

## Crown Premises Fire Inspection Group

Date: 19<sup>th</sup> April 2018

[REDACTED] – Governing Governor  
HMP Nottingham  
Perry Road  
Nottingham  
NG5 3AG



## Home Office

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

Our Ref: 4803/801/01

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

Dear Governor,

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

#### **Premises: HMP Nottingham, Perry Road, Nottingham, NG5 3AG**

Following the fire safety inspection of the above premises on **11<sup>th</sup> and 12<sup>th</sup> April 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 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](mailto: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 Nottingham, Perry Road, Nottingham, NG5 3AG

File Number: 4803/801/01

Sheet: 1 of 5

This schedule should be read in conjunction with the CFRA letter dated 19<sup>th</sup> April 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	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]	Within 28 days upon receipt of this letter
11	<b>Immediate Cause of Failure:</b> <i>No suitable measure was in place</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>		

<b>2. PROTECTION OF STAFF AND PRISONERS.</b>			
<b>WARNING OF FIRE – MEASURES FOR FIRE-FIGHTING – LIGHTING LEVELS FOR SAFE WORKING - RISK OF FIRE SPREAD – SMOKE CONTROL</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)(e), 7(6), 8 & 13	<b><u>WARNING OF FIRE</u></b> a. The premises were not equipped with appropriate fire detectors and alarms	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]  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	Within 28 days upon receipt of this letter

<p>11</p> <p><b>Immediate Cause of Failure:</b> <i>The identified action point was not implemented</i></p> <p>11</p> <p><b>Likely Underlying Safety Management Failure:</b> <i>There are inadequate arrangements to ensure that the action points arising from the fire risk assessment are acted upon.</i></p> <p>i. Prisoners were not presented with effective information directed at preventing tampering with fire detectors.</p> <p>11</p> <p><b>Immediate Cause of Failure:</b> <i>No suitable measure was in place</i></p> <p>5</p> <p><b>Likely Underlying Safety Management Failure:</b> <i>The fire safety policy did not direct compliance in this matter</i></p>		<p>[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><b>Safety Management Remedy:</b> <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>i) Prisoners should be presented with effective information directed at preventing tampering with fire detectors.</p> <p><b>Safety Management Remedy:</b> <i>The fire safety policy must direct compliance in this matter.</i></p>	
<p><b>Relevant article of the Order</b></p>	<p><b>Insufficient information was available to evidence compliance in respect of the following matters:</b></p>	<p><b>Information required:</b></p>	<p><b>Date Required</b></p>
<p>Articles 4(1)(a) &amp; 8</p>	<p>b. [REDACTED].</p>	<p>b. [REDACTED]</p>	<p>Within 28 days upon receipt of this letter</p>

### 3. STAFF INSTRUCTIONS FOR ACTIONS IN THE EVENT OF FIRE.

<b>CELL FIRE RESPONSE.</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)(f), 7(6), 8 & 15	<p>b. The cell fire response plan was time based</p> <p>i) The calculated pre-release movement times (PRMT) have not been validated through a practical test.</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>Inadequate monitoring is undertaken to establish whether the fire safety arrangements are successful.</i></p>	<p>i) The calculated pre-release movement times (PRMT) should be validated through a practical test.</p> <p><b>Safety Management Remedy:</b> <i>Suitable arrangements must be introduced for monitoring the success of the fire safety arrangements.</i></p>	Within 28 days upon receipt of this letter
11			
11			

<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>
Articles 4(1)(f), 7(6), 8, 13, 15 & 21	<p>a. The training delivered to staff provides insufficient theoretical and practical instruction on the use of:</p> <p>i. Fire Safety Systems and their role as part of the cell fire response procedures</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>The fire safety policy was not followed.</i></p>	<p>a. The training delivered to staff should provide sufficient theoretical/practical instruction on the use of:</p> <p>i. Fire Safety Systems and their role as part of the cell fire response procedures</p> <p><b>Safety Management Remedy:</b> <i>The fire safety policy must be followed.</i></p>	Within 28 days upon receipt of this letter
11			
5			
	<p>b. The wing staff were not always able to implement the cell fire response plan safely and effectively</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>The arrangements do not ensure that sufficient trained persons are available when necessary to carry out the fire action plan successfully and safely.</i></p>	<p>b. A sufficient number of prison response staff members should be available at all material times [REDACTED]</p> <p><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></p>	
11			
13 & 15			

<p>11</p> <p>13 &amp; 15</p>	<p>c. [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>The arrangements do not ensure that sufficient trained persons are available when necessary to carry out the fire action plan successfully and safely.</i></p>	<p>c. [REDACTED]</p> <p><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></p>	
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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.