

## **PE1719/B**

The National Fire Chiefs Council submission of the 5 July 2019

The NFCC is the professional voice of the UK fire and rescue services and is comprised of a council of UK Chief Fire Officers. This response was put together through the NFCC's Protection and Business Safety Committee, which is comprised of fire and rescue service fire safety specialists from across the UK.

### **NFCC Position**

NFCC published a [stay put policy position statement](#) previously which supports stay put in residential buildings that have been built and maintained correctly.

The "stay put policy" is a principle of building design, and which underpins the development of fire safety and Fire Service operational policy for buildings of this kind. The stay put approach has been in place for many years and, although fires in flats unfortunately occur virtually every day across the UK, the fire usually only affects the room of origin or the flat on fire.

It is unusual for fires in individual flats to spread beyond the room of fire origin, and very rare for those to spread beyond the compartment (i.e. beyond the flat of origin). Only 8% (56) of the 714 fires in purpose-built blocks of high-rise flats (ie 10 storeys or more) in 2016/17 spread beyond the room of origin [based on the Home Office's ad-hoc publication on fires in purpose-built flats, England, April 2009 to March 2017].

For instance, in Scotland between 2017 and 2018 there were 5,310 primary fires in dwellings. Of these 521 (10%) spread beyond the room of fire origin and in 74% of cases the fire was confined to the item where the fire started.<sup>1</sup>

In addition, between April 2010 and March 2017, there were 57,633 (primary) fires in purpose-built blocks of flats across England. Of these the number of fires that broke out of a compartment was 1% (569).

Multi occupied residential buildings should be designed and built in accordance with relevant building standards to accommodate a stay put strategy in the event of fire. This requires a high degree of compartmentation between all flats to prevent fire spreading from the flat of fire origin. In addition, compartmentation around escape routes and smoke control provisions in escape routes should ensure that if occupants wish to evacuate they should be able to do so in relatively smoke free conditions. External wall systems of multi occupied residential buildings also require consideration as this is a further means by which fire can spread and impede means of escape.

The fire resistance of components that form compartment walls and floors are typically assessed using the standard fire test procedures laid down in specified British and European Standards. As all fire scenarios can not be covered by a single testing regime, the tests are generally conservative in order to ensure that the

---

<sup>1</sup> Table 22, Fire and Rescue Incident Statistics, Scotland, 2017-18, Released 31st October 2018. [https://www.firescotland.gov.uk/media/1332762/sfrs\\_incident\\_2017\\_18.xlsx](https://www.firescotland.gov.uk/media/1332762/sfrs_incident_2017_18.xlsx)

components will provide an appropriate level of fire resistance in an actual fire in a real building.

Some high-rise residential buildings may also have additional fire safety provisions such as sprinklers fitted which can play a significant role, as part of an appropriate package of fire safety measures, in reducing the impact of fire on people, property and the environment and further supporting the stay put policy. They also assist firefighters in carrying out search and rescue operations by limiting fire development.

NFCC recommends that sprinklers should be required in all new residential buildings above 18 metres in height in the UK in line with the existing Technical Standards in Scotland.

A stay put policy not only relies upon the fire safety provisions in a building but also on robust management and maintenance of those fire safety provisions. In England and Wales responsible persons are required to carry out a suitable and sufficient fire risk assessment which should identify persons at risk, additional fire safety provisions, management and/or maintenance measures to reduce the risk to life in case of fire. It is for the responsible person to satisfy themselves that they have sufficient competencies themselves or have employed a competent person to undertake the fire risk assessment for the building.

It is understood that Scottish Government (through consultation) are currently reviewing whether there needs to be a change to the Scottish regulatory system to ensure fire risk assessments in residential buildings are carried out by an appropriate entity.

Fire and rescue services in England have a statutory duty to undertake fire safety audits of all premises (including the parts used in common of residential buildings). This duty is normally discharged based upon risk. There are currently no equivalent statutory duties for Scottish Fire and Rescue Service in residential buildings. Scottish Fire and Rescue Service are however, the enforcing authority under Regulation 23 and 24 of the Fire Safety (Scotland) Regulations 2006 where they can enforce facilities already provided for the use by or protection of firefighters. Intelligence gathering visits are undertaken on a quarterly basis.

A stay put strategy in high-rise residential buildings also allows firefighters to easily access a building in the event of fire unimpeded by occupants evacuating the building. This should assist fire and rescue service personnel to respond more effectively for search and rescue purposes through direct access to firefighting shafts and laying hose to the floor of fire origin. Operational challenges may arise where an evacuation strategy other than stay put is introduced for high-rise single staircase residential buildings.

NFCC notes that the Scottish Government announced a change to fire safety measures in all new high-rise residential buildings to facilitate whole building evacuation using sound alerts.

Evacuation systems could be a useful additional provision in a fire and rescue services toolbox in conjunction with a package of fire protection measures, however

this requires careful consideration to ensure the systems interact appropriately with other fire safety design measures of the building to ensure they can be used safely. NFCC strongly believe that this should only ever be an additional measure and never used as a trade off or substitute for lack of, or reduction in, fire protection measures.

NFCC are currently considering how sound alerts might also be applied elsewhere in the UK, where fire safety requirements in residential buildings differ to those in Scotland. In Scotland, proposals to introduce sound alerts have been part of a package of measures inclusive of a linked proposal for introducing two escape stairs in all new high-rise residential buildings, which is currently not the case in the UK.

NFCC is content for the stay put strategy to be reviewed but have identified the need for Government funded robust academic research, including practical exercises, into high-rise residential evacuation strategies and the supporting building fire safety features. This would ensure that revisions to current guidance would be based upon appropriate up to date information, robust data and evidence rather than just opinion.

### **Consistency in the UK**

Throughout the UK there is a wide range of guidance governing fire safety standards all of which currently recommend a stay put policy which drives consistency of evacuation strategy practices in the UK.

National Operational Guidance was created to deliver best practice operational policy and tactical guidance to fire and rescue services during incidents. All fire and rescue services are moving towards adopting National Operational Guidance which will drive consistency of operational approach. National Operational Guidance gives clear guidance on stay put and states that it *'should be kept under review throughout the incident'*<sup>2</sup>. This guidance should ensure that appropriate decisions are made during an incident to either support stay put or evacuate part or whole of the building.

NFCC also recommends that there is increased communication with residents. The recent England Government consultation published on 6th June 2019 [Building a safer future: proposals for reform of the building safety regulatory system](#) proposes a requirement on duty holders to provide information to residents through a resident engagement strategy which includes the evacuation strategy, the actions to take in the event of fire, residents fire safety responsibilities, information on the fire safety features of the building, contact details of the duty holder and a clear route to escalation of issues to a new national regulator.

This should drive consistency of information given to residents in England however, it will not be equally applicable in devolved administrations.

In reference to comments contained in your [report](#) of session 5 (30th May 2019), NFCC can also confirm that Greater Manchester Fire and Rescue Service support a stay put policy in high-rise residential buildings.

---

<sup>2</sup> National Operational Guidance, [Operations](#), Control Measure, evacuation and shelter