

# **Safer Communities Division Fire and Rescue Unit**

## **Consultation on Strengthening Fire Safety in High-Rise Domestic Buildings**

### **Analysis of responses**

**December 2019**



**Scottish Government**  
Riaghaltas na h-Alba  
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# Consultation on Strengthening Fire Safety in High-Rise Domestic Buildings

## Analysis of responses

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### **FINAL REPORT**

November 2019

Pye Tait Consulting

Report commissioned for:

Fire and Rescue Unit

Safer Communities Division

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## 2. Executive Summary

### 2.1 Background

This summary presents the key findings from the Scottish Government's consultation on Stengthening Fire Safety in High Rise Domestic Buildings. The focus of the consultation was on four of the Recommendations from the Ministerial Working Group on Building and Fire Safety Post-Grenfell.

1. Specific fire safety guidance aimed at all residents of high-rise domestic buildings.
2. Introduction of Scottish guidance concerning Fire safety in purpose-built blocks of flats.
3. Introduction of Scottish guidance concerning fire risk assessments.
4. A fire safety campaign relative to common areas.

The Scottish Government publicly consulted on four of the recommendations. The consultation was live via an online survey via Citizenspace from 24 April to 17 July 2019 and copies provided on request and responses included. In total 70 responses were collected from 35 individuals and 35 organisations with an interest in fire safety in high rise domestic buildings.

### 2.2 General findings from the consultation

#### **Part 1 - Fire Safety Information for People Who Live in High Rise Domestic Buildings**

There was a preference for information to be given to residents in leaflet form but there was also support for a mix media approach when distributing information. It was felt that it was important to ensure that the information is accessible to all.

Respondents also felt that the information needed to be easy to understand by people with a range of language skills. It should be made available in other languages and formats.

The majority of respondents were supportive of the guidance; agreeing that it provides good information on stopping fires from happening, provides good information on what to do if a fire starts and aids understanding of fire safety.

Clarity was required around safety of electrical appliances and around making specific warnings impactful so that they are adhered to.

Clarity was also required when it came to 'stay put' advice. Respondents had major concerns that they were receiving conflicting advice on 'stay put'. Information needs to be clearer on when to evacuate the building.

With regards to processes to report fire safety concern some respondents did not know if there was a process in place or if it worked. They were also unsure whose responsibility it should be to monitor the process.

Respondents would like more information on action they should take in general. There seemed to be a lack of information provided to tenants by Residents Associations and also due to absentee landlords.

## **Part 2 - Fire Safety Campaign relative to Common Areas**

Respondents welcomed information to encourage people not to leave items in common areas, but it was acknowledged that there may be people that would ignore the guidance.

Some respondents welcomed the idea of supporting the information with hard hitting images. This being said a few organisations highlighted that there should be a balance between the images being hard hitting and not causing concern or anxiety for residents.

A campaign to provide information on not leaving items in common areas was thought to be a great idea. Respondents felt a multimedia campaign would be the best approach to take.

It was mentioned by respondents that a mechanism or method of reporting items in common areas would help. In general, a caretaker/concierge or contacting the Local Authority was the current way of reporting items but no structured or formal mechanism exists.

A suggestion was made to have SFRS reinforce the importance of not leaving items in common areas as people were more likely to listen to them compared to a landlord.

Eight out of thirty-nine respondents (21%) didn't know if there is a process for the removal of items and others that knew there was a process didn't know if it worked. Reasons for this are unclear. Clear guidance on processes would be useful.

With regards to a method for providing information on keeping common areas safe, it was felt that via a noticeboard/poster was the best option following by SFRS home visits and printed information from the landlord when moving in.

## **Part 3 - Fire Safety in Existing High-Rise Domestic Buildings Guidance, including Fire Risk Assessments.**

On the Fire Safety in Existing High Rise Domestic Buildings Guidance, of those responding the majority responded that it was clear;

- who the guidance was aimed at
- how it should work in practice
- how to prevent the impact of fires
- how to reduce the impact of fires

The guidance was praised for being very helpful and also useful to support information sessions. It was also felt that information around physical fire safety was particularly important and useful.

Common areas were a key theme in this section with multiple mentions; 58% of those that factor/manage properties knew if there was a process for the removal of items in common areas and only 59% were confident the process works. Difficulty around keeping them clear of items was commented on and that more emphasis should be placed around removal of items, in the guidance.

The majority of respondents felt that there were clear reasons for fire risk assessments and that the 7-step method was also clear. However, the responsibility and competence of those carrying out the fire risk assessments were discussed – who would carry them out? Will they be properly qualified?

It was also mentioned that fire safety within high-rise buildings should be everyone's responsibility including the residents.

Examples were given of further information to include - best practice examples, ban on smoking, clarity of electrical testing guidance and installation, zero tolerance for items in common areas, continual review and update of the guidance.

## 3. Introduction

### 3.1 Background

Following the fire at the Grenfell Tower, London on 14 June 2017, the Scottish Government set up a Ministerial Working Group (MWG) to oversee the Reviews of building and fire safety regulatory frameworks and any other relevant matters in order to make recommendations for improvement. Its primary objective is to ensure that people are safe in Scottish buildings.

Since the MWG was set up, three key Reviews have taken place. One Review Panel looked at Building Standards (Fire Safety) in Scotland which placed emphasis on reviewing functional standards and associated guidance for building work.

The second review focused its attention on Building Standards Compliance and Enforcement, looking at current operations of the building standards system including strengths, weaknesses, potential changes and improvements.

In addition to the two Reviews detailed above, the MWG also conducted a Review of the Scottish Fire Safety Regime for Domestic High Rise Property. The 2018 report produced from the Review made 6 recommendations to improve fire safety, which were accepted by the MWG. These were;

1. Specific fire safety guidance aimed at all residents of high rise domestic buildings.
2. Introduction of Scottish guidance concerning 'Fire safety in purpose built blocks of flats'.
3. Introduction of Scottish guidance concerning fire risk assessments.
4. Develop a consistent position regarding the storage, removal and enforced prohibition of combustible materials in common areas to be devised and agreed by all relevant stakeholders (including SFRS and Local Authorities).
5. A 'fire safety campaign relative to common areas'.
6. Introduction of Scottish guidance concerning 'fire safety in specialised housing'.



This current consultation focuses on Recommendations 1, 2, 3 and 5.

Guidance developed as part of the 6<sup>th</sup> recommendation was consulted on separately.

High rise domestic buildings are classed as any domestic building with any storey at a height of eighteen metres plus above ground. This generally applies to those with more than six storeys.

The consultation contained 48 questions all of which had an open question for respondents to provide their views. The consultation was split into three parts:

**Part 1** - Fire Safety Information for People Who Live in High Rise Domestic Buildings.

**Part 2** - Fire Safety Campaign relative to Common Areas.

**Part 3** - Fire Safety in Existing High-Rise Domestic Buildings Guidance, including Fire Risk Assessments.

\*Please be aware that some of the base responses for the quantitative questions are small especially when broken down further into different respondent groups.

This consultation which closed on 17<sup>th</sup> July 2019, sought the views and opinions of people living in high rise buildings and key stakeholders including:

Building Owners

Managers

Property Factors

Property Advisors

People with responsibility for Fire Safety

Anyone else with views and ideas

The consultation sought to inform the proposed actions on strengthening fire safety in high rise domestic buildings and improve and refine them where required. The received responses is to aid action implementation in order to ensure effectiveness.

Prior to the consultation launch 4 engagement events were held in Glasgow, Edinburgh and Aberdeen to help inform the consultation questions and get some initial feedback on some of the questions asked in the consultation. Particularly on the kinds of fire safety information that would be helpful for those living in high rise domestic buildings to be provided with.

Pye Tait Consulting was commissioned to objectively and comprehensively analyse all responses received to the consultation and identify the key themes.

# Part 1:

## Fire safety information for high-rise domestic buildings

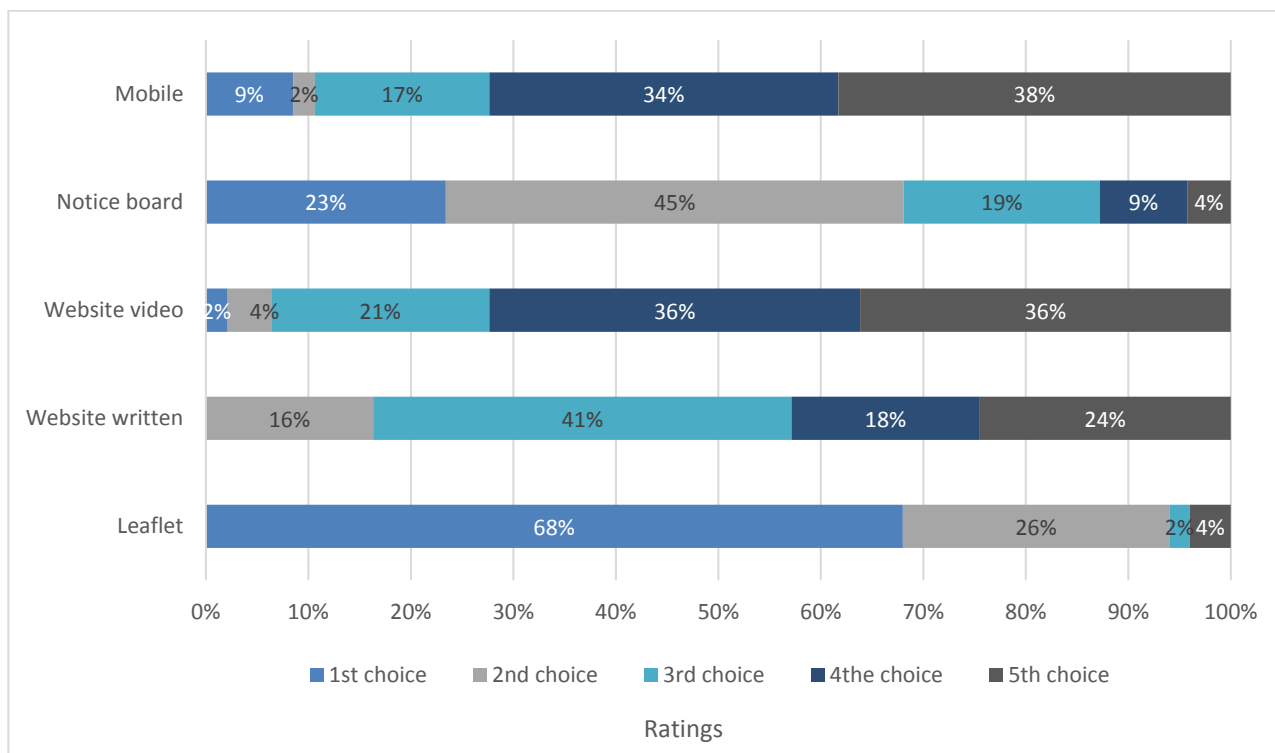
In this section of the consultation the aim was to understand what information to provide to people that live in high rise domestic buildings, and the best way to get it them. An example of fire safety information was provided for respondents.

### 4.1 Fire safety information

**Question 1. Please indicate from 1 to 5 what would be your most and least preferred way to get fire safety information**

The options presented were: Printed leaflet; Written information on a website; Video/animation on a website; Notice board / poster in the building and Mobile Device App.

Figure 1. Options for receiving fire safety information



Bases: Leaflet (51), Website written (50), Website video (48), Mobile (48), Notice board (48)

Table 1. Preferred method of receiving fire safety information

Most preferred option	Number of respondents answering open follow-up
Printed leaflet	19
Written information on website	0
Video/animation on website	1
Notice board/poster in building	4
Mobile device app	2

The most preferred option was for respondents to receive fire safety information as a printed leaflet.

The options of presenting information on websites or by mobile device app were the least preferred options. This was because of concerns around the accessibility of these options. There were suggestions that some households cannot afford internet access, or they do not have the ability to use the internet effectively.

The importance of accessible communication due to potential literacy, language skills and visual impairment was highlighted as being important. Solutions proposed include: using graphics, translating guidance into appropriate languages and using large type.

Individuals raised the fact that certain media wouldn't be applicable/accessible for all. Organisations suggested that a mix of media to communicate fire safety information, most commonly notice boards and printed leaflets would be the best approach. It was thought that printed leaflets are most effective when hand delivered.

Several respondents highlighted the value of giving information face to face, with some proposing that this should be repeated at six-month intervals.

Other means of communication suggested were: local radio, TV, social media, email, fridge magnets, and a 'folder instruction pack' provided to each current/new tenant.

*“There is an assumption that everyone can either use or afford the internet. Printed information is the only guaranteed way to genuinely reach out to everyone.”*

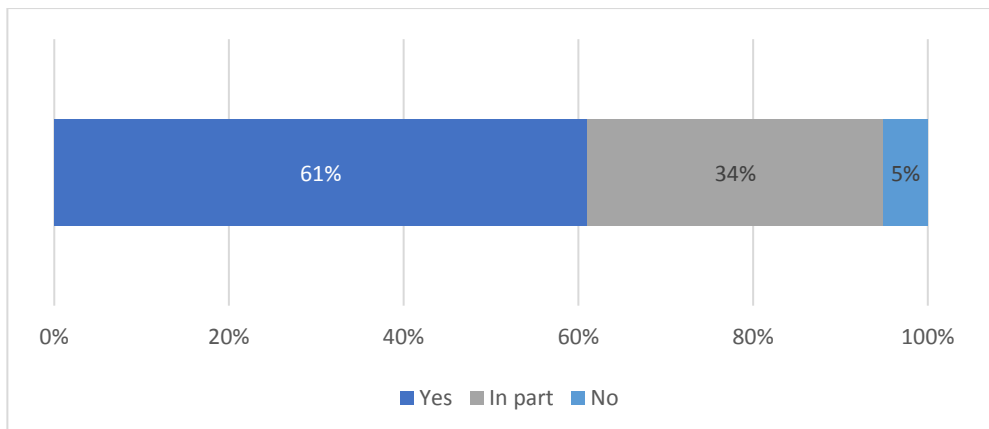
**Owner occupier respondent**

*“Noticeboard and posters must be displayed in a prominent place where all tenants are able to see them, and might need to be supplemented with alternative method for tenants who aren't often out and about or housebound.”*

**Tenant Association respondent**

**Question 2. Does the fire safety information provide good advice on how to stop fires happening?**

Figure 2. Fire safety information providing good advice on stopping fires from happening



Base: 59

Just under two thirds of respondents (61%) agreed that the fire safety information provided good advice on how to stop fires from happening. Only 5% disagreed.

Table 2. Fire safety information -Follow-up responses

Response option	Number answering open follow-up
Yes	3
No	1
In part	18

Those responding stated that advice was good 'in part' generally had concerns that the advice was either incomplete or that impact and accessibility could be improved.

The majority of comments where advice was judged to be incomplete centred on safety of electrical appliances. Respondents would like to see more specific information regarding: maintaining appliances; awareness of product recall notices, and ensuring sufficient airflow around appliances.

Several respondents had concerns that the term 'overloading sockets' could be difficult to understand, and required more explanation.

Respondents called for specific warning regarding: Christmas tree lights, patio heaters and barbecues on balconies, loose wiring, use of multiple extension leads, the requirement to keep combustible materials safe, disposing of cigarette ends in rubbish chutes, checking expiry dates on smoke alarms and charging mobile phones overnight.

Individuals and organisations suggested that the advice might be ignored, and that it should be made more impactful by including graphics and providing examples of the consequences of ignoring advice.

A perceived need for guidance to be bespoke for individual premises was highlighted by two organisations; with one suggesting that information should cover combustible facades.

*“The advice is good, but we recognise that some people will read and follow the advice, and some won’t, so would like to see advice and examples which will have an impact, to really make people think.”*

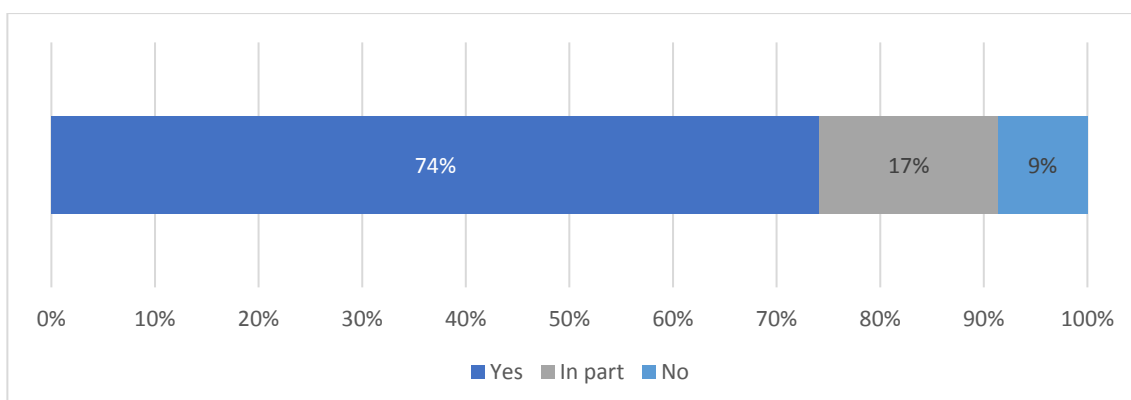
**Tenant organisation**

*“It would be useful to include additional advice on electrical equipment, including heaters and other appliances. Also, multi-lingual versions of the advice or infographics to communicate advice to people whose first language is not English should be provided.”*

**National organisation**

**Question 3. Does the fire safety information provide good advice on what to do if a fire starts?**

Figure 3. Fire safety information providing good advice on what to do if a fire starts



Base: 58

Nearly three quarters (74%) of respondents felt that the fire safety information provides good advice on what to do if a fire starts. Nearly a tenth disagreed (9%).

Table 3. Good advice on what to do if a fire starts – Follow up responses

Response option	Number answering open follow-up
Yes	7
No	2
In part	10

The overwhelming concern expressed by organisations and individuals responding that advice is good 'in part' or simply agreeing that it is good, was around 'stay put' advice. This work applies to buildings that have a 'stay put' procedure in the event of fire. This is when a fire occurs within one flat (or, less likely, in the common areas), it is normally safe for other residents to remain within their own flat.

