Fire Risk Assessment

Bebington Hall Park
Wirral
Mount Avenue L63 5QY
Mount Way CH63 5RA
Kings Close CH63 5QZ

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0 - Introduction

This Fire Risk Assessment (FRA) was made to address the requirements of the Regulatory Reform (Fire Safety) Order 2005 for an assessment of the risk to life from fire in these premises and, as appropriate, to make recommendations to ensure compliance with fire safety legislation.

Because of its importance to the Responsible Person (RP), *Section 2- Action Plan* is provided at the start of this report, immediately following the *Section 1 - Executive Summary*. The information which populates these sections is derived from *Section 4 – Premises Information* and *Section 5 – The Fire Risk Assessment Inspection Form*.

Section 6 – Fire Risk Assessment Protocol provides a framework to show how the overall life risk rating has been arrived at and also how individual actions in the Action Plan have been prioritised.

Section 7 – Site Plans is reserved for any plans that may be provided which assist the reading this report.

Section 8 – Fire Door Defect Spreadsheet lists by door/location and specific fire door defects. This reduces the overall length of the main action plan, to assist the reader in assimilating the plan.

The assessor advises the Responsible Person, any of their representatives or any interested party to read the FRA in its entirety.

1 - Executive Summary

Premises name and address	Bebington Hall Park, Mount Avenue L63 5QY; Mount Way CH63 5RA; Kings Close CH63 5QZ
Premises type	Purpose – built flats, consisting of two and three storeys
Current life risk rating	**Moderate.**
Date of fire risk assessment (FRA)	23.2.24.
Type of FRA	Type 1: common parts only (non-destructive).
Date for re – inspection	February 2025.
Responsible Person/s (RP/s)	Freehold owners – Bebington Hall Park Ltd Managing agents – Keystone Property Management
Principle Legislation	The Regulatory Reform (Fire Safety) Order 2005. The Fire Safety Act 2021. The Building Safety Act 2022. The Fire Safety (England) Regulations 2022. The Housing Act 2004.
Principal guidance document/s (Used to assess premises)	LGA – Fire safety in purpose-built blocks of flats.
Existing control measures (Summarised from FRA) **Note 1: some measures may also which require remedial action.** **Note 2: the extent of any specific control measure is detailed in section 5 of this report.**	• Some individual flats sampled had Grade F and Grade D smoke detectors, (but additional coverage is advised). • Many of the flats sampled appeared to have original “notional” fire doors (but remedial actions are required). • There were emergency escape lighting (EEL) luminaires within the common areas on all levels. • Access for the fire service is adequate. • The standard of housekeeping throughout the premises was very good.
High Priority Actions (Summarised from the Action Plan. Refer to section 2 for all actions in full)	1. The provision, testing and servicing for the domestic AFDA systems in flats requires upgrading. 2. The protection of the common means of escape is not sufficient and requires immediate review. 3. The fire evacuation plan for the development requires review in relation to the standard of passive fire protection. 4. Resident engagement requires enhancement. 5. There was a build-up of combustible items within many of the service cupboards located next to the flat front doors. The combustibles and confirm a zero – tolerance policy is in place regarding combustibles within these areas 6. Remove the obstructions on the means of escape which were evident in several of the blocks. 7. The electrical installation condition reports (EICR) for the main electrical intake/distribution boards for the development were

	not available for audit. Confirm that current and satisfactory EICRs are in place or contact an electrical engineer (advised to be 3rd party accredited) to inspect the main electrical intake/distribution boards ensuring satisfactory EICRs are provided in accordance with BS7671.
The use of this Fire Risk Assessment (FRA)	This FRA is intended to be a working document that should be used by the responsible person/s, to guide future actions aimed at improving compliance with legislation and ongoing general fire precautions. In order to facilitate this, the Action Plan is provided, within which the findings and recommended actions are listed (and prioritised) to assist implementation and allocation of resources. Efforts must now be made to address the findings of this report to reduce the risk of fire, enhance life safety and ensure ongoing compliance can be demonstrated. This should include procedures to ensure that any improvements or protective measures are planned, organised, monitored and reviewed. Whilst we advise what we consider to be reasonable timescales for improvements to be made within the fire action plan, it is for the Responsible Person/s to devise an appropriate action plan which is in line with budgetary constraints etc. This will be required by The Fire Authority who enforce the Regulatory Reform (Fire Safety) Order 2005.
Any other information	• There was no building control certification to confirm construction was in compliance with the Building Regulations. • There was no “as – built” fire strategy. • There was no “as – built” plans. • There were no relevant records to confirm the type/method of construction of the premises. • There was no design, installation, commissioning, verification certificates for the active fire protection systems. • There were no fire door test certification records. • There were no records for the passive fire protection works such as fire stopping.

2 - Action Plan

Action Point 1	Priority rating	H	M	L

Action Reference – provision, testing and servicing for the domestic AFDA systems in flats. Articles 8 and 13 of The Fire Safety Order (The FSO).

Finding/s

The flats sampled during this FRA had the following level of automatic fire detection and alarm (AFDA) systems –

- Flat 6 and Flat 24 Mount Way: 1 x Grade F (battery only) smoke detector in hall.
- Flat 13 Mount Way: 2 x Grade F smoke detectors, 1 x hall and 1 x lounge.
- Flat 5 Kings Close: 1 x Grade F smoke detector in open plan living area/bedroom.
- Flat 10 Kings Close: no detectors installed; 1 x Grade F smoke detector propped on coat stand.
- Flat 16 Kings Close: 1 x Grade D2 smoke detector in hallway, see image opposite.
- Flat 27 Kings Close: 2 x Grade F smoke detectors, 1 x hall and 1 x living room.
- Flat 25 Mount Avenue: No detectors installed.
- Flat 41 Mount Avenue: 2 x Grade F smoke detectors, 1 x hall and 1 x living room.

In all cases the current means of detecting and providing a warning of fire within each flat was not adequate.

Recommended action/s

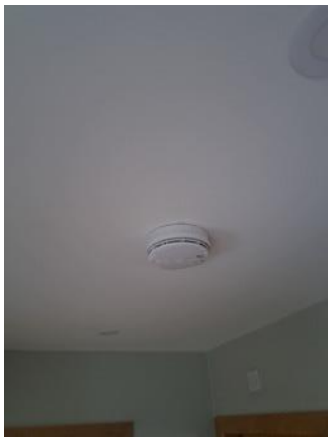
Whilst it is understood that the Regulatory Reform (Fire Safety Order) 2005 does not extend into individual flats, and that for existing owner/occupied flats Grade F2 LD3 coverage is the minimum requirement set by BS5839:6 (2019) the following actions are strongly advised –

- Any leasehold (owner/occupied) flats should install a Grade D2 LD2 domestic AFDA system. This comprises of a series of hard-wired interlinked detectors (with back–up batteries which do not need to be tamper proof), located –
  - 1 x smoke detector in the hallway.
  - 1 x heat detector in the kitchen.
  - 1 x smoke detector in the lounge/main habitable room if it is a separate room from the kitchen.

  This applies to any leasehold flats not inspected during this FRA. Such provision would meet current benchmark guidance for new/materially altered owner/occupied flats, as per BS 5839: 6 (2019).

(Continued overleaf)

Supporting photo/s



Action Point 1 (continued) • Any rented flats should have Grade D1 LD2 systems. Any leaseholders who rent out there flat should upgrade the systems in their flats accordingly. Note: D1 means that the back – up batteries need to be tamperproof. This is an existing requirement under BS5839:6. If installed: • As per BS5839: 6, residents should test their systems at least monthly by use of the test button on the detectors. In reality, they would not be expected to record this. • As per BS5839:6, residents should ensure servicing is carried out by a competent person (which would be stated in the manufacturer's instructions). In addition, the internal batteries should be replaced when a low warning battery is generated or as per the manufacturer's recommended routine replacement, whichever is soonest.	
Actionee/date of action	
Action taken	

Action Point 2	Priority rating	H	M	L

Action Reference – protection of the common means of escape (all blocks). Articles 8 and 13 of The FSO.

Finding/s

The common means of escape from each block is not adequately protected for the following reasons –

- Flat front doors across all the blocks were mainly original "notional" fire doors which do not self – close effectively (due to original self -closing hinges being defective) and which would not meet current standards. Please refer to section 8 – fire door defect spreadsheet for the specific defects but see image 1 as an example of such a door.

- Some residents have replaced the original flat front door with a range of composite/uPVC type doors –. Based on assessing doors to flats such as 10 Kings Close and 16 Kings Close – see images 2 & 3 opposite, these doors do not appear to be FD30s fire doors, are not fitted with self – closing mechanisms and are not compliant with current building regulations. However, on speaking to Maria Rennie (owner/occupier at No16 Kings Close) during this FRA, it appeared that anecdotally she was informed by Smith and Sons (the former property managers) and by a representative of Merseyside Fire and Rescue Service that it was acceptable for her to have a new door/service cupboard that was not fire rated because her flat did lead directly onto the single means of escape. There was no documentary evidence available to confirm this.

- Each flat has a service cupboard next to the front door which houses the flat gas and electrical intakes/consumer unit. As with the front doors detailed above, they are either original cupboards or new composite/uPVC type cupboards. Neither would provide the required 30 minutes fire resistance. See images 3 and 4 as examples.

Recommended action/s

The flats were built circa 1970 and so whilst they are not compliant with current building regulations, the regulations are not retrospective and a reasonable approach is required, as detailed in the LGA guidance document - *Fire Safety in Purpose – Built Blocks of Flats.* The guide allows for reasonable mitigation of non – compliant conditions but in this specific case (where flats open directly onto a single common of escape, which is an open staircase, but which has ceilings wider than 2m) the escape route still needs to be protected.

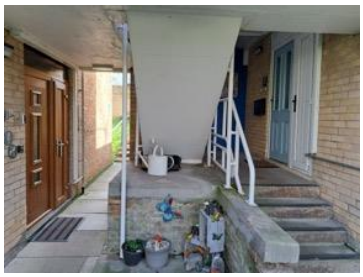
(Continued overleaf)

Supporting photo/s

Action Point 2 (continued)

Based on the above guidance and in assessing the specifics of this case (including the costs already incurred by flat owners in replacing old doors with what they believed to be acceptable doors) a reasonable and proportionate approach would be as follows –

- Upgrade existing "notional" front doors to include a new positive action overhead self - closer, intumescent strip and smoke seal; new BS1935 fire rated hinges x 3. The existing non fire rated letterboxes and high-level vents would be reasonable to remain given the fact that the doors open onto an open stairway.
- Composite/uPVC type doors at ground level in flats – see image 1 opposite of 16 Kings Close, which do not open directly onto the common stairway can remain but should be fitted with positive action overhead self - closing mechanisms.
- Composite/uPVC type doors which open directly onto the common stairway as is the case with flat 17 (light blue door in image opposite) should be replaced with new FD30S fire doors and fitted with positive action overhead self - closing mechanisms. However, if this is financially prohibitive for existing owner/occupiers and if a common means of raising a fire alarm is provided (see action point 3) it may be risk proportionate to allow the doors to remain provided they have positive action overhead self – closing mechanisms fitted.
- Enclosures to each flats service cupboard which have original doors should be upgraded to achieve 30 minutes FR.
- Composite/uPVC service cupboard enclosures that have been provided as per the new flat front doors would be reasonable to remain in place if on the ground floor and remote from the common stairway and if they are kept locked shut; they are completely clear of combustibles; and the individual gas intakes and consumer units are regularly tested.
- Composite/uPVC service cupboard enclosures that have been provided as per the new flat front doors which open directly onto the common stairway should be replaced unless they can be confirmed to provide 30 minutes fire resistance. However, if this is financially prohibitive for existing owner/occupiers then if a common means of raising a fire alarm is provided (see action point 3) it may be risk proportionate to allow them to remain if they are kept locked shut; completely clear of combustibles; and the individual gas intakes and consumer units are regularly tested.



Actionee/date of action	
Action taken	

Action Point 3	Priority rating	H	M	L	Supporting photo/s

Action Reference - the fire evacuation plan. Articles 11 and 15 of The FSO.

Finding/s

In blocks of flats there are normally two different evacuation procedures that could be operated. They are summarised below.

