be replaced by closers that comply with BS EN 1154. (Section 7.8.6. It is this assessor's opinion that these devices are acceptable. It is unknown if this is Southwark Council's policy.

It is stated that the doors to the stairwell and chute rooms are FD60s SC. However, these doors contain Georgian wired glazing. This is normally considered to give 30 minutes fire resistance (integrity). There are no markings on the glazing to indicate otherwise. (The doors are 55mm thick so may give 60 minutes fire resistance if the correctly rated glazing is installed). The same assumption has been made about the adjacent screen. This does not affect the suitability of this assessment as this is considered acceptable.

Comments and recommendations to undertake remedial measures have been a made as to

the majority of stairwell and chute room doors having gaps between the door and frame. The gaps did not appear excessive to this assessor. It may be that remedial measures have been undertaken since the assessment.

It was noted that the lock to flat no 32 was missing, as was the door to the electric meter. It is likely that this has happened since the assessment was undertaken.

36. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management			N/A
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment.

A review period of 1 year was recommended. For a high rise block this is considered reasonable.

## 10.11 Renforth Street, 7 - 61

<b>Summary of audit</b>	<p>Access was not available to the roof space and electrical intakes due to keys not being available. Access was not available to any of the flats.</p> <p>The premises are a 4 storey purpose built block of open balcony flats/maisonettes.</p> <p>The fire risk assessment is comprehensive.</p> <p>Identified risks have been given the appropriate rating.</p> <p>The overall risk rating is given as moderate. It is considered that this would be reduced to tolerable if the recommendations contained in the assessment were implemented</p> <p>The risk assessment is considered suitable and sufficient.</p> <p>It was noted that similar blocks (88-106 Adams Gardens Estate and 1-14 Henly Close, also moderate risks) had review dates of 2 years. It is suggested that some consistency is sought.</p>
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37. Relevant information about the premises, including: This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
The processes carried out on the premises	Y		
Size, height, construction, and use of the building, etc.	Y		
Information on the occupants of the premises; including those especially at risk in the event of fire, public use, etc.	Y		
Information about previous fires is also of value	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
Comments:			
There is a clear description of the property. It was unclear if the assessor had obtained information about previous incidents although arson prevention measures were taken into account. There is no real need to interview a representative of management as the information gathered is readily apparent.			

38. Fire hazard identification and the determination of existing measures for the elimination or control of the identified fire hazards. This will normally involve a combination of interviewing the management and inspection of the premises.

Area being assessed	Yes	No	N/A
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
Arson	Y		
Electrical faults	Y		
Smoking	Y		
Portable heaters, etc.	Y		
Cooking	Y		
Lightning	Y		
Hot works	Y		
Housekeeping	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		
Comments:			
It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made. Considerable storage of resident's effects was located on the open balconies; this was noted by the assessor.			

39. Determine the physical fire protection measures, relevant to protection of people in the event of fire. The relevant information can, again, be obtained partly from the initial discussion with management, but will, primarily, be obtained by inspection of the premises, so that the standard of fire protection can be determined.

Area being assessed	Yes	No	N/A
Means for detecting fire and giving warning to occupants	Y		
Means of escape from the premises (including disabled )	Y		
Fire safety signs and notices	Y		
Emergency escape lighting	Y		
Means to limit fire spread and development of fire	Y		
Means for fighting fire	Y		
Other relevant firefighting systems and equipment; if provided	Y		
Maintenance of facilities to assist fire-fighters	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management?			N/A
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

Comments:

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

A stay put evacuation policy is employed.

40. Fire safety management. This will, primarily, involve discussion with management, but might also involve examination of documentation, such as records of testing, maintenance, training, drills, etc.

Area being assessed	Yes	No	N/A
Emergency action plan	Y		
Staff training and fire drills	Y		
Testing and maintenance of fire protection measures	Y		
Record keeping	Y		
Cooperation & coordination	Y		
Could it be identified if information was obtained by interviewing a relevant representative(s) of the management			N/A
Has an appropriate review period been advised?	Y		
<b>Assessor considers FRA to be suitable and sufficient</b>	Y		

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**Comments:**

It is not considered necessary to interview a management representative. The assessor is a Southwark Council employee and is aware of the systems for recording information and Southwark Council's procedures and policies. All of the areas indicated above appear to have been considered during the assessment and appropriate recommendations made.

A review period of 3 years was recommended. It was noted that similar blocks (88-106 Adams Gardens Estate and 1-14 Henley Close, also moderate risks) had review dates of 2 years. It is suggested that some consistency is sought.