The advice 'you need not leave your home if there is a fire elsewhere in the building. Though, if in doubt, get out' is seen to be inconsistent with that given by Scottish Fire and Rescue Service (SFRS) 'only leave the safety of your flat if you're affected by heat or smoke, or if you're told to leave by firefighters or the police'.

The phrase 'stay put but if in doubt get out' is seen as being confusing and to contradict the reassurance that fire in high rise flats shouldn't spread.

One organisation responding regarded the advice that flats are designed to be fire resisting and that fire should not spread from one flat to another as misleading, stating that 'a number of cases in Scotland have highlighted errors in the compliance of buildings during their construction'.

A tenant organisation and The Fire Protection Association suggested that the information needs to take into account occupants who are elderly, disabled or have mobility issues, including what they need to do in the event of a fire and what support is available to them.

A possible omission highlighted is advice covering what to do if a fire occurs in your flat i.e. use of fire blankets and extinguishers.

There was a suggestion that, it would be beneficial to add images illustrating bad practice e.g. wedging fire doors open.

*"If the official advice is for residents to stay in their home if possible, a clear rationale should be given to help people understand why this is important. Residents should also feel confident that they will not be prevented from evacuating their flat should they wish to do so, even if they are not affected by heat or smoke, and both the fire safety information and the information provided by the Scottish Fire and Rescue Service should make this clear."*

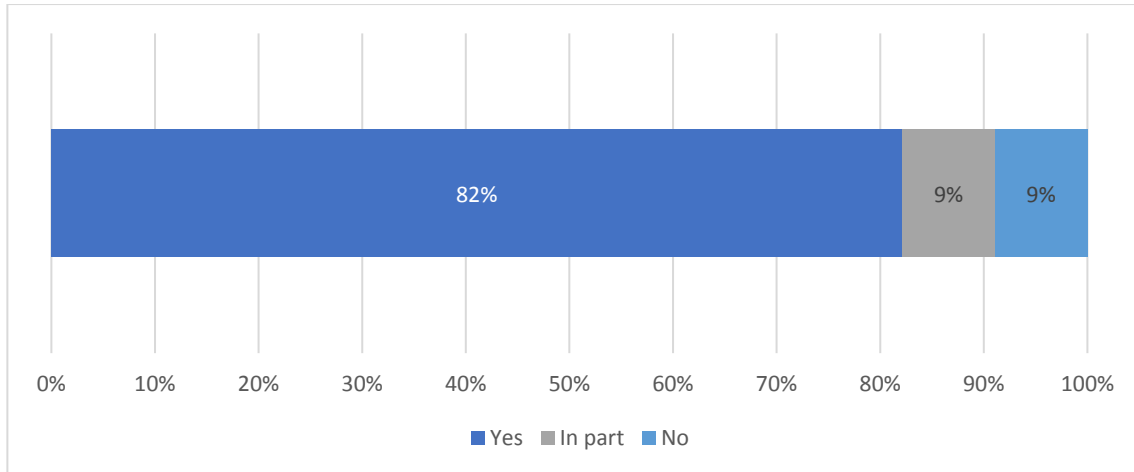
**Chartered Institute of Housing Scotland**

*"In terms of the advice in this document concerning "Stay-Put", we feel that the message needs to be strengthened to promote good advice for customers located common areas out with the immediate vicinity of their own flats when a fire is detected."*

**Wheatley Group**

**Question 4. Does the fire safety information help you to understand the reasons behind fire safety?**

Figure 4. Fire safety information helping respondents understand the reasons behind fire safety



Base: 56

The majority of respondents (82%) felt that the fire safety information was helpful for understanding the reasons behind fire safety. Nearly a tenth (9%) disagreed.

Table 4. The reasons behind fire safety – Follow-up responses

Response option	Number answering open follow-up
Yes	3
No	4
In part	3

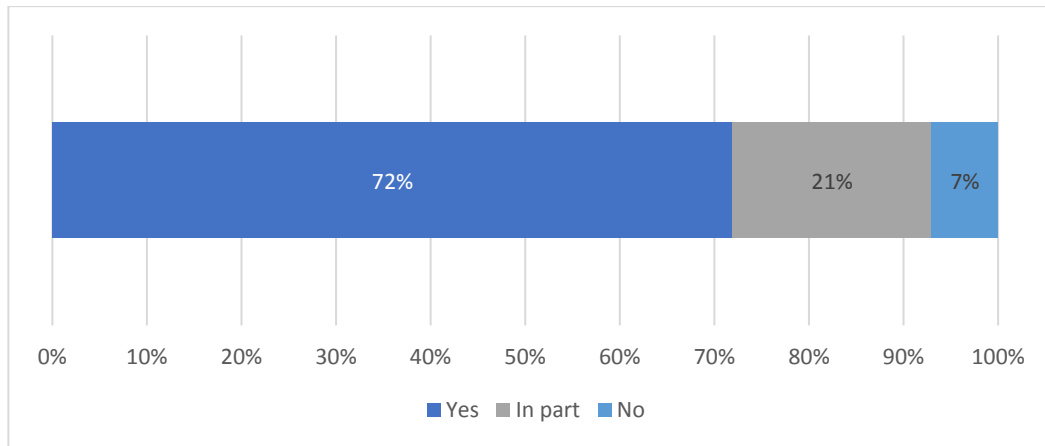
Those answering ‘No’ to this question suggested that individuals as opposed to organisations might not fully understand the reasons behind the advice. They proposed that this may be remedied by providing examples of not following the advice such as ‘leaving equipment in common areas of blocks’ and the consequences of this.

Those answering ‘No’ reiterated concerns regarding literacy, clarification of ‘stay put’ policy and combustible cladding.

The three individuals answering ‘Yes’ thought the advice ‘clear and direct’, ‘reasonable’ and that ‘safety is paramount’.

**Question 5. Is the fire safety information easy to understand?**

Figure 5. Fire safety information being easy to understand



Base: 57

Close to three quarters (72%) of respondents felt that the fire safety information was easy to understand.

Table 5. Easy to understand – Follow-up responses

Response option	Number answering open follow-up
Yes	9
No	2
In part	10

The main concern among those answering ‘In part’ was around perceived problems that could be encountered by those with literacy issues or for whom English was not their first language. Suggestion included: providing a simpler ‘easy read’, ‘plain English’ and foreign language versions alongside using simpler language generally, highlighting information and the inclusion of infographics.

One organisation answering, ‘In part’ and another answering ‘Yes’ suggested augmenting the information with ‘in-person’ advice, at least for those with ‘learning and understanding needs’.

One of those answering ‘No’ thought the information would be less confusing if it was more closely aligned to advice from SFRS. It should be noted that the information provided for the consultation was agreed with SFRS.

Those answering ‘Yes’ had similar concerns to those answering, ‘In part’, alongside concerns that although the information might be understood, it would not necessarily be followed.

*“However, we believe the terminology in fire safety information is not suitable for people with little knowledge of fire safety and would encourage using less jargon and more simplistic language to ensure everyone is able to understand the information”*

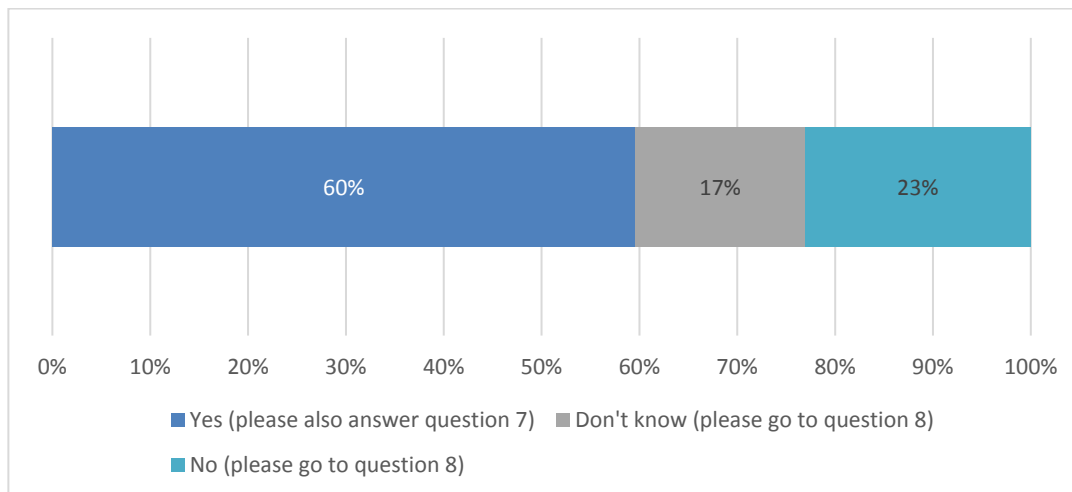
**AXA UK**



## 4.2 Raising concerns

**Question 6. Does your high-rise domestic building have a way people can raise concerns about fire safety?**

Figure 6. Whether way for people to raise concerns about fire safety



Base: 52

Almost two thirds (60%) of respondents agreed there was a way for people to raise concerns about fire safety. Nearly one fifth (17%) didn't know and nearly a quarter (23%) responded 'no'.

Table 6. Way for people to raise concerns about fire safety – follow up

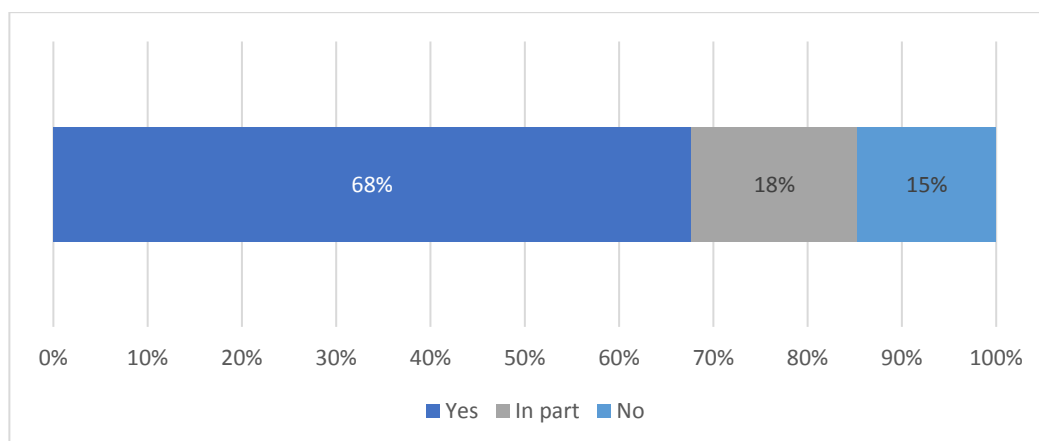
Response option	Number answering open follow-up
Yes	13
No	2
Don't know	1

Individuals answering 'Yes' stated ways in which they would raise concerns; among Owner occupiers these were, residents' meetings, and caretakers and landlords. Those in local authority rented accommodation stated they would contact tenant groups, landlords, SFRS, letting agents and their local authority.

Organisations answering 'Yes', each listed several ways in which their tenants might raise concerns about safety, these included: on site staff – caretakers and concierges; housing officers; maintenance officers; tenant representatives; customer contact centre by telephone or email; fire safety officers and to SFRS during home visits.

**Question 7. If you answered yes to Question 6; does the process work?**

Figure 7. Whether the process for raising concerns works



Base: 34

Over two thirds (68%) of respondents felt that that process for raising concerns works. The remainder felt it worked ‘in part’ or didn’t work.

Table 7. Process for raising concerns – Follow up

Response option	Number answering open follow-up
Yes	13
No	4
Don't know	4

Those answering, ‘In part’ and commenting were all individuals – a mix of owner occupiers and tenants – while they acknowledge there is a system in place for reporting concerns, they state that concerns take a long time to be actioned.

The general comment among those answering ‘No’ was that concerns are reported but they are not actioned.

Those answering ‘Yes’, and commenting were primarily either tenant organisations or landlords.

Organisations representing tenants qualified their responses by stating for example: where there is no caretaker or concierge provision then actioning concerns is an issue; that contacting SFRS is more effective than contacting the Local Authority; and resources are likely to be stretched, particularly at the weekends. Landlords tended to reiterate that they have policies in place.

*“Sometimes landlords (both social and private) can take considerable amounts of time to react.”*

**Owner occupier**

*“Repairs are being reported but not actioned e.g. fire doors on landings not closing”*

**Littleholm MSF Tenants and Residents Association**

### **4.3 Other useful information and comments**

**Question 8. Please let us know if you think there is any other useful fire safety advice and information that could be included for people who live in high-rise domestic buildings**

There were 33 responses around other useful fire safety advice information that could be included for people who live in high rise domestic buildings; 15 individuals and 18 organisations. Organisations included Local Authorities, Tenants and Residents Associations and a mix of Insurers, Fire Safety and Housing Associations.

Individuals and organisations stressed the potential gains to be made from engaging with schools and communities – it was stated that engagement with young people in schools could be helpful in overcoming language barriers in for people where English is not the first language.

Several individuals and organisations stressed the risks posed by fly tipping flammable items – particularly furniture; and similar problems caused by residents leaving combustibles in common areas.

Individuals raised concerns around the difficulty of communicating safety advice in buildings where there is a high density of short-term lets. Landlords appeared to absent and even though Residents Associations are in place they aren't very adept at communicating information to residents.

There were general concerns about a perceived lack of information about action residents should take if there is a fire in their property, there was a suggestion that there should be fire extinguishers in each property.

There was a feeling that there should be more promotion around home fire safety checks from SFRS and more sharing of information among landlords and local authorities to develop best practice.

Two organisations stressed the importance of communicating the potential dangers from building alterations, and the requirement to meet building regulations.

There were suggestions that more information is required about: the dangers of smoke inhalation and the need to check smoke alarms.

There was a call for designated fire representatives.

*“Information on alterations to building should be included i.e. if the tenant wishes to change a partition or fire door, they should seek appropriate approvals”*

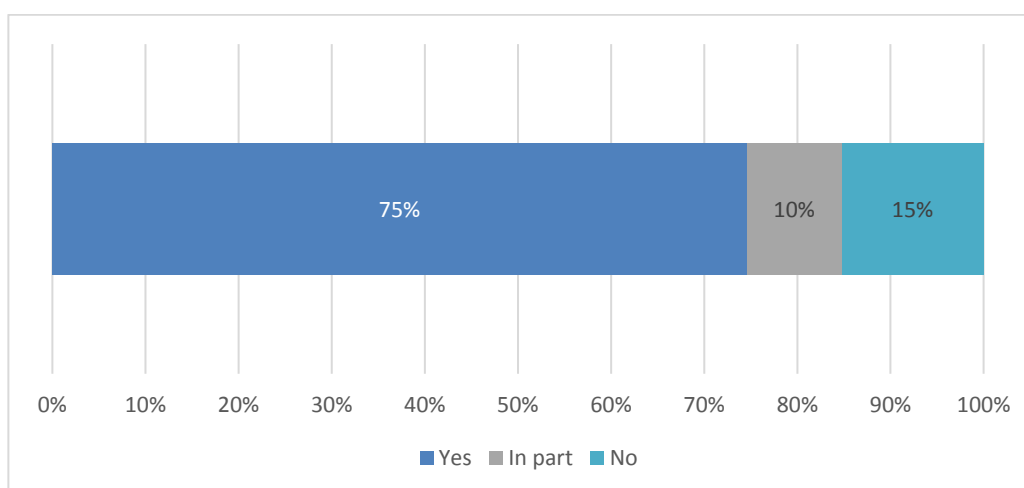
**Fire Protection Association**

*“Everyone should have an extinguisher in their flat. You cannot prevent people from being careless, but you can prevent the fire getting out of control”*

**Manufacturer**

**Question 9. Do you think more information on the ‘stay put’ policy (this is explained on page 5) would be helpful?**

Figure 8. Whether more information on ‘stay put’ policy would be helpful



Base: 59

Three quarters (75%) of respondents agreed that having more information on the ‘stay put’ policy would be helpful. A minority (15%) felt that this wouldn’t be helpful.

Table 8. More information on the ‘stay put’ policy – Follow up

Response option	Number answering open follow-up
Yes	24
No	2
In part	5

The responses suggested that ‘stay put’ advice can seem counter-intuitive and needs to be much more convincing especially in the light of the events at the Grenfell Tower fire; several respondents also find ‘if in doubt get out’ advice confusing, stating that they believed it contradicts SFRS advice.

Suggestions for improving 'stay put' information include: showing diagrams of building compartmentalisation; drawing attention to fire door specifications; reassurances about any external cladding; and a better explanation of the science behind fire protection.

Some respondents see a danger that 'if in doubt get out' advice is included in the stay put advice, this may be seen as a default position and will be everyone's initial response to a fire.

Organisations suggested ways information could be disseminated including: tenancy sign-up, settling in visits, tenancy handbooks, and housing officer visits.

One respondent noted that the guidance states the number of fatalities from fires in multi-storey blocks is small, and suggests that it is important to emphasise the safe and secure nature of living in a multi-storey flat.

Respondents suggested that there should be more information for older people, disabled people or occupants with mobility issues, how they should exit the building safely and what support is available to them.

*"We understand amongst tenants that there can be concern about abiding by a 'Stay Put' policy in a fire situation. In our view, many tenants could benefit from more information on the reasons behind a 'Stay Put' policy for reassurance. Suggest it can be put in the Tenants Handbook. We appreciate however that each tenant is different, and a multi-faceted approach to education and raising awareness about 'Stay Put' will help too."*

**Maxwellton Court Tenant Association (Secretary)**

**Question 10. Please provide any further comments on the information and advice in this section on the consultation in the box below.**

Twenty-two respondents left further comments on the information and advice in this section of the consultation.

Several respondents used this section to reiterate views expressed in answers to earlier questions; including: use of plain English in advice; the effect of Grenfell on adherence to 'stay put' advice; testing smoke alarms; the importance of keeping common areas clear; and the perceived effectiveness of face to face engagement to impart information.

