

## Crown Premises Fire Inspection Group

Date: 26<sup>th</sup> September 2018

Governor, [REDACTED]  
HMP Wymott  
Ulness Walton  
Leyland  
Lancashire  
PR26 8LW



## 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: 3817/803/01

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

Dear [REDACTED],

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

**Premises: HMP Wymott, Ulness Walton, Leyland, Lancashire, PR26 8LW.**

Following the fire safety inspection of the above premises on 5<sup>th</sup> and 6<sup>th</sup> September 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. 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.gov.uk](mailto:cpfig@homeoffice.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 Wymott

File Number: 3817/803/01

Sheet: 1 of 7

This schedule should be read in conjunction with the Home Office letter above dated 26<sup>th</sup> September 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  9  9	a. Inadequate arrangements were in place to ensure ignition sources are kept separate from combustible materials.  <i>Immediate Cause of Failure: The fire risk assessor did not identify the opportunity to reduce risk.</i>  <i>Likely Underlying Safety Management Failure: 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>	a. Ignition sources should be separated from combustible materials.  <i>Safety Management Remedy: The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i>	Within 28 days upon receipt of this letter

<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	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]  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	Within 28 days upon receipt of this letter

	<p>i. Prisoners were not presented with effective information directed at preventing tampering with fire detectors.</p> <p>ii. The sanctions' system is not used effectively to deter prisoners from tampering with fire detectors.</p> <p><b>Immediate Cause of Failure:</b> No appropriate corrective measure was identified for action.</p> <p><b>Likely Underlying Safety Management Failure:</b> The fire precautions were not benchmarked against an accredited approach.</p>	<p>cell call in the event of a fire and regular monitoring on response times by staff should be undertaken.</p> <p>i) Prisoners should be presented with effective information directed at preventing tampering with fire detectors.</p> <p>ii) The sanctions system should be used effectively to deter prisoners from tampering with fire detectors.</p> <p><b>Safety Management Remedy:</b> The fire precautions must be benchmarked against an accredited approach.</p>	
<p>Articles 4(1)(c), 7(6), 8 &amp; 14</p>	<p style="text-align: center;"><b><u>LIGHTING LEVELS FOR SAFE WORKING</u></b></p> <p>c. Emergency lighting [REDACTED] .</p> <p><b>Immediate Cause of Failure:</b> The fire risk assessor did not identify the significance of the risk.</p> <p><b>Likely Underlying Safety Management Failure:</b> 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>b. [REDACTED]</p> <p><b>Safety Management Remedy:</b> 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(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>c. There were inadequate measures to control the risk of fire and smoke spreading within common areas.</p> <p><b>Immediate Cause of Failure:</b> The fire risk assessor did not identify the significance of the risk.</p> <p><b>Likely Underlying Safety Management Failure:</b> The arrangements in place for carrying out fire risk assessments do not ensure that the level of risk is judged</p>	<p>c. The fire resistance protecting the escape routes must control the spread of smoke [REDACTED]</p> <p><b>Safety Management Remedy:</b> 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(1)(a)(b)(c), 7(6), 8 &amp; 14</p> <p>9</p> <p>11</p>	<p><i>through comparison with relevant and accredited benchmarks of safety.</i></p> <p style="text-align: center;"><b><u>SMOKE CONTROL</u></b></p> <p>d. In the event of a cell fire, the existing smoke control arrangements for [REDACTED] were inadequate to prevent smoke from:</p> <p>i. [REDACTED] ; and</p> <p>ii. [REDACTED]</p> <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>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>	<p>d. An effective mechanical smoke control system, based on engineering calculations and commissioned by a competent contractor, is required [REDACTED]</p> <p>Effective arrangements are required to ensure that lock-back doors are released where this is significant for the effective performance of mechanical smoke control systems.</p> <p>In the case of a cell fire, immediate priority should always be given to dealing with the fire and the occupant in the affected cell.</p> <p><b>Safety Management Remedy:</b> <i>Arrangements must be put in place for the fire risk assessment findings to be taken into account when decisions are taken over matters which affect fire safety.</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>e. [REDACTED] f. [REDACTED]</p>	<p>e. [REDACTED] f. [REDACTED]</p>	<p>Within 28 days upon receipt of this letter</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>9</p> <p>11</p>	<p>a. [REDACTED]</p> <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>Inadequate monitoring is undertaken to establish whether the fire safety arrangements are successful.</i></p>	<p>a. [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>

<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>
Articles 4(1)(f), 7(6), 8, 13, 15 & 21	b. There was insufficient evidence provided to demonstrate that the calculated pre-release movement times (PRMT) have been validated through a practical test.	b. Evidence should be provided to confirm that the calculated pre-release movement times (PRMT) have been validated through a practical test.	Within 28 days upon receipt of this letter

