

## Crown Premises Fire Inspection Group



Date: 25<sup>th</sup> October 2016

<REDACTED>  
Governor  
Freckleton Road  
Kirkham  
Preston  
Lancashire  
PR4 2RN

Crown Premises Fire Inspection Group  
Fire and Resilience Directorate  
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2 Marsham Street  
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SW1P 4DF

Our Ref: 3817/800/01

Your Ref:

Please reply to:

<REDACTED>@homeoffice.gsi.gov.uk

Dear Sir,

### **The Regulatory Reform (Fire Safety) Order 2005 (the Order)**

**Premises: HMP Kirkham, Freckleton Road, Kirkham, Preston, Lancashire, PR4 2RN.**

Following the fire safety inspection of the above premises on **28<sup>th</sup> & 29<sup>th</sup> September**, I am writing to confirm my opinion that the identified individuals or groups of people would be at risk in case of fire. You will need to take action to ensure their safety.

In the event that a long-term solution cannot be implemented immediately, you will need to introduce interim measures to reduce the level of risk whilst longer-term measures are being prepared.

This letter should be read in conjunction with the previously sent RAG Risk Rating form which provides examples of the areas we have identified as specific failures and require your attention.

The RAG Risk Rating form provides a clear decision framework for assigning RAG outcomes, which will also include a score for each bespoke General Fire Precaution. This is intended to improve/demonstrate consistency of judgments, and also to provide better information to you about the success of the safety management arrangements at managing risk.

The RAG Risk Rating form contains a bar chart at the end to provide you with a visual summary of how well the establishment has been judged to be meeting the individual requirements of the Fire Safety Order. The RAG Risk Rating Form will be revised during any follow-up inspection, and this will result in a second bar on the chart, showing the improvement made.

Fire safety measures are largely interactive, and fire risks can be controlled in many ways. Therefore, whilst the schedule refers to solutions you could adopt, I am not directing you to choose any one of them. It will be acceptable for you to implement any measures which achieve an appropriate standard of safety from fire.

Successful approaches to assessing and managing risk can be provided by accepted guidance, BS9999: 2008 or fire engineering calculations. Each of these requires the involvement of a person with comprehensive training or experience.

There is no formal right to appeal against this letter but if you would like clarification of its contents or to comment on your experience of the visit, please contact either me or the CPFIG Team Leader on [cpfig@homeoffice.gsi.gov.uk](mailto:cpfig@homeoffice.gsi.gov.uk).

Yours faithfully

<REDACTED>  
Crown Premises Fire Inspector  
Crown Premises Fire Inspection Group  
Office of the Chief Fire & Rescue Adviser

CC - <REDACTED>  
CC - <REDACTED>

## Schedule

**Premises: HMP Kirkham, Freckleton Road, Kirkham, Preston, Lancashire, PR4 2RN.**

**File Number: 3817/800/01**

**Sheet: 1 of 15**

This schedule should be read in conjunction with the CFRA letter dated **25<sup>th</sup> October 2016**.

### The Fire Risk Assessment

A successful fire risk assessment for any custodial building – and especially a residential wing – must benchmark the effectiveness of the existing (and proposed) control measures against the legal standard of safety set by accredited guidance.

The Fire Risk Assessment Council has set out competency criteria for the fire risk assessor's role. In the case of prisons, the role requires not only a highly-trained and experienced fire risk assessor or one with sufficient knowledge and other qualities to assess the fire safety requirements for a highly complex building and occupancy, but also a fire risk assessment format which takes into account how fire hazards increase, change and interact as a fire develops, and how fire precautions must combine to achieve their full effect. This is vital to identify the general fire precautions and timescales for intervention necessary to safeguard prisoners and prison staff members.

The PAS79 methodology used for the fire risk assessment provides a structured approach to fire risk assessment for people with knowledge of the principles of fire safety, but is not intended as a guide to fire safety and does not itself set a benchmark of the minimum standard of fire safety measures required.

