Safety and Health Services

Fire safety policy:
Supporting guidance document

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Definitions of roles and responsibilities under the Regulatory Reform (Fire Safety) Order 2005

The main fire legislation in the UK is The Regulatory Reform (Fire Safety) Order 2005 - (RRO). The Order places duties on ‘responsible persons’, to the extent which they have control, over premises and activities to:

- Ensure compliance with relevant legislation;
- Ensure suitable and sufficient fire risk assessments are carried out;
- Implement protective and preventative measures as required to ensure the safety of all ‘relevant persons’;
- Appoint competent person/s to assist him/her in implementing the measures as required;

In the case of the University of Bristol, the Board of Trustees is the “Responsible Person” and is represented by the Vice-Chancellor.

Definitions

The following definitions are taken from the RRO:

**Responsible Person:**

In relation to a workplace, the employer, if the workplace is to any extent under their control.

In relation to any premises not falling within the above:

- 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
- 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.

**Relevant Persons:**

Any person who is or may be lawfully on the premises and any person in the immediate vicinity of the premises who is at risk from a fire on the premises.

**Principles of Control (General):**

The RRO defines the principles of control, in order of preference, as being:

- avoiding risks;
- evaluating the risks which cannot be avoided;
- combating the risks at source;
- adapting to technical progress;
• replacing the dangerous by the non-dangerous or less dangerous;
• developing a coherent overall prevention policy which covers technology, organisation of work and the influence of factors relating to the working environment;
• giving collective protective measures priority over individual protective measures;
• giving appropriate instructions to employees.

Place of Reasonable Safety:
A place within a building or structure where, for a limited period of time, people will have some protection from the effects of fire and smoke. This place, usually a corridor or stairway, will normally have a minimum of 30 minutes fire resistance and allow people to continue their escape to a place of total safety.

Place of Total Safety:
In relation to premises, means a safe area beyond the premises, generally the fire assembly point.

Fire risk assessments
On behalf of the Chief Property Officer, all University of Bristol Fire Risk Assessments (FRAs) will be completed by Campus Division with involvement and cooperation of building users. Residential Facilities Managers will be responsible for residence FRAs but the practical element of completing them will be delegated to suitably trained Residential Facilities Coordinators.

Fire risk assessments will be completed using the current template owned by Campus division. The template can be obtained from the relevant building’s Facilities Manager.

Fire alarms
When the fire alarm in a University building sounds, it is normally expected that everyone will immediately leave the building and go to the designated fire assembly point. The only exceptions to this rule are those people who cannot readily escape the building without assistance. These people will go with their helpers to a refuge and use the communications device to seek advice on whether to evacuate the building or not. People needing assistance to escape will only be evacuated from a building if there is a real fire or if they want to put their Personal Emergency Evacuation Plan into practice. The only other group of people potentially not leaving immediately could be those operating on a patient in surgery. In these circumstances, standing arrangements are in place to alert and advise whether there is a need to evacuate the building due to staff life risk from fire.
It is recognised that people may leave their valuables/keys/money in a building if they leave hurriedly due to a fire alarm. **It is considered acceptable to collect your personal belongings in your immediate vicinity as long as your escape from the building is not delayed.** For example, grabbing a laptop computer but not unplugging and packing into a carry case.

**Personal Emergency Evacuation Plan**

Where it is identified that a member of staff needs assistance to escape a building in the event of an emergency, the Head of School, School Manager or Head of Service as appropriate will arrange, via a delegate if necessary, to have a Personal Emergency Evacuation Plan written. This should be done with involvement of the individual concerned and input from the Fire Safety Adviser and Facilities Manager. All reasonable measures will be adopted to facilitate a person’s needs with regard assisted escape in the event of an emergency.

Guidance on this is available from the [Safety and Health Services website](https://bristol.ac.uk/safety).

Note: Multiple PEEPs are likely if the person uses different buildings, or one PEEP written to include multiple buildings.

**Fire detection and alarm systems**

New and replacement fire detection and alarm systems will be addressable, incorporating automatic fault monitoring and reporting. Systems with a limited number of automatic detectors may be a ‘conventional zoned type’ and will incorporate automatic fault monitoring and reporting.