One respondent called for all high-rise properties to have break glass alarms and sprinklers retro fitted.

A tenant group highlighted a need for social landlords to ensure that allocations to high rise buildings are appropriate and that tenants and residents are given appropriate support around fire safety to enable them to live safely and protect those who live alongside them; going on to state that for instance, tenants or residents with specific educational needs, chaotic lifestyles and specific medical conditions e.g. dementia might need extra help.

One local authority tenant would like to see local authorities given more powers to enforce fire safety regulation with private landlords.

There was a suggestion that more information on what measures to expect in the event of a fire e.g. emergency lighting will be activated, and the self-closure of doors will take place to help prevent the spread of the fire, as well as existing advice on not using the lifts.

An owner occupier responded that many householders are unaware of defects in their properties that might allow fire to spread e.g. insufficient fire stopping material between floors, ducts and ventilation shafts that might allow fire to spread.

There was a request that Scottish Government publish statistics on the number of fires within multi-storey blocks and their causes; in the belief that this would help landlords, property managers and staff to deliver more targeted messaging to residents.

*“Regular themed awareness campaigns to maintain /improve fire safety awareness would be useful with particular reference to smoke/heat alarm testing, maintaining unobstructed escape routes, the function of fire doors and fire safety self-assessments by residents of their dwellings.”*

**Fire Protection Association**

## **Conclusions/Main findings**

- There was a preference for information to be given to residents in leaflet form but there was also support for a mix media approach when distributing information. It was felt that it was important to ensure that the information is accessible to all.
- Respondents also felt that the information needed to be easy to understand by people with a range of language skills. It should be made available in other languages and formats.
- The majority of respondents were supportive of the guidance; agreeing that it provides good information on stopping fires from happening, provides good information on what to do if a fire starts and aids understanding of fire safety.
- Clarity was required around safety of electrical appliances and around making specific warnings impactful so that they are adhered to.
- Clarity was also required when it came to ‘stay put’ advice. Respondents had major concerns that they were receiving conflicting advice on ‘stay put’. Information needs to be clearer on when to evacuate the building.
- With regards to processes to report fire safety concern some respondents did not know if there was a process in place or if it worked. They were also unsure whose responsibility it should be to monitor the process.
- Respondents would like more information on action they should take in general. There seemed to be a lack of information provided to tenants by Residents Associations and also due to absentee landlords.

# Part 2:

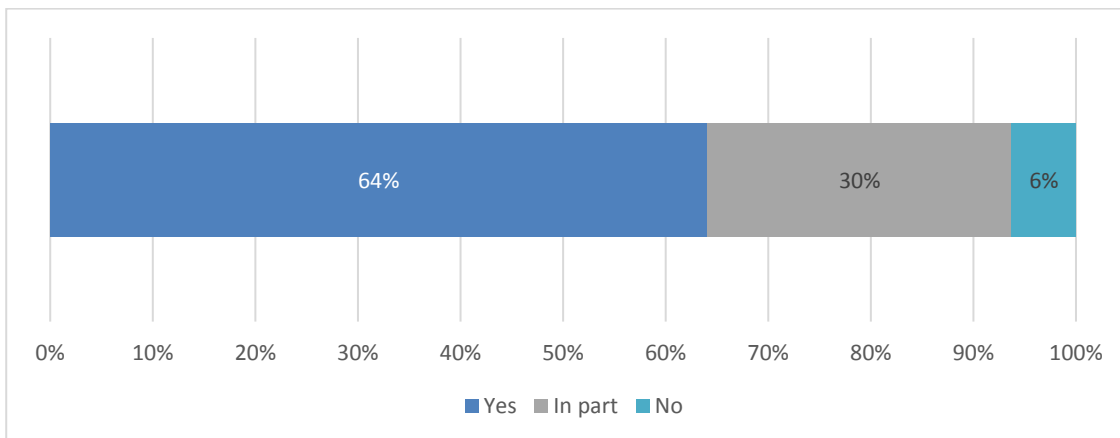
## Fire safety campaign - common areas

### 5.1 Information on dangers and potential damage

This section of the consultation aimed to gather information to help develop a fire safety campaign regarding common areas in high rise domestic buildings. The campaign will seek to raise awareness on the fire risks associated with any items that might be left in common areas; this includes items that may block access to and exit from buildings, not just those items that will burn.

**Question 11. Would having clearer information on the dangers of leaving items that will burn in common areas, encourage people not to do this?**

Figure 9. Clearer information on dangerous of items



Base: 64

Nearly two thirds (64%) of respondents felt that having clearer information would encourage people not to leave items in common areas. Close to a third (30%) thought that this would be part helpful. Only 6% disagreed.

Table 9. Dangerous Items – follow-up

Response option	Number answering open follow-up
Yes	20
No	2
In part	16

The overriding concern of those answering 'In part' was a belief that regardless of how well guidance is presented there will always be some residents who ignore it. Suggested solutions to this included: stricter enforcement with 'zero tolerance'; stronger penalties; and encouragement to report infringements.

Several organisations called for information to be ‘hard hitting’ and include graphic images of the consequences of leaving flammable items in common areas. One organisation highlighted that common areas also include bin areas and storage areas, not just common walkways, stairs and foyers; and that the dangers are both obstruction and fire risk. One organisation expressed a wish for guidance to emphasise the dangers of flammable items and barbecues on balconies.

*“In order to be effective, the information provided to residents must be clear about the approach taken by landlords/building managers to keep common areas clear (i.e. a ‘zero tolerance’ approach or a ‘managed use’ approach), whose responsibility it is to keep these areas clear, and why this is so important for all residents.*

*This should also be matched by appropriate enforcement from landlords/building managers to ensure that residents are adhering to this approach.”*

**Chartered Institute of Housing Scotland**

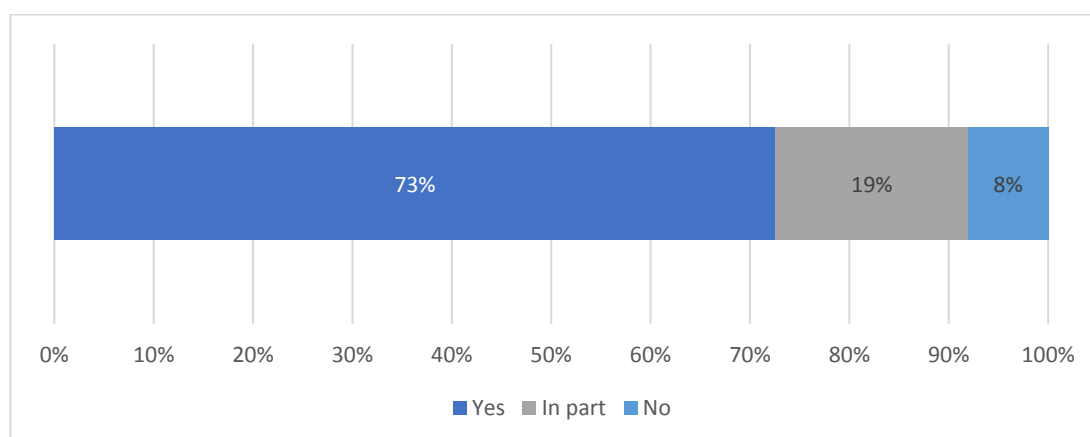
Those who answered ‘Yes’ had similar concerns to those answering, ‘In part’; calling for ‘hard hitting visuals’ to illustrate the dangers.

One individual owner-occupier was concerned about the particular danger of Christmas trees in public areas.

A tenants’ organisation suggested that CCTV might dissuade residents from leaving items in public areas.

**Question 12. Would images to highlight the damage caused by fires started in common areas be helpful to encourage people not to leave items that will burn in those areas?**

Figure 10. Images on Dangerous Items – whether helpful



Base: 62

About three quarters (73%) of respondents agreed that this would be a good idea. Close to a tenth (8%) said ‘no’ and nearly a fifth (19%) said ‘in part’.



Table 10. Images – Follow-up

Response option	Number answering open follow-up
Yes	20
No	3
In part	8

Those answering ‘Yes’, who gave comments to support their response tended also to indicate that images would ‘strike a chord with’, or ‘shock’, people who might otherwise leave items in common areas, or ‘highlight the consequences’ of this action. Several respondents repeated their response to the previous question.

A possible consequence of using unpleasant imagery was highlighted; by one organisation answering ‘No’, which suggested that material featuring it may be removed from common areas.

There was concern from a few of organisations that images should be balanced and not be so severe as to cause anxiety among residents. A local authority respondent answering ‘In part’ was concerned that images would generate fear among householders and may exaggerate the risks associated with living in multi-storey housing.

Several organisations suggested that images could be a more accessible way to communicate with those for whom English is not their first language.

There was a concern that this information may draw attention away from fire safety within tenants’ homes (where it is stated most fires start).

General concerns among those answering ‘In part’ were around the feeling that advice will be ignored.

*“Whilst having the potential to be highly effective, a degree of caution should be adopted with this approach as it may also generate a degree of fear amongst certain residents. This would be counterproductive to the reassurance local authorities and Scottish Government have been offering tenants of high-rise buildings in recent years.”*

**Local authority**

**Question 13. Please let us know if you have any further comments about the fire safety campaign regarding common areas in high-rise domestic buildings.**

There were 37 further comments about the fire safety campaign regarding common areas in high rise domestic buildings.

Respondents generally welcomed the campaign and comments were around how it may be improved. Several respondents were of the opinion that an effective enforcement mechanism; policing; and education of residents are critical factors to ensuring success.

Suggested mechanisms for reporting items in common areas were: CCTV, property factors, landlords, NHS (visiting care workers etc.), tenants directly (SFRS).

Respondents suggested that lease agreements might set out penalties for leaving items in common areas.

One local authority respondent welcomed the campaign but had concerns around possible confusion caused by different approaches adopted by landlords (e.g. zero tolerance / managed use). One tenant organisation highlighted a perceived need for balance between 'homely appearance' and fire safety in common areas

Suggestions for improving engagement included: targeting children; using multi-media, large print and multi-lingual messages, regular meetings and events: and case studies to target communicating with different ages or other demographics.

There was a suggestion that there should be engagement at each stage of the letting process, involving: estate agents; solicitors; insurance companies and letting agents.

Mention was made of the specific dangers posed by mobility scooters and smoking in lifts and laundries.

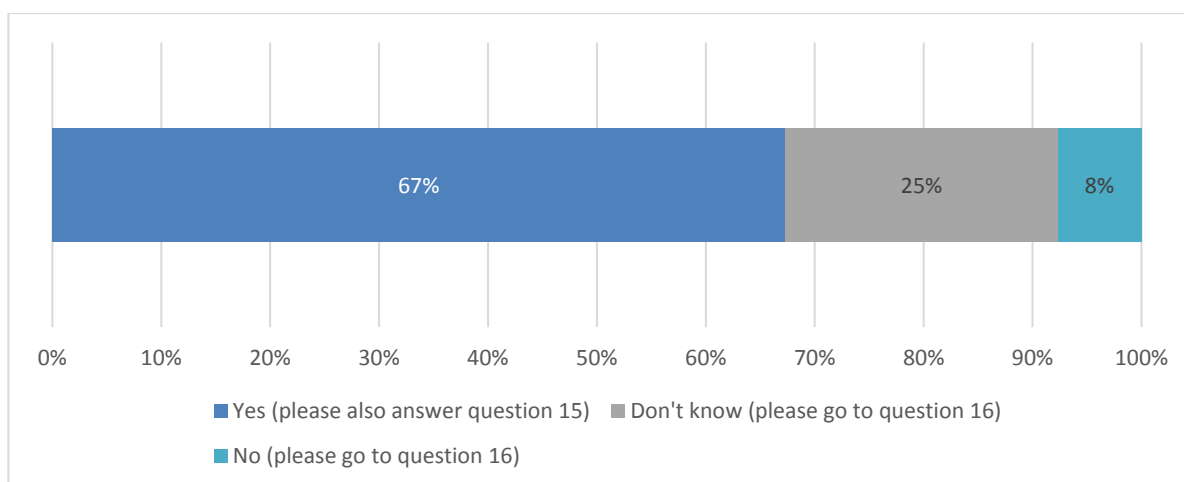
*"It would be helpful if the local authority and fire service could arrange meeting with all the residents at a suitable location and demonstrate various incidents, films would be good."*

**Tenant and Residents Networks - Central Scotland Region 4**

## 5.2 Keeping common areas safe from fire

**Question 14. If you live in a high-rise domestic building, is there a process in place for the assessment and removal of items left in common areas?**

Figure 11. Process for removal of items left in common areas



Base: 52

Just over two thirds (67%) agreed that there was a process in place. A quarter (25%) didn't know.

Table 11. Process = Follow-up

Response option	Number answering open follow-up
Yes	15
No	1
Don't know	1

Individuals and organisations answering 'Yes' each gave some details of the process for removal of items left in common areas. For organisations, the process generally relies on caretaker/concierge service or contacting the local authority; similarly, for individuals, with one reporting some involvement of SFRS and another, the residents' association.

Organisations suggested that the process might only work when day staff are on duty. The process appears to be a mix of caretakers checking for items, and residents reporting items to caretakers.

One individual respondent answering 'No' gave the example of a Christmas tree in a common area of his building; the building factor wrote to residents advising them to remove it, but this advice was ignored. The respondent went on to explain that there appears to be a process for reporting potential risks, but no process for removing them.

One organisation commented that landlord sanctions enabling actual enforcement would be unlikely to exist without very significant legislative change; going on to state that this would not be the right or proportionate solution. They see the advantage of the SFRS having greater powers, as this means people are more likely to act on instructions from SFRS than from their landlord. The organisation highlighted resourcing issues around supporting further SFRS powers.

*“Yes, but it requires the vigilance of one caretaker for 340 flats. Residents who don’t understand the dangers won’t complain when they should.”*

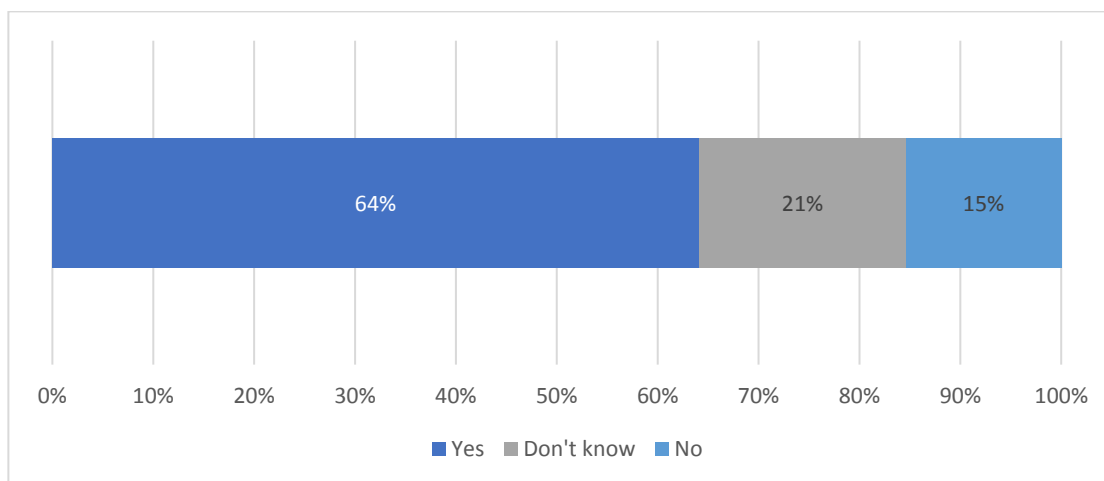
**Individual owner occupier**

*“Customers, staff and the general public have a variety of ways to report any concerns surrounding combustible materials in common areas. Concierge staff within our MSF blocks also complete block patrols which includes checking common foyer areas as well as stairs, bin areas, bin chutes and storage areas for combustible material. Any combustible material found is then removed.”*

**Wheatley Group**

**Question 15. If you answered yes to questions 14; does the process work?**

Figure 12. Does process work



Base: 39

Nearly two thirds (64%) agreed that the process works while nearly a quarter (21%) did not know.

Table 12. Does Process work – follow-up

Response option	Number answering open follow-up
Yes	15
No	4
Don't know	1

Individuals answering ‘Yes’, generally explained that as they are not encountering items in common areas, then the system must work.

Organisations answering ‘Yes’ tend to qualify their response. Generally, problems encountered are: the length of time taken before action is implemented; the potential failure of the system when there are no night time inspections; some residents being

unaware of bulk storage areas and the problems of items removed remaining in bulk storage areas for lengthy periods of time.

Those answering ‘No’ and commenting were all individuals, their concerns included the price charged for removal of unwanted items by Local Authorities; caretaking resources being spread too thinly; and the perception that a local authority was uncooperative.

