

FIRE SAFETY CONSULTATION



October 2020

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Q1. Please select in what capacity you are responding to this consultation. Please select any that apply. a) Responsible Person b) Dutyholder c) Enforcing authority d) Resident e) Residential group f) Local authority g) Construction company h) Property company i) Building resident/tenant j) Building Control Body k) Trade association l) Other If other, please specify.

k) Trade association

Q2. Please indicate whether you are responding as an individual or on behalf of an organisation. a) Individual (If yes, move onto question 3) b) On behalf of an organisation (If yes, skip to question 4) c) Trade body or other representative group of individuals or organisations (If yes, skip to question 5)

Trade body

Q3. If you are responding as an individual, please specify in what capacity you are responding: a) Responsible Person b) Dutyholder c) Resident d) Landlord e) Home owner f) Employee g) Fire safety professional h) Other If other, please specify.

Not applicable.

Q4. If you are responding on behalf of an organisation, please provide details of: a) The name of the organisation you are representing. b) How many people the organisation employs a. Under 10 b. 10–49 c. 50–249 d. 250–999 e. 1,000 or more

Not applicable.

Q5. If you are responding on behalf of a trade body or other representative group of individuals or organisations, please provide: a) The name of the group b) Brief description of its objectives c) Brief description of its membership d) Number of members a. Under 10 b. 10–49 c. 50–249 d. 250–999 e. 1,000 or more

British Property Federation

Represents large investors in a range of commercial and residential real estate

Membership c. 500

Number of employees is not a very good proxy of size in our sector. We represent a commercial property investment sector of c. £512bn and a growing sector investing in residential and student accommodation of c. £56bn (Source: <https://www.ipf.org.uk/resourceLibrary/the-size---structure-of-the-uk-property-market---year-end-2018-update--december-2019--full-report-.html>)

Q6. To what extent do you agree that Article 50 is a sufficient basis for providing guidance to RPs to support their compliance with their duties under the Order?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q7. To what extent do you agree that a strengthened legal basis for guidance under the Fire Safety Order is needed such as a Code of Practice?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q8: If you agree that a strengthened legal basis for guidance is required, then can you set out which specific areas or issues you think should be covered by an 'Approved Code of Practice'?

a) Responsible Persons

b) Enforcement and Sanctions

c) Fire Risk Assessments

d) Higher Risk Workplaces

e) Provision of Information

f) Other If 'Other' please outline what other areas should be considered to be covered by a code of practice and why:

Q9: If you do not agree that the legislative basis for guidance needs to change, to what extent do you agree/disagree that the format and style of Codes of Practice (such as the Health & Safety Executive's) should be adopted for any new or revised guidance under the existing provisions within the FSO?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q10. To what extent do you agree that a requirement for RPs to record who they are, the extent of their responsibility under the FSO, and their contact information will facilitate the identification of RPs?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q11. To what extent do you agree that the requirements set out in proposal 1 be extended to others that have control of the premises, such as dutyholders?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q12. To what extent do you agree that the information the RP is required to record should include a UK based contact address?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q13. To what extent do you agree that the duty to cooperate and coordinate (Article 22) should be amended to include a requirement for RPs to take steps to identify themselves to all other RPs (and where applicable Accountable Persons and/or Building Safety Managers as proposed under the Building Safety Bill) where they share or have duties in respect of the same premises.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q14. Do you have any other comments to further support your answers above?

Our strong support on Q13 is subject to any requirement being couched in terms of making reasonable endeavours. If a responsible person has made it difficult to be identified other responsible persons should not be held at fault for not being able to cooperate and coordinate with them, for so long as they have made reasonable endeavours.

Q15. To what extent do you agree that the FSO should include a competency requirement for fire risk assessors and other fire professionals engaged by the RPs?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q16. To what extent do you agree that the name and contact information of an individual engaged by the RPs to undertake any or all of the fire risk assessment, should be recorded within the completed fire risk assessment.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q17. Please set out any further information you think fire risk assessments should include.

No additional comments.

Q.18 To what extent do you agree that a duty should be placed on all RPs to record their completed fire risk assessments?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q19. To what extent do you agree that all RPs should be required to record their fire safety arrangements (Article 11)?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q20. Do you have any other comments to further support your answers above?