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

##### FIRE TRAINING – EVACUATION

<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  9  9	a. There is insufficient instruction for staff to ensure that they check for tampering with fire detection systems.  <b>Immediate Cause of Failure:</b> <i>The fire risk assessor did not identify the significance of the risk.</i>  <b>Likely Underlying Safety Management Failure:</b> <i>The review process was inadequate to identify the changes required.</i>	a. The training delivered to staff should provide sufficient instruction to ensure that they check for tampering with fire detection systems.  <b>Safety Management Remedy:</b> <i>The review process must be sufficient to identify the changes required.</i>	Within 28 days upon receipt of this letter

#### 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  9  11	a. The fire safety measures were not always being tested and maintained in good condition and effective working order.  <b>Immediate Cause of Failure:</b> <i>The fire risk assessor did not identify the significance of the risk.</i>  <b>Likely Underlying Safety Management Failure:</b> <i>Arrangements for the day-to-day management of fire safety were inadequate.</i>	a. The fire safety measures should be tested and maintained in good condition and effective working order.  <b>Safety Management Remedy:</b> <i>Adequate arrangements are required for the day-to-day management of fire safety.</i>	Within 28 days upon receipt of this letter

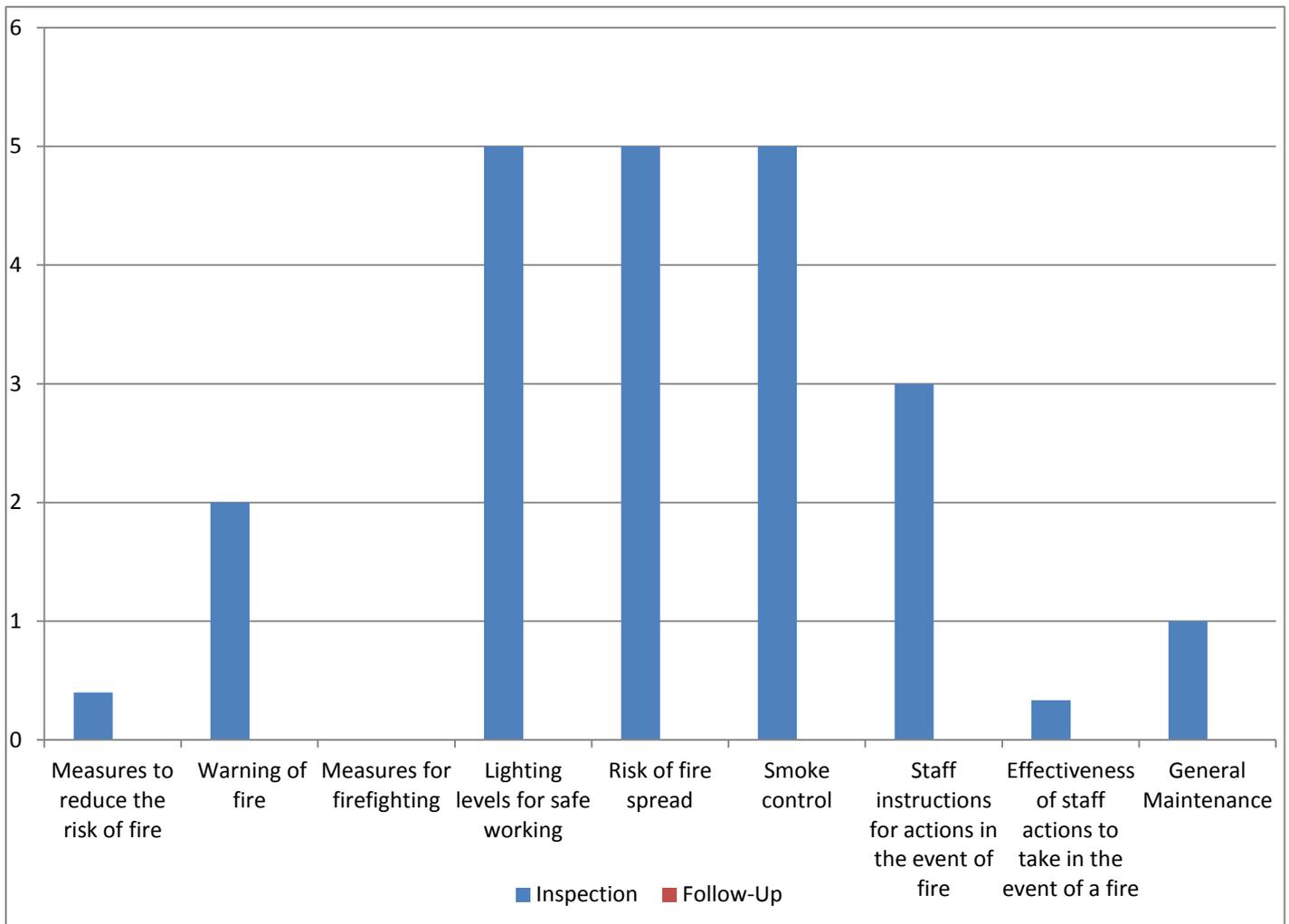
Where appropriate, a plan may form part of this Schedule to illustrate the steps which, in the opinion of the Crown Premises Fire Inspection Group, need to be taken in order to meet the requirements of the Order.

**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 General Fire Precautions.

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>