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## C. Fire risk manager – competency requirements

### **COMPETENCY OF FIRE RISK MANAGER(S)**

Top management within organisations should appoint a fire risk manager(s) who, irrespective of other responsibilities have defined roles, responsibilities and authority with regard to fire risk management.

For small/low risk organisations a dedicated fire risk manager role may be inappropriate. The fire protection needs will be relatively simple and the fire risk management duties will often be carried out by the owner or general manager.

For medium size organisations, the role of the fire risk manager is often combined with other duties such as health & safety, facilities management or with security risk management. It is however, important that the organisation recognises that in appointing a fire risk manager with a combined role, they are unlikely to possess all the necessary competencies in fire protection. In such an organisation the fire protection needs may be more complex than for small/low risk organisations and the organisation may need to seek specialist fire protection expertise from a third party.

For large organisations, and certainly those with extensive estate portfolios fire risk management will be a complex role and should be undertaken by a competent dedicated fire risk manager.

The extent of the fire risk management system should be proportionate to the level of risk arising from the organisation's activities and subsequent level of assurance sought. It follows therefore, that the competency of an organisation's fire risk manager should directly relate to the context of the organisation and the management system level.

Management system levels may fluctuate over time and therefore the competency of fire risk management should be reviewed if the demands of the fire risk management system significantly changes, e.g. if an outsourced fire risk assessment program is brought in-house.

Within PAS7:2013 an organisation is required to adequately identify the organisational context, the required level of management and employ a specific fire risk manager(s) who is competent.

The fire risk manager should be competent on the basis of education, training skills and experience for the job in hand;

Organisations should;

1. Take into account the competencies required to undertake fire risk management duties when appointing those employees;
2. Demonstrate the competency of those individuals once employed; and

3. Define the competence required of the person nominated to control the management of fire risk.

Competence in fire risk management does not necessarily depend on the possession of specific qualifications, although such qualifications might contribute to the demonstration of competence.

The fire risk manager will be tasked with managing fire protection systems such as the risk assessment programme and the testing and maintenance of fire detection systems. However they may not undertake these activities themselves. Unless they themselves undertake activities such as fire risk assessment, testing and maintenance or quality assurance of fire protection work, they do not necessarily need to be competent themselves. Competency in the area of fire prevention and protection systems would of course be advantageous to the fire risk manager and they may be directly involved in the specification/provision of those systems. But the primary role of the fire risk manager is to manage a system that minimises fire risk through the activities of themselves and/or others.

In general then, other than in the case of small/low risk organisations, fire risk managers need an appropriate knowledge of:

- Principles and practice of fire risk management
- The context of the organisation
- Leadership skills
- Planning
- Support
- Operation
- Performance and Evaluation
- System audit

### **Principles and practice of fire risk management**

The fire risk manager will:

- Understand the nature and extent of primary compliance drivers such as life safety, property protection, mission continuity, environmental considerations and reputational risks within the context of the organisation.
- Understand the basic legal framework and the roles and powers of enforcement agencies.
- Understand the basic principles of combustion, fire growth and fire spread.
- Understand the primary causes of fire, sources of fuel, sources of ignition and oxygen.
- Understand the basic control measures used to mitigate the risk posed by the threat of fire.
- Understand the basic principles of fire protection in buildings, e.g. early warning and means of escape, compartmentation and fire service access provision.
- Understand the difference between strategy, policy and procedure.
- Be aware of the importance of maintaining fire risk information and the extent of information required at premises level and organisation level.
- Understand the principles and practice of fire risk assessment.

- Understand the principles of due diligence as they apply to obtaining quotations for work, appointing contractors, selecting suppliers, executing work and record keeping.

### **Context of the organisation**

The fire risk manager will:

- Understand the internal and external issues that are relevant to the organisation.
- Understand the needs of all stakeholders and other interested parties.
- Have a good understanding of the applicability, principles, objectives, and intent of legislation so far as premises under their control fall within their jurisdiction.
- Know the boundaries of their jurisdiction and the scope of the fire risk management system under their control.

### **Leadership**

The fire risk manager will:

- Understand the importance of aligning fire prevention and protection objectives with the broader objectives of the organisation.
- Understand the resource requirements for maintaining governance of fire risk.
- Know how to define roles and responsibilities.

### **Planning**

The fire risk manager will:

- Understand the importance of setting SMART objectives.
- Be able to demonstrate how to create SMART objectives

### **Support**

The fire risk manager will:

- Understand the importance of gaining and maintaining competencies in fire risk management.
- Have an appropriate knowledge of the identity and status of those with responsibilities and duties in relation to fire risk.
- Have good communication skills and use them to effectively engage with internal and external stakeholders.
- Understand the importance of documented information at organisation and premises level.
- Establish an effective fire risk management training and development strategy

### **Operation**

The fire risk manager will:

- Understand the issues relating to the control of work onsite in so far as it affects fire risk management.

