

Mark Snelling

20th June 2017

Our ref: SAF001-ARMA-MS01 20.06.17

Dear Mark,

Re: Fire risk assessment advice for residential management agents

I write further to our telephone discussions pertaining to the review of fire risk assessment guidance notes for ARMA members.

The current guidance within note B05 is comprehensive, technically correct, and helpful to the reader with relevant links to more detailed guidance. I note that it was recently reviewed (January 2017), and there have been no significant changes to guidance or legislation since this time. However, in view of the recent events at Grenfell Tower, although I do not suggest that it is yet appropriate to draw any conclusions from the incident I agree that it would be pertinent to bolster the information provided with regard to fire risk assessments of the common areas of buildings, and most particularly for high rise or complex residential accommodation.

Regrettably, there has been a significant amount of misinformation in the press, and some unhelpful speculation, and ARMA members may be understandably unsure as to the fire safety status of some of the buildings for which they may have some management responsibility. I suggest then that the following narrative should be included as an appendix, or be issued as a separate extraordinary guidance note for members, as preferred:

The scope of a fire risk assessment needs to be relevant to the nature of the premises and the amount known in respect of the structural protection. There are, in principle, four different types of fire risk assessment that can be carried out for a purpose-built block of flats. They differ in the extent to which the building is inspected.

Guidance on the selection criteria for risk assessors and the methods of carrying out a fire risk assessment are provided by organisations including the Fire Protection Association, the Health and Safety Executive, and the Department for Communities Local Government. The latter of these provides some detailed descriptions of the varying degrees of invasiveness and detail required for fire risk assessments, as follows:

Type 1 – Common parts only (non-destructive)

A Type 1 fire risk assessment is the basic fire risk assessment required for the purpose of satisfying the FSO.

The inspection of the building is non-destructive. But, as well as considering the arrangements for means of escape and so forth, the fire risk assessment includes examination of at least a sample of flat entrance doors. It also considers, so far as reasonably practicable, the separating construction between the flats and the common parts without any opening up of construction. However, in this Type of fire risk assessment, entry to flats beyond the area of the flat entrance door, is not involved.

Where there are demountable false ceilings in the common parts, it may be appropriate to lift a sample of readily accessible false ceiling tiles. In addition, it will normally be appropriate to open a sample of service risers, provided access is practicable at the time of inspection.

Unless there is reason to expect serious deficiencies in structural fire protection – such as inadequate compartmentation, or poor fire stopping – a Type 1 inspection will normally be sufficient for most blocks of purpose-built flats. Where doubt exists in relation to these matters, the action plan of a Type 1 fire risk assessment may recommend that one of the other types of fire risk assessment be carried out or that further investigation be carried out by specialists. (However, this should not be a generic recommendation of all Type 1 fire risk assessments; the recommendation should be based on identification of issues that justify reason for doubt.)

Type 2 – Common parts only (destructive)

The scope and objectives of a Type 2 fire risk assessment are generally similar to those of a Type 1 fire risk assessment, except that there is a degree of destructive inspection, carried out on a sampling basis. This will usually necessitate the presence of a contractor for the purpose of opening up construction and making good after the inspection.

In order to check the integrity of separating construction, the areas in which destructive inspection is carried out might sometimes include a sample of flats. However, because of the nature of the work, this can often only be carried out in vacant flats.

A Type 2 fire risk assessment is usually a one-off exercise, which is carried out only if there is good reason to suspect serious structural deficiencies that could lead to spread of fire beyond the flat of fire origin. The age of the block alone is not generally sufficient to warrant a Type 2 inspection. The need for a Type 2 fire risk assessment may sometimes be identified in a Type 1 fire risk assessment, but should not simply be recommended as a matter of course.

Type 3 – Common parts and flats (non-destructive)

A Type 3 fire risk assessment includes the work involved in a Type 1 fire risk assessment, but goes beyond the scope of the FSO (though not the scope of the Housing Act). This risk assessment considers the arrangements for means of escape and fire detection (i.e. smoke alarms) within at least a sample of the flats. Within the flats, the inspection is non-destructive, but the fire resistance of doors to rooms is considered.

Measures to prevent fire are not considered unless (e.g. in the case of maintenance of the electrical and heating installations) the measures are within the control of, for example, the landlord.

A Type 3 fire risk assessment may sometimes be appropriate for rented flats if there is reason to suspect serious risk to residents in the event of a fire in their flats. (This might be, for example, because of the age of the block or reason for suspicion of widespread, unauthorised material alterations). This type of fire risk assessment will not be possible in the case of long leasehold flats, as there is normally no right of access for freeholders.

