

David Sugden, Chairman of the Passive Fire Protection Federation says Risk Assessments should always start with the structure.

Risky Business

Ever since the Lakanal House disaster Risk Assessments have been high on the list of “things to do” for Registered Social Landlords (RSLs). But are they doing them correctly - and above all, safely? When the Regulatory Reform (Fire Safety) Order or ‘FSO’ became law in 2006 there was a lot of confusion about what RSLs needed to do, and many prosecutions have followed.

The best starting point is Regulation 38 (which is Regulation, not guidance!) in Approved Document B. This requires those constructing new buildings or making major changes to existing buildings to provide details of all the fire safety measures. Building Control must not issue the Completion Certificate until this information has been provided - and it should include details on the actual structure of the building. This is to provide the Responsible Person under the FSO with the information for an initial Risk Assessment.

So how does the average landlord or building owner go about this exercise? For older buildings where records of work done since the original construction are poor or non-existent the only way to start is by examining the structure.

The Risk Assessment should investigate whether the original compartmentation of the building remains intact. Compartmentation refers to the areas of manageable risk within a building that are designed to contain any outbreak of fire for a certain time; usually 30 minutes but sometimes up to two hours. Approved Document B also requires the load-bearing elements of the building to remain stable for a similar period of time.

The Responsible Person will need to know the boundaries of the compartments, known as the ‘fire separating elements’ (such as floors, ceilings and walls along escape routes) and be satisfied that any penetrations/holes are adequately sealed. Any pipes, cables, ductwork, doors and windows - ie anything that penetrates the fire separating elements - must be constructed to provide the required period of stability, integrity and in some cases insulation. Any work done on the building after occupation must not compromise these fire separating elements or reduce the structural stability of the load-bearing elements.

To ensure this happens, any further maintenance or improvement work should be undertaken by contractors who know about structural fire safety (known as Passive Fire Protection or PFP). Approved Document B recommends that contractors are members of recognised third party certification schemes rather than general tradesmen who may leave fire safety products and measures damaged. Contractors should provide Certificates of Conformity showing how the integrity of fire separation element has been ensured, or how structural stability has been maintained. Only when you have certificates of conformity for all the work should you then look at the management of the escape routes, fire drill operations etc. Remember the Risk Assessment is a dynamic document and should be revised after any modification to the building.

Further guidance and details of third party certification schemes -shortly to include those currently being established for Risk Assessors - are on www.pfpf.org.uk.

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