- Stay put procedure – the occupants of the flat(s) involved and anyone in the common areas of the blocks would evacuate in the event of fire. Other occupants would "stay put" in the relative safety of their flat, because the procedure is premised upon the fire resisting compartmentation being of a standard that would contain the fire to the flat of origin for a minimum of 60 minutes. This is still the procedure advised by national guidance for purpose – built blocks of flats. Normally, there would not be a common automatic fire detection and alarm (AFDA) system in the building unless it was to initiate the operation of a fixed installation such as an automatic opening vent (AOV) or to indicate a fire at the panel, but it would sound a silent alarm, because an audible alarm would not be aligned to a stay put procedure, since it would alert people across the block to evacuate.

- Full evacuation procedure – all occupants of the building would evacuate simultaneously on hearing the common fire alarm, since a common automatic fire detection and alarm (AFDA) system would be installed.

Currently, each block in Bebington Hall appears set up to follow national guidance and adopt a 'stay put' procedure as described above. However, the current fire action notice displayed at the base of each block on the external walls is not suitable and sufficient for the following reasons –

- The fire action notices are not specific, see image opposite because there is no way of raising/sounding the alarm by using a manual call point because they are not provided. Also, raising a common alarm is not aligned to a stay put procedure.

- They do constitute a full fire evacuation plan because there is no information to describe the type of evacuation procedure and the full detail of the procedure.

(Continued overleaf)

Action Point 3 (continued)

In addition, the following issues and information are provided to the responsible person (RP) –

- There were issues identified with passive fire protection (PFP), principally flat front doors and individual service cupboards next to flat front doors (see action point 2 above).

- Due to the limitations of a Type 1 FRA, it cannot be categorically confirmed that the standard of compartmentation /PFP would support a stay – put procedure. That is because an inspection of PFP could not be made between flats; where services are enclosed in existing construction within flats (which may hide breaches) and finally because there were no records available to assist in confirming the methods of construction/materials used. For example, even if the floors between flats are concrete, a type 1 FRA cannot determine what breaches may exist in the floors, caused by the passage of services which may not have been suitably fire stopped. For example, on speaking to a resident and observing a boiler cupboard it appeared that there may be existing (and possibly redundant) communal extraction ductwork running between flats. A type 1 FRA does not extend to inspecting such areas within flats and even if a type 3 FRA was carried out it may not be possible to fully ascertain if the fire separation between flats or the fire rated integrity of the ductwork was adequate.

- Benchmark national guidance around stay put procedures does not appear to differentiate between high rise blocks of flats and low-rise blocks of flats such as those in Bebington Hall Park. They can be different in a number of key ways. For example –
  - High rise blocks of flats often have a significant number of occupants with a single common stairway for use as a means of escape which is not designed to accommodate all occupants in a full and simultaneous evacuation. In low-rise blocks such as Bebington Hall Park there are a much smaller number of occupants who have access to a stairway which can easily accommodate that number of people.
  - The Fire Service will use the single stairway to conduct firefighting and rescue operations. In high rise blocks of flats that can cause a significant issue if large numbers of people are evacuating down the stairway, whilst The Fire Service are looking to utilise it.

(Continued overleaf)

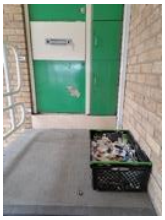
Action Point 3 (continued) In low rise blocks of flats such as Bebington Hall Park that is unlikely to be an issue because the occupants would have likely evacuated before the arrival of the Fire Service given that travel distances down the stairway are relatively short, as opposed to high rise blocks which have longer travel distances and longer evacuation times due the number of people. • However, a movement to a full and simultaneous evacuation plan would not be straightforward because the common means of escape are open and the provision of a common smoke detection within the stairways would not seem practical or effective.	
Recommended action/s Based on the above, the RP should consult with all the residents and fully consider the options in light of the overall findings of this FRA as follows – 1. Confirm formal adoption of a stay put procedure and produce a fully documented evacuation plan, which is displayed in a prominent position in each block and provided to each resident as part of a fire safety information pack (cross reference with action point 4). This evacuation plan may be valid if the standard of passive fire protection (PFP) can be guaranteed to support it. That would require any passive fire protection issues identified by this FRA remediating, but also possibly more extensive investigation carried out inside individual flats (which is beyond the scope of a Type 1 FRA) and which may include destructive inspection by a competent specialist (advised to be 3rd party accredited). 2. Adopt a full and simultaneous evacuation procedure as described above if the standard of PFP cannot be guaranteed to support a stay - put policy. Such an evacuation plan would seem intuitive in low – rise flats. If a full evacuation procedure is adopted then there should be a Plan B, which would be that in the event that a person/s could not evacuate (either due to mobility issues or because on opening their flat front door they found that the common means of escape was already compromised by a fire) they should be able to remain in their flat in a relatively safe area, call the fire service and use any existing compartmentation to maintain their safety. If a full and simultaneous evacuation procedure is adopted a common automatic fire detection and alarm (AFDA) system would need to be provided in each block. (Continued overleaf)	NA

Action Point 3 (continued) Given, the layout already described it would be reasonable to provide a category M (manual) system in accordance with BS5839 – 1 within each block. This would comprise of a series of manual call points and a fire alarm control panel. Sounders would need to be positioned at suitable locations to ensure that sleeping occupants could hear the alarm. The only issue with this system is it would rely on a resident to raise the common fire alarm rather than this being detected automatically. This should be done in consultation with your fire alarm engineer (advised to be BAFE or similarly 3rd party accredited). If this procedure was adopted there would be more mitigation for the RP not to insist on new front doors to be replaced because it would be likely people would have evacuated prior to any major failure of a flat front door.	
Actionee/date of action	
Action taken	

Action Point 4	Priority rating	H	M	L	Supporting photo/s
Action Reference - resident engagement: a requirement of The Fire Safety Regulations (England) 2022.					NA
Finding/s There was no information provided detailing the type and method of resident engagement. There was no resident information within the common areas. Resident engagement should be enhanced. From 23/1/23 this became a requirement under The Fire Safety (England) Regulations 2022.					
Recommended action/s If not already taking place residents should be provided with a fire prevention/safety information handbook offering simple practical advice to assist in ensuring the safety of all residents in the flats. Information should include: • The fire evacuation procedure, clearly displayed in the common areas on a noticeboard or similar form of signage – refer to action point 3. • An explanation of the means of escape and how to make sure that it is always protected, available and not obstructed. • Fire prevention measures for smoking, cooking, electrical and gas safety. • Electrical safety advice with regard to charging of equipment using lithium-ion batteries, (never charge while asleep or while the property is empty). • The elimination of storage/use of dangerous substances (e.g. portable gas heaters or gas barbecues). • Safe use of candles if permitted. • Good housekeeping and an explanation of the housekeeping policy (i.e., zero tolerance). • Information on fire doors, including the importance of fire doors; self – closers and not wedging doors open etc. • Testing of smoke detectors in their flats/avoidance of false alarms/reporting defects. • Explanation of any other active or passive fire protection measures provided in the common areas/in the building. The information should be reviewed periodically as situations change. Information on a noticeboard or similar form of signage should be reviewed and periodically updated.					

Actionee/date of action	
Action taken	

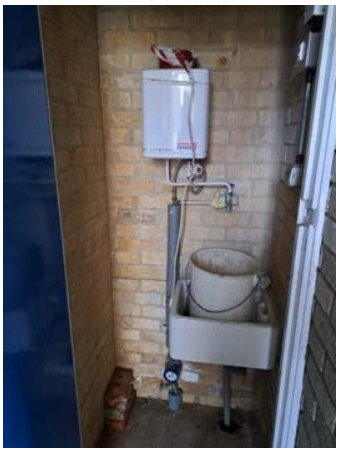
Action Point 5	Priority rating	H	M	L	Supporting photo/s
Action Reference – combustibles within the service cupboards next to flat front doors. Article 8 of The FSO.					  
Finding/s There was a build-up of combustible items within many of the service cupboards located next to the flat front doors – see images opposite.					
Recommended action/s Remove the combustibles stored within the cupboards. Ensure these areas remain sterile and clear of any combustibles/storage. Confirm a zero – tolerance policy is in place regarding combustibles within this area. Ensure this information is communicated to agents and contractors working on behalf of the responsible person when carrying out testing/inspections within the building. Please also refer to action point 3 above.					
Actionee/date of action					
Action taken					

Action Point 6	Priority rating	H	M	L	Supporting photo/s
Action Reference – obstructions on the means of escape. Article 8 of The FSO.					   
Finding/s There were obstructions on the means of escape in several of the blocks reviewed at the time of the FRA – see images opposite.					
Recommended action/s Remove the items forming the obstructions on the means of escape. Ensure these areas remain sterile and clear of any obstructions. Confirm a zero – tolerance policy is in place regarding the means of escape. Ensure this information is communicated to agents and contractors working on behalf of the responsible person in the common areas on the means of escape in the development.					
Actionee/date of action					
Action taken					

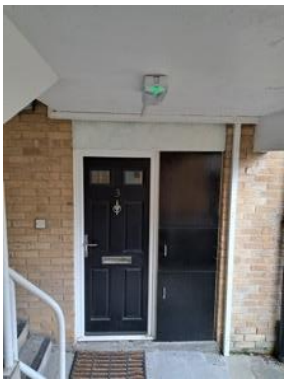
Action Point 7	Priority rating	H	M	L	Supporting photo/s
Action Reference - common electrical installation EICR. Article 8 of The FSO.					**NA**
Finding/s The electrical installation condition reports (EICR) for the main electrical intake/distribution boards for the development were not available for audit.					
Recommended action/s Confirm that current and satisfactory EICRs are in place or contact an electrical engineer (advised to be 3rd party accredited) to inspect the main electrical intake/distribution boards ensuring satisfactory EICRs are provided in accordance with BS7671.					
Actionee/date of action					
Action taken					

Action Point 8	Priority rating	H	M	L	Supporting photo/s
Action Reference - Gas Safety within individual flats. Article 8 of The FSO.					**NA**
Finding/s Gas boilers are provided in individual flats but there were no service records available for audit.					
Recommended action/s The landlord for any tenanted flat (s) is responsible for ensuring that there is a current and satisfactory annual gas safe certificate, confirming the boiler and any gas hob is satisfactory. If not already done so, ensure the boiler has an annual service and safety inspection carried out by a competent 3rd party accredited engineer in accordance with BS 7593.					
Actionee/date of action					
Action taken					

Action Point 9	Priority rating	H	M	L	Supporting photo/s
Action Reference – electrical testing within individual flats. Article 8 of The FSO.					**NA**
Finding/s There were no domestic electrical installation condition reports (DEICR) available for audit for flats to confirm that individual flats have a current and satisfactory DEICR. The arrangements for the inspection and testing of electrical appliances within the flats is not known.					
Recommended action/s It is recommended to contact an electrical engineer (advised to be 3rd party accredited) to carry out a domestic electrical inspection on the installation within the flats and issue a domestic EICR. It would be advised that portable electrical appliances are checked regularly. For tenanted flats, the following guidance is provided- • Letting agents and landlords should check all electrical appliances at the start of each new tenancy for defects (for example frayed wiring or badly fitted plugs) and remove any unsafe items. • It is good practice to have the equipment checked at regular intervals thereafter, but there is no legal requirement to do so unless appliances are used by employees. • Records should be kept of the checks carried out. • Instruction booklets should be available at the property for all appliances and any necessary safety warnings should be given to tenants; and • Second-hand electrical appliances should not be supplied, but if they are then they should be checked by a competent electrical engineer.					
Actionee/date of action					
Action taken					

Action Point 10	Priority rating	H	M	L	Supporting photo/s
Action Reference – portable appliance testing (PAT) in the common areas. Article 8 of The FSO.					
Finding/s Portable electrical appliances were identified in "sluice rooms" in the common areas on the ground floor of the development – see image opposite in Block 22 – 30 Kings Close as an example. However, there was no PAT testing policy available for audit and it was not known if there was an inventory of appliances within the development.					
Recommended action/s For clarity effective PAT testing involves the following – • A PAT testing policy, including the control of unauthorised appliances. Good practice is to instigate PAT testing, but this is not a legal requirement unless appliances are used by employees. • Ensure a PAT inventory listing all appliances as assets, type of appliance, location and test result and next test date due is provided. • Overarching PAT test certification provided by the competent person engaged to carry out PAT testing. • PAT labels on all appliances that have been tested.					
Actionee/date of action					
Action taken					

