

Practical Fire Safety Guidance for Existing High Rise Domestic Buildings and the Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises: Response to recommendations from research

November 2021

Background - Grenfell Tower Fire and Fire Safety Regime Review

On 14 June 2017 a major fire in Grenfell Tower, London caused the death of 72 people. In June 2017, the Scottish Government Ministerial Working Group on Building and Fire Safety (MWG) was established following the Grenfell Tower fire to oversee a review of building and fire safety regulatory frameworks, and any other relevant matters.

The Review of the Fire Safety Regime in Scotland for High Rise Domestic Property (the Review) was led by the Scottish Government Fire and Rescue Unit (in the Safer Communities Division) and the Better Homes Division and reported to the MWG in 2018 (<https://www.gov.scot/publications/scottish-fire-safety-regime-final-review/>). It made six Recommendations on fire safety specific to high rise domestic buildings:

1. Specific Fire Safety Guidance aimed at all residents of high rise domestic buildings.
2. Introduction of Scottish Guidance concerning “Fire Safety in purpose-built block of flats”.
3. Introduction of Scottish Guidance concerning Fire Risk Assessments.
4. A consistent position regarding the storage, removal and enforced prohibition of combustible materials in common areas to be devised and agreed by all relevant stakeholders.
5. A Fire Safety campaign relative to common areas.
6. Introduction of Scottish guidance concerning ‘Fire safety in specialised housing’.

The 6th recommendation applies to many types of housing, not only for high rise domestic buildings.

The first 5 recommendations were delivered in late 2019, and the specialised housing guidance was published in early 2020. When publishing the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) and the [Practical Fire Safety Guidance for Existing Specialised Housing](#) we committed to monitoring and evaluating the impact and effectiveness of both documents.

Fire Safety Guidance: Monitoring and Evaluation

In 2021 Progressive Partnership Ltd were contracted to carry out independent evaluation of the fire safety guidance, to determine whether the guidance in its current form is used by those it is intended for; is helpful; and what may be needed to strengthen it. The key objectives of the research were to:

- measure awareness of the guidance and establish the extent to which it is being used;
- explore how the guidance is being used, and its effectiveness in supporting implementation of fire safety measures/procedures; and
- determine improvements that could be made to the guidance, in terms of format, delivery, content and more generally, to strengthen the effectiveness of the fire safety support it provides.

A final report was provided to Scottish Government officials on 29 June 2021, which set out the main findings as noted below.

Research, findings, recommendations and actions

The research involved phone interviews and an online survey with those responsible for fire safety in high rise domestic and specialised housing (including carers).

The overall response rate of the research was lower than hoped for. This was due to a number of factors:

- there is no single person or body responsible for fire safety in privately owned high rise;
- similarly there is a large range of organisations involved in care and support and getting in touch with an appropriate contact to respond proved difficult;
- the impact of Covid-19 and restrictions on staff capacity.

However, the findings across the study were consistent and a clear picture of the strengths and areas for improvement of both sets of guidance did emerge. The research therefore provides insights and actions we can take to improve the impact and effectiveness of the guidance.

Key Findings - Practical Fire Safety Guidance for High Rise Domestic Buildings

Awareness of the guidance was quite high, but some sectors were not aware of it. Most of the high rise research participants were using the guidance for the intended purposes, including:

- Ensuring a satisfactory standard of fire safety.
- Updating policies and procedures, when undertaking fire safety risk assessments (FSRAs) and act in response to fire safety risk assessments.
- Participants generally found the FSRA template provided in the guidance to be helpful (though many still used their own templates). Some minor modifications to the FSRA template were suggested.
- Most of the high rise research participants considered the guidance for high rise domestic properties and the template for fire safety risk assessments to be valuable.
- The research participants who had used the guidance considered it to be clear and concise.
- The aspects of the guidance they were most likely to rate as very good were:
 - comprehensive coverage of relevant aspects of fire safety.
 - clarity as to which organisations and buildings the guidance applies.
 - provision of tools to support the guidance.

Key Findings - Specialised housing and similar properties

- Awareness of the guidance was very high amongst the research participants. However, the report advised that while it seems likely that most in the social housing sector will have some awareness, it is less clear whether those in the wider care sector and private housing sector will do so e.g. unpaid carers.

- The majority of the specialised housing participants had used the guidance.
- It was mainly being used to ensure a satisfactory standard of fire safety, to update policies and procedures, when conducting fire safety risk assessments, and when conducting person-centred risk assessments.
- It was also being used when undertaking actions in response to fire safety risk assessments, to support development of new policies and procedures, and to train staff.
- A small number of research participants were using the Fire Risk Assessment templates in the guidance, in whole or in part, to conduct their risk assessments. Others continue to use other approaches, typically a PAS 79 template.
- Most of the specialised housing research participants considered the guidance for existing specialised housing and the templates for the risk assessments to be valuable.
- The key aspects of the guidance that research participants were most likely to rate as very good were:
 - the clarity of the buildings and organisations to which the guidance applies;
 - the provision of practical tools to support the guidance;
 - comprehensive coverage of relevant aspects of fire safety; and
 - the guidance being user-friendly.
- Almost none of the respondents rated guidance on who should complete the risk assessments as *very good*.
- Around half of the specialised housing respondents thought that clearer guidance on who is responsible for completing the person-centred risk assessment, and more tools for completing the template, would be helpful

Recommendations for Improvement

Progressive Partnership Ltd made 5 recommendations within their research to improve the impact and effectiveness of the guidance. These recommendations are set out below alongside consideration given to each by Scottish Government and the intended next steps.

