

Crown Premises' Fire Safety Inspectorate

Date: 9th January 2019

[REDACTED]
Governor
HMP Downview
Sutton Lane
Sutton
SM2 5PD



Home Office

Crown Premises' Fire Safety Inspectorate
Policing and Fire Directorate
6th Floor SE Fry Building
2 Marsham Street
London
SW1P 4DF

Our Ref: 2846/028/01

Your Ref:

Please reply to:
[REDACTED]
@homeoffice.gov.uk

Dear [REDACTED]

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

Premises: HMP Downview, Sutton Lane, Sutton, SM2 5PD

Following the fire safety inspection of the above premises on the **12th & 13th December 2018** 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.

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: 2017 or fire engineering calculations. Each of these requires the involvement of a person with comprehensive training or experience.

I have included additional information to assist you with planning what action to take:

1. The schedule identifies in each case the 'immediate' (i.e. what has its roots at the premises) and the likely 'underlying' (i.e. corporate) causes of the failures identified during the inspection.
2. Risk ratings for the fire safety measures and for key areas of fire safety management are set out in bar charts at the end of the schedule.

The risk ratings will be revised during any follow-up inspection. These will be shown as a second bar on the chart, demonstrating the improvement made.

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 CPFSI Team Leader on cpfig@homeoffice.gov.uk.

Yours faithfully

[REDACTED]

Crown Premises' Fire Inspector
Crown Premises' Fire Safety Inspectorate
Office of the Chief Inspector Crown Premises' Fire Safety.

CC - [REDACTED]

Direct Dial: 0300 1233911
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PROMOTING FIRE SAFETY

Schedule

Premises: HMP Downview, Sutton Lane, Sutton, SM2 5PD

File Number: 2846/028/01

Sheet: 1 of 6

This schedule should be read in conjunction with the Home Office letter dated 9th January 2019

1. MEASURES TO REDUCE THE RISK OF FIRE.		
Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure
Articles 4(1)(a) & 8	a. Prisoners were not presented with a sufficient range of purposeful information directed at preventing prisoners from fire-setting	a. Prisoners should be presented with a sufficient range of purposeful information directed at preventing prisoners from fire-setting.
Articles 4(1)(a) & (f), 7(6), 8 & 15	b. Prisoners with a history of fire-setting and those at known risk of self-harm through fire were not located in cells where they were most appropriately safeguarded from fire.	b. Prisoners at known risk from fire should be located wherever possible in cells fitted with [REDACTED]. Locating prisoners at known risk from fire in [REDACTED] without [REDACTED] and [REDACTED] must be avoided.
Articles 4(1)(a) & 8	d. Inadequate arrangements were in place to ensure ignition sources are kept separate from combustible materials.	d. [REDACTED] and [REDACTED] should liaise and take action where necessary to manage ignition sources from prisoners in [REDACTED] e. Ignition sources should be separated from combustible materials.
11	Immediate Cause of Failure: The identified action point was not implemented	Safety Management Remedy: Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon.
5	Likely Underlying Safety Management Failure: There are inadequate arrangements to ensure that the action points arising from the fire risk assessment are acted upon	

2. PROTECTION OF STAFF AND PRISONERS.

**WARNING OF FIRE – MEASURES FOR FIRE-FIGHTING – LIGHTING LEVELS FOR SAFE WORKING –
RISK OF FIRE SPREAD – SMOKE CONTROL**

Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure.
<p>Articles 4(1)(e), 7(6), 8 & 13</p> <p>11</p> <p>5</p>	<p style="text-align: center;"><u>WARNING OF FIRE</u></p> <p>a. The premises were not equipped with appropriate fire detectors and alarms</p> <p>i. Prisoners were not presented with effective information directed at preventing tampering with fire detectors.</p> <p>Immediate Cause of Failure: The identified action point was not implemented</p> <p>Likely Underlying Safety Management Failure: There are inadequate arrangements to ensure that the action points arising from the fire risk assessment are acted upon.</p>	<p>a. The automatic fire protection for cells must ensure that prison staff members are alerted to cell fires sufficiently early to enable them to implement the cell fire response plan [REDACTED]</p> <p>i) Prisoners should be presented with effective information directed at preventing tampering with fire detectors.</p> <p>Safety Management Remedy: Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon.</p>
<p>Articles 4(1)(a) & 8</p> <p>9</p> <p>9</p>	<p style="text-align: center;"><u>LIGHTING LEVELS FOR SAFE WORKING</u></p> <p>c. Emergency lighting didn't always provide sufficient illumination [REDACTED]></p> <p>Immediate Cause of Failure: The fire risk assessor did not identify the significance of the risk</p> <p>Likely Underlying Safety Management Failure: The arrangements in place for carrying out fire risk assessments do not ensure that the level of risk is judged through comparison with relevant and accredited benchmarks of safety.</p>	<p>c. Appropriate illumination (lux level) from emergency lighting should be provided [REDACTED]</p> <p>Safety Management Remedy: The arrangements in place for carrying out fire risk assessments must ensure that the level of risk is judged through comparison with relevant and accredited benchmarks of safety.</p>
<p>Articles 4 Articles 4(1)(a)(b) (c), 7(6), 8 & 14</p> <p>9</p>	<p style="text-align: center;"><u>RISK OF FIRE SPREAD</u></p> <p>d. [REDACTED]</p> <p>Immediate Cause of Failure: The fire risk assessor did not identify the significance of the risk</p> <p>Likely Underlying Safety Management Failure: The arrangements in place for carrying out fire risk assessments do not</p>	<p>d. i) Fire hazard rooms giving onto common spaces in residential wings should be enclosed with fire-resistance.</p> <p>ii) The fire resistance protecting the escape routes must control the spread of smoke [REDACTED].</p> <p>Safety Management Remedy: The arrangements in place for carrying out fire risk assessments must ensure that the level of risk is judged through comparison with relevant</p>

