

Crown Premises' Fire Inspection Group

Date: 19th July 2018

[REDACTED] – Governing Governor
HMP High down
High down Lane
Sutton
Greater London
SM2 5PJ



Home Office

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

Our Ref: 2846/029/01

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

Dear **[REDACTED]**,

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

Premises: HMP High Down, Highdown Lane, Sutton, Greater London, SM2 5PJ.

Following the fire safety inspection of the above premises on **12th and 13th July 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.

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 a Crown 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 .

Yours faithfully

[REDACTED]

Crown Premises' Fire Inspector

Crown Premises' Fire Inspection Group

Office of the Chief Inspector Crown Premises' Fire Safety.

CC - **[REDACTED]**

Schedule

Premises: HMP High Down, Highdown Lane, Sutton, Greater London, SM2 5PJ

File Number: 2846/029/01

Sheet: 1 of 4

This schedule should be read in conjunction with the Home Office letter dated 19th July 2018

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	Action Plan Required
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.	Within 28 days upon receipt of this letter
9	Immediate Cause of Failure: <i>The fire risk assessor did not identify the opportunity to reduce risk</i>	Safety Management Remedy: <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	Likely Underlying Safety Management Failure: <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>		
Articles 4(1)(a) & (f), 7(6), 8 & 15	c. 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.	c. 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.	
9	Immediate Cause of Failure: <i>The fire risk assessor did not identify the opportunity to reduce risk</i>	Safety Management Remedy: <i>The fire safety policy must be followed.</i>	
5	Likely Underlying Safety Management Failure: <i>The fire safety policy was not followed.</i>		

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	Action Plan Required
<p>Articles 4(1)(e), 7(6), 8 & 13</p> <p>11</p> <p>11</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>Immediate Cause of Failure: <i>The identified action point was not implemented</i></p> <p>Likely Underlying Safety Management Failure: <i>There are inadequate arrangements to ensure that the action points arising from the fire risk assessment are acted upon</i></p>	<p>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. Prisoners 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>Safety Management Remedy: <i>Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon.</i></p>	<p>Within 28 days upon receipt of this letter</p>
<p>9</p> <p>9</p>	<p>i. Prisoners were not presented with effective information directed at preventing tampering with fire detectors.</p> <p>Immediate Cause of Failure: <i>The fire risk assessor did not identify the opportunity to reduce risk</i></p> <p>Likely Underlying Safety Management Failure: <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) Prisoners should be presented with effective information directed at preventing tampering with fire detectors.</p> <p>Safety Management Remedy: <i>Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon.</i></p>	
	<p>ii. The sanctions' system is not used effectively to deter prisoners from tampering with fire detectors.</p>	<p>ii) The sanctions system should be used effectively to deter prisoners from tampering</p>	

<p>9</p> <p>11</p> <p>Articles 4(1)(c), 7(6), 8 & 14</p> <p>9</p> <p>9</p> <p>Articles 4(1)(a)(b), (c), 7(6), 8 & 14</p> <p>9</p> <p>9</p>	<p>Immediate Cause of Failure:</p> <p><i>The fire risk assessor did not identify the opportunity to reduce risk</i></p> <p>Likely Underlying Safety Management Failure:</p> <p><i>Arrangements for the day-to-day management of fire safety were inadequate.</i></p> <p style="text-align: center;"><u>LIGHTING LEVELS FOR SAFE WORKING</u></p> <p>c. [REDACTED]</p> <p>Immediate Cause of Failure:</p> <p><i>The fire risk assessor did not identify the opportunity to reduce risk</i></p> <p>Likely Underlying Safety Management Failure:</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 style="text-align: center;"><u>RISK OF FIRE SPREAD</u></p> <p>d. There were inadequate measures to control the risk of fire and smoke spreading within common areas.</p> <p>Immediate Cause of Failure:</p> <p><i>The fire risk assessor did not identify the opportunity to reduce risk</i></p> <p>Likely Underlying Safety Management Failure:</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>with fire detectors.</p> <p>Safety Management Remedy:</p> <p><i>Adequate arrangements are required for the day-to-day management of fire safety.</i></p> <p>c. [REDACTED]</p> <p>Safety Management Remedy:</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> <p>d. Fire hazard rooms – these are defined in BS9999 - giving onto common spaces in residential wings should be enclosed with fire-resistance.</p> <p>Safety Management Remedy:</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>	
<p>Relevant article of the Order</p>	<p>Insufficient information was available to evidence compliance in respect of the following matters:</p>	<p>Information required:</p>	<p>Date Required</p>

Articles 4(1)(a) & 8	e. There was insufficient evidence available to demonstrate that in the event of a cell fire, the existing smoke control arrangements for areas of [REDACTED] were adequate to prevent smoke from: i. [REDACTED]; and ii. [REDACTED]	e. Evidence should be provided which demonstrates that the fitting of the pinhole screen in front of the fans does not compromise the effectiveness of the mechanical smoke control system.	Within 28 days upon receipt of this letter
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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.