Action Point 11	Priority rating	H	M	L	Supporting photo/s
Action Reference – Passive Fire Protection (PFP) – defective fire doors. Articles 8, 14 and 17 of The FSO.					See section 8 of this FRA report
Finding/s There were a number of defects/issues noted with the fire doors to mains electrical intake cupboards and bin stores inspected as follows, • The doors did not have self-closing mechanisms fitted. • The hinges on doors had no fire rating. • Intumescent strips and seals could not be confirmed. • There was no fire door test certification and none of the door leaves had a certification label (or plug). Please refer to *Section 8 – Fire Door Defects Spreadsheet* for the specific defects by location.					
Recommended action/s Arrange for all the fire door defects identified in section 8 of this report are remediated by a competent person (advised to be a 3rd party accredited fire door installer). They will know the most appropriate remedial actions to take. However, a generic guide in section 8 provides detail on likely remedial actions.					
Actionee/date of action					
Action taken					

Action Point 12	Priority rating	H	M	L	Supporting photo/s
Action Reference – the emergency escape lighting (EEL). Articles 8, 14 and 17 of The FSO.					
Finding/s Emergency lighting is provided within the common areas and on each landing in the development – see image opposite as an example. The following issues were identified with EEL – • There was no design, installation and commissioning certificate available for audit. • The annual service certificates were not available for audit. • There was no evidence of a documented monthly test taking place, although Maria Rennie (No16 Kings Close) stated that all units had recently passed their monthly tests but several had failed the annual full duration test.					
Recommended action/s The following actions are required- • Contact your EEL engineer and ask if they will issue a design, installation and commissioning certificate. • Arrange for the annual service to take place (if not already done so) as soon as possible. • Instigate a documented monthly testing schedule.					
Actionee/date of action					
Action taken					

Action Point 13	Priority rating	H	M	L	Supporting photo/s
Action Reference – condition of the means of escape and pedestrian areas underfoot. Articles 9 and 18 of The FSO.					
Finding/s The conditions underfoot, of the pedestrian areas forming the means of escape requires review. In several areas of the development the footpaths were mossy and quite slippy – see image opposite as an example.					
Recommended action/s The footpaths and pedestrian areas forming the means of escape for the development should be regularly treated to prevent the growth of moss and reduce the risk of slips, trips and falls.					
Actionee/date of action					
Action taken					

Action Point 14	Priority rating	H	M	L	Supporting photo/s
Action Reference - the fire safety file. Article 11 of the FSO.					**NA**
Finding/s There was no fire safety file or relevant records available for audit.					
Recommended action/s It is advised that the fire safety file should include all the following records (which may include some that were provided for audit) - • The fire safety policy. • The fire evacuation plan. • Fire service audits under the Fire Safety Order. • The current fire risk assessment. • Active fire protection system testing/maintenance records. • Passive fire protection inspection records. • Design, installation, commissioning, verification certification for the active fire protection systems (as applicable). • Fire door test certification records. • Electrical safety records (i.e. EICR and PAT records). • Gas safety certification. • Inspections of the general fire precautions. • A copy of fire safety information provided to residents. • Staff fire awareness training records.					
Actionee/date of action					
Action taken					

Action Point 15	Priority rating	H	M	L	Supporting photo/s
Action Reference - Fire safety inspections and testing of the general fire precautions. Article 8 of The FSO.					**NA**

Finding/s

There were no records made available for audit relating to fire safety inspections and testing of the general fire precautions.

Recommended action/s

Ensure that suitable arrangements are made to carry out inspections of the general fire precautions based on the current provisions in place. In the case of daily checks this would be if reasonably practicable, given no staff are based on site. This must be done by a competent person who has received training to carry them out effectively. They should include -

Daily (no need to be documented)

- Check fire exits are immediately available and unobstructed.
- Check escape routes are not obstructed and are sterile.

Weekly

- As per above plus a general housekeeping inspection/fire prevention inspection.

Monthly

- As per weekly inspections plus –
- Monthly emergency lighting test.

Quarterly

- Inspect flat front doors (fire doors) – advised.
- Inspect fire doors in common area (electrical cupboard) – advised as best practice.

Six monthly

- As per monthly inspection

Annually

- As per monthly inspections plus –
- Ensure annual emergency escape lighting service (by competent lighting engineer).
- Ensure annual portable firefighting equipment servicing by competent engineer). If provided.
- Inspect flat front doors (strongly advised as a minimum).

Note: dependant on what actions are taken in respect of action points 3 and 17 if a common AFDA system was provided in each block and fire extinguishers in common service intake cupboards then these would need testing and servicing in line with relevant standards.

Actionee/date of action	
Action taken	

Action Point 16	Priority rating	H	M	L	Supporting photo/s
Action Reference – staff fire awareness training. Articles 8 and 21 of The FSO.					**NA**
Finding/s There was no evidence or documents provided confirming fire awareness training has been provided. Whilst it is understood staff are not employed on site, any staff (particularly anyone who may attend a residential building to carry out fire safety inspections, audits etc) should have been provided with basic fire awareness training (it is a legal requirement).					
Recommended action/s It is advised that appointed staff who will visit the development to carry out testing/inspection regimes have received appropriate fire awareness training as detailed below. It is recommended to obtain copies of any training provided and certificates of attendance of staff to include within your own fire safety file. This would demonstrate a robust approach to eliminating risk as far as reasonably practicable within the premises and ensure any deficiencies are identified. If workers attend the premises on their own it would be advisable to have a lone workers policy, included in the fire safety file. For additional guidance, fire awareness training must be provided to all staff on employment and when exposed to new risk. This training should be repeated periodically (annually is advised). The Fire Safety Order states that the training *"include suitable and sufficient instruction and training on the appropriate precautions and actions to be taken by the employee in order to safeguard himself and other relevant persons on the premises."* The assessor would advise that this specifically includes the following – • A very brief overview of legislative requirements. • The role/responsibilities of staff and fire wardens. • How fires start and develop. • Likely causes of fire in the workplace. • Fire prevention measures. • An overview of the fire protection measures provided. • Emergency procedures. It is recognised that a lot of fire safety training is carried out via e – learning. It will be for the Responsible Person (RP) to be satisfied that the training provided is adequate (which would include the method of delivery). It is the assessor's professional opinion (partly based on their experience as a retired fire officer and qualified fire trainer) that fire safety training is more robust when provided face to face by a competent person (who is a subject matter expert).					

Actionee/date of action	
Action taken	

Action Point 17	Priority rating	H	M	L	Supporting photo/s
Action Reference – provision of extinguishing media in the mains electrical intake rooms in each block. Articles 8 & 13 of The FSO.					**NA**
Finding/s There is no firefighting media provided in the mains electrical intake rooms in each block.					
Recommended action/s Whilst it is not a requirement for firefighting equipment to be provided in the residential common areas, it is advised that 1 x 2kg CO_2 extinguisher is provided in each mains electrical intake room in each block. These extinguishers would be specifically provided in each mains electrical intake room for the use of trained competent persons/contractors. Please also refer to action point 16 above.					
Actionee/date of action					
Action taken					

Action Point 18	Priority rating	H	M	L	Supporting photo/s
Action Reference - Fire door inspections and fire door register. Articles 8, 11 and 14 of the FSO.					**NA**
Finding/s All fire doors in the common areas (including every flat front door) should be inspected regularly. This requirement has been clarified by The Fire Safety (England) Regulations 2022, although for multi – occupied residential premises below 11m it does not make it a requirement. Also, there is no record of any PFP inspections within the premises.					
Recommended action/s It is strongly advised to instigate fire door inspections at least annually, but quarterly if reasonably practicable. This would align to the more robust requirements placed upon such buildings that are above 11m but less than 18m (or seven storeys in height). Also, create a fire door register with each door being given a specific identification number/I.D. and log all fire door tests/inspections including date, result of test, defects and remedial action taken. Whilst not a legal requirement, it is also advised to instigate regular PFP inspections in the building to identify any issues that may be caused by contractors/accidental damage etc.					
Actionee/date of action					
Action taken					

Action Point 19	Priority rating	H	M	L	Supporting photo/s
Action Reference – Control of contractors. Articles 8 and 15 of the FSO.					**NA**
Finding/s It could not be confirmed that there is - • A routine fire safety induction for contractors. • A written policy to show how contractors are controlled, including the requirement for permits to work where required (e.g. hot works or working at height). • That there is a documented policy to show how any works carried out in - house would be controlled.					
Recommended action/s Confirm that these are in place or provide procedures which address all the issues above. This would include the production of a fire safety induction form for contractors.					
Actionee/date of action					
Action taken					

Action Point 20	Priority rating	H	M	L	Supporting photo/s
Action Reference – company fire safety policy. Article 11 of The FSO.					**NA**
Finding/s There was no fire safety policy available for audit.					
Recommended action/s Confirm a policy is in place or produce a company fire safety policy. This should be a higher level, strategic type policy which provides the framework and related specific procedures which show how the company discharge and manage their legislative fire safety duties. Such sub policies like electrical safety, PAT testing, arson prevention, housekeeping, control of contractors could be contained within it.					
Actionee/date of action					
Action taken					

Action Point 21	Priority rating	H	M	L	Supporting photo/s
Action Reference – The evacuation of disabled persons. Articles 8 and 11 of The FSO.					**NA**
Finding/s There were no physically disabled persons reported as living at the premises. Although residents may not have any physical disabilities, they may experience emotional/cognitive issues which can also impact behaviours in a fire situation and particularly evacuating the property. It is important that the location of any disabled person (or person requiring assistance) is known and communicated to The Fire Service if reasonably possible (having considered any data protection issues).					
Recommended action/s If it becomes applicable in the future, The location of any physically disabled person/s (or person requiring assistance) within the building should be held within a Premises Information Box (PIB) or equivalent, in a location easily accessible for the Fire Service on entry to the development. In addition, this information should be provided direct to The Fire Service (by contacting their Operational Intelligence Department or the local fire station).					
Actionee/date of action					
Action taken					

Action Point 22	Priority rating	H	M	L	Supporting photo/s
Action Reference – Arson prevention: bin storage. Article 8 of the FSO.					
Finding/s Bins were identified outside of the bin stores in several locations – see image opposite as an example. The bins are wheelable and unsecure and could possibly be moved up against the building and ignited or stolen.					
Recommended action/s It would be ideal to move and store the bins in a secure compound but that may be unreasonable to achieve. Therefore, consider chaining the bins to an immovable object (i.e. eye bolt in the wall) to prevent them being moved easily into close proximity of the building. This should be written into the fire safety policy for the building and ensure the bins are unlocked and can be emptied weekly by refuse collectors. The bins should then be resecured afterwards. Additional security lighting where the wheelie bins are stored would also reduce the risk of arson.					
Actionee/date of action					
Action taken					

3 - Legislation, Guidance, Scope and Limitations

3.1 Principal Fire Safety Legislation

Common Areas: *The Regulatory Reform (Fire Safety) Order 2005.*This legislation is enforced by the local fire authority which is Merseyside Fire and Rescue Service.

Within individual flats: *The Housing Act 2004.* This legislation is enforced by the local housing authority.

The Fire Safety Act 2021
The act amends article 6 of the Regulatory Reform (Fire Safety) Order Act 2005 in that Section 1 of the Act clarifies that where a building contains two or more sets of domestic premises the Responsible Person must take account of structure, external walls and flat entrance doors in a fire risk assessment.

The Building Safety Act 2022.
This building is classed as a relevant building as defined within the Act.

The Fire Safety (England) Regulations 2022
The Government are introducing regulations under article 24 of the Regulatory Reform (Fire Safety) Order 2005 (Fire Safety Order) to implement the majority of those recommendations made to government in the Grenfell Tower Inquiry Phase 1 report which require a change in the law.

These regulations will make it a requirement in law for responsible persons of high-rise blocks of flats to provide information to Fire and Rescue Services to assist them to plan and, if needed, provide an effective operational response.

Also, the regulations will require responsible persons in multi-occupied residential buildings which are high-rise buildings as well as those above 11 metres in height, to provide additional safety measures.

In all multi-occupied residential buildings, the regulations require responsible persons to provide residents with fire safety instructions and information on the importance of fire doors. The regulations apply to existing buildings, and requirements for new buildings may be different.

