Why should getting a Fire Risk Assessment right be a vital management policy?

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Introduction

Hello (my name is Peter Gannaway and) I work for Paradigm Housing Group and am also chairman of The National Social Housing Fire Strategy Group which is a network of fire safety managers from social housing providers across England and Wales. Our aim is to identify best practice and work with stakeholders within the Fire Sector Federation to improve fire safety standards in housing.

The introduction of the RRO came as something of a wake up call to many in housing who were used to assessing risks to their residents, visitors and employees in other areas of safety but may not have fully recognised the complexity of the risk they had to control from fire.

The need to maintain systems such as emergency lighting, detection and risers was always well recognised; however the interaction of other factors such as those introduced by residents and maintenance teams and how they may impact on the fire safety of the building was perhaps not so well understood. We are now in a position where carpenters are more aware of the hazards of poorly adjusted fire doors and housing officers of the importance of keeping escape routes clear, and the impact cladding has on external fire spread. Greater emphasis is placed on the importance of engaging with residents to ensure they understand the need for maintaining precautions and how to react in an emergency situation.

Core to this level of understanding is the production of a suitable and sufficient assessment which examines all aspects of fire risk.

History

The size of the task to produce detailed assessments across the portfolio of premises many social landlords manage was only fully understood when we read the requirements in guidance
to the legislation produced by DCLG, which for many seemed less helpful than it could have been.

Introducing a risk assessment programme was a daunting task when we consider that in the 2011 census, 21% of the population of England and Wales with a much higher percentage in our cities live in flats, maisonettes or other property with communal areas which come under the requirements of the RRO.

In view of the volume of work to be undertaken housing needed guidance with a balanced approach which recognised the current fire protective properties of buildings, whilst setting boundaries beyond which it was known existing systems simply don’t offer the requisite levels of protection.

We now have additional clearly written guidance supporting a range of differing situations produced by LACORS, Colin Todd Associates and CFOA; along with subject specific documents such as those prepared by the ASFP.

**Current environment and enforcement**

There is an increase in prosecutions arising out of breaches in the RRO and Social Housing providers are aware that relying on the fact that there hasn’t been a fire or loss of life won’t protect them from enforcement action so getting the right assessment is essential.

The Risk Assessor registers provides confidence to the Responsible Person that advice given is suitable and proportionate. There are discussions about the merits of each register but from a sector perspective the common beneficial factor is the requirement for an individual to have had to demonstrate competence to an authoritative lead body before registration.

Unfortunately anyone can call themselves a fire risk assessor and the adequacy or otherwise of assessments is often only picked up as part of a fire service inspection or prosecution. A simple search on the internet reveals many times more individuals offering Fire Risk Assessments than there are registered assessors, and we have heard of companies who offer
them free with other services or claim to complete 12 assessments a day so reducing cost. Across all property types the fire service discovered 14% of risk assessments to be non compliant. We see this as posing a significant risk to public safety.

The RRO was not intended to be a mechanism by which the only valid assessment is a consultant’s assessment. At the beginning there were two very different approaches to the process taken by housing organisations. There was an emphasis in guidance on the fact that people didn’t necessarily need external support but could carry out assessments up to their level of competence and there was a form on the website to encourage people to do so; although guidance was quite clear on its applicability and the need only for people to operate well within their area of competence.

A problem occurs when the Responsible Person doesn’t have the knowledge to make a judgement on what constitutes competence. The fire risk assessment competency council have provided guidance on this, but I believe many particularly smaller organisations aren’t aware of it. I have been asked by a private landlord if I thought he was competent to carry out his own fire risk assessment on a Victorian, four storey pre 91 converted town centre property with basement; he had no previous risk assessment training or experience in fire safety management. My reply was if you have to ask you probably aren’t competent.

The alternative approach was that organisations outsourced all assessments in the belief that they didn’t have the skills necessary to carry out even the most basic review of fire safety precautions on for instance a simple modern two storey block. The outcome was the growth of an industry offering risk assessments without control resulting in the potential for inadequate systems, unsafe conditions and waste of resources. Even where the assessments did adequately record the hazards and risks often the documents were not fully understood by the customer and may have been left unactioned.

**Looking Forward**
Through experience and development of effective working partnerships organisations are now reviewing their original approach with some continuing to work with consultants who act as supportive partners throughout the whole process, whilst others due to economies of scale are developing in-house risk assessment skills which operate within defined boundaries which engage the whole organisation.

All now recognise the importance of implementation and monitoring of controls and the role other parts of the business play in maintaining these elements. To support this our group is working with the Fire Protection Association, Skills for Justice and CFOA to develop a suite of qualifications in fire safety management for the housing sector. The two higher level qualifications will contribute towards underpinning knowledge for those engaged in fire risk assessment in simple and complex blocks of flats.

The introductory level award is aimed at non fire safety professionals such as estates inspection and maintenance staff. This course only examines the identification of fire risk in buildings as those individuals who inspect and repair our properties are best placed to recognise breaches of fire safety. The intended outcome is that unsafe conditions are dealt with at the earliest opportunity.

The introduction of the Primary Authority Scheme into housing is a positive step which will assist our members establish consistent compliant practices across brigade boundaries. The NSHFSG has offered our assistance to help facilitate the process into the sector if required.

The establishment of a suitable and sufficient RA is an essential fire safety measure. However the problem extends into new builds as well as existing stock as necessary information required under Regulation 38 of the building regs is inconsistent to the point where it is often non existent. May I request that the correct process is driven into construction sector and that CDM Co-ords are educated in what to look for and insist on adequate information being provided ideally well before handover as the fire protective measures are normally available at the design stage.
Conclusion

We are now more informed on fire safety issues as can be seen in our changed approach to something as simple as missing or damaged door closers which is now considered to be a breach of compartmentation, not just a repair issue. The impact leaseholders have on communal areas is also now better understood when they change their functional but unattractive flat fire door for a shiny new UPVC door which provides little protection. We appreciate the desire of residents to have an attractive home and therefore wherever possible housing providers work with them to produce acceptable solutions.

Sir Ken Knight has seen for himself the £3m investment South Essex Homes is making in its Tower blocks in consultation with residents. The Callow Mount sheltered project in Sheffield is another example of residents being actively involved in the fire safety process as part of a retrofit sprinkler installation. For many other social landlords the necessary financial requirement is not as great but the commitment to ensure standards are met is equally strong. It is fair to say that although all recognise the need to introduce improvements the costs involved means that resources are prioritised and improvement programmes are in some cases seen in terms of years rather than months.

So in conclusion the right risk assessment is an essential element of fire safety policy. A suitable and sufficient assessment is a business tool which allows for like risks to be grouped across different assessments so controls can be introduced to ensure the safety of residents in a most cost effective manner. From a housing management perspective the fire safety management system should go on to recommend implementation and monitoring measures to provide confidence of ongoing control. We believe a simple way of identifying competence, such as the introduction of a fire safe register, and improved training for those charged with daily management of safety precautions would improve fire safety. The improved application of existing requirements in Regulation 38 is overdue and if applied correctly would assist assessors in their task of producing a suitable and sufficient RA.

Thank you for listening.