The University of Bristol Campus Division’s [Generic Project Requirement resource](https://bristol.ac.uk/safety) details the fire alarm systems selection and design process.

**Emergency escape lighting**

New and replacement emergency lighting systems will incorporate the facility to perform automatic luminaire fault monitoring and routine functional testing. The emergency power supply to each luminaire will be from integral batteries, or from a central battery power supply.

The University of Bristol Campus Division’s [Generic Project Requirement resource](https://bristol.ac.uk/safety) details the emergency lighting systems selection and design process.

Emergency escape signs will be incorporated into escape lighting wherever possible and practical.
Emergency escape signs/fire safety signs

Emergency escape signs will comply with BS5499. Signs indicating locations and types of fire extinguishers will only be provided when the extinguishers are not in plain view (hidden in a recess or similar).

The University has obtained agreement from the enforcing authority that fire extinguisher signage on the body of the extinguisher is adequate and additional signs placed on the wall above extinguishers is unnecessary.

Firefighting and fire suppression

Staff and students are not expected to fight fires even if they have taken training to do so. Firefighting will always be voluntary. Fire extinguisher training must be refreshed annually to comply with legal requirements.

The University approach to installation of portable fire-fighting equipment has the full support of Avon Fire and Rescue Service. Portable fire-fighting equipment (fire extinguishers and fire blankets) will be installed roughly in line with BS5306-8 in that extinguishers will be installed at fire points and, where identified by risk assessment, specific locations. For examples, in some laboratories and plant rooms to protect against specific fire hazards.

In general, fire points will be storey exits and final exits. Any deviation from BS5306/8 has the agreement and support of Avon Fire and Rescue Service and must be risk assessment based.

The University will gradually remove existing fire extinguisher installations (water or foam and CO2) and replace this with one fire extinguisher suitable for any type of fire that could occur in that location. Having only one suitable fire extinguisher at a fire point removes the risk of someone choosing the wrong extinguisher to fight a fire. Until this approach has been adopted in full across the Estate, two-extinguisher installations will generally comprise:

- 9 litre water or foam/AFFF to tackle the class A risk (combustible solids). 6 litre water + additive extinguishers may be installed to reduce the manual handling risk.
- 2kg CO2 to tackle the electrical risk or, where appropriate, the class B risk (flammable liquids)
- Plant rooms including lift motor rooms will have a general-purpose powder extinguisher either just inside or just outside the plant room door. This extinguisher can be used to tackle class A, B, C (flammable gas) fires and fires involving electrical equipment.
- Where deep fat fryers are in use there will be a Wet Chemical fire extinguisher installed – class F fire.
• Synthetic Chemistry will have some specialist dry powder extinguishers as their research experiments can involve metals which can lead to small fires. These extinguishers cover the class D risk – burning metals.

• Four-foot fire blankets will be installed in kitchens with cookers. Six-foot fire blankets will be installed in some laboratories where risk assessment has identified the potential for staff or students to accidentally set their lab coats or clothing alight.

• Building users can request additional fire extinguishers where they have identified through risk assessment there is a need. These additional extinguishers will be purchased by the department but maintained by Campus Division.

• Based on risk assessment carried out by laboratory users, some labs will also hold appropriate portable fire extinguishers to tackle the risks identified (eg, class A, B, C). This information should be made available to the building Facilities Manager for inclusion in the building Fire Risk Assessment.

• Where fire extinguishers are sited out of clear sight, signs indicating their location will be provided. Building floor plans should indicate the type and location of fire-fighting equipment. Maintenance records will include locations and types of portable fire extinguishers.

Student residences have had most portable fire extinguishers removed in 2013. All that remains in student-accessible areas is a fire blanket in student kitchens.

Catered Halls retain the normal extinguisher installation in the non-student areas, such as in catering kitchens and plant rooms. This approach was extensively consulted-on and received approval from the Fire Service and University insurers.

New buildings and, where appropriate, existing buildings being refurbished, will include installation of suitable fire suppression systems to increase fire safety measures within the building. This will ensure compliance with the Fire Safety Bill and recommendations coming from the report following the Grenfell Tower fire.