In high-rise residential buildings, responsible persons will be required to:

- **Building Plans**: provide their local Fire and Rescue Service with up-to-date electronic building floor plans and to place a hard copy of these plans, alongside a single page building plan which identifies key firefighting equipment, in a secure information box on site.
- **External Wall Systems:** provide to their local Fire and Rescue Service information about the design and materials of a high-rise building's external wall system and to inform the Fire and Rescue Service of any material changes to these walls. Also, they will be required to provide information in relation to the level of risk that the design and materials of the external wall structure gives rise to and any mitigating steps taken.
- **Lifts and other Key Fire-Fighting Equipment:** undertake monthly checks on the operation of lifts intended for use by firefighters, and evacuation lifts in their building and check the functionality of other key pieces of firefighting equipment. They will also be required to report any defective lifts or equipment to their local Fire and Rescue Service as soon as possible after detection if the fault cannot be fixed within 24 hours, and to record the outcome of checks and make them available to residents.
- **Information Boxes:** install and maintain a secure information box in their building. This box must contain the name and contact details of the Responsible Person and hard copies of the building floor plans.

- **Wayfinding Signage:** to install signage visible in low light or smoky conditions that identifies flat and floor numbers in the stairwells of relevant buildings.

In residential buildings with storeys over 11 metres in height, responsible persons will be required to:

- **Fire Doors:** undertake annual checks of flat entrance doors and quarterly checks of all fire doors in the common parts.

In all multi-occupied residential buildings with two or more sets of domestic premises, responsible persons will be required to:

- **Fire Safety Instructions:** provide relevant fire safety instructions to their residents, which will include instructions on how to report a fire and any other instruction which sets out what a resident must do once a fire has occurred, based on the evacuation strategy for the building.
- **Fire Door Information:** provide residents with information relating to the importance of fire doors in fire safety.

General note: all fire safety measures must be adequately maintained. An offence is committed if inadequate fire safety measures place people at risk of death or serious injury in case of fire.

3.2 Relevant guidance documents and British Standards (list not necessarily exhaustive).

- *LGA - Fire safety in purpose-built blocks of flats*
- *PAS 79-2:2020 Fire risk assessment – Part 2: Housing – Code of practice*. (Note: used as a reasonable guidance document for conducting FRA's in light of no current extant guidance due to its removal pending development of a British Standard).
- *PAS 9980: 2022 Fire risk appraisal of external wall construction and cladding of existing blocks of flats.*
- Approved Document B (Fire Safety) Volume 1: Dwellings (2019 with 2020 amendments) or the version of ADB current at the time of construction if built whilst ADB was applicable.
- BS 476 (all parts), Fire tests on building materials and structures.
- BS 5255, Specification for thermoplastics waste pipe and fittings.
- BS 5266-1, Emergency lighting – Part 1: Code of practice for the emergency lighting of premises.
- BS EN 50172: 2004 Emergency escape lighting systems.
- BS 5306-3, Fire extinguishing installations and equipment on premises – Part 3: Commissioning and maintenance of portable fire extinguishers – Code of practice.
- BS 5306-8, Fire extinguishing installations and equipment on premises – Part 8: Selection and installation of portable fire extinguishers – Code of practice.
- BS 7671, Requirements for electrical installations – IEE wiring regulations – Seventeenth edition
- BS 8214, Code of practice for fire door assemblies with non-metallic leaves.
- BS EN 1154, Building hardware – Controlled door closing devices – Requirements and test methods.
- BS EN 1155 Building hardware — Electrically powered hold-open devices for swing doors — Requirements and test method.
- BS EN 12209:2003 Building hardware — Locks and latches — Mechanically operated locks, latches and locking plates — Requirements and test methods.
- Furniture and furnishings (fire) (safety) regulations 1988 as amended.
- BS 5499: Part 4: 2000 Code of practice for escape route signing.
- Electricity at Work Regulations 1989.
- Gas Safety (Installation and Use) Regulations 1998
- Sprinklers BSEN 12845:2015.
- Lightning protection: BS EN 62305.
- Dry risers BS9990;2015.
- Dampers BS EN15650.

- Firefighting lifts. EN 81-73.
- BS5839: 6 (2019) - Fire detection and fire alarm systems for buildings Part 6: Code of practice for the design, installation, commissioning and maintenance of fire detection and fire alarm systems in domestic premises
- BS 5839 Part 1: 2017 – Fire detection and fire alarm systems for buildings Part 1: Code of practice for design, installation, commissioning and maintenance of systems in non-domestic premises.

In this report reference may be made to the category of automatic fire detection and alarm (AFDA) system installed or recommended to be installed in premises. System documentation, including any purchase specification, tender document, design proposal, submission to enforcing authorities or insurers for approval and the certificate issued by the designers, installers or commissioners, should clearly identify the system Category as well as, where appropriate, the areas to be protected and any specific proposals for the type(s) of detector to be used.

3.3 Safety assistance

In accordance with 'Article 18' of the Regulatory Reform (Fire Safety) Order 2005, the client have instructed EAL Fire and Safety Solutions Ltd. to assist them in the carrying out of their legal duties, specifically in the undertaking of a Fire Safety Risk Assessment in accordance with 'Article 9' of the Fire Safety Order.

Mr Mike O'Mahony M.I.Fire.E. (Fire Risk Assessor and verifier of the report) is the Managing Director of EAL Fire and Safety Solutions and is a 3rd party accredited fire risk assessor with the Institution of Fire Engineers (IFE) and is listed on the IFE Life Safety Risk Register. He also qualified as a Member of the IFE and is a retired fire officer, having served in Merseyside Fire and Rescue Service between 1984 – 2015. He is a qualified fire door inspector having completed the fire door assessor course with UK Fire Door Training (Fire Qual Accredited) and is a UKFDT approved inspector.

Mr Adam Peers – B.Sc. (Hons), Tech IOSH, SIIRSM, GIFireE, (Fire Risk Assessor) is the competent person nominated to assist the responsible person/s in this matter. Adam Peers is a graduate member of the Institution of Fire Engineers (IFE) and is a retired fire officer, having served with Merseyside Fire and Rescue Service between 1988 – 2019.

3.4 The aims of the fire risk assessment

- To assist the Responsible Person/s, as defined in the Fire Safety Order, to identify the general fire precautions which are to be taken, so far as is reasonably practicable, to ensure the life safety of all relevant persons who may be affected by a fire at the premises/building.
- To assist the Responsible Person/s in meeting the general fire precautions requirements for the premises/building/area under their control.
- To identify any practices or conditions that could pose a significant risk from fire to persons occupying the premises/building or in the immediate vicinity of the premises/building.
- To assist the client in meeting their requirements to ensure compliance with the Fire Safety Order and other fire related issues throughout the premises/building.
- To assess the adequacy of current fire safety measures against the risks posed, using current standards, legislation and recognised codes of practice/guidance and to recommend improvements where required.

The Fire Risk Assessment must be reviewed by the Responsible Person regularly so as to keep it up to date and accurate and particularly if:

- There is reason to believe it is no longer valid and/or significant change in the structure or use of the building.
- There is a significant change in relation to the special, technical or organisational measures.

- Changes have taken place that have not been notified and approved by the relevant enforcing body or Fire Authority where an "Alterations" notice is in force.
- There is reason to believe that an occupant is operating in breach of Fire Safety legislation. Where changes to an assessment are required as a result of any such review, the Responsible Person must make them.
- The RP considers that specialist advice is required.
- A fire occurs.

As soon as reasonably practicable after the assessment is made or reviewed, the Responsible Person must fully record the information prescribed and where 1) A license is in force in relation to the premises; or 2) An alteration notice is in force.

The information to be recorded must include the findings of the assessment, including the measures, which will or have been taken by the Responsible Person pursuant to the Fire Safety Order and any group of persons identified by the assessment as being especially at risk.

3.5 The scope and limitations of the fire risk assessment

This Fire Risk Assessment (FRA) was made to address the requirements of the Regulatory Reform (Fire Safety) Order 2005 for an assessment of the risk to life from fire in these premises and, as appropriate, to make recommendations to ensure compliance with fire safety legislation.

This was a Type 1 – Common parts only (non-destructive) fire risk assessment, as defined in the benchmark LGA guidance document Fire safety in purpose-built blocks of flats. The guidance document states the following -

Type 1 – Common parts only (non-destructive)
The inspection of the building is non-destructive. But, as well as considering the arrangements for means of escape and so forth, the fire risk assessment includes examination of at least a sample of flat entrance doors. It also considers, so far as reasonably practicable, the separating construction between flats and the common parts without any opening up of construction.

Where there are reasonably accessible roof voids (e.g., in buildings with pitched roofs), all reasonable steps should be taken to inspect the roof voids, unless it is considered that there is no need for compartmentation within the voids.

A selective, visual, non – destructive inspection of the passive fire protection (PFP), including designated fire compartmentation, is a key element of the fire risk assessment. It is undertaken to attempt to establish the likely standard of PFP between the common parts of the building and the individual flats; and also, within designated areas such as service/plant rooms, service risers, service cupboards, voids above common areas etc. The inspection of PFP is based on the following limitations -

- The FRA is a visual inspection only.
- The amount of supporting records that may be made available (and which are always requested by the fire risk assessor well in advance of the FRA via a fire record audit checklist issued to the client/Responsible Person).
- The FRA is not a structural survey.
- The FRA is not an intrusive/destructive passive fire protection survey. It is a selective sampling. The sampling will be extensive enough to provide a reliable indication of the likely standard of PFP is readily accessible areas. If significant issues are identified with the standard of PFP then a full, destructive passive fire protection survey is likely to be advised.
- It is not within the scope of a fire risk assessment to necessarily identify the latent defects within a building/premises.

- Certain locations were PFP may be breached or inadequately fire stopped etc will not accessible. These will include any locations were services such as gas and water supply pipes, waste water pipes and electrical services are contained within existing construction or are in an inaccessible location.
- It must be understood by the RP that a non – destructive FRA cannot reasonably be expected to identify all PFP breaches and inadequacies that may be present.
- It must be understood by the RP that a Type 1 FRA cannot reasonably be expected to identify all PFP breaches and inadequacies that may be present (particularly between flats themselves).
- Normally flat front doors and fire doors in the common areas are sampled. In small blocks of flats with less than 20 fire doors in total, at least 50% of the doors would be attempted to sampled (based in part on access made available to flat front doors). In large blocks of flats a maximum of 10% of fire doors will be sampled or 30 fire doors whichever is the least. That is because this is a sampling exercise as part of an overall FRA and not a full (or invasive) fire door survey. The level of sampling will provide a reliable indication of the likely type and condition of fire doors in the premises. If significant issues are identified with the sampling a full (and possibly invasive) fire door survey would be advised.

During this assessment flats 6 Mount Way, 13 Mount Way, 24 Mount Way, 41 Mount Avenue, 10 Kings Close, 16 Kings Close and 27 Kings Close , 5 Kings Close, were available and the front doors to the flats were inspected. In addition, the level of automatic fire detection inside each flat was also reviewed although it is outside the scope of a Type 1 FRA. All common areas were accessed, including all service cupboards next to the front doors of all properties, mains electrical intake rooms, a small number of sluice rooms and bin stores for the development.

When describing the likely construction of the building and making a visual assessment of the likely structural fire resistance it is based on the limitations of a non – destructive inspection and an audit of any relevant records that may have been made available such as the following – “as built” plans, construction drawings, Operation & Maintenance (O&M) manuals etc. Any information in this report in regard to construction cannot be guaranteed but is based on what can be reasonably found from the visual inspection and information provided by the responsible person or their representative/s.

The provision of suitable documentation to attest to the design, installation and commissioning of fire protection systems and products (active and passive) are a requirement to establish likely compliance in any applicable area. This would include any internal and external linings of the building/premises.

Detailed discussions with the client’s representative/s whenever available are a key element in gathering all the available information to inform the fire risk assessment. However, verbal assurances of fire safety records being in place are not accepted for robustness. Where a fire safety record is not available for audit it has been assumed to not exist or be unable to be confirmed and an action will be raised.

The checking of the integrity of PFP within ventilation/extraction ducting; within floor voids and cavity barriers (unless within an accessible void such as a common roof void or above a cross corridor fire door) is outside the scope of this FRA.

A fire risk appraisal of the external wall construction (FRAEW) is outside the scope of this FRA, as per guidance in PAS 79- 2 and PAS 9980.

The main electrical installations and gas installations (as may be applicable) within the common areas of each block are visually inspected for obvious fire hazards. It is not within the scope of this FRA to test or determine the worthiness of any such equipment. However, the servicing and maintenance records for any applicable installations are audited when made available and any deficiencies actioned.