The fire risk assessment should take full account of the risks arising out of those reasonably foreseeable events and behaviour that can be sources of harm. In the context of residential wings within prisons, this should include when a fire is set deliberately in a cell or communal area - especially when involving a non-compliant prisoner - and take particularly into account where the absence of fire protection measures, staffing and security arrangements may exacerbate the risk.

Where additional fire precautions are required but can't be implemented quickly, the fire risk assessment must also include in its action plan the interim general fire precautions which are reasonable in the case to reduce the risk sufficiently for the short-term.

Prisons contain many persons whose planned acts or misjudged behaviour directed at other ends can lead to fire-setting. As a result, the fire risk assessment must take into account the full range of reasons and circumstances – in addition to self-harming or suicide – in which fires are set, and use this information to identify the appropriate fire safety measures both to prevent fires and to safeguard prisoners and prison staff members adequately in the event of fire.

The fire risk assessment process must also include the fire risk assessment of specific individuals who may be at potentially higher risk of injury or death from fire. It is relatively straightforward to identify the necessary additional fire safety measures for those with a physical disability, but a specialist assessment will be required in the case of individuals who could self-harm through fire for reasons associated with their mental health.

<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
9	<p>1. The assessment did not correctly evaluate the likelihood and severity of the harm that could be caused to</p> <p>2. The fire risk assessment process used was not sufficiently systematic to ensure that all factors likely to place at risk were considered :</p> <p>3. The fire risk assessment did not sufficiently consider the actual conditions and events likely to occur and which could place at risk :</p> <p>4. The fire risk assessment did not consider every group of persons at especial risk of harm, and give them sufficient consideration :</p> <p>5. The risk assessment had not identified all the measures which are required to achieve an acceptable level of risk for</p> <p>6. The actions necessary to reduce the level of risk for were not appropriately prioritised</p> <p>7. The action plan had not set an appropriate timescale to introduce the additional necessary fire safety measures to safeguard</p> <p><b>Likely Underlying Safety Management Failure:</b></p>	<p>1. The fire risk assessment process must benchmark judgments of the likelihood and severity of harm against an accredited standard of safety, or be supported by fire engineering calculations</p> <p>2. The fire risk assessment process must take account of all significant matters.</p> <p>3. The fire risk assessment should take full account of the risks of harm arising out of all reasonably foreseeable events and behaviour when identifying the necessary preventive and protective measures.</p> <p>4. The risks to the following groups of persons at your premises must be specifically considered:</p> <ul style="list-style-type: none"> <li>▪ Those with limiting disabilities.</li> <li>▪ People sleeping.</li> <li>▪ People in custody.</li> </ul> <p>5. The fire risk assessment should identify the necessary general fire precautions to ensure that persons are safe</p> <p>6. The fire risk assessment should prioritise those action points arising from it which are the most necessary to ensure that people are safe.</p> <p>7. The fire risk assessment should set an appropriate timescale for the required measures to be introduced.</p> <p><b>Safety Management Remedy:</b></p>	On further Request
9	<p><i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	<p><i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors</i></p>	

## Measures to reduce the risk of fire

Offenders are known to set fires for many reasons other than attempts at suicide or self-harming. Other known motives range from using a fire to secure a move; to disrupt security; to cry for help following bullying or when struggling with mental health problems or learning difficulties; to relieve boredom; or to commit vandalism. Some fires are also accidental.

This range of motivations has been reflected in all recent cell fire inquest verdicts, in which each death was found to be either accidental or misadventure. This means that the offenders did not plan to kill themselves, but misjudged the consequences of setting a fire for other purposes.

As some offenders have shown themselves capable of making serious misjudgements, the key approaches must involve effective measures to educate offenders about the consequences of fire-setting and the use of sanctions as a deterrent.

There is a significantly higher risk of fire setting amongst offenders than there is in the general population. The evidence collected during investigations into prison fires demonstrates that prison staff or mental health professionals are currently unable to identify a significant proportion of fire-setters in advance, so the current process of individual assessments and personal control measures cannot be relied upon sufficiently to reduce the life risk from fire-setting to an acceptable level. Until recognised tools are in place to anticipate individual fire-setting behaviour accurately, generalised fire risk reduction measures will need to be applied to all offenders, with additional control measures (through ACCT or SIR) applied to individuals who have an assessed likelihood of self-harm or suicide through fire.

