

## Crown Premises Fire Inspection Group

Date: 28<sup>th</sup> February 2018

[REDACTED]  
Director  
HMP Forest Bank  
Agecroft Road  
Pendlebury  
Manchester  
M27 8FB



# Home Office

Crown Premises Fire Inspection Group  
Policing and Fire Directorate  
6<sup>th</sup> Floor SE Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Our Ref: 3011/810/01

Your Ref:

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

Dear Director,

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

**Premises: HMP Forest Bank, Agecroft Road, Pendlebury, Manchester, M27 8FB.**

Following the fire safety inspection of the above premises on **20<sup>th</sup> & 21<sup>st</sup> February 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 establishment) and the likely 'underlying' (i.e. corporate) causes of the failures identified during the inspection.
2. I attach the RAG Risk Rating form for the inspection. The form provides a clear risk-based decision framework and a risk score for individual RAG outcomes.
3. Final risk ratings for the fire safety measures and for key areas of fire safety management are also set out in bar charts at the end of the RAG rating form.

The RAG Risk Rating Form and the risk ratings will be revised during any follow-up inspection. This will be shown as a second bar on the chart, demonstrating the improvement made.

I informed you at our meeting that my initial enforcement decision was to allow you the opportunity to comply in a timely manner. The next steps are, therefore, for you to develop your planned action plan, and to confirm the plan and date of completion to me **within 28 days** of receiving this letter.

Please note that, given the level of risk involved, I can only maintain an informal enforcement approach where you are able to evidence your commitment and ongoing progress towards compliance.

If you do not undertake the necessary improvements, then you may be served with an enforcement notice.

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 Senior Fire & Rescue Adviser**

CC - [REDACTED]

# Schedule

Premises: HMP Forest Bank, Agecroft Road, Pendlebury, Manchester, M27 8FB.

File Number: 3011/810/01

Sheet: 1 of 5.

This schedule should be read in conjunction with the CFRA letter dated 28<sup>th</sup> February 2018.

<b>1. MEASURES TO REDUCE THE RISK OF FIRE.</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>
Articles 4(1)(a) & 8	a. Residents were not presented with a sufficient range of purposeful information directed at preventing residents from fire-setting.	a. Residents should be presented with a sufficient range of purposeful information directed at preventing residents from fire-setting.	Within 28 days upon receipt of this letter
9	<b>Immediate Cause of Failure:</b> <i>The proposed action point was not suitable or sufficient.</i>	<b>Safety Management Remedy:</b> <i>A suitable fire safety policy approach</i>	
5	<b>Likely Underlying Safety Management Failure:</b> <i>Inadequate fire safety policy approach</i>		
Articles 4(1)(a) & 8	c. Residents with a history of fire-setting and those at known risk of self-harm through fire were not always located in cells where they were most appropriately safeguarded from fire.	c. Residents at known risk from fire should be located wherever possible in cells fitted with [REDACTED]  Locating residents at known risk from fire in [REDACTED] without [REDACTED] must be avoided.	
11	<b>Immediate Cause of Failure:</b> <i>The identified action point was not implemented</i>	<b>Safety Management Remedy:</b> <i>The fire safety policy must be followed.</i>	
5	<b>Likely Underlying Safety Management Failure:</b> <i>The fire safety policy was not followed.</i>		
Articles 4(1)(a) & 8	e. Inadequate arrangements were in place to ensure ignition sources are kept separate from combustible materials.	e. Ignition sources should be separated from combustible materials.	
11	<b>Immediate Cause of Failure:</b> <i>No suitable measure was in place</i>	<b>Safety Management Remedy:</b> <i>Adequate arrangements are required for the day-to-day management of fire safety.</i>	

11	<p><b>Likely Underlying Safety Management Failure:</b>  Arrangements for the day-to-day management of fire safety were inadequate.</p>		
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**2. PROTECTION OF STAFF AND RESIDENTS.**  
**WARNING OF FIRE – MEASURES FOR FIRE-FIGHTING – LIGHTING LEVELS FOR SAFE WORKING -**  
**RISK OF FIRE SPREAD – SMOKE CONTROL**

<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)(e), 7(6), 8 &amp; 13</p>	<p style="text-align: center;"><b><u>WARNING OF FIRE</u></b></p> <p>a. The premises were not equipped with appropriate fire detectors and alarms</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>In the absence of fitted automatic fire detection protection for cells, interim protection should be provided through the use of domestic smoke alarms or domestic multi-sensing fire alarms. These should be fixed and orientated according to the manufacturer's instructions, and positioned within the area of predicted smoke travel due to a fire in a given cell. Where domestic type fire detectors are installed [REDACTED] the cell call becomes an integral part of the means of giving warning in the event of a fire.</p> <p>Residents must be instructed to use the cell call in the event of a fire and regular monitoring on response times by staff should be undertaken.</p>	<p>Within 28 days upon receipt of this letter</p>
<p>9</p>	<p style="color: red;"><b>Immediate Cause of Failure:</b>  <i>The risk had not been correctly assessed</i></p>	<p style="color: green;"><b>Safety Management Remedy:</b>  <i>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.</i></p>	
<p>9</p>	<p style="color: red;"><b>Likely Underlying Safety Management Failure:</b>  <i>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.</i></p>		
<p>Articles 4(1)(a)(b)(c), 7(6), 8 &amp; 14</p>	<p style="text-align: center;"><b><u>RISK OF FIRE SPREAD</u></b></p> <p>d. There were inadequate measures to control the risk of fire and smoke spreading within common areas.</p>	<p>d. i) Fire hazard rooms – these are defined in BS9999 - giving onto common spaces in residential wings should be enclosed with fire-resistance.</p> <p>ii) The fire resistance protecting the escape</p>	