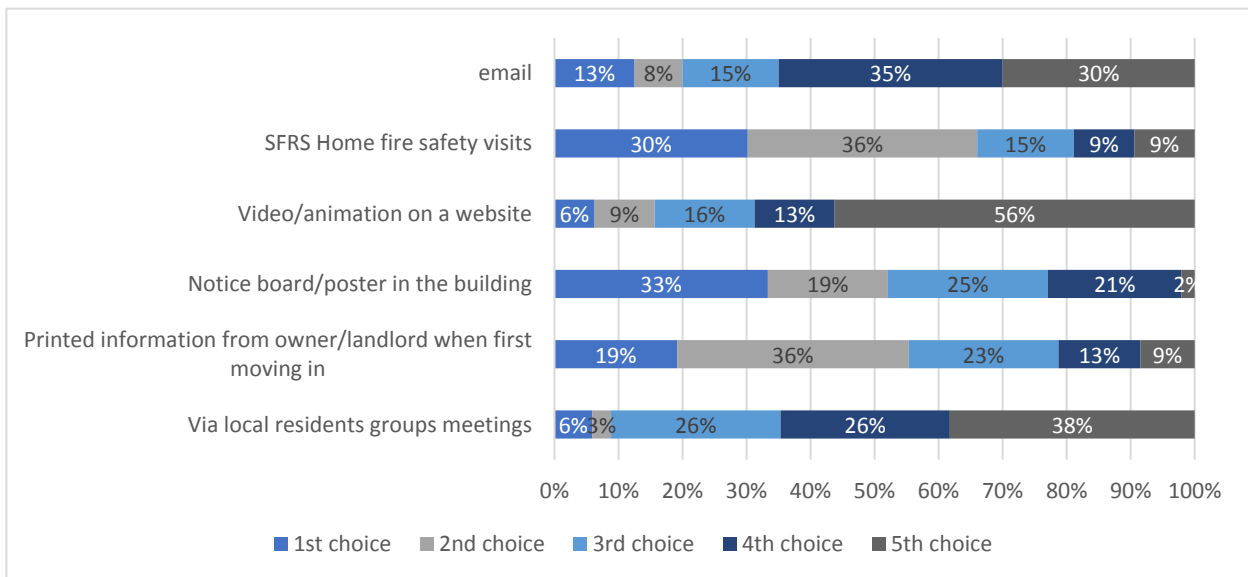
Only one individual who selected ‘Don’t know’ made further comment. They mentioned that if there was a process in place residents aren’t aware of it.

*“Yes and no as Local Authority do not always carry out the removal of said items as quickly as they should.”*

**Organisation**

**Question 16. What is the best way to get information on keeping common areas safe from fire? Please indicate from 1 to 5 what would be your most and least preferred?**

Figure 13. Preferences for receiving information on keeping common areas safe



Bases: Email (40), SFRS home fire safety visits (53), video on website (32), notice board/poster (48), printed info on moving in (47), residents meeting (34)

The top preferences for ways to receive information on keeping common areas safe from fire were notice board/poster in the building, SFRS Homes fire safety visits and printed information from owner/landlord when first moving in.

Several respondents stated in their written responses that they found ranking each of the options difficult, with a widely held view that the best approach would use a combination of methods, with some including suggestions for additional methods

Those choosing SFRS home fire safety visits as the preferred option generally stressed that this should be used in conjunction with information from the landlord when moving in. One individual suggested that there should be a partnership approach by landlords and the fire services for new tenants.

Those choosing notice board/poster tended to also give suggestions for other activity; this included: extending residents' groups to include local schools, community groups or local religious groups; local radio/TV and social media campaigns; and Information screens in foyers.

An organisation highlighted that the efficacy of notice boards/posters depends on residents' literacy levels.

The organisation choosing video/animation on website would like to see this used in conjunction with 'rent and council tax letters'.

The organisations that chose not to rank any of the given options would like to see a combination of methods used. Some gave other suggestions for places where residents might be engaged including: Community Centres, Libraries, Housing Area Offices, Doctor's Surgeries and Shopping Centres. There was a suggestion that some material should be made available in Braille.

*"Our view is that this is an issue of such importance, a multi-faceted approach to sharing information is essential to engage with as many tenants as possible in ways which will be understandable and engaging for all, taking into account diverse backgrounds, cultures and languages and format preferences."*

**Maxwellton Court Tenant Association (Secretary) Tenant Renfrewshire Council**

## Conclusions/Main findings

- Respondents welcomed information to encourage people not to leave items in common areas, but it was acknowledged that there may be people that would ignore the guidance
- Some respondents welcomed the idea of supporting the information with hard hitting images. This being said a few organisations highlighted that there should be a balance between the images being hard hitting and not causing concern or anxiety for residents.
- A campaign to provide information on not leaving items in common areas was thought to be a great idea. Respondents felt a multimedia campaign would be the best approach to take.

- It was mentioned by respondents that a mechanism or method of reporting items in common areas would help. In general, a caretaker/concierge or contacting the Local Authority was the current way of reporting items but no structured or formal mechanism exists.
- A suggestion was made to have SFRS reinforce the importance of not leaving items in common areas as people were more likely to listen to them compared to a landlord.
- Eight out of thirty-nine respondents (21%) didn't know if there is a process for the removal of items and others that knew there was a process didn't know if it worked. Reasons for this are unclear. Clear guidance on processes would be useful.
- With regards to a method for providing information on keeping common areas safe, it was felt that via a noticeboard/poster was the best option following by SFRS home visits and printed information from the landlord when moving in.

# Part 3:

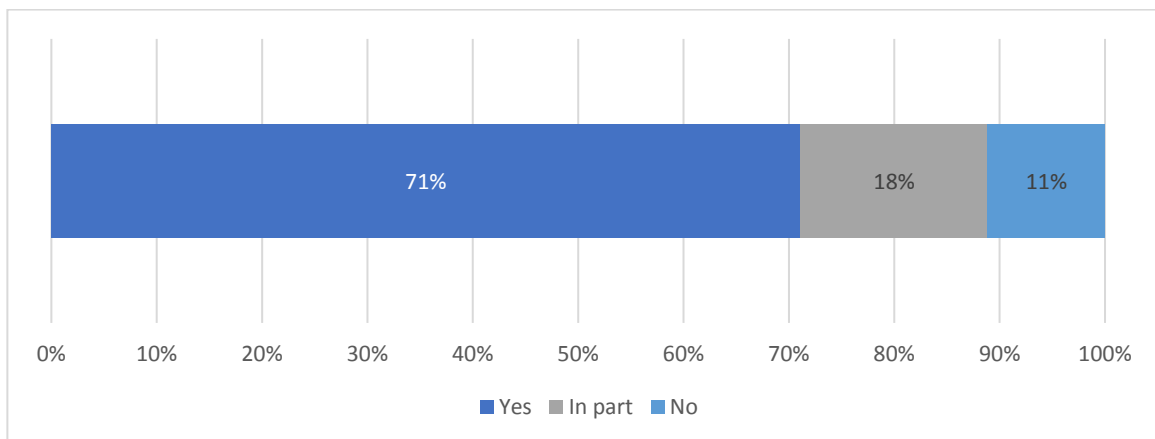
## Fire safety for existing high-rise buildings

### 6.1 Guidance on fire safety in high risk domestic buildings

This part of the consultation asked for thoughts and comments on the Draft Fire Safety in Existing High Rise Domestic Buildings Guidance. This is intended to produce consistent, easily accessible guidance. A copy of the draft Guidance was included in the consultation and respondents were asked to read it and answer the questions.

**Question 17. Is it clear that the Guidance is aimed at those that own, factor, manage, give advice on and enforce standards in high rise domestic buildings?**

Figure 14. Is it clear that the Guidance is aimed at those that own, factor, manage, give advice on and enforce standards



Base: 45

Nearly three quarters (71%) of respondents felt that yes it was clear who the Guidance was applicable to. Nearly a fifth (18%) felt that it was partly clear and the remainder felt that it was not clear.

Table 13. Clear guidance on who it is applicable to – follow-up

Response option	Number answering open follow-up
Yes	5
No	3
In part	5

Those answering ‘Yes’, variously: reiterated their agreement; commented that there was too much to take in; suggested that the competency of in-house teams should be checked; stated that it is useful to have guidance in one place; stated that the target groups are more aware of their duties.



Of the five respondents who answered, 'In part' and left comments, two thought the guidance is too focused on the social rented sector and more could be done to make it applicable to tenants of mid-market blocks, and private landlords.

An individual owner-occupier stated that the guidance should be clear that 'high rise' does not just apply to multi-storey flats, and that some converted Victorian townhouses are more than 18 metres high.

One organisation called for a national public register of residential buildings which are more than 18 metres high, and that the register should include the name of the accountable person.

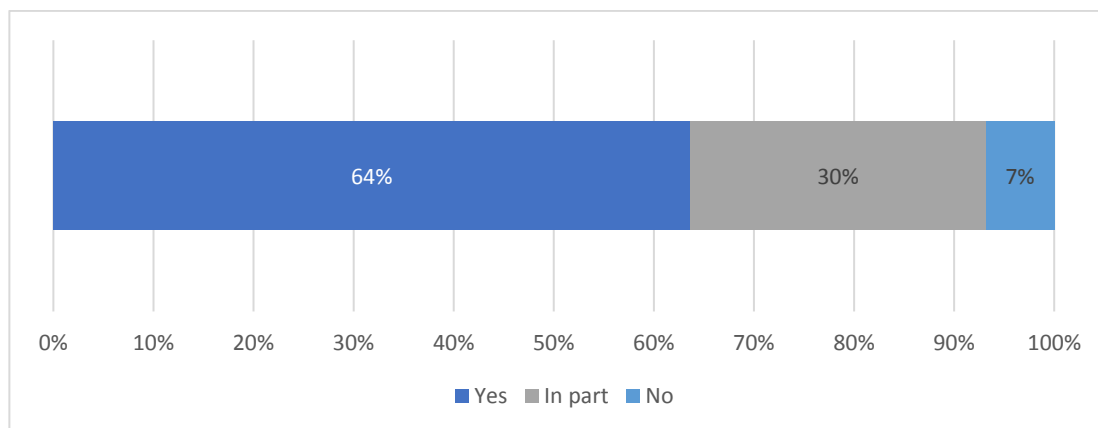
Those who answered, 'No' highlighted perceived problems with mixed tenure, and suggested there was a need for greater clarity. These comments were from two individuals and a council.

*"It is considered that owner occupiers should be specifically mentioned in the Summary part of the Guidance too in terms of their responsibilities in respect to common areas."*

**Fife Council Private Housing Standards Team**

**Question 18. Is the purpose of the Guidance clear for those expected to use it?**

Figure 15. Whether the guidance is clear for those expected to use it



Base: 48

Nearly two thirds (64%) agreed the guidance was clear for those expected to use it. Around a third (30%) felt that it was 'in part' and the remainder felt it wasn't.

Table 14. Guidance clear – follow-up

Response option	Number answering open follow-up
Yes	2
No	3
In part	6

One of the two respondents answering, ‘Yes’ who chose to leave comments, suggested an easy to use ‘hand held’ version of the guidance would be useful; the other respondent confirmed their agreement.

Comments from those answering ‘No’ concerned perceived vagueness of the guidelines, indicators for people with additional support needs; and an assertion that private landlords see safety as not their direct responsibility’. These comments were provided by two organisations (a Local Authority and a Tenants Association) and one individual.

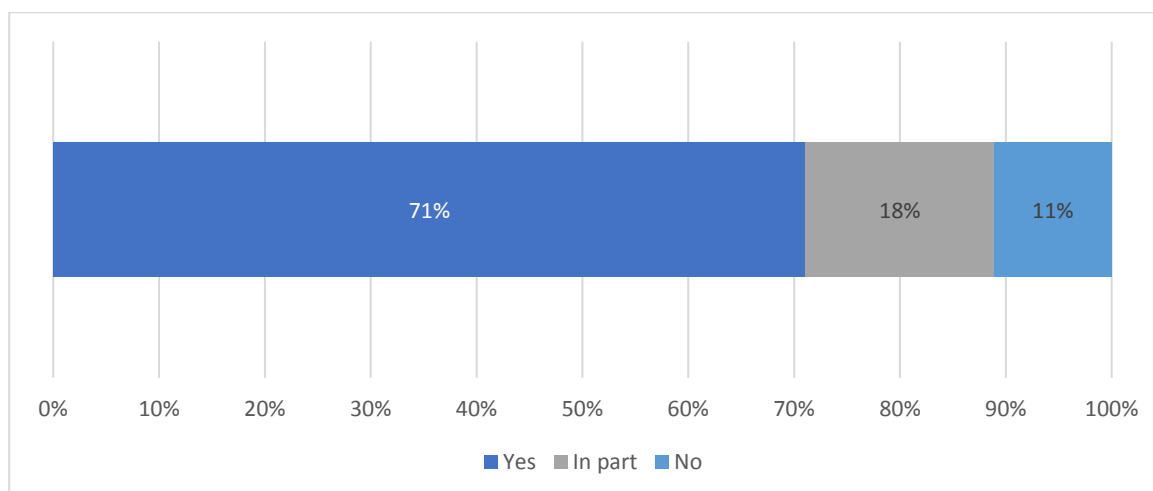
Respondents answering, ‘In part’ had concerns including: the availability of guidance for buildings above 26 storeys; more emphasis on why the guidance should be followed, and perceived ‘grey areas’ and areas ‘open to interpretation or discretion’.

*“While the guidance outlines its purpose is to assist building managers and those assessing fire risk in high-rise domestic buildings, it is unclear why it is important to follow the guidance. Rather, the guidance is quick to note that while those expected to use it are encouraged to do so, it is not mandatory. We believe people have a right to expect that the buildings they live, work, learn and recuperate in are safe. There should be clearer guidance on how those responsible for buildings can achieve a gold standard of fire safety.”*

**Rockwool Ltd.**

**Question 19. Is it clear how the Guidance should be used in practice?**

Figure 16. Is it clear how guidance should be used in practice



Base: 45

Nearly three quarters (71%) said that it is clear how the guidance should be used in practice. Just over a tenth (11%) responded that it wasn't clear.

Table 15. Clarity of how the guidance should be used – follow-up

Response option	Number answering open follow-up
Yes	4
No	3
In part	4

Those answering, 'Yes' left comments including how useful it is to have all guidance in one place; that the paper clearly sets out how the guidance should be used in practice; and perceived issues with interpretation.

Comments from those answering, 'No' included: a lack of definitive limits to the guidance, with a perceived danger of self-assessment where not appropriate; and perceived vagueness. These comments were from three organisations.

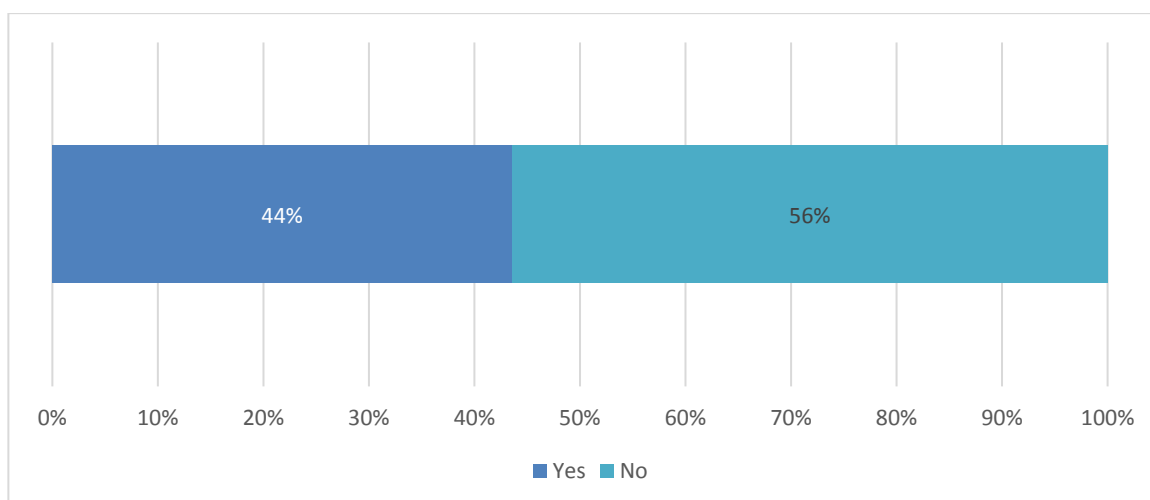
Those answering, 'In part' commented on vagueness, with particular mention of the paragraph 'Using this guidance'; there was a concern that there needs to be 'more education with landlords'.

*"Use of the Guidance is not especially clear as the paragraph headed 'Using this Guidance' starts by hedging the Guidance with qualifications. As declared under Scope the Guidance is not mandatory. There is a case for saying that having due regard to the Guidance is essential (one step short of mandatory) and also saying under Use that due regard is qualified only by particular circumstances in particular buildings."*

**BAFE**

**Question 20. Is there further information that should be included?**

Figure 17. Further information that should be included



Base: 39

Nearly half (44%) felt that there was further information to include while the remainder felt that there wasn't (56%).

Table 16. Further information – follow-up

Response option	Number of respondents answering open follow-up
Yes	14
No	4

Respondents answering, 'Yes' who left comments had concerns about missing information which included:

- the inclusion of how repair/improvement works should be considered in relation to the guidance;
- smoke venting from stairs,
- examples of the consequences for owners/managers where they do not meet the requirements; and
- specific mention of gas and oxygen cylinders.

There were requests for more clarity around 'stay put' guidance, the role of local authorities, obligations of individual owner-occupiers and private landlords in mixed-tenure multi-storey blocks, and the limits of self-assessment.

One respondent who answered, 'No' suggested that there may be too much information in the guidance. They stated that the guidance could be more succinct.

*“It is considered that further information on what happens when for example fire safety measures and systems are found to be in disrepair in blocks should be provided. What are the mechanisms for the various responsible parties to work together to repair them within appropriate timescales? In addition, what are the various problems that could arise in this regard and how might they be fixed?”*

**Fife Council Private Housing Standards Team**

*“Would be useful to provide basic comment on smoke venting from stairs and corridors under certain conditions as escape routes these need to be available for an extended time period due to the ‘stay-put’ policy. The guidance should also note that some fire detection in common areas is not provided to give warning but only to operated smoke control.”*

**Fire Protection Association**

**Question 21. Please provide any further comments on this chapter in the box below.**

Twelve respondents left further comments on this chapter.

Comments included: a reference to the dangers of combustible facades; gas safety and the need for cooperation to ensure access for checking appliances; a consideration of Fire Service access; the definition of ‘specialist’ as required for buildings higher than 60m; problems created by balconies incorporated into flats; and definitive policy around common foyers.

One respondent thought the guidance was a ‘concise and usable document’, whereas another suggested a requirement for ‘condensed easy to understand information’.