- Understand any statutory or manufacturers' requirements for testing and maintaining fire prevention and protection systems to ensure they operate correctly.
- Understand the need for an effective fire risk assessment programme.
- Understand the importance of appointing competent fire risk assessors and where to seek competency in this area.
- Have the knowledge and skills to communicate with all stakeholders in the event of an incident.
- Understand the need to establish and effect a response in the event of an emergency.
- Have (where appropriate) a working knowledge of British Standards.

### **Performance evaluation and improvement**

The fire risk manager will:

- Understand what needs to be monitored and measured and how to interpret results.
- Establish an effective monitoring programme.
- Have the competence to conduct internal audits.
- Understand what information needs to be conveyed during management reviews.
- Understand how to report and act upon non-conformities or corrective actions as necessary to the organisations fire risk management system.

### **System audit**

Confidence in the fire risk management system audit process and the ability to achieve its objectives depends on the competence of those individuals who are involved in planning and conducting fire risk management audits.

The depth of competence required in this area depends on the complexity of the fire risk management system. The greatest depth of competence would be expected from a person who specialises in the audit of fire risk management systems as an external auditor.

Competence in this area of fire risk management should be evaluated through a process that considers personal behaviour and the ability to apply the knowledge and skills gained through education, work experience, auditor training and audit experience. This process should take into consideration the needs of the audit programme and its objectives.

Preferably fire risk management system auditors and/or their audit teams will include competent fire risk assessors, and those with the knowledge and skills of a competent fire risk manager.

In addition the fire risk management system auditor should have knowledge and skills in the areas outlined below:

### **General**

In deciding the appropriate knowledge and skills required of the auditor, the following should be considered:

- The size, nature and complexity of the organisation to be audited;
- The objectives and extent of the audit programme;
- The role of the audit process in the management system of the auditee;

- The complexity of the fire risk management system to be audited;

### **Personal behaviour**

Auditors should possess the necessary qualities to enable them to act in accordance with the principles of auditing as described in BS EN ISO 19011:2011 – Guidelines for auditing management systems. Auditors should exhibit professional behaviour during the performance of audit activities, including being:

- Ethical, i.e. fair, truthful, sincere, honest and discreet;
- Open-minded, i.e. willing to consider alternative ideas or points of view;
- Diplomatic, i.e. tactful in dealing with people;
- Observant, i.e. actively observing physical surroundings and activities;
- Perceptive, i.e. aware of and able to understand situations;
- Versatile, i.e. able and readily adapt to different situations;
- Tenacious, i.e. persistent and focused on achieving objectives;
- Decisive, i.e. able to reach timely conclusions based on logical reasoning and analysis;
- Self-reliant, i.e. able to act and function independently whilst interacting effectively with others;
- Acting with fortitude, i.e. able to act responsibly and ethically, even though these actions may not always be popular and may sometimes result in disagreement or confrontation;
- Open to improvement, i.e. willing to learn from situations, and striving for better audit results;
- Culturally sensitive, i.e. observant and respectful to the culture of the auditee;
- Collaborative, i.e. effectively interacting with others, including audit team members and the auditees personnel.

### **Audit principles, procedures and methods**

Knowledge and skills in this area enable the auditor to apply the appropriate principles, procedures and methods to different audits, and to ensure that audits are conducted in a consistent and systematic manner. An auditor should be able to do the following:

- Apply audit principles, procedures and methods;
- Plan and organize the work effectively;
- Conduct the audit within the agreed time schedule;
- Prioritize and focus on matters of significance;
- Collect information through effective interviewing, listening, observing and reviewing documents, records and data;
- Understand and consider the experts opinions;
- Understand the appropriateness and consequences of using sampling techniques;
- Verify the relevance and accuracy of collected information;
- Confirm the sufficiency and appropriateness of audit evidence to support audit findings and conclusions;

- Assess those factors that may affect the reliability of the audit findings and conclusions;
- Use the work documents to record audit activities;
- Document audit findings and prepare appropriate audit reports;
- Maintain the confidentiality and security of information, data, documents and records;
- Communicate effectively, orally and in writing (either personally, or through the use of interpreters and translators);
- Understand the types of risks associated with auditing.

### **Fire risk management system and other reference documents**

Knowledge and skills in this area enable the auditor to comprehend the audit scope and apply audit criteria, and should cover the following:

- PAS 7: 2013 – Fire risk management system specification or other documents used as audit criteria;
- The application of management system standards by the auditee and other organisations, as appropriate;
- Interaction between the components of the management system;
- Recognizing the hierarchy of reference documents;
- Application of the reference documents to different audit situations.