Whilst there is a need for caution in adding significantly to the information already delivered to offenders during first night induction, it is vital that the potential for personal loss, injury, prosecution and serious sanctions from deliberate fire-setting is communicated to offenders in order to act as an effective deterrent. There is clear scope in a prison context for using both different messengers and messages to do this effectively.

<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
<p>Articles 4(1)(a) &amp; 8</p> <p>9</p> <p>5</p>	<p>1. There are inadequate sanctions to deter prisoners from setting fires or interfering with fire detectors.</p> <p>2. The induction programme does not include sufficient information about the consequences of fire-setting to deter prisoners.</p> <p><b>Immediate Cause of Failure:</b> <i>The fire risk assessor did not identify the opportunity to reduce risk</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>The fire safety policy did not direct compliance in this matter.</i></p>	<p>1. Appropriate sanctions should be applied following fire-setting in order to deter offenders from setting fires or interfering with fire detectors.</p> <p>2. a) The offender induction should include all potentially useful messages for deterring fire setting</p> <p>b) Insiders should be used to deliver potentially useful peer-peer messages for deterring fire setting.</p> <p><b>Safety Management Remedy:</b> <i>The fire safety policy must direct compliance in this matter.</i></p>	<p>On further Request</p>

## Measures to reduce the risk of the spread of fire

The likelihood of injury for prison staff members and offenders increases very significantly if fire and toxic smoke is able to spread along corridors, or to pass from bedroom to bedroom.

Bedroom doors on residential wings in an open prison that are either open, poorly maintained, do not provide a sufficient period of fire –resistance and are not fitted with a self-closing device, will allow smoke to leak past the door and into the common space. However, this does not mean that fire or even smoke will always spread into other bedrooms.

In fact, this is very unlikely where bedrooms open into a more modern atrium, because the smoke will mainly accumulate outside that bedroom door, and never attain the energy to force itself into other bedrooms. This is because it generally has too little convective energy to disperse further through an open space, particularly in the early stages of a bedroom fire.

In many atrium blocks, however, smoke could still pass from bedroom to bedroom through the ventilation ductwork. Some cell ventilation systems are fitted with shunts or smoke detector-operated fire dampers to prevent this. The same effect can be achieved with correctly-baffled ventilation ductwork, but only if the fans continue to operate during a fire.

Atrium wings dating from Victorian times were constructed with natural plenum ventilation pathways, and these are often still in place. It is difficult to predict the potential for smoke to pass through the plenum between bedrooms, but testing has shown that it is unlikely.

The situation can be very different where bedrooms open either onto a corridor approach or onto landings which are separated vertically by intervening floors. Whilst an effective mechanical smoke control system should maintain a safe environment outside the bedrooms, the absence of one will allow the smoke from any bedroom fire to fill the corridor or landing and to start forcing itself into other bedrooms.

<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
Articles 4(1)(a) & 8  9  9	<p>1. The existing smoke control arrangements for enclosed landings / areas of corridor approach are inadequate to prevent smoke spread to other bedrooms in the event of a bedroom fire.</p> <p>2. The precautions to reduce risk from the spread of fire are inadequate.</p> <p><b>Immediate Cause of Failure:</b> <i>The fire risk assessor did not identify the hazard</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	<p>1. Robust staffing arrangements for the evacuation of affected bedrooms, combined with automatic fire detection for bedrooms and an effective system of mechanical smoke control are all required for enclosed landings and closed corridor approach, as benchmarked against BS9999.</p> <p>2. Adequate precautions to reduce risk from the spread of fire must be provided.</p> <p><b>Safety Management Remedy:</b> <i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	On further Request
<b>Relevant article of the Order</b>	<b>Insufficient information was available to evidence compliance in respect of the following matters:</b>	<b>Information required:</b>	<b>Date Required</b>