*“As with all communications surrounding fire prevention, it is important to for us to use a multi-channel approach to target a wide range of customers across multiple locations.*

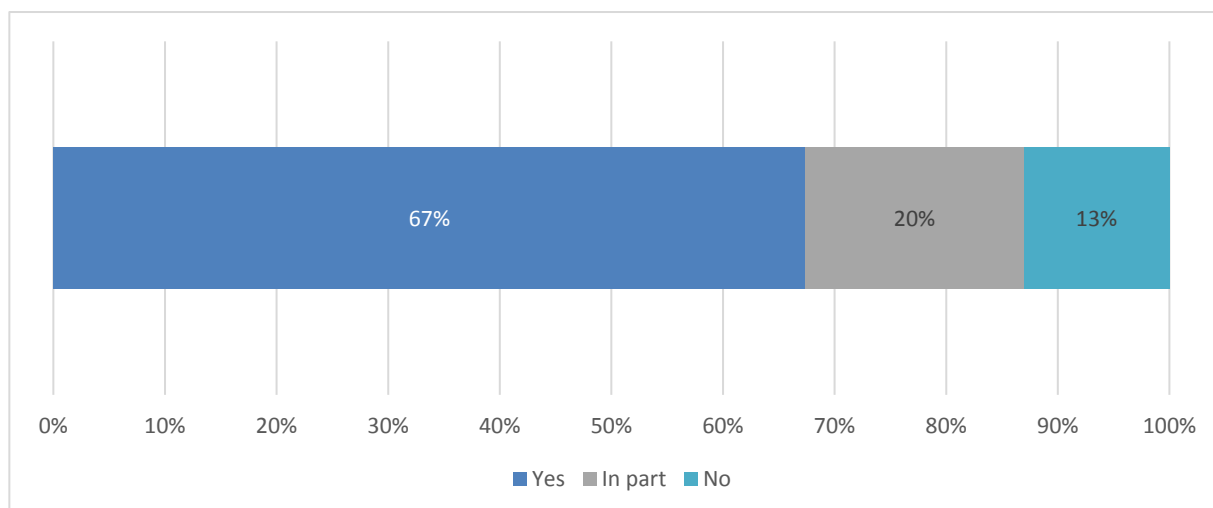
*Face to face reassurance has also been extremely important for us, as this has given us the opportunity to speak to customers directly, find out more about their concerns and pass on the most up to date preventative advice from SFRS.”*

**Wheatley Group**

## **6.2 Fire safety design in high risk domestic buildings**

**Question 22. Do you think Fire Safety measures are clearly explained in the Guidance to those that own, factor, manage, give advice on and enforce standards in high-rise domestic buildings**

Figure 18. Is guidance clear for those that factor, manage, give advice on and enforce standards



Base: 46

Just over two thirds (67%) agreed that the fire safety measures in the guidance are clearly explained for those that property factors, manage, give advice on and enforce standards in high rise domestic buildings. One fifth (20%) replied 'in part' and the remainder stated 'no'.

Table 17. Clear guidance – follow-up

Response option	Number answering open follow-up
Yes	4
No	3
In part	7

Those who answered, 'Yes' made comments including: guidance should complement the existing skills of those who own, factor, manage or give advice; guidance should be augmented with information sessions; and specific technical issues around compartmentalisation and asbestos materials.

One respondent who answered, 'No' referred to failures in fire safety design in England and Scotland, and the need for clarity in the guidance so those responsible for buildings can be confident that they have been constructed as designed. Another called for more clarity around responsibility.

Those answering, 'In part' had various suggestions including: introducing 'a single duty holder' stipulation for buildings in multiple ownership. There were calls for clarity around: 'stay put' policy; responsibilities of individuals and private landlords; and where to go for further guidance.

One respondent asked for more guidance regarding common areas. The guidance statement.

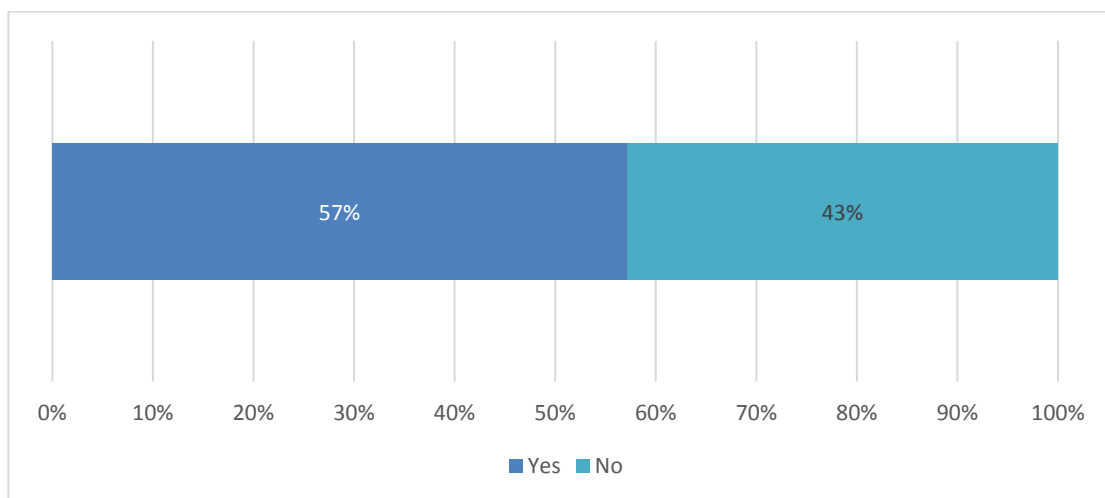
'it is undesirable for a common fire detection and alarm system to be provided' was queried by one organisation.

*“There is an expectation that those who own, factor, manage, give advice on and enforce standards in high rise buildings should already be familiar and competent in this area. This guidance should therefore complement existing skills and understanding.”*

**Local authority**

**Question 23. Do you think there is further information that should be included?**

Figure 19. Should further information be included



Base: 42

Just over half (57%) said that further information should be included in the guidance.

Some 19 respondents who selected 'yes' left comments.

One fire safety organisation queried whether 'stay put' advice has cost lives, suggesting that it might not be possible to include effective evacuation strategy in the guidance without just 'hedging bets', and that a better option would be to listen to SFRS advice.

Two respondents commented at length on the merits of multi-sensor fire detectors stating that they are the most appropriate form of fire detection and should be installed in all residences. Similarly, one respondent suggested that the guidance should have information relating the finite lifespan of smoke detectors. Another organisation asked for information regarding how those responsible for buildings can mitigate against smoke toxicity in the event of a fire.

There was a call for the guidance to include signposting to more detailed information, and a similar suggestion that local numbers for bodies to consult about fire safety should be included in guidance.

One landlord asked for guidance from the Scottish Government relating to retrofit, life cycle replacements and improvements of existing blocks to ensure works to individual building elements do not change the original fire safety provisions within the blocks.

A local authority suggested a review/refinement process be added to the guidance to ensure it remains fit for purpose and new knowledge or understanding can be included.

Several respondents commented that guidance should be clearer on the safety responsibilities of private landlords, visitors and owner-occupiers of flats in buildings. There was particular reference to landlords with short term lets.

One organisation suggested a need for more clarity around the limits of the guidance, so users are able to understand when they have reached their limits in terms of assessing a hazard.

*“More emphasis should maybe be placed on the fact that all owners in the building are equally responsible for fire safety as a way of highlighting to owners that they should ensure their flats are up to the same standards.”*

**West Dunbartonshire Council**

*We would also agree that there is a need for regular SFRS homes safety visits.  
“Private landlords should have more responsibility for the care of their tenants & visitors for short term lets”*

**Individual – local authority tenant**

**Question 24. Please provide any further comments on this chapter in the box below.**

Fifteen respondents provided further comments on this issue.

Two organisations stressed the importance of considering the design of non-residential areas in a building including waste storage facilities and car parking stating that these can be where fires start or are started deliberately and going on to highlight that these areas can also be essential for SFRS access.

One organisation drew attention to there being no mention of emergency lighting provision in the bullet points and the absence of any warning that inspection and competent maintenance of systems, doors, lighting and automatic fire suppression systems is essential; one individual had concerns regarding non slip floors where there are sprinklers, and reflective strips on stairs and stairwells.

A local authority suggested that ensuring tenants’ and residents’ concerns relating to fire safety design are heard and adequately investigated should be a priority; going on to suggest that both landlords and tenants should be clear on their responsibilities in relation to this area. They called for consideration to be given to the most appropriate methods of achieving this.



One respondent queried the accuracy of some of the wording in the guidance: suggesting that "appropriate to seek further opinion" should be clarified to who a further opinion should be sought from; and "Above the third floor . . ." could cause confusion in that third floors are at different heights on sloping sites. The respondent went on to disagree with the statement "A precautionary approach is contrary to the principles of risk assessment" and "rarely a need for fire exit signs".

There was a suggestion that alongside addressing issues of combustibility, regulations should take account of the creation of toxic smoke during fires and that product testing and classification should be introduced for toxicity, with limits set on usage which take account of the fatal dangers of toxic smoke in a fire.

*"It is considered that a fire safety risk assessment should be a legal requirement for the common areas of high-rise blocks. Clarification should also be provided on how common insurance policies relate to this issue generally."*

**Fife Council Private Housing Standards Team**

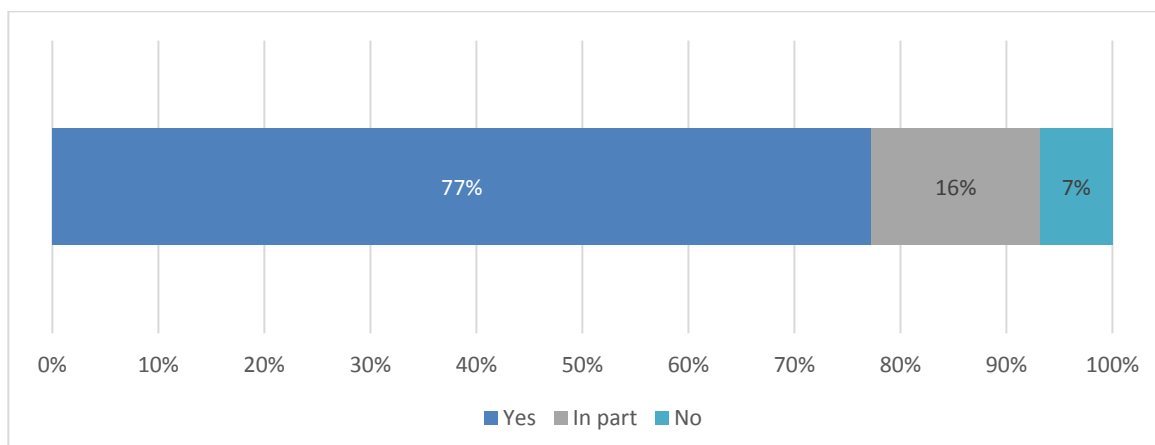
*"With regard to the evacuation strategy it would be of benefit to fire and rescue services to be able to determine who is resident in the building and who may have special needs or disabilities which may hinder their evacuation and who may require particular assistance or measures to be in place This should be recorded as part of the risk assessment and advice, a copy of this should be available to those living in the building. Should this information not also be available to the F&RS as a minimum on arrival at a property?"*

**Trade body**

### 6.3 Risk management – assessing the risk to persons

**Question 25. Do you think the reasons for carrying out a Fire Risk Assessment in high-rise domestic buildings are clearly explained?**

Figure 20. Clarity of reasons for fire risk assessment



Base: 44

Just over three quarters (77%) of respondents felt that the reasons for carrying out a fire risk assessment in high rise domestic buildings were clear. A small minority selected ‘in part’ or ‘no’.

Table 18. Clarity of reasons – follow-up

Response option	Number answering open follow-up
Yes	5
No	2
In part	2

Those answering, ‘Yes’ either simply confirmed their agreement or qualified their response. One national organisation was concerned that fire risk assessments could be carried out by a ‘non-competent’ person.

There was a call for more guidance around those who would be unable to self-evacuate, highlighting the issues faced by those with mobility problems when lifts are out of operation.

One local authority thought the reasons are equally applicable to medium and low-rise multi-occupancy buildings.

Both respondents answering, ‘No’ were tenants commenting that they had received little fire safety information.

One of those answering, ‘In part’ commented on a need to ‘emphasise the benefits of assessment in owner occupied, converted buildings too, not just traditional multi storey flats’; the other was concerned that there are ‘eight key points of risk management in the guidance, but only one of them explains the reason or purpose for assessing the risk from fire’.

*“Reasons are also applicable to medium and low-rise multi-occupancy buildings”*

***Institution of Gas Engineers and Managers***

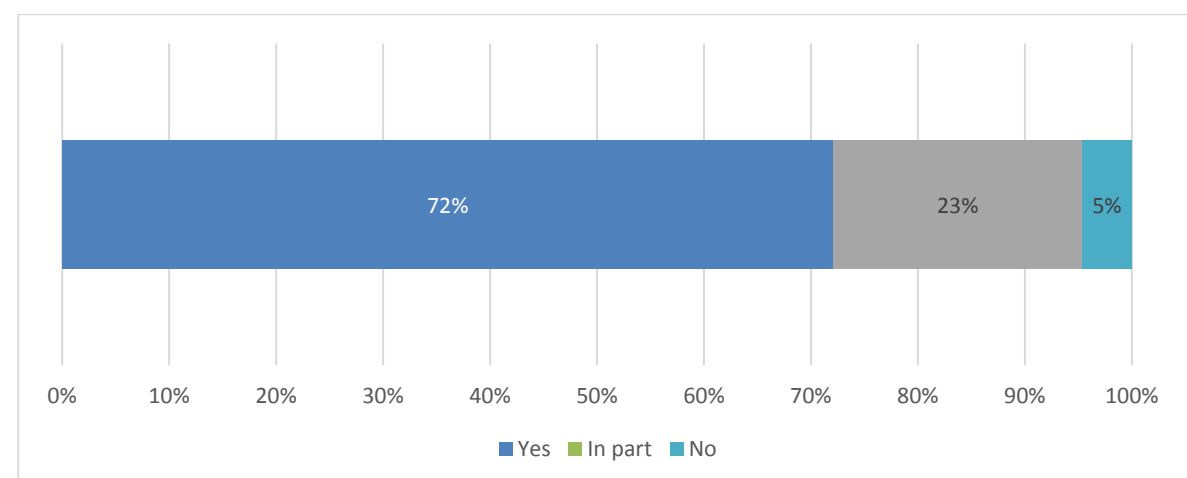
*“The use of third party approved providers for all fire safety assessment, inspection and maintenance functions is supported.*

*There should be more guidance about people who may not be able to self-evacuate. People with mobility impairments may be able to access their flats using the lifts but this may not be available in case of fire, without fire service assistance.”*

**Fire Protection Association**

**Question 26. Do you think how to carry out a Fire Risk Assessment in high-rise domestic buildings is clearly explained in the 7-step methodology for assessing fire risk in the Guidance?**

Figure 21. Is fire assessment method clearly explained in 7 step methodology



Base: 43

Nearly three quarters (72%) of respondents felt the guidance on how to carry out a fire risk assessment was clearly explained. Close to a quarter (23%) felt it was ‘in part’ and the very small remainder thought it wasn’t clear.

Table 19. 7 step methodology -follow-up

Response option	Number answering open follow-up
Yes	11
No	1
In part	5

The overarching concern for those answering, ‘Yes’ was around the competence of individuals carrying out risk assessments. Respondents would like to see a nationally agreed recognised qualification for fire risk assessors.

One local authority stated that they would use the guidance to monitor the external consultants who perform their risk assessments. One respondent suggested that because characteristics of fires in multi-storey blocks can be different to other building types, it is particularly important that assessors understand their specific fire safety requirements.

One housing association and one local authority tenant thought the methodology was too generic.

One owner-occupier responding, ‘In part’ had specific concerns covering: potential (rather than current at the time of the risk assessment) sources of ignition e.g. ‘contractors’ items’; the possible lack of fire stopping between floors; external cladding; and that the assessment should identify any elements of the buildings safety system which may be missing or non-functioning.

An organisation responding, 'In part' highlighted that the guidance: makes no reference as to how to decide if existing fire safety measures are adequate; mentions travels distances without giving any context as to what an acceptable travel distance is; and stated that a fire risk assessment should not be an assessment of whether something is adequate or not (which is a yes/no answer), but an assessment of the risk level.

One organisation supported the need for risk assessments 'as understanding the needs of residents is important in designing risk management measures' they went on to stress that if councils were to be asked to undertake any work, then, if not already funded for such measures, that funding would need to be made available.

*It is considered that referral to an outside specialist could be a preferred choice. It is important that this sector is properly regulated. It is important that fire risk assessors have the required competence in the particular field of high-rise blocks, and they can provide competent, properly reasoned and site-specific assessments.*

**Fife Council Private Housing Standards Team**

*"It is useful for the guidance to include suggested methodology for carrying out a fire risk assessment, but it does also make clear that this is just one example and that others can be used if deemed to be more appropriate."*

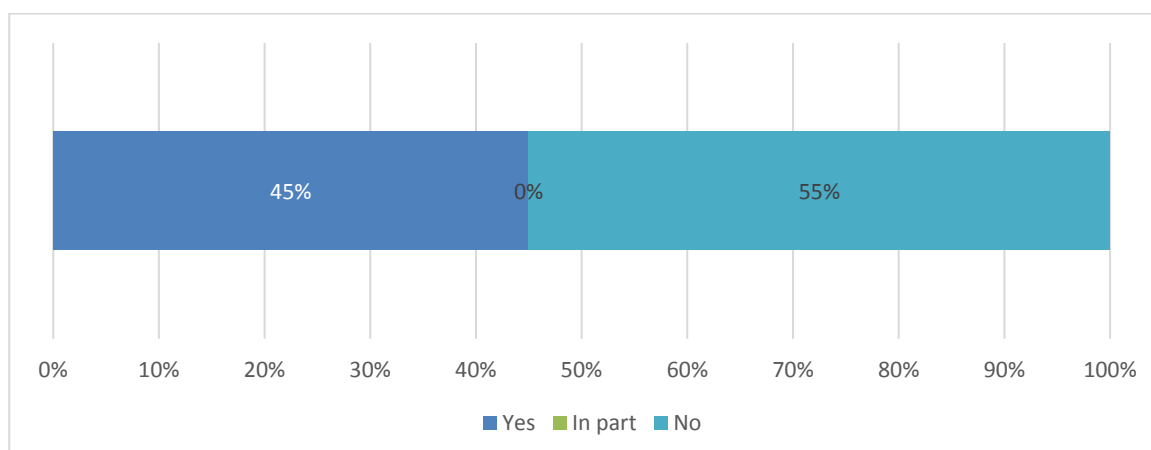
**Chartered Institute of Housing Scotland**

*"Scope of fire risk assessment should include reference to utilities. In particular the risk of fire from the gas supply. It must take account of the ventilation of service ducts and gas meter rooms."*

**Institution of Gas Engineers and Managers**

**Question 27. Do you think there is other information that should be included?**

Figure 22. Further information necessary



Base: 40

Nearly half the respondents (45%) felt that further information should be included.