Any major changes to the occupancy, layout or use of the building will render this document invalid and a review and or re – inspection must be carried out.

3.6 General guidance note on passive and active fire protection systems and 3rd party accredited specialists carrying out works.

Passive fire protection (PFP)

PFP refers to any form of construction/structure which is designed to provide a specified level of fire resistance and prevent the spread of fire, heat or smoke. It includes designated walls, floors and enclosures (such as intake rooms, cupboards, service risers, bin rooms, server rooms etc); fire stopping (i.e., sealing) of any breaches in walls, floors and enclosures caused by service penetrations etc. PFP can be risk critical to life safety in a building and should only be installed by a competent person (who is advised to be 3rd party accredited. They should only use appropriate materials designed/accredited for the purpose intended. They should provide overarching certification for the installation of any PFP; tag any fire stopping works (i.e., label next to fire stop detailing installation type and installer) and provide relevant data sheets for materials they have used.

PFP includes fire doors. Fire doors can be either a fire door assembly (where the component parts are assembled together on site) or a fire door set (where the component parts are pre -assembled as a unit). The components include the fire door leaf, door frame, hinges, self – closing mechanism if required, other relevant ironmongery and intumescent heat strip and smoke seal (as required). The components of a fire door assembly must be compatible with the fire door leaf.

A fire door can only be considered to be certified if the relevant test certification is available to confirm this. The data sheets for the compatible components should also be provided. Without relevant certification a fire door can only be considered to be a notional fire door, which may provide an adequate level of fire resistance but which cannot be guaranteed. Because different fire doors have specific installation criteria a fire door may be installed incorrectly and not in compliance with the fire door test certification. The fire door installer should provide certification to confirm they have installed the fire door in compliance with the test certification.

Active fire protection systems (AFPS)

This includes automatic fire detection and alarm (AFDA) systems; emergency escape lighting (EEL) systems; sprinklers/suppression systems; smoke control systems; and portable fire extinguishers/fire blankets.

Fire Service firefighting/access facilities

This includes the following (list not exhaustive): Dry or wet rising mains which are used by the Fire Service to supply water for firefighting purposes; Firefighting shafts – which are designated stairways/protected areas used by the Fire Service to direct and carry out firefighting operations from, these are provided in designated buildings dependant on height, size and use; override facilities for active fire protection systems; and firefighting lift/s.

Records

It is the experience of the assessor that on many occasions there is very limited evidence provided by RPs for the following –

- Fire door test certification records.
- Data sheets for PFP materials and components of fire door assemblies (to prove they are compatible
- Fire door/PFP certification by the installers.
- Localised tagging of any fire stopping work (i.e., a label fixed adjacent to an individual fire stop which lists such things as the name of the installer; type of fire stop; level of fire resistance; date of installation; warning that any damage to fire stop must be reported to the installer and that the damage will invalidate the integrity of the fire stop).

Note: for the avoidance of repetition in The Action Plan (Section 2) if an action point advises work of any type on any PFP, AFPS, or fire service facilities then this should be carried out by a relevant specialist, who is advised to be 3rd party accredited. Any relevant certification, data sheets for products used etc. should be provided by the relevant specialist and the Responsible Person should retain these within the fire safety file.

4 - Premises Information

4.1 Premises description

The responsible person and FRA completion	
Responsible person/s (RP) for fire safety at these premises	Freehold owners – Bebington Hall Park Ltd. Managing agents – Keystone Property Management.
Day to day responsibility for fire safety (delegate)	Property Manager on behalf of Keystone Property Management – Bruce Riley.
Person/s consulted at the time of the assessment	Property manager on behalf of Keystone Property Management – Bruce Riley. Maria Rennie – Resident at No16 Kings Close and recently appointed to Bebington Hall Park Ltd.
Assessors names	Mike O'Mahony M.I.Fire.E. Adam Peers – B.Sc. (Hons), Tech IOSH, SIIRSM, GIFireE.
Verified by	Mike O'Mahony M.I.Fire.E.
Date of fire risk assessment	23.2.24
Date of issue of FRA	1.3.24.
Date of previous FRA	Unable to confirm.
Date for re-inspection	February 2025.
Date for review	The FRA is a live document and should be under continual review by the RP.
Use	
Purpose – built block of general needs flats:	
Date of construction	Circa 1970.
Number of storeys (ground and above)	2 storey flats – ground and 1st floor. 3 storey flats – ground, 1st and 2nd floor.
Number of basement levels	0
Height of top floor above ground.	2 storey flats – less than 5m. 3 storey flats – above 5m but less than 11m.
Brief description of layout	
The Bebington Hall Park development is situated in a residential area of Higher Bebington on the Wirral peninsular. The development was constructed c.1970 and this Fire risk assessment is concerned with the 72 purpose-built flats, situated in 24 low-rise blocks that are located on Mount Way, Mount Avenue and Kings Close. With the exception of the block comprising 1 – 6 Kings Close that is two storeys (ground and 1st floor), the remainder of the 72 flats are situated in three storey blocks – ground, 1st and 2nd floor. As can be seen from the site plans on pages 52 and 53 below, the 72 flats are essentially arranged in 4 clusters, with the flats in each cluster linked by open landings and common pedestrian areas that also lead throughout the development.	

The 4 clusters consisting of the 24 blocks are as follows:

- 1 – 6 Kings Close (comprising two blocks).
- 7 – 30 Kings Close (comprising eight blocks).
- 31 – 45 Mount Avenue and 1 – 18 Mount Way (comprising eleven blocks).
- 19 – 27 Mount Way (comprising 3 blocks).

The front doors of each flat lead directly onto the means of escape that are formed by the linked walkways and open concrete landings that are visible in the aerial view of the development on page 53 below. Due to the linked nature of the open landings and walkways, the common means of escape in the event of fire is shared in most instances, but not all. In a small number of flats however, such as 16 Kings Close, the front door leads directly on to a pedestrian area that is not shared by other properties. It is important to note this distinction as it is related to recommendations on replacing/not replacing existing composite/uPVC doors (please also refer to action point 2 above in the action plan).

Each of the 24 blocks are served by a mains electrical intake room on the ground floor of each block and a bin store for each block as well. Each flat is constructed with service cupboards that are situated next to the front door, that house a gas meter and the electricity meter/intake for each individual flat.

A small number of garages are also used by residents on the development, but they are away from the residential blocks and were not accessible and did not form part of this FRA.

Construction	
External walls/structural frame	Each block has external brick walls.
Floors	Each block has concrete floors.
Internal walls	Brick walls to common means of escape, open landings and stairway. Internal walls within flats likely to be either brick or stud partition walls.
Roof	Flat roof with bitumen/sealed membrane material.
Cladding to external walls	None – but the ceilings of some open landings have been clad with a timber tongue and grooved product, and painted over.
Balconies	None.
Additional information	No “as – built plans”, O&M manuals, fire strategy etc. available to assist in confirming construction.
Utilities (location of intake/isolation point)	
Gas	Gas intakes to each flat are located in a service cupboard next to each flat front door.
Electric	Mains electricity intake rooms are located on the ground floor of each block of flats and each individual flat has a meter/intake located in a service cupboard next to the front door of each flat.
Heating and ventilation systems (including any portable heating)	
Gas and/or electrical	Each individual flat is heated by individual private gas boilers.
Heating, Ventilation and Air Conditioning (HVAC) systems	None in common areas.

Occupancy Characteristic	
Occupancy profile	• Staff of property management company: familiar and awake. • Visitors/contractors: unfamiliar and awake. • Residents: familiar but can be asleep. • Guests staying with residents: unfamiliar and can be asleep.
Evacuation procedure	To be confirmed – refer to action point 3.
Max. number of employees at one time	1 – Property Manager for Keystone Property Management Bruce Riley
Max. number of occupants at one time	146 across the development (assuming 2 residents per flat – 72 flats in the development, and 2 contractors).
Occupants especially at risk from fire	
Sleeping occupants	144 assuming 2 residents per flat.
Occupants with disabilities	None reported.
Young persons	None reported.
Lone workers	Building Manager, Management company staff and/or contractors.
Others	N/A.
Reported fire loss	
None reported.	
Fire Service audit information (carried out under the Fire Safety Order)	
No information available at the time of the FRA.	

5 – Fire Risk Assessment Inspection Form

The FRA inspection form provides a structured set of documented questions which the assessor uses as a framework to gather relevant information about the premises. Any existing control measures will be captured and commented upon within this section of the report. Any deficiencies will be highlighted as significant findings in the Action Plan with accompanying recommendations. The questions in this form are not exhaustive and a reliance is also placed upon the underpinning knowledge, experience, qualifications and professional judgement of the assessor.

Fire Prevention Measures
(Elimination or reduction of fire hazards)

Section A - Electrical Sources of ignition

Question A1 - Has the fixed electrical installation in the common area (landlord's system) been inspected and tested within the prescribed time period?	Unable to confirm (UTC)
Comment • The Electrical Installation Condition Reports (EICR) for the development were not available at the time of this FRA. Please refer to action point 7.	

Question A2 - Is portable appliance testing (PAT) carried out for appliances within common areas?	UTC
Comment • There were a number of appliances that were identified in the sluice rooms in the common areas of the development. They should be subject to PAT testing at set frequency which would be determined by the company PAT testing policy. All the appliances should be held on a PAT inventory so the number of appliances, type, position, testing history etc can be tracked and recorded. Please refer to action point 10.	

Question A3 - Is there a suitable limitation of such hazards as: trailing leads, overloading sockets, adaptors, bundled leads, daisy chained adaptors and mechanical damage/strain to wiring in common area?	Yes
Comment • No additional comment.	

Question A4 - Have the fixed electrical installations in individual flats been inspected and tested within the prescribed time period?	Unable to confirm UTC
Comment • Please refer to action point 9.	

Question A5 - Is there evidence to confirm that electrical appliances within individual flats are safe?	UTC
• It is beyond the scope of an FRA to physically inspect appliances, but it is within the scope to request evidence from landlords/letting agents about their inspection and testing regimes and there was no evidence made available at the time of this FRA. Please refer to action point 9.	

Section B – Smoking/Vaping

Question B1 - Is there a written smoking/vaping policy and notices which clearly identify the site procedures?	No
Comment • There was no unauthorised smoking identified at the time of the FRA, but the no smoking/vaping policy was not available for audit. Please refer to action points 4 and 20.	

Question B2 - Are there suitable arrangements in place for those who wish to smoke/vape?	Yes
Comment • Residents can smoke/vape within their own private dwelling/accommodation.	

Question B3 - Was there evidence that smoking/vaping in non – designated areas or unsafe practise is avoided?	Yes
Comment • There was no evidence of smoking/vaping in all common areas of each block; or areas outside the premises near to access points/or vulnerable areas such as below windows etc.	

Section C - Arson Prevention and Site Security

Question C1 - Is there a written arson prevention policy?	UTC
Comment • Please refer to action points 20 and 22.	

Question C2 - Are access doors to the premises suitably secured to prevent unauthorised entry?	Yes
Comment • Access doors were fitted with mechanical security locks with controlled entry systems for visitors which prevented unauthorised access from outside the building.	

Question C3 - Are bins stored in a suitably secure manner/location?	No
Comment • Wheelie bins are stored outside the bins stores in some locations and bin stores were not locked. Please refer to action point 22.	

Question C4 - Is fire loading close to the premises minimised (e.g. waste materials, motor vehicles)?	Yes
Comment • Motor vehicles are not parked too close to the premises and private garages are also provided for some properties although they were not accessible and did not form part of this FRA.	

Question C5 - Are additional prevention/security measures in place (i.e., security, CCTV, lighting etc)?	Yes
Comment • Street lighting and lighting is also provided outside the buildings that form the development and appeared to be sufficient.	

Section D - Heating Systems (Fixed and Portable) in the common areas

Question D1 – Are there fixed or portable heating systems?	Yes
Comment • The flats in the development are provided with gas boilers that power central heating in individual flats. Please refer to action point 8.	

Question D2 - If fixed heating systems are provided are they suitably tested and maintained?	UTC
Comment • Please refer to action point regarding servicing of the gas boilers for individual flats. Please refer to action point 8.	

Question D3 – If portable heating systems are used are they of a suitable type (lower powered and thermostatically controlled) and tested/maintained?	NA
Comment • N/A for common areas.	