Type 4 – Common parts and flats (destructive)

A Type 4 fire risk assessment has the same scope of work as a Type 3 fire risk assessment, except that there is a degree of destructive inspection, in both the common parts and the flats, carried out on a sampling basis. This will usually necessitate the presence of a contractor for the purpose of opening up construction and making good after the inspection. However, the nature of the work is such that, often, destructive inspection within flats can only be carried out in those that are vacant.

This is the most comprehensive fire risk assessment, but will only be appropriate in limited circumstances – such as when a new landlord takes over a block of flats in which the history of works carried out is unknown and there is reason to suspect serious risk to residents from both a fire in their own flats and a fire in neighbours' flats.

Note: *Before destructive inspection is to be carried out, the risk of disturbing asbestos should be considered (e.g. by examination of the asbestos register).*

Any person appointed to undertake or review a fire risk assessment must have a detailed understanding of:

- *the intent, objectives and requirements of the FSO, as it relates to the building being assessed;*
- *the design principles of blocks of flats, including blocks constructed in accordance with previous standards and legislation;*
- *the causes of fire and means for their prevention;*
- *relevant fire protection measures, particularly means of escape and compartmentation in the building being assessed;*
- *the requirements of the Building Regulations Article B1 to B5 as applied to the building being assessed;*
- *the requirements of Fire Safety In Purpose-built Blocks of Flats guidance, as published by the Local Government Association;*
- *the appropriateness of fire alarm systems in the building being assessed;*
- *the appropriateness of fire extinguishing appliances in the building being assessed;*
- *the evacuation strategy for the building being assessed, including 'stay put' policies;*
- *fire safety management, as it relates to the building being assessed;*
- *the effect of social and lifestyle factors on the risk to residents of purpose-built blocks of flats, and of the special needs for disabled people in the event of fire.*

The review should consider the whole building encompassing the overarching design, the construction and composition of the means of escape, and the fire resisting elements including external façades, cladding, windows, and internal means of compartmentalisation.

*The fire safety systems required within buildings will vary significantly subject to the complexity of the measures required to ensure fire containment (e.g. fire suppression systems), emergency firefighting facilities (e.g. wet or dry rising mains, firefighting lifts), and protection of the means of escape (e.g. smoke control systems). In general, these increase as a function of the building's height above ground, as well as the dependency of the occupants should there be sheltered or specialised housing. **It is therefore very important that the fire risk assessor is able to fully demonstrate the necessary set of competencies that increase in accordance with the complexity of the building.***

Small buildings of consisting of ground and no more than one storey above ground:

Small buildings with few above or below ground levels will usually be the least complex in terms of the fire safety systems required. The fire safety arrangements as listed above are unlikely to be complex, unless the building has been engineered to overcome a particular design issue. The fire risk assessor must be able to demonstrate knowledge of residential fire safety measures, and have prior experience of this type of risk assessment in similar buildings.

Low-rise buildings:

Buildings with a single stair and no more than 3 storeys (or up to 11m), or buildings generally up to 18m above ground will usually require some measure of additional protection to escape routes. There may also be some restriction on the materials used for the façades, subject to the distance between adjacent buildings and boundaries. The fire risk assessor must be able to demonstrate knowledge of residential fire safety measures including the control of smoke and fire spread, and have prior experience of this type of risk assessment in similar buildings.

High-rise buildings i.e. those with a storey height that exceeds 18m above ground:

High-rise buildings will require additional measures for firefighters which, in the case of new buildings, would ordinarily include protected firefighting shafts including lifts. For buildings that exceed 30m in height, current guidance also requires fire suppression systems and phased evacuation may also be a recommendation. In older existing buildings, these facilities may not all be provided and a thorough assessment of the implications will be required.

High-rise buildings require additional control of fire spread over their external wall surfaces, including any cladding materials, and may have more complex smoke control requirements internally. The design of stairs may also differ in the tallest buildings, including the possible requirement to discount one stair where firefighters may require use of it during evacuation.

In the case of high-rise accommodation, the fire risk assessor must have previous experience of fire safety works in high-rise buildings, and a good understanding of smoke control and fire suppression systems. It is therefore very strongly recommended that the fire risk assessor is able to provide evidence of a suitable fire engineering qualification e.g. with the Institution of Fire Engineers. There are also several schemes that accredit the work of fire risk assessors and allow them to demonstrate their competence by third party assessment. More information is available from the Fire Protection Association and ARMA.

I very much hope that this is of help. If there is anything you consider that I have missed or under/over stated, then please do advise me accordingly.

Yours sincerely,



Alastair Burleigh
Director