There were 17 further comments for this section.

Respondent requests for information that could be added to the guidance include: location of first aid trained personnel; details for assessing blocks with wooden balconies including their particular evacuation requirements; and more emphasis on support available for assessors.

There were several suggestions around risk assessments including: two organisations which highlighted the need to keep records and documentation supporting assessments, and that these should be kept off-site; one organisation would like to see samples of risk assessments included in the guidance; and suggestions that that further information on how to organise and act on findings of risk assessment would be useful.

Two nationwide organisations called for details of closer cooperation with utilities providers – particularly gas.

There were two suggestions highlighting a perceived need for clearer specification of the duties of private landlords and owner-occupiers in multi-tenure blocks.

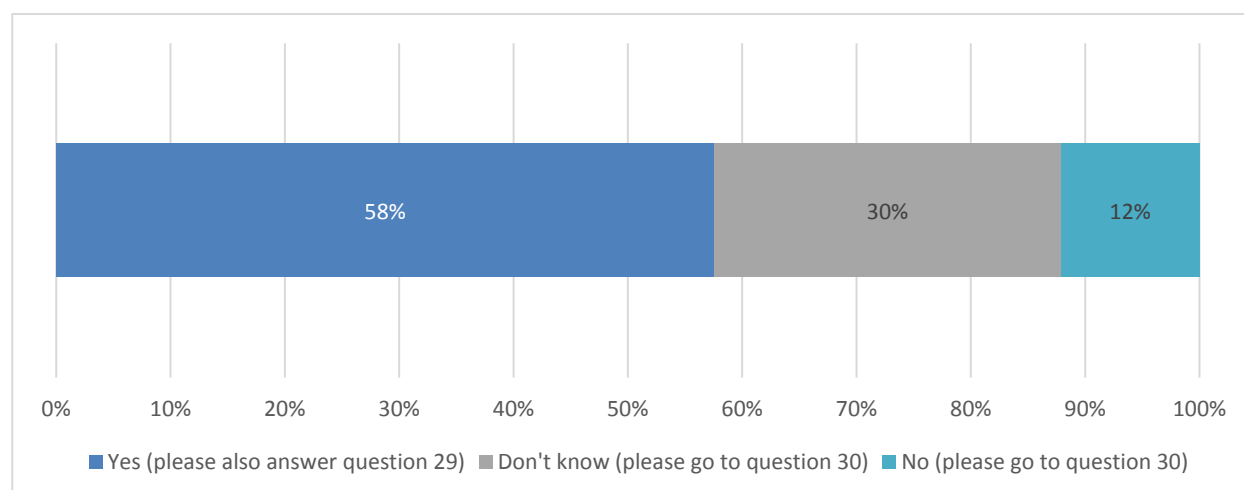
One organisation commented that It would be useful to have references to legislation, but in doing so the language used needs to be understandable to all that have access to the guidance.

*“The need to keep suitable documentation and records to support the assessment of risk and management of the fire safety of the building should be included. These include a copy of the risk assessment, design information such as as-built drawings and the fire strategy document, inspection and maintenance records, installation and commissioning certificates (active and passive systems) and similar.”*

**Fire Protection Association**

**Question 28. If you own, factor, manage, give advice on and enforce standards in high-rise domestic buildings: is there a process in place for the assessment and removal of items left in common areas.**

Figure 23. Process in place for assessment and removal of items left in common areas (those that own, factor, manage, give advice on and enforce standards in high rise domestic buildings)



Base: 33

With regard those that own, factor, manage and give advice on and enforce standards in high rise domestic buildings, over half (58%) said that there was a process in place for the assessment and removal of items left in common areas. Nearly a third (30%) didn't know if a process existed 12% stated there wasn't a process.

Table 20. Process- follow-up

Response option	Number answering open follow-up
Yes	7
No	0
Don't know	0

Organisations left comments summarising their processes for managing items left in common areas. Processes included: checking areas four times daily; engaging with tenants, and removing items after a set period of time if necessary.

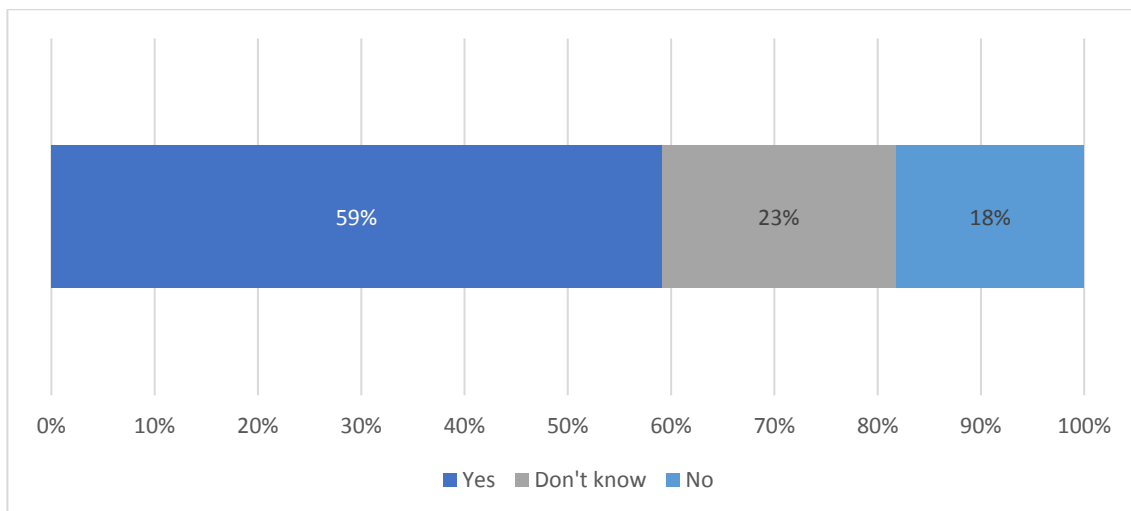
Two organisations highlighted difficulties; one had concerns about items placed in common areas for 'decorative purposes', and mobility scooters; the other stated that the process can sometimes take longer to fully action and implement than would be ideal.

*“Should items be left in common areas the council will engage with tenants or residents responsible to ensure it’s removed as quickly as possible. If tenants or residents fail to remove it within a set period of time, the council will take action to remove it and dispose of the items.”*

**Local authority**

**Question 29. If you answered yes to question 28: do you have confidence that the process works in practice?**

Figure 24. Confidence that process works in practice



Base: 22

Just over half (59%) felt that the process in place works, nearly a quarter (23%) didn't know and the remainder felt it doesn't work.

Table 21. Process works – follow-up

Response option	Number answering open follow-up
Yes	4
No	3
Don't know	2

Two of the four organisations answering, 'Yes' qualified their response by stating that the process sometimes takes longer than they would like. The other two which were both local authorities reiterated that their processes work; highlighting that 'sweeps' are made regularly and that they are monitored.

Two organisations answering, 'No' pointed out that success is subject to enforcement action which in one case can be delayed by bureaucracy.

One housing association reported different levels of confidence for each of its units, and suggested that 'clearer legality of enforcement and removal powers would be required'.

*“Regular inspections by officers and enforcement of non-compliance proves effective in ensuring both of the clearing of items and reducing persistent offenders.”*

**Local authority**

*“The process works. Sweeps of buildings are carried out and any items that shouldn't be there are acted upon. It is monitored that the sweeps are carried out also.”*

**West Dunbartonshire Council**

**Question 30. Please provide any further comments on this chapter in the box below.**

Six respondents left further comments on this chapter.

One would like the Fire Risk Assessment to be 5 steps to match existing FRA methodology, and the inclusion of a risk matrix and industry-standard definitions for assessing fire risk.

There was a suggestion that the competence of fire risk assessors is critical and a way of checking their credentials is to check their professional indemnity insurance.

Reference was made to maintenance of fire mains and fire-fighting lifts in the guidance, with a respondent asking for clarity about who would verify the maintenance.

There was a call to make removal of obstructions in common areas compulsory, alongside fire risk assessments for these areas, and similarly that installation of decorative features should be discouraged.

*“Risk management also applies to lower rise properties that do not meet the definition of high rise. Issues can arise for example where 4/5 storey blocks etc have possibly had a factor in place in the past but thereafter owners/landlords have not worked together to manage the risk in common areas.*

*This should also be considered as part of the ongoing review to strengthen fire safety.”*

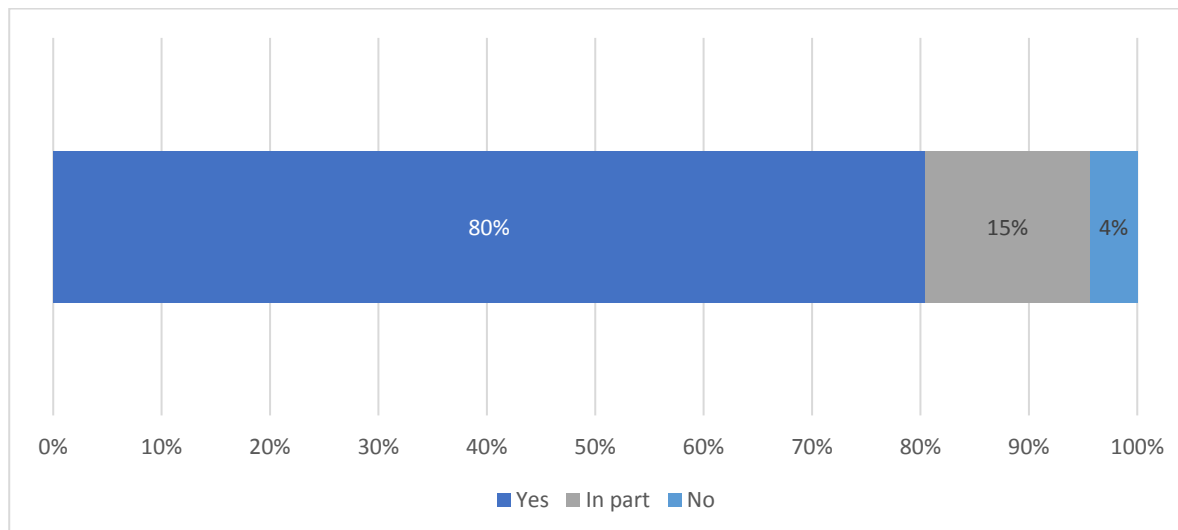
**Fife Council Private Housing Standards Team**



## 6.4 Risk management – preventing fires

**Question 31. Do you think it is clearly explained how to prevent the impact of fires in high-rise domestic buildings?**

Figure 25. Whether how to prevent the impact of fires is clear



Base: 46

The majority of respondents (80%) felt that the guidance clearly explains how to prevent the impact of fires in high rise domestic buildings. A small percentage (15%) felt that it did 'in part' and the very small remainder (4%) felt it didn't.

Table 22. Preventing impact – follow-up

Response option	Number answering open follow-up
Yes	6
No	0
In part	4

Those answering, 'Yes' generally left comments in support of the guidance.

A tenant association and a local authority both praised advice and information about preventing fires, but they stated that advice about preventing the impact of fires lacked clarity; they commented that preventing fires and preventing impact of fires are separate issues.

Local authorities commented that they found advice about the importance of containing fires in their place of origin and maintaining the integrity of common areas helpful; whereas two individuals answering, 'In part' called for greater emphasis and more information about removing items from common areas.

One manufacturer highlighted that the use of combustible materials for facades is permissible in Scotland, and called for public access to information concerning the characteristics of materials used in the building they are living in or considering living in.<sup>1</sup>

*“The need to respond to recalls for electrical appliances should be mentioned”*

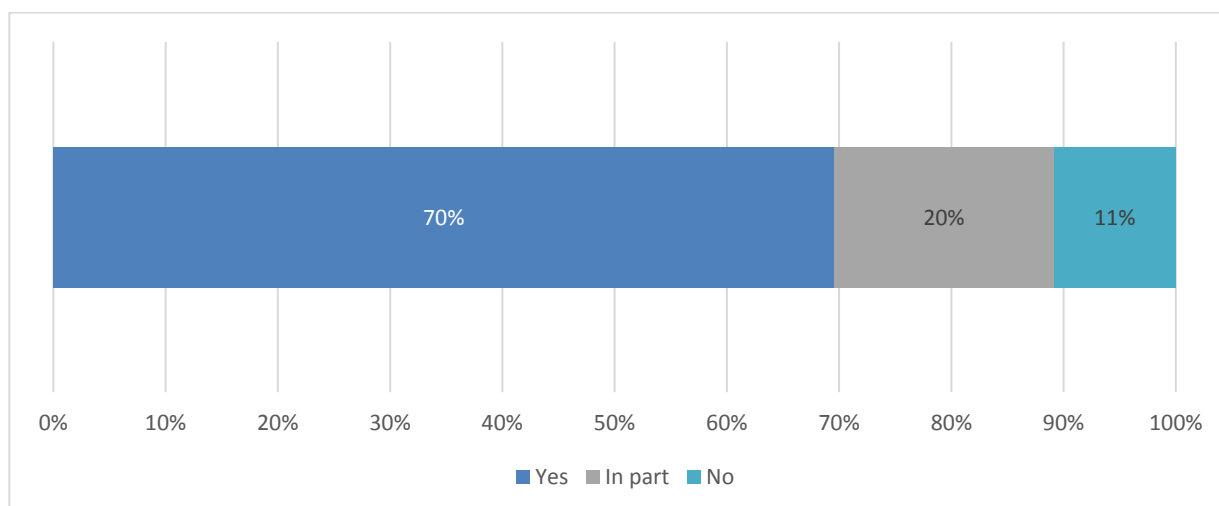
**Maxwellton Court Tenant Association (Secretary) Tenant Renfrewshire Council**

*“The guidance clearly identifies the importance of containing the fire in its place of origin and maintaining the integrity of common areas.”*

**Local authority**

**Question 32. Do you think it is clearly explained how to reduce the impact of fires in high-rise domestic buildings?**

Figure 26. Is how to reduce the impact of fires clearly explained



Base: 46

Nearly three quarters (70%) felt that the guidance clearly explains how to reduce the impact of fires in high rise domestic buildings. A fifth (20%) felt it did partly, and the rest (11%) felt it didn't.

Table 23. Reduce impact – follow-up

Response option	Number answering open follow-up
Yes	3
No	2
In part	5

<sup>1</sup> “Building Standards guidance states that external wall cladding should be non-combustible (insulation may be combustible only under very limited circumstances). Guidance in BRE 135 and BS 8414 involving large-scale fire tests may be used as an alternative to non-combustible external wall cladding

Those answering, 'In part' and those answering, 'Yes' had similar issues.

One local authority and one national trade organisation drew attention to a possible error in guidance for electrical testing 'The electrical testing cycle is stated incorrectly as every 10 years - BS 7671 states it should be every 5 years', with the trade organisation going on to say that testing intervals for privately owned properties in high risk residential buildings should be maximum five years.

One local authority commented that it had no detailed information about the condition of electrical installations in owner-occupied flats.

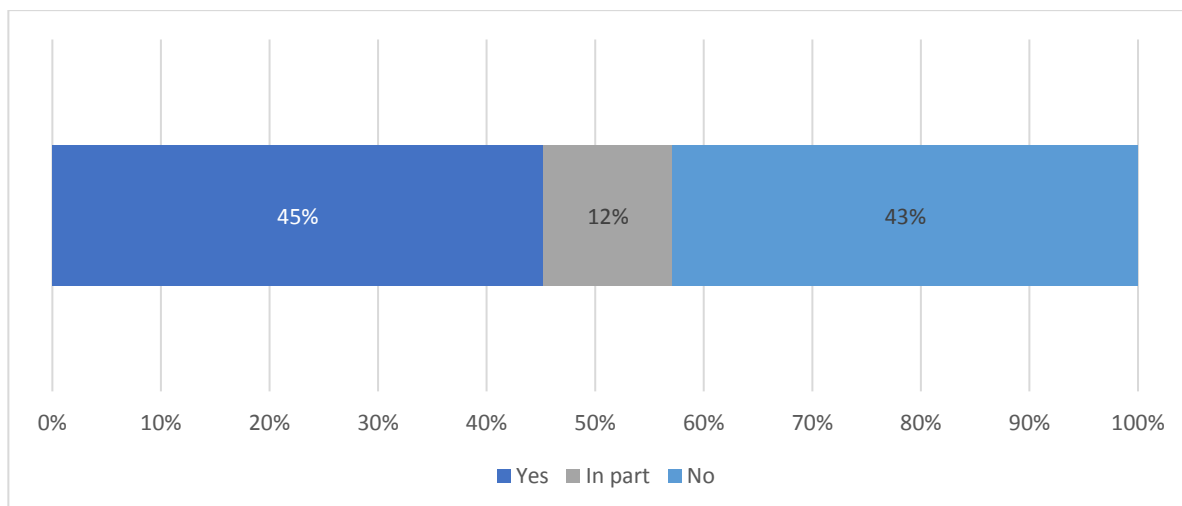
Two local authorities called for 'zero tolerance' towards items in common areas – regardless of combustibility, reasoning that any item in common areas may prohibit escape for those evacuating the building or restrict entry for emergency personnel trying to gain entry.