Our response to Q18 and Q19 is subject to the process for recording being as simple as possible, including in digital form.

Q21. To what extent do you agree that a new requirement should be placed on RPs to provide information to specific relevant persons (residents) on fire safety in multioccupied residential buildings (excluding individual flats/private dwellings) in which they reside?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q22. To what extent do you agree that a new requirement should be placed on RPs to take steps to provide the following information to residents in multi-occupied residential buildings:

a) Information on the risks identified by the fire risk assessment;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

b) The preventative and protective measures in place to mitigate potential fire risk;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

c) The role and responsibilities of relevant RPs and dutyholders, including their name and contact details;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

d) The Fire Risk Assessment (available on request).

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q23. Please note any comments you have on whether the information outlined above should be provided to specific relevant persons (residents).

Our strong support on part d) is subject to the FRA being on request. We would be concerned if the requirement was without that qualification, not least because for general information to residents a FRA is not the most user-friendly of formats.

Q24. What other information, if any, should RPs be required to provide specific relevant persons (residents)?

No additional comments.

Q25. The intention of proposal 6 is to provide information to residents of all multioccupied residential buildings subject to the FSO. To what extent do you agree that this information should be available on request to other 'relevant persons' within:

a) multi-occupied residential buildings covered by the Order

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

b) all buildings covered by the Order

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q26. Please note any additional information to support your answer to Question 25.

On Q25b we don't object in principle to other relevant persons having access to FRAs in a commercial property setting, but would want to balance that against the misuse of the FRA, for example to abuse security. It may be best to limit the scope therefore to relevant persons that use the premises regularly.

Q27. To what extent do you agree that a new requirement should be placed on RPs to take steps to share all relevant fire safety information with subsequent RPs?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q.28. In addition to fire risk assessments, is there any other information that should be shared between successive RPs?

No additional comments.

Q29. Please note any other gaps in the FSO in relation to the provision of information and how they could be addressed.

No additional comments.

Q30. Do you have any other comments to further support your answers above?

We could strongly agree with Q27, but would want to see further information and the form of guidance before being unequivocally supportive. There will be have to be some allowance for lack of complete historical information.

Q31. To what extent do you agree that a level 3 fine (£1,000) provides a suitable deterrent and carries a suitable financial penalty?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q32. To what extent do you agree that a level 4 fine (£2,500) would provide a suitable deterrent and carry a suitable financial penalty?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q33. To what extent do you agree that a level 5 fine (unlimited) would provide a suitable deterrent and carry a suitable financial penalty?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q34. Do you have any other comments to further support your answers above?

It is very difficult to give a reasoned answer to Q31, Q32 and Q33. A £1,000 fine could be a substantial deterrent for an small business, but very little deterrent to a large one.

Q35. To what extent do you agree that Article 17 makes sufficient provision for ensuring that premises and any facilities etc are subject to a system of maintenance and are maintained to an appropriate standard for the safety of relevant persons?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q36. To what extent do you agree that the FSO sufficiently provides for the replacement of defective or substandard facilities, equipment and devices including fire doors?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q37. To what extent do you agree that Article 17 is effective in ensuring the occupier (of parts of a building to which the FSO does not apply) co-operates with the RP?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q38. To what extent do you think that the occupier (of residential parts of a building to which the FSO does not apply) in buildings out of scope of the new regime should be under duties similar (in relation to fire safety) to those being considered under the Building Safety Bill?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q39. To what extent do you agree that the powers of enforcement available to Fire and Rescue Authorities are effective in ensuring remediation for breaches of Article 17?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q40. Do you have any other comments to further support your answers above?

We are not best placed to answer this question - Q39.

Q41. To what extent do you agree that Article 38 makes sufficient provision for ensuring that premises and any facilities etc are subject to a system of maintenance and are maintained to an appropriate standard for the safety of fire-fighters?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

We are not best placed to answer this question .