22	<i>There was inadequate co-operation between responsible persons.</i>	<p>4. Emergency doors should not be secured in a manner which prevents them from being easily and immediately opened by any person who may require to use them in an emergency.</p> <p><b>Safety Management Remedy:</b> <i>Arrangements must be introduced to ensure appropriate co-operation between responsible persons.</i></p>	
18	<p>4. Emergency doors were secured in a manner which prevents them from being easily and immediately opened by any person who may require to use them in an emergency.</p> <p><b>Immediate Cause of Failure:</b> <i>Day-to-day management of the fire safety arrangements was inadequate</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>There was inadequate co-operation between responsible persons.</i></p>		
22	<i>There was inadequate co-operation between responsible persons.</i>		

<b>Means to secure that cells can be evacuated safely</b>			
<p>Bedrooms are generally constructed to make each room a fire-resisting enclosure and to prevent fire spread to other bedrooms. A bedroom door that is either open, poorly maintained or is one that is not fire –resisting and fitted with a self-closing device, will allow smoke to leak past the door and into the common space.</p> <p>In an atrium setting, the smoke leaking past the bedroom door mainly accumulates outside that bedroom, and never attains the energy to force itself into other bedrooms. This is because it has limited convective energy to disperse further through an open space, particularly in the early stages of a bedroom fire.</p> <p>In the case of, bedrooms in Category D (open) prisons, in corridor approach or where landings are separated by horizontal screens, smoke would be expected to fill the corridor or landing and to accumulate the energy to force itself into other bedrooms unless it is removed by a mechanical smoke control system, combined with the releasing of lock-back doors by prison staff.</p> <p>While the fire loading of most bedrooms is sufficient to enable a serious fire to be set - even before any offender possessions are added - there are much larger fire loads in other spaces, such as wing kitchens, wing offices, storerooms and wing laundries. These should be fully enclosed with fire-resisting construction and protected with automatic fire detection in order to provide enough warning and time for prison staff members and offenders to evacuate the wing safely in the event of a fire in one of these spaces.</p> <p>Where there is a large fire loading within the atrium itself – such as an enclosed wooden-fabricated wing office – it will always be necessary to base the fire-fighting and evacuation strategy on an expert report which sets out the relevant fire engineering calculations. Where an approach is not consistent with BS9999 or an equivalent accredited standard, it will need to be evidenced through fire engineering calculations and testing.</p>			
<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
Articles 4(1)(c), 7(6), 8 & 14 9	<p>1. Fire hazard rooms were not suitably enclosed with fire-resistance.</p> <p><b>Immediate Cause of Failure:</b> <i>The fire risk assessor did not identify the opportunity to reduce risk</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	<p>1. Fire hazard rooms – these are defined in BS9999 - giving onto common spaces in residential wings should be enclosed with fire-resistance.</p> <p><b>Safety Management Remedy:</b> <i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	On further Request
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### The Fire-Fighting Arrangements.

In open prisons where offenders are able to release themselves from residential wings to a place of safety, portable fire-fighting equipment, such as fire extinguishers and fire blankets, should be provided for use by trained prison staff to deal with any small fires and to aid evacuation during the implementation of the fire response plan.

<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
Articles 4(1)(d), 7(6), 8 & 13	1. The fire-fighting plan did not safeguard staff members "so far as is reasonably practicable".	1. The fire-fighting plan must safeguard people "so far as is reasonably practicable".	On further Request
18	<b>Immediate Cause of Failure:</b> <i>Day-to-day management of the fire safety arrangements was inadequate.</i>	<b>Safety Management Remedy:</b> <i>The arrangements must ensure that sufficient trained persons are available when necessary to carry out the fire action plan successfully and safely.</i>	
18	<b>Likely Underlying Safety Management Failure:</b> <i>The arrangements do not ensure that sufficient persons are appointed to carry out competent fire safety roles effectively.</i>		

### **Warning of fire**

Fitted in-room automatic fire suppression or a full standard of automatic fire detection for bedrooms will enable offenders and staff to be adequately safeguarded in the event of a fire because they ensure that fires can be detected and dealt with before they represent a serious danger.