*"The section clearly and accurately explains how certain 'human behaviours' could reduce the impact of fires in high rise buildings. However, this can only be achieved through the application of a 'zero tolerance' policy. Regardless of how combustible items are defined as, keeping any item in common areas may prohibit escape for those evacuating the building or restrict entry for emergency personnel trying to gain entry."*

**Local authority**

**Question 33. Do you think there is further information that should be included?**

Figure 27. Any further information to be included



Base: 42

Close to half (50%) the respondents felt that the response should include more information.

Table 24. Further information -follow-up

Response option	Number answering open follow-up
Yes	16
No	2
In part	3

Several organisations asked for examples of best practice to be expanded and for case studies to be included in the guidance.

Two respondents said their housing association stated that smoking in homes and common areas should be discouraged; while a local authority called for a total ban on smoking (to include e-cigarettes) within buildings.

Several organisations remarked on the difficulties of keeping common areas clear.

One organisation and one individual had concerns about combustible facades.

There was one reference to relatively new electrical standards by a trade association; while an individual highlighted potential problems with recalled appliances; and a local authority suggested guidance around not leaving cookers unattended.

A tenants' association suggested that there should be a requirement to ensure that communication with the concierge is functional.

*“It should be legislated that companies cannot carry out works within flats that affect the common fabric of the building and in turn affect the fire safety of the building. Communication companies especially can drill holes etc. into walls affecting fire safety measures without having had to seek a permit to work. Permit to work in all instances should be made mandatory and penalties should be in place for companies who do not adhere to this.”*

**West Dunbartonshire Council**

**Question 34. Please provide any further comments on this chapter in the box below.**

Nine respondents left further comments on the chapter.

Two local authorities and one housing association commented that they would like ‘zero tolerance’ policy to be the default; one local authority stated that this was SFRS policy and highlighted a lack of clarity in legislative power to support this; another local authority asked who would be responsible for enforcing policy.

A tenants' association which was happy that the guidance commended landlords for providing scooter charging stations outside buildings; went on to suggest that 'scooters, prams, bicycles etc can be in 'common areas' as long as they don't cause an obstruction'.

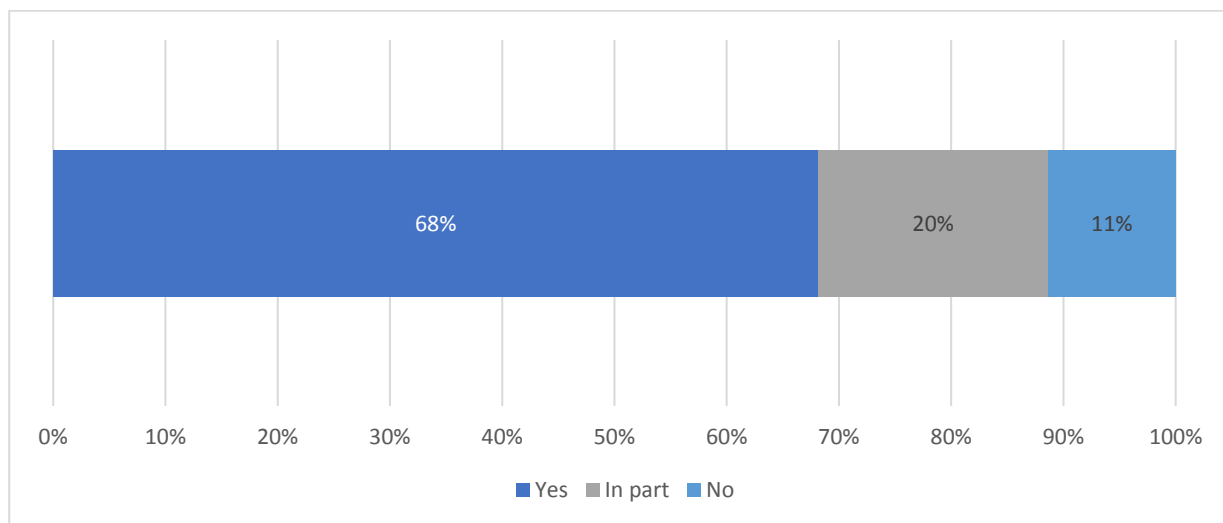
A local authority suggested that the guidance should be reviewed to ensure that it remains up to date, taking account of advancements in all aspects of building design and use. Another local authority stated that the guidance could apply to blocks with fewer than six storeys.

One organisation suggested that guidance around prevention of fire is set out well but does not address how to reduce the impact of fire in a high rise, i.e. how to limit the damage/spread post-ignition. They suggested that maintenance and integrity of life safety systems e.g. smoke extractors and fire doors is a key part of this.

## 6.5 Risk management – physical fire safety measures

**Question 35. Do you think the physical fire safety measures in high-rise domestic buildings are clearly explained?**

Figure 28. Are physical fire safety measures clearly explained



Base: 44

Just over two thirds (68%) of respondents agreed that the physical fire safety measures are clearly explained. A fifth (20%) felt they were 'in part' and a small percentage (11%) felt they weren't.

Table 25. Physical fire safety measures -follow-up

Response option	Number answering open follow-up
Yes	0
No	2
In part	7

The two respondents answering, 'No' were individuals commenting on the situation in their residences.

A local authority tenant answering, 'In part' stated that more should be done about the responsibility of owners to their tenants and to their neighbours.

Some respondents suggested that the guidance takes for granted that the target audience would have a good level of understanding of general fire safety principles; for example, that a landlord or managing agent/factor knows what constitutes 60 minutes or 120 minutes fire resistance, or what constitutes non-combustible, or how to identify a fire door.

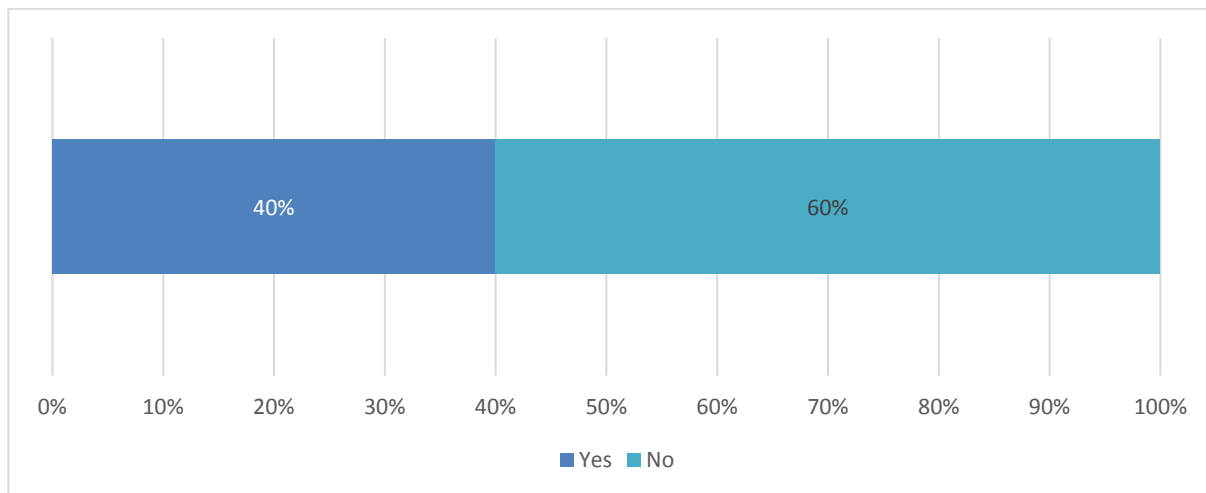
Two organisations left comments which referred to exterior cladding, including the following.

*"We are concerned that the guidance and objectives of this consultation will be undermined by the Scottish Government's confirmation that building regulations will continue to permit the use of combustible cladding and insulation on the façades of all buildings in Scotland"*

**Rockwool**

**Question 36. Do you think there is further information that should be included?**

Figure 29. Further information needed



Base: 40

Nearly two thirds (60%) felt that there was no need for further information to be included.

Table 26. Further information – follow-up

Response option	Number answering open follow-up
Yes	10
No	5
Not Answered	2

Those that answered 'No' generally felt that the guidance was very comprehensive and is consistent with current best practice. Although one mentioned that guidance relating to the use of portable gas or paraffin heaters would be helpful and another suggested that landlords may have some thoughts around the guidance.

Those that did not select an answer stated that providing warning notices on fire prevention devices would be useful to prevent vandalism. Information around construction and things that compromise fire safety was requested.

The respondents that answered 'Yes' felt that the following additional information could be included.

Fire cabling systems were mentioned particularly those in common or escape stair areas in relation to ensuring cables installed are suitably classified. Fire stopping should also be considered where cables breach fire compartments and separating walls and floors. It was also mentioned that with regards to cable entrapment for fire fighters, reference to 'Requirements for Electrical Installations' should be included.

One individual mentioned that any information that could potentially save someone's life should be included. Another mentioned links to sources that might be helpful and any photos or imagery that might help support the message.

One respondent said that the importance of ventilation should be highlighted in connection with the build up of flammable gas/the escape of gas. They also mentioned that cooperation between the Gas Transporter and Meter Asset Manager with the building owner/fire safety office would be key.

There remained a concern around assumed fire safety systems and it was felt that residents should be made aware if a system does not exist or if it is malfunctioning.

One organisation mentioned that it is not clear who the person responsible is. Another stated that they would support having the details of a key named contact/duty holder who is responsible for asset management and accountable for all activities within the building. This will make communication easier and quicker if a building safety matter arises.

Also including a section for those with disabilities was thought to be useful.

*“Information on construction and whether the methods compromise fire safety, whether our buildings have been checked or should be checked.”*

**Individual**

*“No, the information provided is consistent with current best practice.”*

**Local Authority**

**Question 37. Please provide any further comments on this chapter in the box below.**

There were 7 respondents that left further comments on this chapter.

One respondent had concerns around the Fire Detection and Alarm Systems section as they noted some inconsistencies and wanted to raise the use of long-life battery tamper proof devices.

Another respondent stated that this section within the guidance is too wordy and mentioned that this may put landlords off reading it.

It was suggested by one organisation that it might be good to involve tenants who are interested or knowledgeable about their building in the inspections.

One respondent had queries around the lifespan and expiry of products within buildings and how this would be managed.

It was felt by one respondent that information notes on pages 48-50 should be shared with all residents who live in high rise domestic buildings. Another noted that physical fire safety measures and risk assessments also apply to blocks of for example, 4 or 5 storeys.

One organisation made multiple comments on the chapter but welcomed the guidance references to ducted heating, ventilation, air conditioning systems and fire stopping. They mentioned a few things in connection with third parties. This was around adding third party certification of products as a means of due diligence and said that third party certification of specialists in the testing of risers is being developed and that a reference to this might be good to include. They also mentioned that fire resistant doors should be installed by relevant people to ensure the efficacy of the doors as there have been occasions where poor fitting has undermined how they perform. Experience has also pointed to lights on escape routes as being a common failure and wanted to ensure regular testing and maintenance. According to them on page 59 it is unclear where the suggested reference to "paragraphs 38 and 39" is. There was also mention that additional commentary may be required in relation to this and around the prevention of external fire spread via balconies or trellises. They want to make sure that it is clear in the guidance that testing and maintenance is high priority.



*“The section within the guidance is too wordy (18 pages long). PRS landlords will be put off from participating in the consultation.”*

**Local Authority**

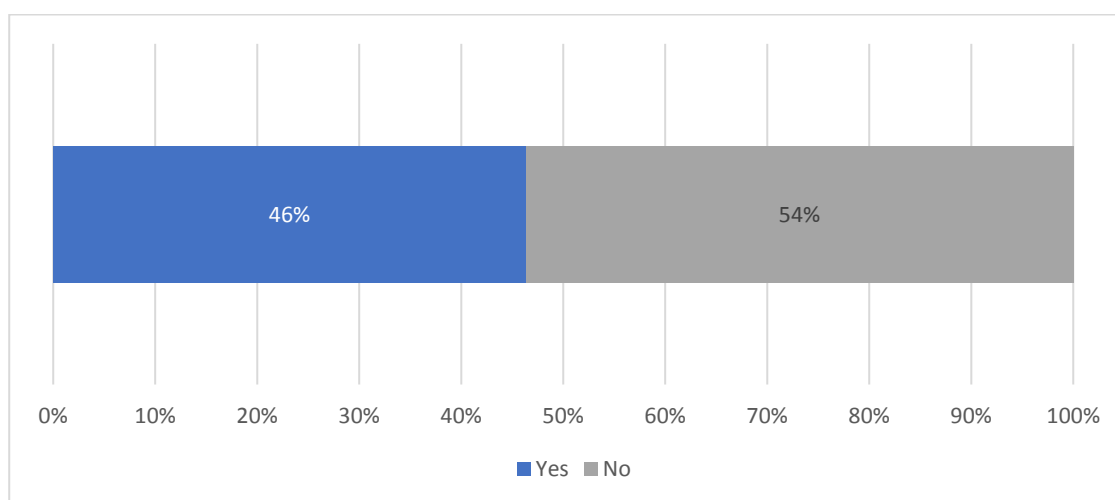
*“Involve Residents interested/knowledgeable about their building in Inspections.”*

**Organisation**

## 6.6 Risk management – ongoing control

**Question 38. Do you think there is further information that should be included?**

Figure 30. Risk - further information required



Base: 41

Just under half (46%) of respondents felt that more information should be included.

Table 27. Further information – follow-up

Response option	Number answering open follow-up
Yes	15
No	2

The respondents that answered ‘yes’ suggested the following information be included or clarified within the guidance.

It was suggested that a best practice management system with strict controls be introduced and be used for things such as building work and alterations and a model best practice permit system for things such as for DIY, electrical installations. Another mentioned using third party accredited persons when work is required to be carried out.

One respondent suggested that fire safety should be checked every 11 months as with gas appliances. Another stated that there must also be a duty to cooperate between the building owner, the Gas Transporter and Meter Asset Manager.

Additional support for PRS tenants was mentioned.

There were a few mentions of 'responsibilities' within the feedback. Two respondents stated that collective responsibility of all residents for fire safety should be highlighted. It was understood that this may be a challenge as it depends on how tenants view collective responsibility, but it could be part of their sign-up agreement or charter or part of their settling in visits. One respondent mentioned that responsibilities for landlords, especially factors would be useful. Another stated that the responsibility for fire risk management is not clear and that fire assessments should be mandatory, not optional and that the factor should have the duty to carry out and enforce the resulting findings. One organisation requested clarification whose responsibility it would be for dealing with issues in common areas if it was an MSF block and if there was no Housing Officer.

Advisory notices should be utilised including information such as not to using the lifts during fire alarms and leave safely without panic.

One respondent mentioned that the chapter gives a good overview indicating roles and responsibilities but that it would be useful to define in the tenant information handbook, specific testing and maintenance duties that the tenant could/should undertake in order to limit fire hazards (boiler, white goods, smoke detection) and what should normally be done.

A few mentioned that contractors should be monitored properly and any work carried out should have a building warrant or sufficient approved alternative measures in place.

There were also requests for regular survey findings, more information about building construction and the implications of risk.

One respondent mentioned that information on preparing for emergencies should include plans, information boxes and the provision of info for fire fighters.

*"Our view is that fire safety in high rise blocks, is the responsibility of each and every tenant and resident who lives there. We would like to see some emphasis placed on the collective responsibilities of all tenants & residents in order to encourage people to see beyond their own individual properties and experiences."*

**Maxwellton Court Tenant Association (Secretary) Tenant Renfrewshire Council**

*"There should be a best practice management system for controlling building work and alterations carried out within high risk residential buildings - residents should only be permitted to undertake work and strict controls should be applied in this type of building - DIY work in particular to electrical installations should be prohibited- perhaps a model best practice permit system should be given in the guidance."*

**Organisation**

**Question 39. Please provide any further comments on this chapter in the box below.**

There were 14 further comments left by respondents on this chapter.

More emphasis could be given to the benefit of having a common alarm system as an added safety measure.

Respondents mentioned the importance of inspections and having a qualified professional to carry them out. One organisation stated that they welcome the importance placed on inspection, testing and maintenance of fire safety systems and equipment. Following significant alteration or repairs a qualified fire risk assessor should inspect the work. Documentary evidence including the spec of the materials should be provided to the assessor along with certificates, photographs and videos where appropriate. Another respondent mentioned that utility providers should notify landlords/owners/factors in advance of proposed work, that the providers maintain compartmentalisation at all stages of the works and that the fire compartmentalisation reinstatements are undertaken by third party accredited contractors.

One of the respondents suggested that it would be good to include residents in inspections. Another mentioned that landlords must discuss with their tenants the rules and regulations which are important to keep them safe in their homes.

The topics of fire doors was also raised. One tenant mentioned that they still have no working fire door in their kitchen and are concerned about it. One of the organisations stated they agree with the guidance that fire doors should be routinely checked and requested that the Scottish Government review the frequency of these checks to ensure proportionate to the risk. Again, it was stated that these checks should be performed by a qualified professional.

There was a suggestion that landlords/owners can carry out alterations or building works without informing the local authority as it can cause delays.

One respondent strongly supported the requirement of appointing someone responsible for fire safety in the building.