Q42. To what extent do you agree that Article 38 is effective in ensuring that the occupier (of parts of a building to which the FSO does not apply) co-operates with the Responsible Person?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q43. To what extent do you agree that the powers of enforcement available to Fire and Rescue Authorities are effective in ensuring remediation for breaches of Article 38?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

We are not best placed to answer this question .

Q44. Do you have any other comments to further support your answers above?

No additional comments.

Q45. What risk factors are of most concern to you in higher risk workplaces (such as prisons, hospitals, sheltered and supported housing, residential educational buildings, care homes) and why? For example:

- a) Occupancy (who is on the premises: children, patients, the elderly, etc.);**
- b) Use of premises (what activity is carried out);
- c) Existing fire strategy;
- d) Design and construction of the building (e.g., layout, materials, size, etc.);
- e) Other – please specify.

Q46. What additional fire precautions requirements – over and above those already required under the Order – should apply to higher risk workplaces to increase fire safety?

- a) Provision and maintenance of means of escape;**
- b) Provision and maintenance of firefighting systems;**
- c) Provision of employee training on fire safety;**
- d) Provision of sufficient employees present on the premises to ensure means of escape can be safely and effectively used all times;**
- e) Annual review of the fire risk assessment;**
- f) Record keeping demonstrating the specific requirements;**
- g) Other – please specify.

Q47. Based on the above, please also indicate what specific requirements should apply to what type of higher risk workplace building:

No additional comment.

Q48. Do you have any other comments?

In reference to residential educational buildings, we are interpreting those as boarding schools etc, where the residents are under adult-age and not purpose-built student accommodation, for those in higher education, where the residents are adults. For the reasons of occupancy set out in Q45 we see the former as high-risk and the latter as not.

Q49. To what extent do you agree that the current provisions for prohibition of charging within s.18B(8) of the Fire and Rescue Services Act 2004 should be removed to align with the proposed approach to charging for enforcement action in the Building Safety Bill (the starting scope of the regime is proposed as HRRBs of 18 metres or more in height, or more than six storeys)?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q50. Alternatively, to what extent do you agree that the current provisions for prohibition of charging within s.18B(8) of the Fire and Rescue Services Act 2004 should be removed in their entirety to enable charging for enforcement activity for all premises subject to the FSO?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q51. To what extent do you agree that the proposed ability to charge would incentivise compliance with the FSO?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q52. To what extent do you agree that FRAs should be able to charge for all unsatisfactory audits conducted under the FSO?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q53. To what extent do you agree that FSO Inspectors should be able to charge only for unsatisfactory audits that result in:

a) Informal notifications;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

b) Enforcement notices;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

c) Prohibition notices; and

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

d) Alteration notices

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q54. To what extent do you agree that there should be charging guidance for FRAs in relation to charging provisions in the Fire and Rescue Services Act 2004?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q55. Please share any thoughts you have on levels of charging and when and how these charges should be applied by FRAs if provision was made for charging in relation to FSO activity.

We support the need for FRAs to recover their costs. We would rather see a charging regime based on nationally agreed fixed prices rather than discretionary to every occurrence.

Q56. Do you have any other comments?

No additional comments.

Q57. To what extent do you agree that charging can be a beneficial tool when attempting to reduce FFA and encourage behaviour change?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q58. Please provide further information on your thoughts around possible behaviour change (both positive and negative).

We are not best placed to answer this question.

Q59. To what extent do you agree that barriers to the current charging system for FFA exist?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q60. Please provide further information on your views.

We are not best placed to answer this question.

Q61. To what extent do you agree that the following terminology, under 18C(3) FRSA, in relation to charging for FFA are appropriate and clear?

a) Malfunctioned;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

b) Misinstalled; and

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

c) Persistent.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q62. Please provide further information on your thoughts around the following terminology, under 18C(3) FRSA, in relation to charging for FFA –

a) Malfunctioned;

b) Mis-installed;

c) Persistent; and

d) Other (Please note any other terminology you would like to comment on).

Q63. To what extent do you agree that FRA can charge for the following types of FFA? FFA is defined into four categories under BS 5839-1: False alarms with good intent, malicious false alarms, equipment false alarms and unwanted alarms.

a) False alarms with good intent;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

b) Malicious false alarms;

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

c) Equipment false alarms; and

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

d) Unwanted alarms.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q64. Please provide further information on your views.