<p>Articles 4(1)(a)(b)(c), 7(6), 8 &amp; 14</p>	<p>11 <b>Immediate Cause of Failure:</b> <i>No suitable measure was in place</i></p> <p>17 <b>Likely Underlying Safety Management Failure:</b> <i>Inadequate arrangements for the effective reporting of faults and the actioning of repairs</i></p> <p style="text-align: center;"><b><u>SMOKE CONTROL</u></b></p> <p>e. In the event of a cell fire, the existing smoke control arrangements [REDACTED] were inadequate to prevent smoke from:</p> <ul style="list-style-type: none"> <li>i. [REDACTED]; and</li> <li>ii. [REDACTED]</li> </ul> <p><b>Immediate Cause of Failure:</b> <i>No appropriate corrective measure was identified for action</i></p> <p><b>Likely Underlying Safety Management Failure:</b> <i>The review process was inadequate to identify the changes required.</i></p>	<p>routes must control the spread of smoke where this could cause potential harm to persons using escape routes.</p> <p><b>Safety Management Remedy:</b> <i>The arrangements for maintenance must ensure the effective reporting of faults and the actioning of repairs</i></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><b>Safety Management Remedy:</b> <i>The review process must be sufficient to identify the changes required.</i></p>	
<p>9</p>	<p>9</p>		
<p>9</p>			

3. STAFF INSTRUCTIONS FOR ACTIONS IN THE EVENT OF FIRE.			
CELL FIRE RESPONSE.			
<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)(f), 7(6), 8 &amp; 15</p> <p>11</p>	<p>a. Effective procedures have not been established for staff to deploy and use water mist equipment [REDACTED]</p> <p><b>Immediate Cause of Failure:</b> <i>No suitable measure was in place</i></p>	<p>a. Effective procedures should be established for staff to deploy and use water mist equipment [REDACTED]</p> <p><b>Safety Management Remedy:</b> <i>Suitable arrangements must be introduced for monitoring the success of the fire safety arrangements</i></p>	<p>Within 28 days upon receipt of this letter</p>

11	<p><b>Likely Underlying Safety Management Failure:</b>  <i>Inadequate monitoring is undertaken to establish whether the fire safety arrangements are successful.</i></p>		
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<b>4. EFFECTIVENESS OF STAFF ACTIONS TO TAKE IN THE EVENT OF FIRE.</b>			
<b>FIRE TRAINING – EVACUATION</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>Articles 4(1)(f), 7(6), 8, 13, 15 &amp; 21</p> <p style="text-align: center;">11</p> <p style="text-align: center;">5</p>	<p>a. The training delivered to staff provide insufficient practical instruction on the use of:</p> <ul style="list-style-type: none"> <li>i. RPE</li> <li>ii. Inundation equipment</li> <li>iii. Inundation port keys</li> <li>iv. Cell fire response procedures</li> <li>v. Checking for tampering with fire detection systems.</li> </ul> <p><b>Immediate Cause of Failure:</b>  <i>No suitable measure was in place</i></p> <p><b>Likely Underlying Safety Management Failure:</b>  <i>The fire safety policy was not followed.</i></p>	<p>a. The training delivered to staff should provide sufficient practical instruction on the use of:</p> <ul style="list-style-type: none"> <li>i) RPE</li> <li>ii) Inundation equipment</li> <li>iii) Inundation port keys</li> <li>iv) Cell fire response procedures</li> <li>v) Checking for tampering with fire detection systems.</li> </ul> <p><b>Safety Management Remedy:</b>  <i>The fire safety policy must be followed.</i></p>	<p>Within 28 days upon receipt of this letter</p>
<p>Articles 4(1)(f), 7(6), 8, 13, 15 &amp; 21</p> <p style="text-align: center;">11</p> <p style="text-align: center;">13 &amp; 15</p>	<p>b. [REDACTED].</p> <p><b>Immediate Cause of Failure:</b>  <i>No suitable measure was in place</i></p> <p><b>Likely Underlying Safety Management Failure:</b>  <i>[REDACTED]</i></p>	<p>b. [REDACTED].</p> <p><b>Safety Management Remedy:</b>  <i>[REDACTED]</i></p>	

## 5. GENERAL MAINTENANCE.

<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-e), 7(6), 8 & 17	a. The fire safety measures were not always being tested and maintained in good condition and effective working order.	a. The fire safety measures should be tested and maintained in good condition and effective working order.	Within 28 days upon receipt of this letter
17	<b>Immediate Cause of Failure:</b> <i>Contractor had not carried out the remedial works</i>	<b>Safety Management Remedy:</b> <i>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.</i>	
17	<b>Likely Underlying Safety Management Failure:</b> <i>There were inadequate arrangements for the maintenance of general fire precautions.</i>		

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.