**Building structure**

New buildings or buildings being refurbished will not have external cladding made of ACM or other flammable materials if cladding exists or intended to be installed. This applies to all buildings of any height or purpose. Any external cladding systems will be non-combustible following European Standard EN-13501-1.

Permanent “fire-stopping” will not include the use of expanding foams. Breaches in compartmentation during ongoing works will be temporarily fire-stopped overnight/at weekends by the use of intumescent pillows.

Works carried out by IT Services that will involve the penetration of fire compartments will be overseen by Campus division. An example of this type of work
would be the installation or relocation of data cabinets and associated cabling. Data cabinets should not be located in an escape route. Those currently installed in such locations should be relocated to a safe place when the building or area is refurbished or changes to the installation occur.

Building layout plans following construction, refurbishment or alterations must contain relevant fire safety information including compartmentation lines. This information must be sent to Space and Asset Management for inclusion on their building floor plans/records and be available for use during fire risk assessments or building inspections.

Testing

Statutory testing of building fire alarm systems, emergency lighting systems, electronic door release systems and refuge communication systems will continue in line with Campus Division Maintenance Services procedures and British Standards. Records of these tests will to be held in the relevant logs section of Building Fire Manuals. Fixed electrical installation testing will continue to be carried out as above and records will be held in the Testing Office within Maintenance Services at Old Park Hill.

Portable Appliance Testing (PAT) is the responsibility of the Head of School or Service. The School or Service Safety Adviser will ensure that there is a system in place to manage it. The testing can be done by a trained member of staff, using approved, calibrated testing equipment, or it can be done by one of the approved contractors available via Procurement, see PAT Testing on the Procurement website Finance Services - Campus division and facilities.

The contract for annual testing and maintenance of portable fire extinguishers will be managed by Campus Division Compliance Team.

Six-monthly inspections of fire doors is the responsibility of the Campus Division and, in practice, will be done by suitably trained and competent staff. Fire doors will be inspected every six months and be instigated by the Campus Division Compliance Team planned preventative maintenance system.

Results will be reported to Campus Division Maintenance and logged in the appropriate log within the Building Fire Manual, with any remedial works carried out by Maintenance Services.

Responses to internal audits or fire service audits and inspections

Audits of University buildings carried out by the fire service will be notified to the Facilities Manager and Head of Campus Division Safety and Health as soon as
dates are known. Pre-warning of ad-hoc building inspections carried out by the Fire Safety Adviser will not be given.

Scheduled building inspections carried out by the Fire Safety Adviser do not occur when fire service inspections are taking place. Building inspections carried out by Facilities Managers or school safety personnel are recorded and actions dealt with using their own recording systems and outcomes not made known to the Fire Safety Adviser.

Non-compliance issues identified during fire safety inspections/audits carried out by wether the university Fire Safety Adviser or Avon Fire and Rescue Service inspectors will be dealt with as identified below.

**Issues identified by the Fire Safety Adviser:**

Initial report will go to the Facilities Manager to action, copied to the Head of Campus Division Safety and Health team. The Facilities Manager may choose to create an action plan for association with the building fire risk assessment and sign-off actions as they are completed. The Fire Safety Adviser will not require a copy of the plan or updates on completed actions.

**Issues identified during fire service audits/inspections:**

If the inspection identifies issues needing to be resolved and an action plan is required to be sent to them, their letter stating areas of non-compliance will be sent to the Fire Safety Adviser who acts as liaison between the university and the fire service. The letter will be forwarded to the relevant people:

- Facilities Manager
- School or service representative
- Head of Facilities Management Hard Services
- Head of Campus Division Safety and Health Team
- Head of Safety and Health Services, dependant on the nature of the non-compliances

An Action Plan will be created by the Facilities Manager, sent to the Fire Safety Adviser for comment and the Head of Campus Division Safety and Health for information/monitoring. The Fire Safety Adviser will forward to the fire service within the timescales required by them.