This is reinforced by all current accredited guidance: BS9999:2008 calculates that an L2 system is required, i.e. equipment designed to afford "an early warning of fire in specified areas of high fire hazard or high fire risk". The Building Regulations and BS5839-1: 2013 identify that bedrooms should be fitted with an L5 (i.e. risk appropriate) standard of automatic fire detection. The difference between L2 and L5 in a prison setting is negligible, and either approach is acceptable. For the automatic fire detection for bedrooms to be risk-appropriate, it must ensure that prison staff members are automatically alerted early enough so that the fire is not likely to have injured either the bedroom occupant(s) or any prison staff member by the time that fire response plan has been completed successfully.

Fire detectors mounted in the ventilation ductwork at plant room level should not be relied on as a means of detection

A full standard automatic fire detection and warning system will generally ensure that prison staff are alerted at an early stage and before the fire is injurious. This will allow them to implement the fire response plan for the residential wing, with the result that neither they nor any offender would be likely to encounter injurious levels of smoke.

The use of domestic or stand-alone smoke alarms as an interim measure mitigates the risk significantly, and contributes greatly to the safety of offenders and prison staff members. However, stand-alone smoke alarms are not suitable as a long-term measure because, although they detect fires quickly and sound a local alarm, the absence of a connection to the fire alarm and the lack of a reported fire location identify the bedroom involved and implement the fire response plan means that some extra delay is likely before prison staff members are alerted to the fire,.

<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
Articles	1. The coverage of bedrooms by	1. The automatic fire protection for	On further Request

4(1)(e), 7(6), 8 & 13	automatic fire detection was insufficient to control the risk to an acceptable level.	bedrooms must ensure that prison staff members are alerted to fires in bedrooms/residential wings sufficiently early to enable them to implement the fire response plan before foreseeable injury can be caused to offenders and prison staff.	
11	<p><b>Immediate Cause of Failure:</b></p> <p><i>The planned fire safety measure had not been implemented.</i></p>	<p><b>Safety Management Remedy:</b></p> <p><i>Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon</i></p>	
11	<p><b>Likely Underlying Safety Management Failure:</b></p> <p><i>There are inadequate arrangements for the fire risk assessment findings to be taken into account when decisions are taken, which may affect fire safety matters.</i></p>		
9	<p>2. Insufficient measures are in place to prevent offenders from interfering with or attempting to defeat the detection system prior to setting a fire.</p> <p><b>Immediate Cause of Failure:</b></p> <p><i>The fire risk assessor did not identify the opportunity to reduce risk</i></p>	<p>2. Appropriate measures should be taken to prevent offenders from interfering with or attempting to defeat the detection system prior to setting a fire. These should include the use of tamper-indicators and implementing a system of sanctions for tampering with fire detection equipment. Where necessary and as supported by testing, detectors should be protected with a protective guard or sited where offenders cannot readily tamper with them.</p>	
9	<p><b>Likely Underlying Safety Management Failure:</b></p> <p><i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	<p><b>Safety Management Remedy:</b></p> <p><i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	

**Fire response plan**

Any fire response plan must be time-based because fire is a dynamic and growing hazard as time passes, and delay directly increases the likelihood of serious injury.

The approach to the evacuation of other bedrooms in residential units during a bedroom fire must be appropriate for, and specific to the building configuration:

- In the case of a modern atrium wing or in Victorian wings with plenum ventilation - even where a limited amount of smoke could travel via ventilation pathways between groups of bedrooms - it is unlikely that there will be an urgent and immediate need for the wider evacuation of other bedrooms even though the prison staff may receive multiple simultaneous alerts of fire from fire detectors or offenders.
- The situation can be very different where bedrooms open either onto a corridor approach or onto landings which are separated vertically by horizontal screens or intervening floors. Whilst an effective mechanical smoke control system should maintain a safe environment outside the bedrooms, the absence of one will allow the smoke from any bedroom fire to fill the corridor or landing and to start forcing itself into other bedrooms.

PSI 11 2015 emphasises the hazardous conditions that this creates - even for prison staff wearing RPE - so it is clear that both automatic fire detection and an urgent evacuation are required where closed corridors and landings separated vertically by horizontal screens or floors are not fitted with effective mechanical smoke control.