Q65. To what extent do you agree that we should take steps to change the current approach to charging under 18C(3) FRSA?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q66. To what extent do you agree that we should apply the same height definition for high-rise residential buildings to that set out in the proposed Building Safety Bill (18 metres and above and / or more than six storeys whichever comes first) to any proposed regulations made under the FSO?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q67. Do you have any other comments to further support your answers above?

No additional comments.

Q68. To what extent do you agree with the above proposal to make regulations as described above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

We strongly support in principle, but if such regulations are to work effectively it is important that a standardised approach is adopted at national level and makes use of technology so that such information can be provided online.

Q69. In your view, what form should the information in relation to fire risks linked to the design and materials of the external wall structures, and the mitigating steps, be provided:

- a) A bespoke standard format, or
- b) The relevant section of the fire risk assessment that is related to external walls?

We support a). We suspect that if a) is adopted then it will soon become the format that is followed in FRAs and so to some extent b) will flow from a).

Q70. Do you have any other comments to further support your answers above?

No additional comments.

Q71. To what extent do you agree with this proposed approach to make regulations as described above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q72. Please indicate what key firefighting equipment could be included in the building plans:

a) Dry risers;

b) Wet risers;

c) Location of the nearest fire hydrant;

d) Smoke control systems;

e) Suppression systems (including associated operating instructions);

f) Lifts; or

g) Other (please specify).

Q73. Please indicate whether you think building plans should be provided for every floor of a building or only for those floors that are different in their layout?

a) Every floor of the building;

b) Only for those floors that are different in their layout.

Q74. Do you have any other comments to further support your answers above?

Just to reinforce that we support the proposal that these documents should be submitted in digital form only.

Q75. To what extent do you agree with this proposed approach to make regulations as described above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

We can see the need for all the information identified, but think it would be better to provide that information electronically than in boxes at the premises, for some of the practical reasons that are set out in the consultation paper.

Q76. To what extent do you agree that the Premises Information Boxes should include copies of the completed fire risk assessment?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q77. To what extent do you agree that the Premises Information Box should include the contact details for the relevant Responsible Person?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q78. To what extent do you agree that there should be a consistent approach to Premises Information Boxes between the Fire Safety Order and the Building Regulation guidance?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q79. To what extent do you agree that Approved Document B should set the threshold at 18m top storey height only in relation to the Premises Information Boxes requirement?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q80. Do you consider that other recommendations should be provided? Please explain.

No additional comments.

Q81. Do you have any other comments to further support your answers above?

No additional comments.

Q82. To what extent do you agree with this proposed approach to make regulations as described above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q83. What would you suggest is a sufficient threshold for the reporting timeframe to the local Fire and Rescue Services

a) Within 24 hours of the fault or issue being identified;

b) Within 48 hours of the fault or issue being identified;

c) Within 72 hours of the fault or issue being identified;

or d) Other – please specify.

Q84. To what extent do you agree that the proposal should cover all lifts within a building?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q85. To what extent do you agree that the proposal should cover other pieces of key fire-fighting equipment?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q86. What other pieces of key fire-fighting equipment, excluding lifts and the mechanism with through which fire-fighters can take control of the lifts, would you suggest should be included in this proposal (therefore tested or inspected every month and reported to the local Fire and Rescue Service in the event of failure)?

a) Dry risers;

b) Wet risers;

c) Smoke control systems;

d) Suppression systems (including associated operating instructions);

and e) Other (please specify).

Q87. To what extent do you agree that the proposal should be extended to include a requirement for information about the monthly checks to be made visible to residents?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q88. Do you have any other comments to further support your answers above?

No additional comments.

Q89. To what extent do you agree with the proposed approach to make regulations as described above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q90. Do you think this proposal should be extended to cover all multi-occupied residential buildings of 11 metres and above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

The Government is implementing a huge amount of changes to the building safety and fire safety regulatory systems and requiring a huge amount of information flow to FRSs, even in electronic format. We think it should focus on the 18m threshold at present and get the new regime working effectively. extending to 11m will bring a lot more buildings in scope, increasing the burden on FRSs and leaving different requirements on different RPs. If Government presses ahead, it should consider having different implementation dates, 18m when first implemented, and a future date for 11m.