Completed actions will be signed-off by the Facilities Manager as necessary for auditing purposes.
### Fire safety training

All University staff will undertake basic fire safety training as part of their induction:

- Fire safety awareness training online, which should be refreshed annually
- Building induction training, which includes fire safety, emergency arrangements for the building and walking through fire escape routes

Further fire safety training is also available, such as fire warden training. These training courses are typically open to all staff but particularly useful for specific staff groups. Fire safety training records will be held by both the School/Service and by the Administration Team within Safety and Health Services (SHS). The SHS Admin Team can be requested to provide a list of people who have taken fire safety training, when, and the due date for refresher training. The accuracy of SHS records relies on staff reporting changes to their circumstances, such as change of location, leaving the University, etc.

Lecturers and tutors will act as ‘fire wardens’ for their respective lessons and ensure students leave the building safely, reporting this to the officer in charge of the evacuation. Lecturers and tutors will inform students of the fire safety arrangements and procedures for escape at the first lecture to the group each year. This information will be contained in a manual at the lectern or the teaching room manual and be maintained by Learning Facilities Management.

All Schools and Services will provide staff to be trained in the use of fire extinguishers. This training is to be refreshed annually and reminders will be issued by the SHS administration team three months prior to training expiry. Use of fire extinguishers to tackle fires will always be voluntary even if trained.

Where there is an identified need, nominated or volunteer staff will take training in the operation of evacuation chairs and/or evacuation lifts where provided. The training will highlight the need for regular practice in the use of the equipment. Refresher training could be provided bi-annually but the key to confidence and competence is regular practice.

Students residing in University residences will take an online fire safety package providing general fire safety information prior to receiving their room keys. They will also attend a mandatory fire safety briefing at their residence, within the first week of residence. This approach also applies to students residing at third party residences approved by Residential and Hospitality Services.

Emergency alarm investigation training will be delivered by the fire safety adviser as part of fire safety awareness training or as a short, stand-alone training event.

Fire drills will be arranged by Facilities Managers and take place every term. The result will be recorded in the appropriate log in the building Fire Manual by the
Safety and Health Services

Facilities Manager. False alarms do not count as a fire drill because they are not viewed as a learning or training exercise. The Fire Safety Adviser will receive early warning of planned fire drills so he or another available member of the SHS team can attend to monitor the effectiveness of the evacuation. Fire drills will be used as a means of assessing fire safety arrangements for the building and will also act as a means of training building users on the arrangements in place for fire safety and the means of escape available within the building.

When a building is evacuated due to a fire alarm or other similar emergency, staff and students will not return to the building until it is confirmed safe and they have been authorised to do so by security officers or the fire service. In the event of a real fire not affecting some parts of a building, if safe to do so, security officers will escort people to those unaffected areas to collect belongings such as house keys, bags, laptops left in the building when the alarm sounded.

Use of passenger lifts for emergency evacuation

Externally-sourced information (Croner-i, June 2020)

Under the UK fire safety legislation, the responsible person is required to put in place an emergency evacuation plan that takes into account the evacuation of any disabled persons who may be present.

The use of passenger lifts to assist in the evacuation of disabled occupants as part of this plan is not normally recommended. However, government guidance suggests that, subject to an adequate risk assessment and suitable fire safety strategy, passenger lifts can be utilised.

Campus Division, supported by Safety and Health Services, are responsible for developing an emergency evacuation plan for its premises and will therefore determine the viability of using passenger lifts as a means of escape.

Benefits and risks

BD 2466 Guidance on the Emergency Use of Lifts or Escalators for Evacuation and Fire and Rescue Services Operations (2006) from the Government, states that the use of lifts in an evacuation strategy can have a number of benefits.

This includes the timely evacuation of disabled occupants, familiarity of the use of lifts (rather than escape routes), reductions in physical effort, stair congestion and a reduction in evacuation time. However, the use of lifts can also present risks. These include:

- current practice and training not to use general lifts for evacuation purposes
- consistency of approach between buildings of a similar type
• extent of passive protection and compartmentation
• potential exposure to fire gases while waiting for a lift
• lift and escalator availability, reliability and failure modes
• human factors, such as exit choice behaviour, particularly where phased evacuation strategies are adopted.

Taking account of the above, practice normally dictates that passenger lifts should not be used for emergency evacuation. This is reflected in government guidance that notes that a lift not specifically designed as a firefighting or evacuation lift is “not normally considered acceptable as a means of escape”.