<p>9</p> <p>Articles 4(1)(a), 8</p>	<p>ensure that the level of risk is judged through comparison with relevant and accredited benchmarks of safety.</p> <p style="text-align: center;"><u>SMOKE CONTROL</u></p> <p>e. In the event of a cell fire, the existing smoke control arrangements for [REDACTED] and or areas of [REDACTED] were inadequate to prevent smoke from:</p> <p>i. [REDACTED]; and</p> <p>ii. [REDACTED]</p> <p>Immediate Cause of Failure:</p> <p>No appropriate interim measure was implemented</p> <p>Likely Underlying Safety Management Failure:</p> <p>There are inadequate arrangements to ensure that the action points arising from the fire risk assessment are acted upon</p>	<p>and accredited benchmarks of safety.</p> <p>e. An effective mechanical smoke control system, based on engineering calculations and commissioned by a competent contractor, is required for areas of [REDACTED] and [REDACTED] to ensure that they remain tenable.</p> <p>Safety Management Remedy:</p> <p>Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon.</p>
<p>11</p>	<p>11</p>	<p>11</p>

3. STAFF INSTRUCTIONS FOR ACTIONS IN THE EVENT OF FIRE. CELL FIRE RESPONSE.		
Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure
<p>Articles 4(1)(f), 7(6), 8 & 15</p> <p>11</p> <p>11</p>	<p>a. Effective procedures have not been established for staff to deploy and use water mist equipment [REDACTED]</p> <p>i) Effective procedures have not been established for staff to sustain a water misting [REDACTED].</p> <p>Immediate Cause of Failure:</p> <p>No suitable measure was in place</p> <p>Likely Underlying Safety Management Failure:</p> <p>Inadequate monitoring is undertaken to establish whether the fire safety arrangements are successful.</p>	<p>a. Effective procedures should be established for staff to deploy and use water mist equipment [REDACTED]</p> <p>i) Effective procedures should be established for staff to sustain a water misting attack [REDACTED].</p> <p>Safety Management Remedy:</p> <p>Suitable arrangements must be introduced for monitoring the success of the fire safety arrangements</p>

5. GENERAL MAINTENANCE.

4. EFFECTIVENESS OF STAFF ACTIONS TO TAKE IN THE EVENT OF FIRE.

FIRE TRAINING – EVACUATION

Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure
<p>Articles 4(1)(f), 7(6), 8, 13, 15 & 21</p> <p>9</p> <p>9</p>	<p>a. The training delivered to staff provided insufficient theoretical and practical instruction on the use of:</p> <p>i. RPE ii. Inundation equipment iii. Inundation port keys iv. Cell fire response procedures</p> <p>Immediate Cause of Failure: The fire risk assessor did not identify the significance of the risk</p> <p>Likely Underlying Safety Management Failure: The review process was inadequate to identify the changes required.</p>	<p>a. The training delivered to staff should provide sufficient theoretical/practical instruction on the use of:</p> <p>i. RPE ii. Inundation equipment iii. Inundation port keys iv. Cell fire response procedures</p> <p>Safety Management Remedy: The review process must be sufficient to identify the changes required.</p>
Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure
<p>Articles 4(1)(a-e), 7(6), 8 & 17</p> <p>Article 38</p> <p>11</p> <p>17</p>	<p>. The fire safety measures were not always being tested and maintained in good condition and effective working order.</p> <p>b. The facilities, equipment and devices installed for the protection of fire-fighters were not always subject to a suitable system of maintenance.</p> <p>Immediate Cause of Failure:</p> <p>The identified action point was not implemented</p> <p>Likely Underlying Safety Management Failure:</p> <p>There were inadequate arrangements for the maintenance of general fire precautions</p>	<p>. The fire safety measures should be tested and maintained in good condition and effective working order.</p> <p>b. The facilities, equipment and devices installed for the protection of fire-fighters should be subject to a suitable system of maintenance.</p> <p>Safety Management Remedy:</p> <p>The arrangements for maintenance must ensure that the general fire precautions are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.</p>