Q91. What information do you think should be included in an evacuation plan?

No additional comments.

Q92. Do you have any other comments to further support your answers above?

No additional comments.

Q93. To what extent do you agree with the proposed approach to make regulations as described above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

We tend to agree with the general approach the Government sets out, but again believe this information is more likely to be up-to-date if it is exchanged electronically, than kept in box on site.

Q94. To what extent do you agree that a RP should notify their local Fire and Rescue Service of any residents who cannot self-evacuate (subject to the resident's consent and self-identification)?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q95. What information, other than location, do you think should be provided to Fire and Rescue Services in relation to residents who cannot self-evacuate?

We would suggest whether the person who cannot self-evacuate lives with others or not. Also, with their consent, the nature of why they cannot self-evacuate.

Q96. To what extent do you agree that a Responsible Person should notify their local Fire and Rescue Service of any residents who cannot self-evacuate (subject to the resident engagement, resident self-identification and consent)?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q97. Please indicate what information you would like to see included in the supporting guidance?

The lengths of engagement that the RP will have to go to. How to ensure the RP or their agent is not breaching data protection. What would constitute consent.

Q98. Do you have any other comments to further support your answers above?

No additional comments.

Q99. To what extent do you agree with this proposed approach to make regulations as stated above? Please explain.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

We would stress, however, that the objective should be in regulations, but much of the detail should be left to guidance.

Q100. Other than the information already listed under Proposals 25 and 26, what other information or instruction should be provided to residents?

No additional information.

Q101. What factors should be taken into consideration in relation to the:

a) "nature of the building",

and b) the RPs "knowledge of the occupants"?

The nature of the building and how it is managed will differ significantly, between Build-to-Rent, Purpose-Built Student Accommodation and leasehold blocks for example. It is quite commonplace in Build-to-Rent to have an electronic building hub and live-in building managers. In Student Accommodation it is quite common to have notice boards and back-of-the-door information. In leasehold flats, however, the demographic may be more varied and less-accepting of having information posted on the walls, let alone somebody's flat that they own. Allowing a variety of options for delivering evacuation plans will thus be important.

Q102. Please indicate what information you would like to see included in the supporting guidance?

The acceptable formats that evacuation plans can be provided in.

Q103. Do you have any other comments to further support your answers above?

No additional comments.

Q104. To what extent do you agree with this proposed approach as described above?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q105. Do you have any other comments to further support your answer?

We support the principle of checking doors, both in the domestic and non-domestic parts.

We would rather see a consistent approach across all buildings over 11m, rather than a differentiated approach depending on whether a building is over 11m or 18m.

Our suggestion would be to have communal doors inspected every 3 months, but flat doors once a year. Expecting residents to allow access to their flats more than once a year for the same procedure we think is unrealistic. Retaining the goodwill of residents will be important if these measures are to be effective.

It is vital if these provisions are to be effective that RPs also feel they have powers deliver the kind of compliance that is expected in the consultation paper and it is not clear why Government has taken a different approach to those residents who are uncooperative versus the Building Safety Bill, which has access to the Court as a backstop.

Q106. Please note any factors we should consider in the implementation of these proposals.

As explained above, we think the regularity of inspections on residents' doors is unrealistic if their cooperation is to be maintained.

We agree that any extension of these provisions below 11m should be risk-based and not apply to all buildings.

Q107. Please provide any additional comments on the related matters on which we are seeking views.

No additional comments.

Q108. To what extent do you agree with this proposed approach as described above?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q109. Do you have any other comments to further support your answers above?

We have no strong views on this aspect. The expense that individual flat owners may incur versus the alternative proposal in relation to the Fire Safety Bill and expenditure on replacing cladding is a fine balance and one we think it is for representatives of flat owners to determine.

Q110. Please note any factors we should consider in the implementation of these changes in this proposal?

No additional comments.

Q.111. Please provide any additional comments on the sufficiency of the Government's actions to date to address the Inquiry's concerns.