• It is not known if residents use portable heaters within individual flats because this is outside the scope of a Type 1 FRA. However, if they do, they should be provided with fire safety guidance. Please refer to action point 4.

Question D4 - Are suitable measures taken to minimise the hazard of ignition of combustible materials in proximity to heaters that are capable of igniting combustibles?	UTC
Comment • N/A for common areas. Please refer to action point 4 regarding fire safety advice to residents.	

Section E - Cooking /Kitchen Safety in the common areas

Question E1 - If cooking facilities are provided are suitable measures taken to prevent fires (e.g., maintenance of appliances, filters being changed, ductwork cleaned and protected)?	NA
Comment • There were no cooking facilities in the common areas of each block. An assessment of cooking facilities within individual dwellings is outside the scope of a Type 1 FRA. However, please refer to action point 4 regarding fire safety information to provide to residents.	

Section F - Lightning Protection

Question F1 - If a lightning protection system is provided has it got a current testing/service certificate (due eleven monthly) – State date of last test if known?	UTC
Comment • It is beyond the scope of an FRA to determine the requirement for a lightning protection system. A risk assessment tool for determining the need for lightning protection can be found in BS EN 62305-2, but normally needs a specialist to apply it. However, given the size and height of the premises it would seem unlikely that this would be a requirement.	

Section G - Housekeeping

Question G1 – Is there a written housekeeping policy?	UTC
Comment • Please refer to action point 20.	

Question G2 – Is the means of escape clear of combustibles and obstructions?	No
Comment • Please refer to action point 6.	

Question G3 - Are all plant rooms and/or service cupboards/risers clear of combustibles?	No
Comment • Please refer to action point 5.	

Question G4 – Are regular, documented housekeeping inspections carried?	No
Comment • There were no documented records made available to audit to confirm that any housekeeping inspections are carried out within each block. Please refer to action point 15.	

Section H - Control of Contractors

Question H1 – Is there a written policy to control contractors?	No
Comment • Please refer to action point 19.	

Question H2 - Are contractors inducted onto the site?	No
Comment • Please refer to the action point 19.	

Question H3 – If required, are permits to work (PTW) in place?	UTC
Comment • Please refer to the action point 19.	

Question H4 – Is work carried out by employees (i.e., in – house) adequately controlled?	No
Comment • Please also refer to the action point 16.	

Section I - Dangerous Substances

Question I1 – Are there dangerous substances stored or used?	No
Comment • There were no dangerous substances stored in the common areas of each block.	

Question I2 - If dangerous substances are stored or used can they be eliminated?	NA
Comment • NA.	

Question I3 – If dangerous substances are stored or used, but cannot be eliminated, are they suitably controlled?	NA
Comment • NA.	

Question I4 – If dangerous substances are stored or used does it require a DSEAR risk assessment to be produced?	N/A
Comment • NA	

Section J - Other Hazards

Question J1 – Are there any other significant fire hazards present not covered in any other section? (List).	No
Comment • NA	

Question J2 - If there any other significant fire hazards present are they suitably controlled?	NA
Comment • NA	

Fire Protection Measures

Section K - Means of Escape in the common areas

Question K1 – Is the design of the escape route/s considered adequate?	Yes
Comment • Means of escape from flats in the development would be via the open stairways to a place of absolute safety away from the buildings.	

Question K2 - Is the escape route/s adequately protected? (Cross reference with sections L and M)	No
Comment • Please refer to action points 2, 11 and 18.	

Question K3 – Are there reasonable travel distances (in either a single direction and/or alternative directions?	Yes
Comment • Travel distances in a single and an alternative direction were reasonable for the development.	

Question K4 – Are there adequate fire exits for the number of people likely to use them?	NA
Comment • The flat front doors to the residential properties open directly out on to the open stairways and fire exits are not required/provided.	

Question K5 – Is there adequate escape width for the likely number of people?	Yes
Comment • Corridor widths, stairway width and the fire exit widths are all adequate within each block.	

Question K6 – Do fire exits open in the direction of travel where necessary?	NA
Comment • The flat front doors to the residential properties open directly out on to the open stairways and fire exits are not required/provided.	

Question K7 – Are revolving or sliding doors avoided?	Yes
Comment • N/A.	

Question K8 – Are fire exits immediately openable by a single mechanism, without the use of a key, the method of opening being recognisable?	NA
Comment • The flat front doors to the residential properties open directly out on to the open stairways and fire exits are not required/provided.	

Question K9 – Do fire exits lead to a place of ultimate safety?	Yes
Comment • The flat front doors to the residential properties open directly out on to the open stairways and to a place of absolute safety away from the buildings.	

Question K10 – If installed, are electrically operated access control systems fitted to doors or gates on escape routes provided with override facilities and/or designed to 'fail safe' on power failure?	NA
Comment • NA – none installed.	

Question K11 – Are corridors sub-divided with a cross-corridor fire resisting door/s where required?	NA
Comment • NA – none installed/required.	

Question K12 – If cross – corridor fire doors are required has any void above any ceiling line been adequately protected?	NA
Comment • NA – none installed/required.	

Question K13– Are the escape routes provided with adequate means of ventilation for the control of smoke?	NA
Comment • The means of escape and landings provided for the residential properties are open and additional ventilation is not required.	

Question K14 – Are there suitable arrangements in the building for means of escape for people with disabilities?	No
Comment • Please refer to action point 21.	

Section L - Fire Doors in the common areas (including flat front doors)

Question L1 – Do fire doors have test certification to prove they are certified fire doors?	No
Comment • There was no fire door test certification available for audit. • A number of flat front doors (and service cupboard doors next to the flats) appeared to be original "notional" fire doors that were installed when the development was built in the 1970s. • Please refer to the action points 2, 11 and 18; Section 3.6 and Section 8 of this report.	

Question L2 – Were the fire doors sampled fitted with effective self – closing devices where required?	No
Comment • None of the flat front doors inspected at the time of this FRA were fitted with positive action self-closing devices. Please refer to action points 2, 11 and 18 of this report.	

Question L3 – Were the fire doors sampled fitted with clearly marked fire rated hinges (e.g., BS1935 stamped on hinges)?	No
Comment • Please refer to action points 2, 11 and 18 and section 8 of this report.	

Question L4 – Were the fire doors sampled fitted with intumescent strips/smoke seals?	No
Comment • Please refer to action points 2, 11 and 18 and section 8 of this report.	

Question L5 – If any fire doors sampled had vision panels was the glazing suitably fire resistant?	UTC
Comment • The original 1970s front doors installed in the majority of flats do not have glazing/vision panels. It was not possible to confirm if the glazing in the newer uPVC and composite front doors that have been installed was FR. Please refer to action points 2, 11 and 18 and section 8 of this report	

Question L6 – If fire doors sampled were part of a fire screen or had side panels etc, were these suitably fire rated?	UTC
Comment • It was not possible to confirm if the panels above many of the doors to the electrical mains intake rooms and bin stores were FR rated. Please refer to action points 2 and 11 and section 8 of this report	

Question L7 – Were all other issues with fire doors sampled satisfactory? (e.g., gaps around door leaf/leaves; other ironmongery not mentioned; gaps to frame; damage etc).	No
Comment • The type of screws cannot be fully determined from a non – invasive fire door inspection. • Please refer to action points 2, 11 and 18 of this report.	

Section M – Measures to Limit Internal Fire Spread in The Common Areas

Question M1 – Does there appear to be an adequate level of structural fire resistance (FR)?	Yes
Comment • The elements of structure would appear to provide an adequate level of fire resistance to enable the evacuation strategy to be carried out safely and effectively. It should also prevent premature collapse of the buildings in normal fire conditions for the protection of firefighters. However, a visual only FRA cannot confirm that the structural fire resistance (FR) would meet current benchmark requirements, for blocks of	

purpose – built flats. The fire resistance of purpose-built flats with a top floor up to 5m above ground floor level is 30minutes, and for flats over 5m but less than 11m above ground level is 60 minutes FR.

Question M2 – Does there appear to be an adequate level of compartmentation/fire resisting enclosures?	No
Comment • The level of compartmentation/PFP was not considered adequate. Please refer to action point 2.	

Question M3 – Were services/breaches in compartment walls and/or floors suitably fire stopped?	No
Comment • Please refer to action point 2.	

Question M4 – Are places of special fire hazard/ plant rooms/ service cupboards etc. enclosed in adequate fire resisting construction?	No
Comment • Please refer to action point 2.	

Question M5 – If there any roof voids were the level of compartmentation and passive fire protection adequate?	NA
Comment • There are no roof voids in the building – loft hatches/openings were identified that appear to provide access to the flat roofs above the common areas/flats but were not accessible at the time of this FRA.	

Question M6 – Is there a reasonable limitation of linings on escape routes that might promote fire spread?	Yes
Comment • On many ground floor and 1st/2nd floor landings, the ceiling surfaces have been installed with timber cladding that has been painted. The timber and decorated finish was in good condition and as the landings are open, it is considered to be an acceptable part of the means of escape.	

Question M7 – If present, are ventilation systems, ventilation ducts and grilles adequate to limit fire spread/growth? (Consider dampers etc.) N.B. A full investigation of the design of heating, ventilation and air conditioning systems is outside the scope of this fir e risk assessment.?	NA
Comment • The means of escape and landings provided for the residential properties are open and additional ventilation is not required.	

Section N – Measures to Limit External Fire Spread

Question N1 – Do the external walls of the building have any type of cladding or balconies? (State).	Yes
Comment • On many ground floor and 1st/2nd floor landings, the ceiling surfaces have been installed with timber cladding that has been painted. The timber and decorated finish was in good condition and as the landings are open, it is considered to be an acceptable part of the means of escape.	

Question N2 – If the external walls of the building have any type of cladding or balconies has a FRAEW been carried out as per PAS9980 and/or has an EWS1 form been completed?	NA
Comment • NA	

Question N3 – If the external walls of the building have any type of cladding or balconies and a FRAEW, as per PAS9980, and/or an EWS1 form have not been completed were any other records made available to confirm the type of cladding, insulation and construction/workmanship etc?	NA
Comment • NA	

Question N4 – If the external walls of the building have any type of cladding or balconies is an FRAEW considered to be required? (Quantify answer in either case of Yes or No).	No
Comment • NA	

Section O – Means of Giving Warning in The Event of a Fire

Question O1 – Is a reasonable fire detection and fire alarm system provided where necessary*? N.B. Based on visual inspection, but no audibility tests or verification of full compliance with relevant British Standard carried out.	No
Comment • Several flats were inspected across the development and a mix of Grade F and Grade D smoke detection was provided in these flats. Please refer to action point 1.	

Question O2 – If there is a communal fire detection and fire alarm system, does it extend into individual dwellings?	No
Comment • Please refer to action point 3.	

Question O3 – Were there any obvious defects or issues identified with the common fire detection and fire alarm system?	Yes
Comment • Please refer to action point 3.	

Question O4 – Where appropriate, has a fire alarm zone plan been provided?	NA
Comment • An AFDA system panel is not provided for any of the blocks in the development. Please refer to action point 3.	

Question O5 – Is there remote transmission of alarm signals	No
Comment • N/A	

Question O6 – Are individual flats provided with suitable domestic automatic fire detection and alarm systems	No
Comment • Based on sampling of flats in the development, a mix of Grade F and Grade D smoke detection was provided in these flats. Please refer to action point 1.	

Section P – Emergency Escape Lighting (EEL)

Question P1 – Does the emergency escape lighting provided appear to be adequate (i.e., including external areas and any service areas etc)?	No
Comment • Emergency escape lighting is located throughout all common areas, landings and the means of escape. • Please refer to action point 12.	

Section Q – Fire Action Notices and Fire Safety Signage

Question Q1 – Are site specific fire action notices provided?	No
Comment • Fire action notices were displayed throughout the development, but they were of a generic nature and not site-specific, and not suitable. Please refer to action point 3.	

Question Q2 – Are escape routes suitably signed?	Yes
Comment • The standard of directional means of escape signage throughout the development was reasonably good.	

Question Q3 – Are fire exits suitably signed?	NA
Comment • Residential flats open directly out on to the open landings and mean sof escape and fire exits are not required/provided.	

Question Q4 – Are fire extinguishers/fire blankets suitably signed?	No
Comment • Fire extinguishing media is not currently provided. Please refer to action point 17.	

Question Q5 – Are fixed fire – fighting installations suitably signed?	NA
Comment • N/A	

Question Q6 – Are fire doors suitably signed?	No
Comment • Please refer to action points 2, 11 and 18 and section 8.	