However, the same guidance also notes that “normal lifts may be considered suitable for fire evacuation purposes, subject to an adequate fire risk assessment and development of a suitable fire safety strategy by a competent person”.

This latter statement is further expanded upon in BS 9999:2017 *Fire Safety in the Design, Management and Use of Buildings. Code of Practice*, which states that lifts not explicitly designed for evacuation should not be used for general evacuation, “but they may be used for the evacuation of disabled people” provided that certain recommendations are met.

**Assessment of use**

BS 9999 further states that “a lift that is not explicitly designed for evacuation may be used for evacuation, provided that it provides the same functionality as an evacuation lift” and subject to a risk assessment.

This is also reflected in the recently published BS 8899:2016 *Improvement of Fire-fighting and Evacuation Provisions in Existing Lifts. Code of Practice*. This document, like others states that the use of lifts should be risk assessed and “put into context as part of a wider building fire strategy”. The assessment and strategy development should include the following.

• A review of the building design including building characterisation and environs, occupant characterisation and fire safety management.
• The fire safety objectives of the use of lifts of disabled persons.
• Additional fire safety precautions that can be adopted (eg protected lobbies, upgraded lift systems, CCTV, management procedures, etc).
• Acceptance criteria and methods of analysis such as a significant reduction in evacuation time, degree of protection, etc.
• Evacuation scenarios for analysis taking account of factors such as occupancy levels, training, mobility of occupants, etc.

When assessing the risks, all relevant fire protection measures need to be given consideration. For example, if the property has significant protective measures such
as a sprinkler system and compartmentation, this may influence and enable the early use of a lift.

BS 9999 provides a useful list of factors to be considered when assessing the use of a passenger lift, including the:

- interface between the lift control system and the fire detection and alarm system so as to support the evacuation management strategy
- controlled operation of the lift will be possible during an evacuation (evacuation switches)
- power supply to the lift is likely to remain usable throughout the time required for evacuation.

Other factors to consider will be in relation to the measures built into the property including the provision of a refuge area, communication equipment, protected lobbies, etc.

The risk assessment should be evaluating whether the lift meets the recommendations given in Annex G of BS 9999. The same requirements are now also found in Annex C of BS 8899. The criteria set cover both physical elements and managerial elements such as:

- a minimum size for the lift car and doors
- the basic requirements of BS EN 81-20/81-70 are met
- power should be provided from a dedicated submain circuit
- trained staff should be designated to manage the use of the lift.

Where all relevant criteria are met and the risk assessment justifies the use of the passenger lift, then a suitable strategy can be developed for the use of the lift for evacuation purposes.

**In use factors**

Where it is determined that a passenger lift can be used for evacuation purposes, it is essential that appropriate management procedures are adopted so as to enable an effective emergency evacuation plan integrating lift usage to be developed.

BD 2466 states that for lifts to be used for emergency evacuation, the management level in the building should be Level 1 as detailed in BS 9999, which states that “Level 1 demonstrates best practice in which the organisation’s management system is determined to meet a management system standard such as PAS 7”.

**Note:** PAS 7 has now been replaced by BS 9997:2019 Fire Risk Management Systems. Requirements with Guidance for Use.
BS 8899 notes that “evacuation lifts are intended to allow authorised persons to use lifts to evacuate disabled persons… they are not intended to be used by disabled people to evacuate themselves”.

Therefore, a key element of the strategy is the appointment and training of relevant staff to act as “evacuation wardens”. For example, an operator should be allocated to take control of the lift and:

- determine the storey and part of the building indicated at the location of the fire
- determine the storeys at which people are awaiting assistance
- take control of the lift and proceed to move people requiring assistance to the final exit level.

From the above, it can be concluded that the responsible person will need to ensure that there is a process in place to identify those needing assistance and what floor they are located on. This can be achieved through the completion of Personal Emergency Evacuation Plans (PEEPs) that are made known to the evacuation wardens.

The effective development of a PEEP for a member of staff or visitor is very much a collective effort that may require an input from various parties. However, it is important that a named individual is made responsible for the co-ordination of the process, including the testing process, particularly where lifts are used.