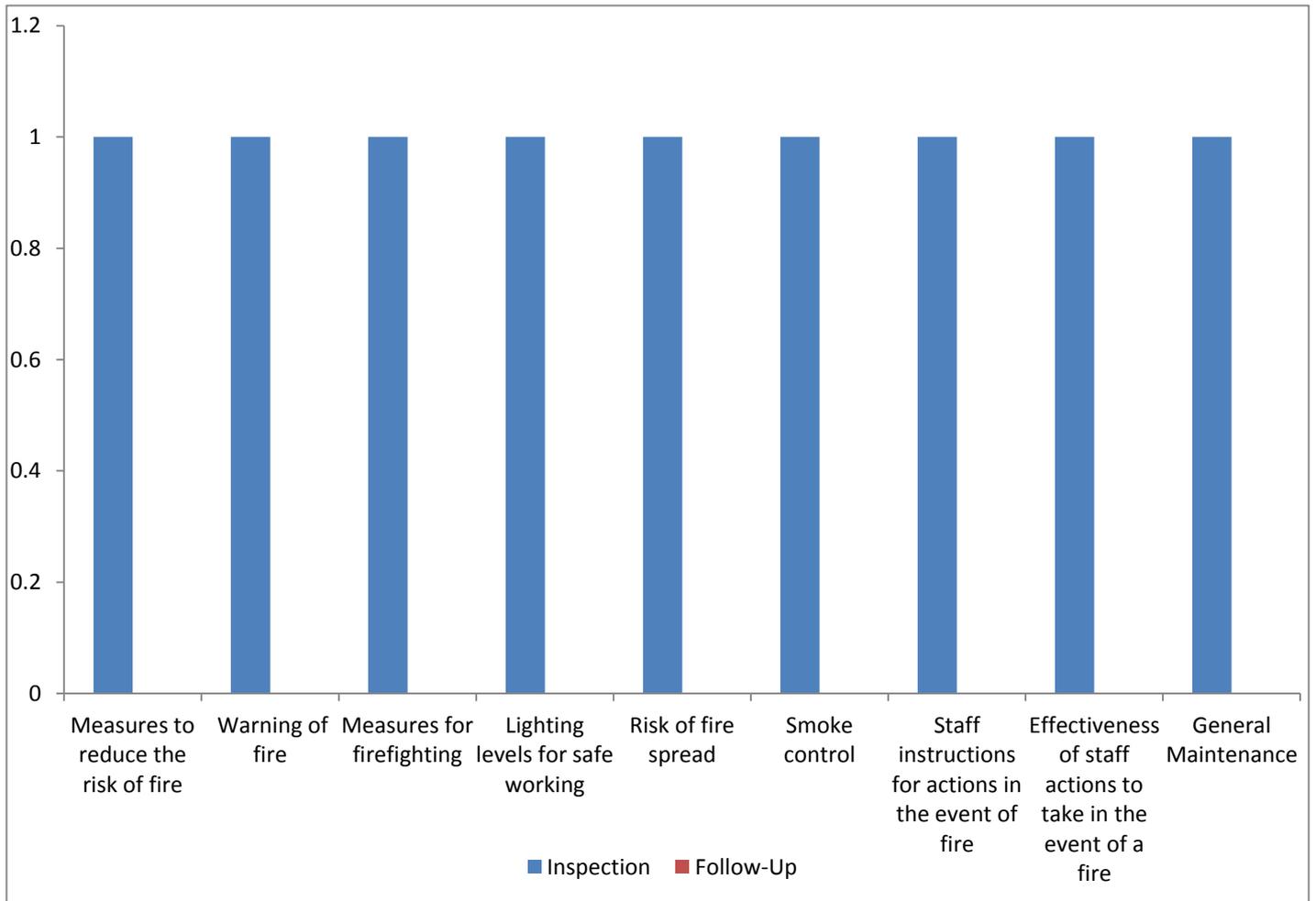
Where appropriate, a plan may form part of this Schedule to illustrate the steps which, in the opinion of the Crown Premises' Fire Safety Inspectorate, need to be taken in order to meet the requirements of the Order.

Note: Notwithstanding any consultation with other enforcing authorities undertaken by the Crown Premises' Fire Safety Inspectorate, 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.

RAG Score for each GFP

Current Serious Risk	4	5	6
Current Significant Risk	1	2	3
Tolerable Risk	0	0	0
	Adequate action planned	Inadequate action planned	No action planned

All sections within the RAG are averaged with the exception of section 2 (Protection of staff and prisoners) which uses the individual score for each requirement.



RAG Score for Fire Safety Management

Safety Management Failure Directly Linked to GFP Failure	4	5	6
Safety Management Failure Contributing to GFP Failure	1	2	3
Safety Management Failure Incidental to GFP Failure	0	0	0
	<i>Potentially Significant Risk</i>	<i>Significant Risk</i>	<i>Serious Risk</i>