### **Organisational context**

Knowledge and skills in this area enable the auditor to comprehend the auditee's structure, business and management practices, and should cover the following:

- Organisational types, governance, size, structure, functions and relationships
- General business and management concepts, processes and related terminology, including planning, budgeting and management of personnel;
- Cultural and social aspects of the auditee.

### **Applicable legal and contractual requirements and other requirements that apply to the auditee**

Knowledge and skills in this area enable the auditor to be aware of, and work within, the organisation's legal and contractual requirements. Knowledge and skills specific to the jurisdiction or to the auditee's activities and products should cover the following:

- Laws and regulations and their governing agencies;
- Basic legal terminology
- Contracting and liability.

## D. Action plan

The table below can be used by Southwark Council as an Action plan. The last three columns are left blank intentionally for Southwark Council to identify someone responsible for each recommendation, set a target completion date and monitor progress by signing off the confirmed completion date.

**Table 4: List of audit recommendations**

Recommendation	Duty holder	Target completion date	Completion confirmed date
<p><b>Recommendation 1</b></p> <p>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.</p>			
<p><b>Recommendation 2</b></p> <p>There is an opportunity for Southwark Council to integrate their approach to risk management systems incorporating fire, health and safety plus business continuity. This would be an integrated risk management system (IRMS).</p>			
<p><b>Recommendation 3.4</b></p> <p>Southwark Council will need to formalise it's procedures for keeping up-to date with legal and regulatory requirements.</p>			
<p><b>Recommendation 4.2</b></p> <p>In accordance with clause 4.2 contained within PAS 7: 2013 – Fire risk management system specification, an organisation wishing to comply with the standard must establish a fire safety policy.</p>			
<p><b>Recommendation 4.3</b></p> <p>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.</p>			
<p><b>Recommendation 5.1.1</b></p> <p>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.</p>			

Recommendation	Duty holder	Target completion date	Completion confirmed date
<p><b>Recommendation 5.1.2</b></p> <p>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 would be worth Southwark Council documenting its void inspection process and including consideration of fire safety.</p>			
<p><b>Recommendation 5.1.3</b></p> <p>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 including consideration of Type 4 fire risk assessment.</p> <p>A suitable procedure should be formulated for the implementation of a Type 4 fire risk assessment.</p>			
<p><b>Recommendation 5.1.3a</b></p> <p>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.</p>			
<p><b>Recommendation 5.2</b></p> <p>Southwark Council should establish fire safety objectives as part of its FRMS.</p>			
<p><b>Recommendation 5.3</b></p> <p>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.</p>			

Recommendation	Duty holder	Target completion date	Completion confirmed date
<p><b>Recommendation 6.1</b></p> <p>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.</p>			
<p><b>Recommendation 6.2.1</b></p> <p>Having identified all employees with roles and responsibilities that have a bearing on the organisation 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.</p>			
<p><b>Recommendation 6.2.2 (a)</b></p> <p>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.</p> <p>Consideration should be given to the provision of training on the national guidance for Fire safety in purpose-built blocks of flats.</p> <p>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.</p>			
<p><b>Recommendation 6.2.2 (b)</b></p> <p>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.</p>			
<p><b>Recommendation 6.4</b></p> <p>We recommend that Southwark Council</p>			

Recommendation	Duty holder	Target completion date	Completion confirmed date
<p>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.</p>			

Recommendation	Duty holder	Target completion date	Completion confirmed date
<p><b>Recommendation 6.5</b></p> <p>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.</p>			
<p><b>Recommendation 7.2</b></p> <p>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.</p>			
<p><b>Recommendation 7.3</b></p> <p>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.</p>			
<p><b>Recommendation 7.4</b></p> <p>Southwark Council should document its processes for establishing, implementing its fire risk assessment programme. Southwark should give consideration to joining the FRACS (Company) Register.</p>			
<p><b>Recommendation 7.4 (a)</b></p> <p>Southwark Council should review the latest guidance on fire safety in specialised housing and adopt relevant recommendations.</p>			
<p><b>Recommendation 8.3</b></p> <p>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</p>			

Recommendation	Duty holder	Target completion date	Completion confirmed date
<p>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.</p>			
<p><b>Recommendation 9.1</b></p> <p>Southwark Council need to implement a process for identifying nonconformities with the fire risk management system and take corrective actions.</p>			
<p><b>Recommendation 9.2</b></p> <p>Southwark Council should continually improve the suitability, adequacy and effectiveness of its fire risk management system.</p>			

# BB7

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