Section R – Portable Fire Fighting Appliances

Question R1 – Are the type of fire extinguishers and/or fire blankets provided suitable and adequate?	No
Comment • Fire extinguishers should be provided in rooms of special hazard in the development but not in common areas and residential areas of the development. This is consistent with the LGA guidance for purpose – built blocks of flats. Current benchmark guidance is still not to make portable firefighting appliances available for use for residents because of the inherent dangers of doing so. For example, a resident having a fire inside their flat and coming out into a common area to obtain a fire extinguisher. Then returning into their flat to tackle a fire which may be too well developed to do so, and which now may have spread to the common areas etc. Rather the thinking is to leave the fire isolated if possible and evacuate the flat and the building. • There is an obvious counter argument that would state that fire extinguishers should be simple to use and that anyone with common sense should be able to make an informed decision on whether they could tackle a small fire safely. And that the omission of portable firefighting appliances means this effective control measure has been removed/not provided. However, given the construction of the development with open landings that mitigate the risk of fire development and are open to the public as well, fire extinguishers should not be put in place in residential common areas. • The provision of extinguishers in the mains electrical intake rooms in each block, which are considered to be rooms of special hazard is advised, however. Refer to action point 17.	

Question R2 – Are fire extinguishers and/or fire blankets suitable located and readily available?	No
Comment • Extinguishers are not provided in the development. Refer to action point 17.	

Section S – Fixed Suppression Systems and Fixed Installations /Fire – fighting facilities

Question S1 – Is a fixed suppression system provided?	No
Comment • None installed.	

Question S2 – Is there a dry and/or wet rising main/s installed?	No
Comment • None installed.	

Question S3 – Are there any other fixed installations/ firefighting facilities?	No
Comment • None installed.	

Fire Safety Management Procedures

Section T – Policies, Procedures and Arrangements

Question T1 – Is there a company fire safety policy?	No
Comment • Please refer to action point 20.	

Question T2 – Is there a fire strategy? (Which shows how compliance is achieved with Parts B1 – B5 (Fire Safety) of the Building Regulations?	No
Comment • A fire strategy was not available for Bebington Hall Park.	

Question T3 – As per Regulation 38, has a suitable and sufficient amount of fire safety information been provided to the Responsible Person to enable them to manage the building effectively?	No
Comment • It is not clear what information may have been provided to the RPs. • For additional information of the owner/RPs Approved Document B section 17: Fire Safety Information states the following (in italics) - *For building work involving the erection or extension of a relevant building (i.e., a building to which the Regulatory Reform (Fire Safety) Order 2005 applies, or will apply), or the relevant change of use of a building, fire safety information should be given to the responsible person at one of the following times. a. When the project is complete. b. When the building or extension is first occupied.* *<u>Essential information</u>* *Basic information on the location of fire protection measures may be sufficient. An as-built plan of the building should be provided showing all of the following. a. Escape routes – this should include exit capacity (i.e., the maximum allowable number of people for each storey and for the building). b. Location of fire separating elements (including cavity barriers in walk-in spaces). c. Fire door sets, fire door sets fitted with a self-closing device and other doors equipped with relevant hardware. d. Locations of fire and/or smoke detector heads, alarm call points, detection/alarm control boxes, alarm sounders, fire safety signage, emergency lighting, fire extinguishers, dry or wet fire mains and other firefighting equipment, and hydrants outside the building. e. Any sprinkler systems, including isolating valves and control equipment. f. Any smoke control systems, or ventilation systems with a smoke control function, including mode of operation and control systems. g. Any high-risk areas (e.g., heating machinery).* *Details should be provided of all of the following. a. Specifications of fire safety equipment provided, including routine maintenance schedules. b. Any assumptions regarding the management of the building in the design of the fire safety arrangements. c. Any provision enabling the evacuation of disabled people, which can be used when designing personal emergency evacuation plans.*	

Question T4 – Is there a valid written fire evacuation procedure? (State type i.e., full and simultaneous evacuation, phased evacuation).	No
Comment • Please refer to action point 3.	

Question T5 – Safety assistance: The competent person(s) appointed under Article 18 of the Fire Safety Order to assist the responsible person in undertaking the preventive and protective measures (i.e., relevant general fire precautions) is:	See comments
Comment • EAL Fire and Safety Solutions Ltd have carried out the fire risk assessment.	

Question T6 – Fire safety at the premises is managed by - N.B. This is not intended to represent a legal interpretation of responsibility, but merely reflects the managerial arrangement in place at the time of this risk assessment.	See comments
Comment • Freehold owners – Bebington Hall Park Ltd. • Managing agents – Keystone Property Management.	

Question T7 – Is there suitable co -ordination and co – operation if there is more than one Responsible Person (RP)?	Yes
Comment • Freehold owners – Bebington Hall Park Ltd. • Managing agents – Keystone Property Management.	

Question T8 – Is there a suitable fire safety file containing all relevant records?	No
Comment • Please refer to action point 14.	

Question T9 – Are there routine and documented in-house inspections of the general fire precautions including the means of escape, fire exits and housekeeping?	UTC
Comment • Please refer to the action point 15.	

Section U - Staff Training

Question U1 – Have staff received suitable fire safety training?	UTC
Comment • There were no records available for audit to confirm that training has been provided. Please refer to action point 16.	

Question U2 – Have staff been nominated and trained as fire wardens?	NA
Comment • There are no staff employed permanently on site so they would not be in a position to carry out this role.	

Question U3 – When the employees of another employer work in the premises, is appropriate information on fire risks and fire safety measures provided?	No
Comment • Please refer to action point 19.	

Section V - Testing and Maintenance of Fire Protection Systems

Question V1 – Is the AFDA system tested weekly and is the test always recorded?	NA
Comment • An AFDA system is not installed across the Bebington Hall Park Development. Refer to action point 3.	

Question V2 – Is the AFDA system serviced six monthly?	NA
Comment • An AFDA system is not installed across the Bebington Hall Park Development. Please refer to action point 3.	

Question V3 – Is the emergency escape lighting tested monthly?	UTC
Comment • In discussions with Maria Rennie (owner/occupier at No16 Kings Close) monthly tests have been completed but no documentation was available at the time of the FRA. Please refer to action point 12.	

Question V4 – Is the emergency escape lighting tested annually?	Yes
Comment • In discussions with Maria Rennie (owner/occupier at No16 Kings Close) annual tests have been completed with a number of EEL units failing the full duration test but no documentation was available at the time of the FRA. Please refer to action point 12.	

Question V5 – Are fire extinguishers visually inspected monthly?	No
Comment • None are currently provided. Please refer to action point 17.	

Question V6 – Are fire extinguishers tested annually?	No
Comment • None are currently provided. Please refer to action point 17.	

Question V7 – Are regular fire doors inspections carried out?	No
Comment • Please refer to the action points 15 and 18.	

Question V8 – Is there a fire door register?	No
Comment • Please refer to the action points 18.	

Question V9 – Is passive fire protection (PFP) inspected regularly?	No
Comment • Please refer to the action point 18.	

Question V10 – Is the dry/wet rising main/s tested and serviced?	N/A
Comment • None installed.	

Question V11 – Is the fixed suppression system tested and serviced?	N/A
Comment • None installed.	

Question V12 – Is the smoke control system tested and serviced?	NA
Comment • The landings and means of escape are open and additional ventilation is not required.	

Question V13 – Is the firefighting and/or evacuation lift/s tested and serviced?	N/A
Comment • None installed.	

Question V14 – Are access control systems tested and serviced?	N/A
Comment • None installed.	

Question V15 – Are there any other relevant tests/inspections?	N/A
Comment • None provided.	

Section W - Other records

Question W1 – Is there a fire strategy and/or plans showing lines of fire compartmentation etc?	No
Comment : • No further comments.	

Question W2 – Has the AFDA system got design, installation and commissioning certification?	NA
Comment • None installed.	

Question W3– Has the emergency escape lighting system got design, installation and commissioning certification?	No
Comment • Not provided for audit.Please refer to action point 12.	

Question W4 – Has the dry/wet rising main/s got design, installation and commissioning certification?	NA
Comment • None installed.	

Question W5 – Has the fixed suppression system got design, installation and commissioning certification?	NA
Comment • None installed.	

Question W6 – Has the firefighting and/or evacuation lift/s got design, installation and commissioning certification?	NA
Comment : • None installed.	

Question W7 – Has the smoke control system got design, installation and commissioning certification?	NA
Comment • None installed	

Question W8 – Are there to records to indicate that passive fire compartmentation (fire stopping, cavity barriers etc.) have been installed using accredited materials by a competent person?	No
Comment • Please refer to actions 2 and 18.	

Question W9 – Have the access control systems got design, installation and commissioning certification?	NA
Comment • None installed.	

Question W10 – Is there original Building Control certification (and associated correspondence from The Fire Service) to confirm the premises was constructed in compliance with Building Regulations?	No
Comment: • No records provided for audit.	

Section X - Engaging with Residents

Question Y1 - Has sufficient information on fire procedures and fire safety measures been disseminated to residents?	No
Comment : • Please refer to action point 4.	

Section Y - Fire Service Access

Question Z1 – is there adequate access for fire appliances and for firefighting personnel?	Yes
Comment: • Suitable access would be gained from Mount Road into Mount Avenue and Mount Way.	

6 - Fire Risk Assessment Protocol

Employers and other persons who have control of premises are required by legislation to carry out an assessment of fire risks to occupants of buildings, and other people in the vicinity of the buildings, to ensure that these people are safe from fire and its effects. The Regulatory Reform (Fire Safety) Order 2005 requires that, in England and Wales, the risk assessment is "suitable and sufficient." Therefore, Fire Risk Assessment refers to the overall process of identifying fire hazards and evaluating the risks to health and safety arising from them, taking account of the existing risk controls (or, in the case of a new activity, the proposed risk controls). A fire hazard can be described as a source or situation with potential to result in a fire. A fire risk can be described as a combination of likelihood and consequence(s) of fire. The fire risk assessment is a systematic and structured assessment of the fire risk in the premises for the purpose of:

- expressing the current level of fire risk;
- determining the adequacy of existing fire precautions; and
- determining the need for, and nature of, any additional fire precautions.

Any such additional fire precautions required are set out in the Action Plan, which forms part of the documented fire risk assessment. The objective of the Action Plan is to set out measures, which will ensure that the fire risk is reduced to, or maintained at, a tolerable level. In carrying out the fire risk assessment, EAL Fire and Safety Solutions will consider the following:

- Fire prevention measures - measures to prevent the outbreak of fire.
- Fire protection measures - design features, systems, equipment or structural measures to reduce danger to people if fire occurs.
- Components of fire safety management - procedures and associated tasks carried out by a defined individual/s with appropriate powers and resources to ensure that fire safety systems (active, passive and procedural) within the premise are functioning properly at all times.

The following methodology details EAL Fire and Safety Solutions fire risk assessment process.
It comprises nine steps and is based on established PAS 79 Fire Risk Assessment Methodology.

- Step 1 - to obtain relevant information about the building, the processes carried out in the building, and the occupants of the building.
- Step 2 - fire hazard identification and the determination of measures for the elimination or control of the identified fire hazards.
- Step 3 - to make a (subjective) assessment of the likelihood of fire. This will be based primarily on the findings of Step 2 above. However, the assessment of likelihood of fire will also take account of any relevant information obtained in Step 1 above.
- Step 4 - to determine the physical fire protection measures, relevant to the protection of people in the event of fire.
- Step 5 - to determine relevant information about Fire Safety Management.
- Step 6 - to make a (subjective) assessment of the likely consequences to the occupants in the event of fire.
- Step 7 - to make an assessment of the fire risk and to decide if the fire risk is tolerable. The fire risk is assessed by combining the likelihood of fire and the consequences of fire (see below).
- Step 8 - to formulate an Action Plan to address shortcomings in fire precautions in order to reduce the fire risk.
- Step 9 - to determine the Fire Risk Assessment periodic review period / date.

Fire Risk Assessment

The overall risk rating to life from fire is an assessment of the likelihood of a fire occurring at the premises in conjunction with the likely severity of the outcome of the fire to any "relevant person", as defined by The Regulatory Reform (Fire Safety) Order 2005.