High rise domestic buildings and Specialised housing Recommendation

1) Awareness Raising

It was noted throughout the research that awareness of both sets of guidance was quite high amongst most of the participants, but there were still some sectors that were unaware of them.

Recommendation: To further improve awareness and use of the guidance. Promote the guidance across social housing, housing management, and care and health sectors, drawing on opportunities to work with/through key partners, and to take part in conferences/seminars.

Response and action

When both sets of guidance were published they were made available on the Scottish Government website, alongside a press release providing context and background. A link was also sent directly to a wide range of providers and their umbrella bodies.

There were plans to continue to promote the specialised housing guidance, since this was the first time it was produced for Scotland. This was delayed, due to the impact of Covid-19. Going forward, we will review the guidance and refresh plans to raise awareness by working with Scottish Government policy and marketing colleagues and the relevant stakeholder groups.

High rise domestic building guidance recommendation

2) Fire Safety in Common Areas

Some research participants were concerned that some grey areas remain regarding fire safety in common areas, especially around implementing actions when owners refuse to take action.

Recommendation: Scottish Government to progress planned work designed to improve fire safety in common areas. Scottish Government to consider if new fire safety legislation for common areas is required. Include further guidance on managing works on common areas in mixed tenure/private sector blocks within the document.

Response and action

Within the Practical Fire Safety Guidance for High Rise Domestic Buildings document, we developed a framework to help those with fire safety responsibilities to manage combustible items left in common areas. We are aiming to trial this framework in 2021/2022 and evaluate its effectiveness. This trial will inform further steps on this issue, including whether there is a need to amend or introduce legislation.

Specialised housing recommendations

3) Fire Safety in Common Areas

A number of barriers were identified to conducting the premises-based risk assessments in specialised housing, which were largely similar to those identified for high rise domestic properties. A key barrier is securing compliance from owners in private/mixed tenure blocks.

Recommendations: Scottish Government to progress work on improving fire safety in common areas in mixed/private sector blocks. Include further guidance on managing works on common areas in mixed tenure/private sector blocks within the document

Response and action

The High Rise guidance has been updated to cross-refer to the Specialised Housing guidance. Any changes or amendments made to the High Rise Domestic Building

guidance will therefore apply, where appropriate. Consideration will also be given to how we can ensure compliance in mixed tenure blocks. The Scottish Government intends to commission the Scottish Law Commission to carry out a law reform project on cooperation between owners in tenements, and other types of flats, with a view to improve cooperation on maintenance, energy efficiency, and fire safety.

4) Concerns regarding person centred risk assessments

The current person-centred risk assessment template does not specify who is responsible for carrying out the assessment or for ensuring the actions identified are implemented and monitored. The guidance is also designed for professionals, a more concise and easy to read version may be useful for unpaid carers.

Recommendation: Consider a review of the person-centred fire safety risk assessment materials, including providing information on who could be responsible (for assessment/actions/monitoring), good practice on determining responsibilities, and consideration of whether arrangements for imposing/arbitrating responsibility are required.

Response and action

We will review the person-centred risk assessment guidance and templates and amend as appropriate. We previously considered whether the guidance should specify the person responsible for undertaking the person-centred risk assessments. However, individual circumstances and support/caring arrangements vary. Decisions are best made by those closest to, and with, the person concerned. For these reasons, the guidance is not prescriptive. We will work with relevant organisations to support people so they can identify the most suitable person, e.g. by providing worked examples or case studies.

5) Training and Resources

Further guidance and support to complete the person-centred risk assessment templates, including worked examples based on frequently encountered scenarios would be very useful. This would show people how to complete the template, the types of issues to look out for, the types of actions that can be taken, and how risks are assessed.

Recommendation: Consider developing a pack of worked example templates

Response and action

We will consider how best to improve guidance to complete person-centred risk assessments, including the use of key worked examples.

Action summary

High rise and specialised housing guidance

Action	Response	Timeframe
1) Awareness raising of the guidance	Work with Scottish Government policy and marketing colleagues and relevant stakeholder groups to carry out further awareness raising.	Both guidance documents are being reviewed and refreshed this year. We would therefore envision publishing updated versions and raising awareness of these in Q1 2022

High rise domestic building guidance

Action	Response	Timeframe
2) Fire Safety in Common Areas	A framework for managing combustibles left in common areas is already in the high rise domestic building guidance (and cross referred in the specialised housing guidance). This framework is due to be trialled early next year and this would inform our approach to this issue	The trial is due to take place in Q1 2022 . Any learning from this trial will inform our approach to the issue of fire safety in common areas.

Specialised housing guidance

Action	Response	Timeframe
3) Fire Safety in Common Areas	A framework for managing combustibles left in common areas is already in the high rise domestic building guidance (and cross-referred in the specialised housing guidance). This framework is due to be trialled early next year and this would inform our	The trial is due to take place in Q1 2022 . Any learning from this trial will inform our approach to the issue of fire safety in common areas.

	<p>approach to this issue. Consideration will also be given to how we can ensure compliance in mixed tenure blocks.</p>	
<p>4) Concerns regarding person centred risk assessments</p>	<p>We will review the person-centred risk assessment guidance and templates and amend as appropriate</p>	<p>The specialised housing guidance is being reviewed and refreshed this year. We would therefore envision publishing updated versions and raising awareness of these in Q1 2022</p>
<p>5) Training and Resources</p>	<p>We will consider how best to improve guidance to complete person-centred risk assessments including the use of key worked examples.</p>	<p>The specialised housing guidance is being reviewed and refreshed this year. We would therefore envision publishing updated versions and raising awareness of these in Q1 2022</p>



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