Other factors to consider will be occupant’s familiarity with the plan, their willingness to use it and the means of communicating with them. As such, procedures will need to be adopted to ensure all stakeholders are aware of the procedures and practice the procedures.

In addition, the hardware necessary to operate the lift should be tested regularly including a weekly test of the evacuation lift switches and a monthly test of the power supply.

Further information

- BD 2466 Guidance on the Emergency Use of Lifts or Escalators for Evacuation and Fire and Rescue Services Operations
- PD ISO/TR 25743:2010 Lifts (Elevators). Study of the Use of Lifts for Evacuation During an Emergency, British Standards Institution
Building Safety Bill 2020

Background and introduction

The Draft Building Safety Bill 2020 was published on 20 July 2020 introducing fundamental changes to improve building and fire safety in structures and will apply to all new multi-occupied residential buildings over 18 metres, or six storeys, in height in England. Existing buildings will be brought within the system on a phased basis. The Bill amends the 1984 Building Act and associated regulations for all building work.

A new regulatory body, The Building Safety Regulator (BSR) has been established. The BSR will be run by the Health and Safety Executive (HSE) and is responsible for all major regulatory decisions at design, construction, occupation and refurbishment of buildings. It will also maintain a national register of buildings that come under the legislation, issue best practice guidance, oversee building control bodies and advise government on changes to building regulation as well as overseeing a new competency framework.

New requirements

- Those building, or carrying out significant refurbishment of, new residential high-rise buildings will be required to seek approval from HSE at three ‘gateways’, or stages: planning permission; pre-construction; and pre-occupation. Owners of existing buildings will be required to seek pre-occupation approval on a phased basis.
- Five categories of ‘duty holder’ will be created during the construction phase: client; principal designer; designer; principal contractor; and contractor. These mirror existing health and safety roles under the 2015 Construction (Design and Management) Regulations, but with new responsibilities for fire and structural safety of the building. The principal contractor and principal designer will be required to sign a declaration that the building complies with the building regulations.
- Once the building is occupied, an 'accountable person' will have to be appointed to ensure the ongoing fire and structural safety of the building and to proactively engage with residents. The accountable person must appoint a building safety manager to run the building safely on a day-to-day basis. The HSE will have the power to veto the appointment of unsuitable building safety managers.
- Buildings within scope will have to be registered with the new regulator, and a safety case provided before the HSE will issue a building assurance certificate allowing occupation of the building, with a five-yearly review.
Dutyholders will also be responsible for keeping vital safety information on the building design and build and its management up to date. This so-called 'golden thread' of information will be stored electronically for the entire life of the building. The government is likely to require that this digital record complies with building information modelling (BIM) standards.

Fire Safety Bill 2020

Reference: Russell-Cooke solicitors

The Fire Safety Bill 2020 has now been introduced for the purpose of ensuring that owners and managers of multi-occupancy residential buildings in the UK are reducing the risk of fire through unsafe cladding and entrance doors. For many years, dutyholders and those worried about their personal safety as residents of buildings have been confused about who should be responsible for the fire safety of external walls and the entrance doors to individual flats. The Bill seeks to clarify this.

The Bill will amend the Regulatory Reform (Fire Safety) Order 2005 to clarify requirements for the Responsible Person or Duty Holder for multi-occupied, residential buildings to manage and reduce the risk of fire for:

- the structure, external walls (including cladding, balconies, windows, insulation and fixings)
- common parts
- doors between domestic premises and common parts (entrance doors to individual flats) in all multi-occupied residential buildings of all heights

Building owners and managers of high rise and multi occupied residential buildings should be responsible for a number of areas including:

- regular inspections of lifts and the reporting of results to the local fire and rescue service
- ensuring evacuation plans are reviewed and regularly updated and personal evacuation plans are in place for residents whose ability to evacuate may be compromised
- ensuring fire safety instructions are provided to residents in a form that they can reasonably be expected to understand
- ensuring individual flat entrance doors, where the external walls of the building have unsafe cladding, comply with current standards
- dutyholders should now proactively review how they identify fire safety risks to walls, windows, external facades and balconies and decide how to access flat entrance doors.