The decision on whether other bedrooms need to be evacuated in the event of a bedroom fire or a fire in the common space should be clearly set out in the fire risk assessment, and supported by fire engineering calculations.

A generic plan which directs prison staff members to prioritise the evacuation of adjoining bedrooms above safeguarding the occupant of the bedroom involved in fire will be unacceptable. Where there is a need to evacuate all the bedrooms in that area – such as within corridor approach without effective smoke control – the evacuation of other bedrooms will normally need to involve additional prison staff members beyond those required to deal with the fire room. Any plan must therefore consider the scenario of an offender that is unresponsive or appears non-compliant and may have barricaded themselves in their bedroom.

There may also be a requirement for prison staff to release locks at storey exits/final exits on residential wings where offenders can self-evacuate from their bedrooms but cannot evacuate to ultimate safety, this must be supported by a robust fire action plan and staff training to ensure the effective and safe implementation of the plan.

The generic fire response plan must be adapted to suit circumstances in which fighting the fire with the prisoner in situ is not the safest available approach. This is the case for residential wings, such as in Category D (open) establishments, where offenders are not confined to their bedrooms during patrol and night states, so that there is an opportunity for the residential unit to be evacuated quickly.

<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
Articles 4(1)(f), 7(6), 8 & 15	1. The fire response plan was not appropriate for the nature of the hazard / number of nominated persons who will be available / use of the premises / size of the premises / number of people who may be present / people who are especially at risk.	1. The fire response plan must be appropriate for the nature of the hazard / number of nominated persons who will be available / use of the premises / size of the premises / number of people who may be present / people who are especially at risk.	On further Request
9	<b>Immediate Cause of Failure:</b> <i>The fire risk assessor did not identify the opportunity to reduce risk</i>	<b>Safety Management Remedy:</b> <i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i>	
9	<b>Likely Underlying Safety Management Failure:</b> <i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</i>	2. The actions set out in individual PEEPs must be included in the premises' fire response plan.	
18	<b>Immediate Cause of Failure:</b> <i>Day-to-day management of the fire safety arrangements was inadequate.</i>	<b>Safety Management Remedy:</b> <i>The arrangements must ensure that nominated persons receive suitable and sufficient training for them to carry out the fire action plan successfully and safely.</i>	
13&15	<b>Likely Underlying Safety Management Failure</b> <i>The arrangements do not ensure that nominated persons receive suitable and sufficient training for them to carry out the fire action plan successfully and safely.</i>	3. The number of people nominated to roles in the fire response plan must be sufficient for the requirements of the plan.	
	3. The number of people nominated to roles in the fire response plan was insufficient for the requirements of the plan.	4. The fire response plans for employees,	

9	<p>4. The fire response plans for employees, other persons, and those at special risk had not been adequately tested.</p> <p><b>Immediate Cause of Failure:</b> <i>The risk assessor did not identify the significance of the risk.</i></p> <p><b>Likely Underlying Safety Management Failure</b> <i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	<p>other persons, and those at special risk must be adequately tested: (Art. 15)</p> <p><b>Safety Management Remedy:</b> <i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	
9	<p>5. There were no arrangements for people who had been exposed to serious and imminent danger to receive adequate information about the nature of the hazard and the general fire precautions in place to protect them from it;</p> <p><b>Immediate Cause of Failure:</b> <i>No appropriate interim measure was identified for action</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>Employees are given inadequate safety information.</i></p>	<p>5. There must be arrangements in place for people who may be exposed to serious and imminent danger, to receive adequate information about the nature of the hazard and the general fire precautions in place to protect them from it;</p> <p><b>Safety Management Remedy:</b> <i>Sufficient information must be given to employees about their safety from fire.</i></p>	
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<b>Fire Training.</b>			
<p>All prison staff members working on residential wings should receive practical training in the use of portable fire-fighting equipment (such as extinguishers and fire blankets) to aid evacuation, where they are required to undertake roles that form part of the fire response plan. Refresher training should be undertaken at regular intervals.</p> <p>Prison staff members should also receive appropriate training for checking that the fire safety measures in bedrooms and residential units have not been disabled, whether intentionally or otherwise. It is fundamental to adequate fire safety management that all prison staff members working in residential wings are able to confirm that smoke detector anti-tamper tags are in place and that cell ventilation grilles are not blocked.</p>			
<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
Articles 4(1)(f), 7(6), 8, 13 & 15	<p>1. Prison staff members working in residential wings have not received sufficient training on the fire detection system to be able to carry out meaningful checks on whether it has been tampered with and whether an attempt has been made to defeat it.</p> <p>2. Prison staff members working on residential wings have not received practical training in the use of portable fire-fighting equipment (such as</p>	<p>1. All prison staff members working in residential wings should receive sufficient training on the fire detection system to be able to carry out meaningful checks on whether it has been tampered with and whether an attempt has been made to defeat it.</p> <p>2. All prison staff members working on residential wings should receive practical training in the use of portable fire-fighting equipment (such as extinguishers and fire</p>	On further Request