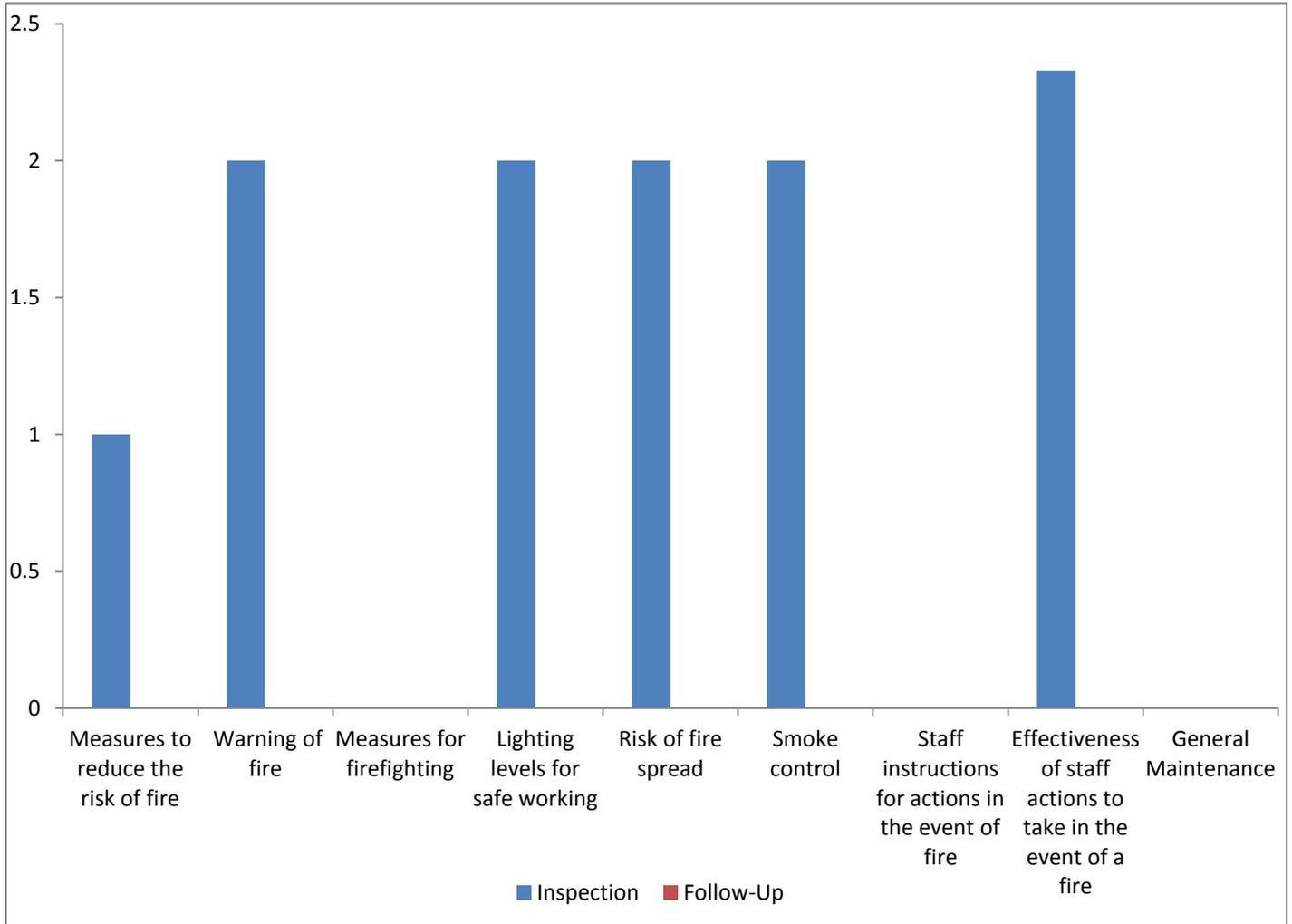
Note: Notwithstanding any consultation with other enforcing authorities undertaken by the Crown Premises Fire Inspection Group, before you make any alterations to the workplace which constitutes building works you must apply to your local building control body (the local authority or an approved inspector) 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.

RAG Score for each GFP

Current Serious Risk	4	5	6
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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>