The outcome of any fire could potentially be catastrophic (death) for any person directly involved in a fire. However, in reaching a severity rating, the likely **severity** of a fire causing serious injury or death of a relevant person/s is primarily based on the assessment of what fire protection measures and management controls are in place which would lower the probability of a fire causing such a catastrophic result. For example, in a well-managed premise with robust fire protection measures it should mean that occupants will be able to safely evacuate the premises, or in certain types of premises, to safely occupy the building in areas of relative safety whilst the fire service deal with an incident. This is different than the **likelihood** of a fire actually occurring, which is primarily assessed against the fire hazards and the extent of the fire prevention and fire management controls that are in place to effectively manage the associated risk.

The fire risk category has been determined using the risk level estimator below which is based on a more general health and safety risk level estimator of the type contained in BS 8800:

Likelihood of fire ↓	**Likely Consequences of Fire** →		
	Slight Harm	**Moderate Harm**	**Extreme Harm**
Low	Trivial	Tolerable	Substantial
Medium (Normal)	Tolerable	**Moderate**	Substantial
High	Moderate	Substantial	Intolerable

Taking into account the fire prevention measures observed at the time of this risk assessment, it is considered that the hazard from fire (likelihood of fire) at these premises is:

Low	**Medium**	High

In this context, a definition of the above terms is as follows:

- **Low**: Unusually low likelihood of fire as a result of negligible potential sources of ignition.
- **Medium**: Normal fire hazards (e.g., potential ignition sources) for this type of occupancy, with fire hazards generally subject to appropriate controls (other than minor shortcomings).
- **High**: Lack of adequate controls applied to one or more significant fire hazards, such as to result in significant increase in likelihood of fire.

Taking into account the nature of the building and the occupants, as well as the fire protection and procedural arrangements observed at the time of this fire risk assessment, it is considered that the consequences for life safety in the event of fire would be:

Slight Harm	**Moderate Harm**	Extreme Harm

In this context, a definition of the above terms is as follows:

- **Slight harm**: Outbreak of fire unlikely to result in serious injury or death of any occupant (other than an occupant sleeping in a room in which a fire occurs).
- **Moderate harm**: Outbreak of fire could foreseeably result in injury (including serious injury of one or more occupants or the death of an occupant/s in the room /compartment of the origin of the fire), but it is unlikely to involve multiple fatalities.
- **Extreme harm**: Outbreak of fire has a significant potential for serious injury or death of one or more occupants.

It is the professional judgement of the assessor that in any instance where the likely severity of a fire is that of extreme harm then the overall risk rating to life can never be anything less than substantial since it is an unacceptable level of risk which requires further management and control measures to reduce the risk rating.

Risk Level

Intolerable: The premises (or relevant area of the premises) should not be occupied until the risk is reduced.
Substantial If the premises are unoccupied, it should not be occupied until the risk has been reduced. If the premises are occupied, urgent action MUST be taken at the earliest opportunity.
Moderate: It is essential that efforts are made to reduce the risk. Risk reduction measures should be implemented within a defined time period.
Tolerable: No major additional controls required. However, there is a need for improvements.
Trivial: The existing measures are deemed to be adequate however an improvement opportunity exists, often purely for property protection or business continuity purposes.

Prioritising the Fire Action Plan

Hazards detailed in the Fire Action Plan are risk rated to assist the Responsible Person to prioritise the actions required. They are contained within the significant findings section of the action plan, having considered the existing control measures, the likelihood of a fire resulting and the severity of the outcome to the people likely to be affected and to the premises from a specific hazard. The subsequent actions that are recommended are also provided in the action plan. They will detail what is recommended to reduce risks to a reasonable level and to comply with the duties placed on a responsible person under relevant fire safety legislation.

Hazards identified in fire risk assessments do not just relate to physical hazards but can also relate to deficiencies in fire safety management measures such as policies, procedures, training and records. They can contribute directly or indirectly to a fire and also to the subsequent events following a fire, principally the safe evacuation of all relevant persons (or adoption of the fire evacuation plan) and the protection of the premises and any other relevant premises that may be affected by a fire originating from the premises.

High (H)	A significant breach of fire safety legislation and /or a hazard that would significantly contribute to a deficiency in fire safety arrangements which requires immediate action. Some high risk/priority actions may require longer term strategic arrangements but there should be evidence of immediate action.
Medium (M)	A lesser breach of fire safety legislation and /or a hazard that would contribute to a deficiency in fire safety arrangements which requires action. Suggested timeframe is within 3 months. However, some actions may be actioned immediately if they are simple to address and present little cost. Others may need some interim action until the longer-term solutions can be enacted.
Low (L)	May not constitute a breach of fire safety legislation but poor practise that may contribute to a lowering of overall fire safety arrangements. Some actions could be seen as best practise that are above the minimum standards required by fire safety legislation and associated guidance/standards etc. Suggested timeframe 6 -12 months. However, some actions may be actioned immediately if they are simple to address and present little cost.

The risk rating is reflective of the hazard and associated risk, the significance of any breach with fire safety legislation and provides guidance on reasonable timescales reflective of the above.

The action plan is a working document. It provides a section for which an action owner can be allocated by the responsible person and the subsequent actions undertaken to address an action point can be entered and time stamped.

7 – Plans

Site Plan of Bebington Hall Park

Aerial view of Bebington Hall Park

The 72 flats can clearly be seen in the image below, situated in 24 blocks constructed as 4 distinct “clusters”, with the linked open landings and walkways in each cluster also visible.

8 – Fire Door Defects Spreadsheet

This FRA included a selective inspection of fire doors. It was not an intrusive fire door survey. It was carried out to establish the likely standard of fire doors in the premises and indications of whether the doors are tested on a regular basis and suitably maintained (including whether they are wedged open).

The spreadsheet below lists the doors by location and by defects noted. Occasionally a supporting photograph will be used to highlight a general issue as required.

The defects have been provided a code number for ease of writing and a priority rating (high or medium) to correlate directly with priority ratings in the action plan) these are listed below –

Defect	Defect code
No self-closing mechanism	**1**
Defective self – closing mechanism	**2**
Door not self – closing (e.g., sticking on uneven floor or carpet)	**3**
Door wedged open	**4**
No intumescent strip	**5**
No smoke seal	**6**
Damaged intumescent strip and/or smoke seal	**7**
Damage to glazed vision panel (includes any damage to seals)	**8**
Hinges have no fire rating marking (e.g. BS1935) – unable to confirm fire rated	**9**
Missing hinge(s)	**10**
Missing screw(s)	**11**
Damage to door leaf and/or frame	**12**
Excessive gap around or between door leaf/leaves (2mm – 4mm is tolerance).	**13**
Excessive gap under door leaf/leaves (2mm – 4mm is tolerance).	**14**
Gap between frame and wall (inc. gaps sealed with foam)	**15**
Open keyhole/non fire rated lock	**16**
No mandatory fire door signage	**17**
Incorrect mandatory fire door signage	**18**
No fire door test certification documentation	**19**
No fire door certification label/s (or plug) on door leaf	**20**

Door location	Defects	Additional comments/information
Electrical mains intake room opposite Flat 2 Mount Way	5, 6, 9, 10, 12, 14, 15, 17, 19, 20	Unable to confirm if panel above doors is FR.
Bin store next to Flat 2 Mount Way	2, 5, 6, 9, 10, 18, 19, 20	Unable to confirm if panel above doors is FR.
Front door to Flat 6 Mount Way	1, 3, 5, 6, 9, 10, 19, 20	Door is thought to be an original door from the 1970s when the development was first built. Vent at top of door and letterbox – unable to confirm if FR.
Electrical intake room serving 17 – 27 Mount Avenue	5, 6, 10, 15, 17, 19, 20	Door was not locked and was swollen and would not close.
Bin store serving 17 – 27 Mount Avenue	5, 6, 10, 18, 19, 20	Unable to confirm if panel above doors is FR.
Electrical intake room serving 29 – 45 Mount Avenue	5, 6, 9, 15, 17, 19, 20	Unable to confirm if panel above door is FR.
Bin store serving 29 – 45 Mount Avenue	5, 6, 9, 10, 17, 19, 20	Unable to confirm if panel above doors is FR.
Front door to Flat 41 Mount Avenue	1, 5, 6, 9, 10, 19, 20	Door is thought to be an original door from the 1970s when the development was first built. Vent at top of door and letterbox – unable to confirm if FR.
Electrical intake room serving 16 – 21 Kings Close	5, 6, 10, 17, 19, 20	
Bin store serving 16 – 21 Kings Close	5, 6, 9, 10, 13, 17, 19, 20	Unable to confirm if panel above doors is FR.
Front door to Flat 16 Kings Close	1, 5, 6, 9, 19, 20	Door is a relatively new uPVC style door with uPVC assembly that also covers the adjacent service cupboards.
Electrical intake room serving 22 – 30 Kings Close	5, 6, 9, 10, 15, 17, 19, 20	Unable to confirm if panel above door is FR.
Bin store serving 22 – 30 Kings Close	5, 6, 9, 10, 17, 19, 20	Unable to confirm if panel above doors is FR.
Front door to Flat 27 Kings Close	1, 5, 6, 9, 19, 20	Door is a relatively new composite style door.

Photographs of fire doors

 Electrical mains intake room opposite Flat 2 Mount Way – gap between frame and brickwork.	 Original front door to Flat 6 Mount Way.	 Front door to Flat 6 Mount Way showing original hinges and no intumescent strips or smoke seals and vent at top of door.
 Typical arrangement of door to electrical intake room and external doors to bin store serving 17 – 27 Mount Avenue.	 Fire doors facing inwards to bin store serving 17 – 27 Mount Avenue.	 Fire door to electrical mains intake room serving 29 – 45 Mount Avenue. UTC FR rating of panel above door.
 Composite front door to Flat 27 Kings Close.	 uPVC front door to Flat 16 Kings Close.	 Bins store serving 16 – 21 Kings Close with 15mm gap in the centre between door leaves.

Typical defect	Typical remedial actions/s that may be expected
No self-closing mechanism	Fit self – closing mechanism
Defective self – closing mechanism	Adjust or replace mechanism so it closes fully and squarely into the frame and latches shut if it is provided with a latch.
Door not self – closing (e.g., sticking on uneven floor or carpet)	Adjust door and or remove the issue causing the door to stick.
Door wedged open	Remove wedge immediately.
No intumescent strip	Fit compatible strip (usually combined with smoke seal)
No smoke seal	Fit compatible smoke seal (usually combined with intumescent strip). Note on cupboards or rooms which have no automatic fire detection (AFD) within them often it is appropriate not to fit a smoke seal to allow for a controlled amount of smoke to leak and set off AFD in close proximity.
Damaged glazed vision panel (inc. seals)	Repair damage.
Missing hinge/hinges and/or screws missing from hinges	Replace hinges with BS1935 fire rated hinges and any screws with compatible fire rated screws.
Unable to confirm hinges are fire rated	Replace the hinges with BS1935 fire rated hinges if possible.
Significant damage to door leaf and/or frame	Replace door leaf and/or frame unless satisfactory remedial repairs are possible.
Missing part of/damaged intumescent strip/smoke seal	Replace strip and/or strip and seal. Monitor any paint on smoke seals because this should be avoided. If the smoke seal has a lot of paint on it replace it.
Excessive gap around door leaf or between door leaves	Adjust door to achieve tolerances of 2mm – 4mm.
Excessive gap under door leaf	Adjust door to achieve tolerances of 2mm – 4mm. On uneven floors a drop down, seal is usually a viable solution.
Moderate/minor damage to door leaf and/or frame	Repair the damage, if possible, rather than having to door leaf and/or frame.
Gap between frame and wall (inc. gaps sealed with foam)	Rake out foam (if applicable) and seal gap with a suitable product.
Open key hole/non fire rated lock	Replace with fire rated barrel lock (unless heritage lock were an assessment of risk posed is quantified).
No mandatory signage or incorrect fire door signage	Fire doors designed to self – close should be signed “fire door keep shut” on both door faces. Fire doors designed to be locked should be signed “fire door keep locked” on the front face. Fire doors which are on hold open devices should be signed “automatic fire door keep clear” on both door faces. Doors on rooms/cupboards containing a hazard should have appropriate hazard warning signage.
No fire door test certification documentation	Try and obtain documentation. In future always obtain test certification and product data sheets.
No fire door certification label/s (or plug) on door leaf	No action possible. But ensure in future that installers do not remove, damage the test labels (normally on top edge of door leaf).