	<p>extinguishers and fire blankets, where they are required to undertake roles that form part of the fire response plan and to aid evacuation</p> <p>3. Prison staff had not received adequate training to carry out the fire response plan effectively and safely.</p> <p><b>Immediate Cause of Failure:</b> <i>Day-to-day management of the fire safety arrangements was inadequate.</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>Employees are given inadequate safety information.</i></p>	<p>blankets, where they are required to undertake roles that form part of the fire response plan and to aid evacuation</p> <p>3. Prison staff should receive adequate training to carry out the fire response plan effectively and safely.</p> <p><b>Safety Management Remedy:</b> <i>Sufficient information must be given to employees about their safety from fire.</i></p>	
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<b>General Maintenance</b>			
<p>Where necessary in order to safeguard the safety of relevant persons the responsible person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.</p> <p>Where the premises form part of a building, the responsible person may make arrangements with the occupier of any other premises forming part of the building for the purpose of ensuring that the requirements of paragraph (1) are met.</p>			
<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>
Articles 4(1)(d), 7(6), 8 & 17	<p>1. The responsible person has not ensured that the premises and any facilities, equipment and devices are subject to a suitable system of maintenance.</p> <p><b>Immediate Cause of Failure:</b> <i>Contractor had not informed the occupier that the general fire precaution was not in effective working order</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>There was inadequate co-operation between responsible persons.</i></p>	<p>1. The responsible person must ensure that any facilities, equipment and devices are subject to a suitable maintenance programme and in an effective working order.</p> <p><b>Safety Management Remedy:</b> <i>Arrangements must be introduced to ensure appropriate co-operation between responsible persons.</i></p>	On further Request
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<b>Fire Safety Management</b>			
<b>Relevant article of the Order</b>	<b>Specific Failure to Comply with the Order</b>	<b>Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure</b>	<b>Action Plan Required</b>

	<p>1. The responsible person has NOT established suitable co-operation and co-ordination with other responsible persons.</p> <p>2. The responsible person has NOT implemented the general fire precautions set out in the action plan.</p> <p>3. Suitable proactive monitoring is NOT done to confirm that key risks from fire are controlled and performance standards are achieved in practice.</p>	<p>1. Effective arrangements should be implemented to ensure that, where PPM checks establish that fire safety facilities, equipment and devices are not in effective working order, this information is always communicated immediately between competent persons.</p> <p>2. Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon.</p> <p>3. Effective arrangements should be implemented to facilitate the monitoring of contractual performance, to ensure that any facilities, equipment and devices are subject to a suitable maintenance programme and in an effective working order.</p>	<p>On further Request</p>
			<p>On further Request</p>

Where appropriate, a plan may form part of this Schedule to illustrate the steps which, in the opinion of the Crown Premises Fire Inspection Group, need to be taken in order to meet the requirements of the Order.

**Note:** Notwithstanding any consultation with other enforcing authorities undertaken by the Crown Premises Fire Inspection Group, before you make any alterations to the workplace which constitutes building works you must apply to your local building control body (the local authority or an approved inspector) for any necessary approvals and to any other body which has a statutory interest in the workplace if their permission is required for those alterations to be made.