No additional comments.

Q112. To what extent do you agree that the installation of sprinklers in existing buildings should continue to be guided by the fire risk assessment process rather than be made mandatory under the FSO?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q113. To what extent do you agree that regulations should be made requiring wayfinding signage to be introduced in multi-occupied residential buildings?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q114. Should the requirement for wayfinding signage be introduced in:

a) all multi-occupied residential buildings;

b) or b) multi-occupied residential buildings of 11 metres and above?

Q115. To what extent do you agree any requirement for evacuation alert systems should be informed by the outcome of the programme of research and testing?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q116a. To what extent do you agree, that further guidance should be provided on the information which needs to be supplied?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q116b. If you agree, please specify what information this should cover

No comment.

Q117. To what extent do you agree that a standardised set of building fire safety information requirements describing what information is to be provided would be helpful?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q118. To what extent do you agree that a standardised format for providing the above information would be helpful?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q119. To what extent do you agree that plans certificates should be mandated for FSO buildings?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q120. To what extent do you agree that plans certificates could allow for conditions to be set?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q121. To what extent do you agree that plans certificates should be mandated only where building work affects fire or structural safety matters?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q122. As an alternative, to what extent do you agree that further guidance would be sufficient?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q123. Please explain your views on plans certificates further:

No additional comment.

Q124a. To what extent do you agree that there are additional consultation points that could be specified in legislation or guidance? 52 Under Article 45 of the FSO 53 Regulation 12 of the Building (Approved Inspectors) Regulations 2010 (as amended).

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q124b. If yes, please specify what these points are and whether these should be specified in legislation or guidance?

It would make sense to have the same consultation points whether a local authority or approved inspector is used.

Q125. To what extent do you agree that there should be a fixed statutory timeframe in legislation for response by Fire and Rescue Authorities (upon receipt of the appropriate information from building control bodies)?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q126a. If a statutory timeframe were to be introduced in legislation, to what extent do you agree that it should be:

a. 15 calendar days

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

b. 21 calendar days

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

c. other – please specify.

Q126b. Please explain your response

We would advise aligning the periods with other statutory consultees.

Q127. To what extent do you agree that there should be a flexible arrangement where all parties involved including developer, building control body and Fire and Rescue Authority are able to agree an extension to the timeframe to meet the need/s of the specific project?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q128. Please note any other factors we should consider relating to introducing statutory timeframes for consultation between building control bodies and Fire and Rescue Authorities.

No additional comments.

Q129a. Are there problems with resolving disputes between building control bodies and Fire and Rescue Authorities which could benefit from a mediation panel with appropriate representative bodies providing advice on resolving disputes?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q129b. Please explain your answer

We are not best placed to answer this question, but the mediation proposal seems sensible.

Q130. Which bodies should be involved?

No additional comments.

Q131a. To what extent do you agree that standing advice, separate to but complementing Approved Document B and the Procedural Guidance, for use at the local level would be helpful?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q131b. If so, please specify all areas it would be helpful to address

No additional comments.

Q132a: To what extent do you agree that the application of Regulation 38 should be extended to material alterations and/or other types of building work?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q132b. If you agree, please specify which types of work.

Q133. To what extent do you agree that the building control body should have to approve the fire safety information to be handed over?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q134. To what extent do you agree that a review of the Regulation 38 information should be included in any formal consultation requirements between the building control body and the Fire and Rescue Authority prior to the issue of a completion or final certificate?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q135. To what extent do you agree that there should be a requirement for the developer to provide a formal notice to the building control body that fire information has been handed over (including confirmation from the Responsible Person to that effect)?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q136. To what extent do you agree that further guidance would be useful, for example through a British Standards such as BS 8644?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q137. Overall, please state which of the three options is your preference.

a) Option 1;

b) Option 2;

c) Option 3;

or d) None.

Please explain the reason/s for your preference:

Q138a. If implemented, to what extent do you agree that the changes would provide benefits to your work?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q138b. Please specify how

Q139a: If implemented, what extent do you agree the changes would result in any additional costs to your organisation?

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to Disagree

Strongly disagree

Don't know

Q139b. Please specify how

No additional comments.