*“It was felt that maybe more emphasis could be given to the benefit of having a common alarm system as an added safety measure and not just install one in instances where it is felt that fire safety in the block may not be as good as it should.”*

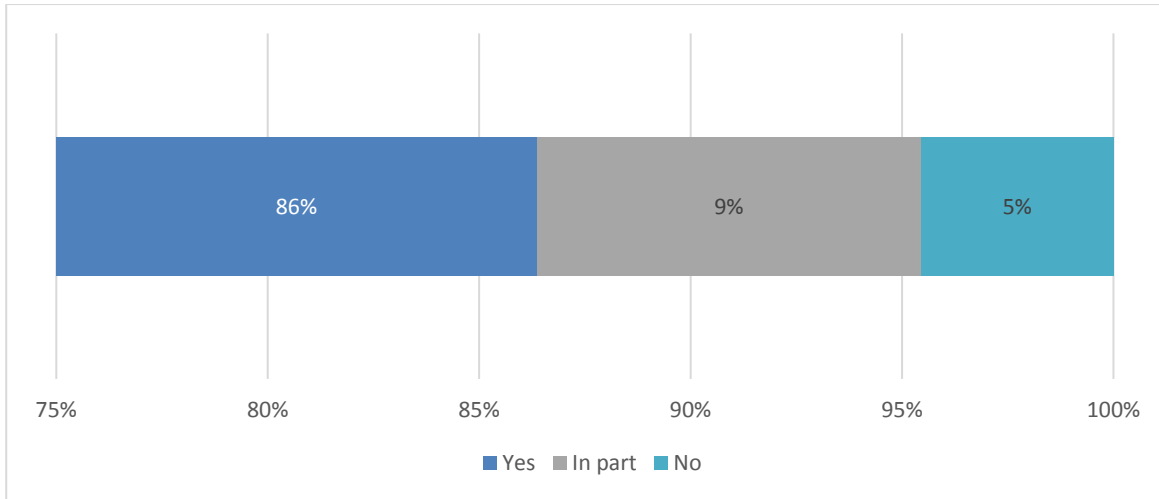
**West Dunbartonshire Council**

*“Installation and completion certificates should be obtained for all active and passive protection installations along with supporting evidence where possible such as photographs.”*

**Fire Protection Association**

**Question 40. Do you think information on physical fire safety is useful to have in the Guidance?**

Figure 31. Useful to have information on physical fire safety measures in the guidance



Base: 44

The majority (86%) felt that it was useful information to have in the guidance. Nearly a tenth (9%) felt it was ‘in part’ and a very small proportion (5%) felt it wasn’t useful.

Table 28. Physical fire safety guidance – follow-up

Response option	Number answering open follow-up
Yes	9
No	1
In part	2

The majority of respondents who left comments felt that it was useful information to have in the guidance.

Most that selected ‘yes’ thought that the information that was listed and explained was very useful and important. They felt that it provides clarification of what would be assessed, what parties should and should not be doing, details legal rights, responsibilities and implications of breach of law and provides good information for all parties to be aware of. Although most selected ‘yes’ there were some further comments on this topic.

One tenant requested that lay person language would be helpful.

Two companies mentioned that it is good that high importance is being placed on this topic and that it is great that the information and guidelines will be constantly reappraised and updated. Suggestion was made to perhaps point readers to the online version to make sure they access the most up to date guidance.

Three respondents mentioned CDM regulations and if they should be included. One suggested that there should be a new section included stating who is responsible as the 'client' in each case.

It was suggested by two companies that there should be stronger penalties in place for regulation breaches and that it might be worth highlighting existing penalties and including prosecution examples.

One respondent would like clarification on the role of building standards to be included and that the guidance should emphasize that building owners are responsible for meeting the required building regulations.

*“With regard to breaches of statutory regulation there should be stronger penalties available to impose on those found to have contravened such regulations in high risk residential buildings and others - how many persons are actually prosecuted for this type of breach in Scotland - probably very few!”*

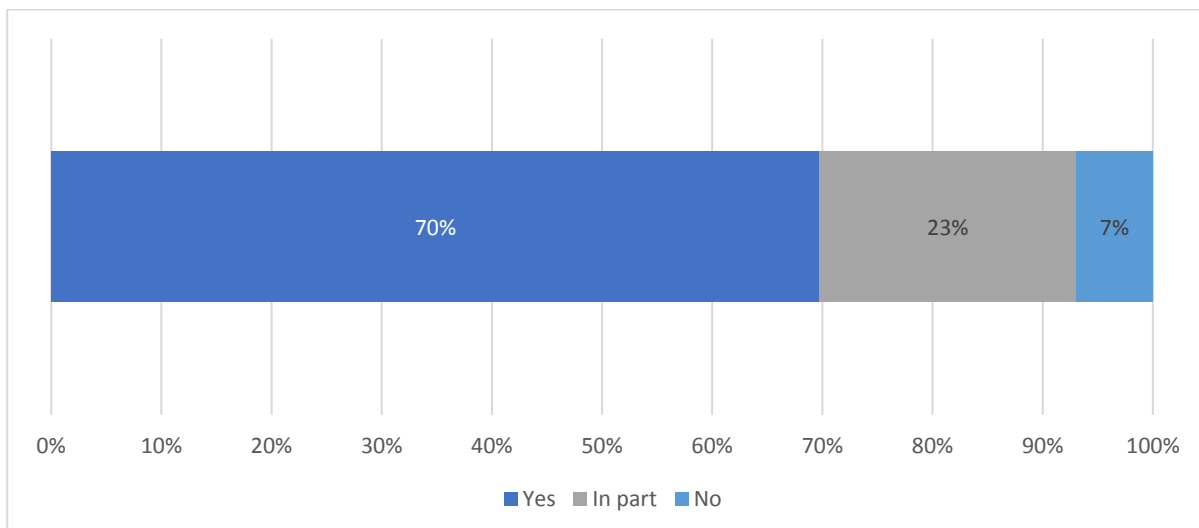
**Organisation**

*“This is useful as it indicates that issues regarding high rise flats are being considered at a higher level and will be constantly reappraised.”*

**Tenant and Residents Networks - Central Scotland Region 4**

**Question 41. Is the information on the legislation in this section of the guidance clear?**

Figure 32. Information on legislation clear



Base: 43

Close to three quarters (70%) of respondents felt the information on legislation was clear, nearly a quarter (23%) felt it was partly and a small minority (7%) thought it wasn't.

Table 29. Information on legislation – follow-up

Response option	Number answering open follow-up
Yes	2
No	2
In part	7

Those that answered ‘no’ and ‘in part’ left the following comments and suggestions.

One respondent was unsure where the legislation was and where the resident copy was.

One individual mentioned that translation to lay person language would be helpful.

Other respondents mentioned some areas that were unclear. These included making the duty to cooperate with the guidance more explicit, stating the cost implications, having a deterrent to prevent unauthorised alterations, highlighting resourcing requirement for enforcement activities, reviewing the Tenements Act with provision of structures and management processes.

One organisation continued to have concerns about the Government allowing the use of combustible cladding and insulation.

*“In part. The guidance highlights the range of powers available to local authorities under the Building (Scotland) Act 2003, however barriers do currently exist in applying enforcement practices within these. Further review of this area may be required to ensure that if it is identified within the new guidance it can be actively enforced.”*

**Organisation**

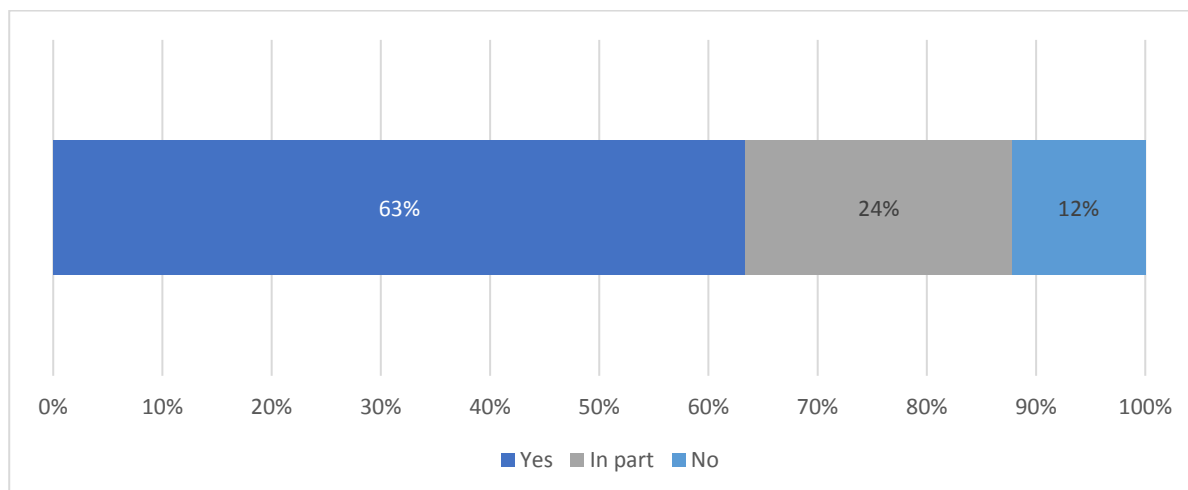
*“However, there does not appear to be an explicit duty to cooperate placed on the building owner and the Gas Transporter/Meter Asset Manager. This should be emphasised within the guidance.”*

**institution of Gas Engineers and Managers (IGEM)**

## 6.7 Using a fire risk assessment

**Question 42. Do you think that those responsible for carrying out a fire risk assessment will find the included Fire Risk Assessment template easy to use to carry out an effective assessment?**

Figure 33. Is fire risk assessment template easy to use



Base: 41

Nearly two thirds (63%) thought that the template would be easy to use. Just over a tenth (12%) felt it wouldn't be easy to use and nearly a quarter (24%) felt it was 'in part'.

Table 30. Template easy to use – Follow-up

Response option	Number answering open follow-up
Yes	6
No	3
In part	3

There were 12 responses to this question.

There were mixed feelings towards the suggested template. The respondents that selected 'yes' stated that the template was easy to use, helpful and clear with good detail. They mentioned that it was useful for training and quality assurance and would ensure things aren't overlooked. Some organisations commented that they already have templates in place but that this one aligns closely.

Of those that selected 'no' or 'in part' one of the respondents said that the template was incomplete and confusing, and others had suggestions on where improvements could be made.

The following suggestions were made for the improvement of the template/process;

### 7.7.1 Professional assessment by someone accredited

It was felt by one organisation that a professional assessment should be carried out by an accredited professional. They stated that landlords and organisations should not be left to manage their own templates. They said that the template should be removed, and an alternative solution put in place. Another organisation agreed that a simple template is inappropriate and recommended it be removed in favour of a comprehensive assessment by someone qualified.

### 7.7.2 Format/question review

Consider if tick box is the best approach

Leave room for comments

Ensure wording is clear for each question

Make sure two-part questions are split out

### 7.7.3 Inclusions

A completed template as an example

Matrix guidance

Section for fire safety documents/record availability

Section to identify whether this is a re-inspection after the initial fire risk assessment. On P84 if fire suppression installations are provided there should be an additional question about whether they are maintained.

It was mentioned that some installations do not have fire classification reports making it difficult to assess against certifications. Also no current requirement for a building passport.

*“It is easy to use and provides a common standard for all.”*

**West Dunbartonshire Council**

*“No – we need a higher standard than the Fire Risk Assessment template provided in this guidance. Competent and professional assessments of high-rise buildings are required and should be carried out with professionals holding third party accreditation. There should not be an option for organisations, building owners, managers to use their own templates. The current template should be removed from the guidance and an improved solution put forward by Scottish Government.”*

**Organisation**



**Question 43. Can you suggest ways to let people know this Guidance is available once it is published.**

Table 31. Ways to let people know the guidance is available

Medium	Suggestions
National/widespread advertising	9
Property factors/letting agents/owners	8
Social media	6
Mail/Council tax/rent letters	6
TV campaign	5
Local or national news/newspaper	5
Gov and council websites	4
Leaflets	4
Events/Roadshows	4
Radio	3
Residents groups and organisations	3
Common area notices	3
Posters	2
Email	1
Billboards	1
On buses	1
Newsletter	1
RTOs	1
Word of mouth	1
Magazines	1
Welcome packs	1

The most mentioned methods of making people aware of the guidance were national/widespread advertising, through property factors/letting agents/owners.

There were 37 further comments in response to this question.

The following were suggested as ideas of ways to let people know about the guidance. The key ideas below were mentioned multiple times.

A national widespread campaign appeared to be the most popular options closely followed by information distributed through factors, letting agents and landlords. After this, letters, social media, tv and news were other suggested options. It was suggested by most that a multi-media approach would be best.

*“Country wide advertising campaign. Social media campaign. Leaflet drops to high rise. Opportunities for different languages. Local events.”*

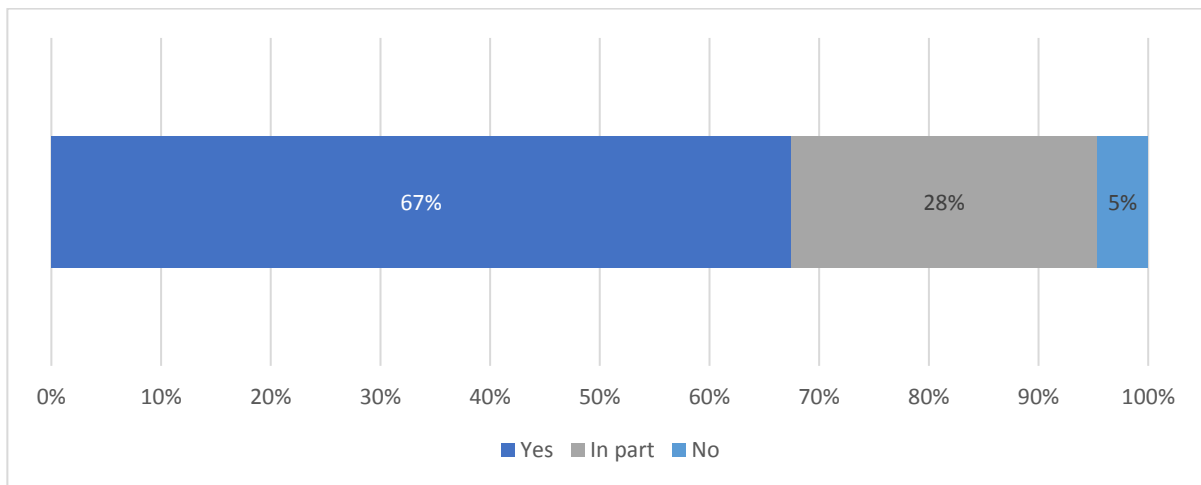
**Anonymous**

*“Send a letter to all High-rise dwellers but also have a TV, poster and newspaper campaign - it might be costly but will save lives in the longer term, social media should also be used.”*

**Individual tenant**

**Question 44. Will this Guidance be straightforward to use by those that own, factor, manage, give advice on and enforce standards in high-rise domestic properties?**

Figure 34. Guidance straightforward to use by those that own, factor, manage, give advice on and enforce standards in high rise domestic buildings



Base: 43

Just over two thirds (67%) thought that this guidance will be straightforward to use. Over a quarter (28%) felt it was ‘in part’.

Table 32. Guidance straightforward follow-up

Response option	Number answering open follow-up
Yes	6
No	1
In part	6

This question received mixed responses. Those that selected ‘yes’ reported that the guidance would be straightforward to use for those that manage, give advice on and enforce standards in high rise domestic buildings. One reported that the document was well structured and another mentioned that those using it should be aware of any new guidance being published.

The remainder of organisations selecting ‘no’ or ‘in part’ said that more clarity around the approach to managing/enforcing housekeeping in common areas is required and suggested that information for owners needs to be simplified.

One organisation raised that how straightforward the guidance is to use would depend on how those using the guidance would be regulated to see if they understand and have implemented it correctly.

Two organisations questioned whether it would be possible to put a legal framework in place regarding fire risk in common areas.

*“There are discrepancies within the document which we have raised in previous sections. In addition, it will still be challenging to apply the Guidance in full due to properties being factored.”*

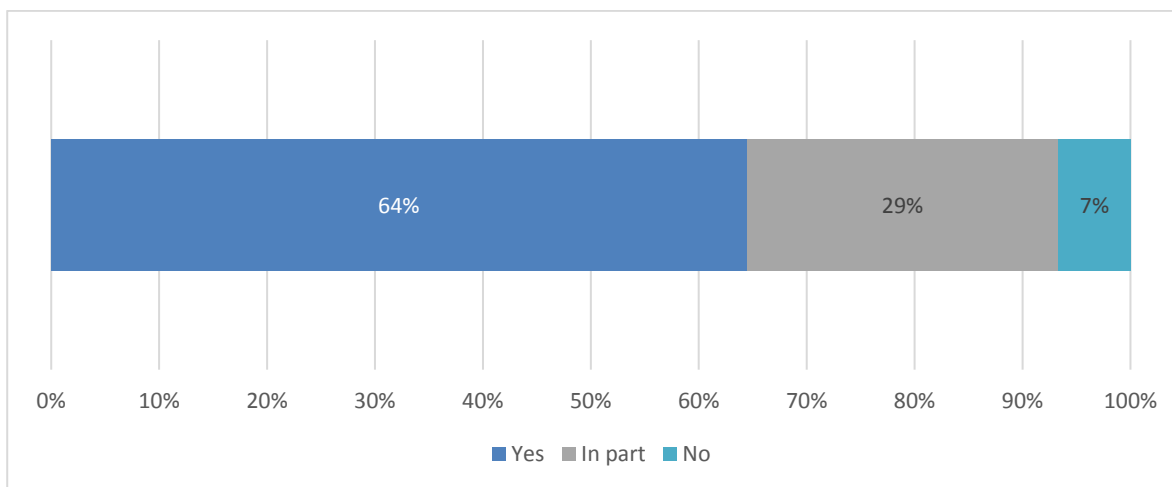
**Local authority**

*“Depends on how landlords are regulated in the use of the Guidance.”*

**Local authority**

**Question 45. Do you think the content is clear and easy to understand?**

Figure 35. Content is clear and easy to understand



Base: 45

Close to two thirds (64%) felt the content was clear and easy to understand. A very small proportion felt it wasn't (7%) and just over a quarter (29%) felt it was 'in part'.

Table 33. Content is clear – follow-up

Response option	Number answering open follow-up
Yes	2
No	1
In part	7

Ten comments were left under this section.

Generally the document was perceived as being clear and easy to understand. However, all respondents that selected 'in part' did feel that it was a little too wordy in places potentially due to the technical nature of the topic.

*"It will be important that the guidance is followed by all stakeholders in practice. Our members have indicated that the guidance is likely to be clear and easy to understand to the target audience."*

**Organisation**

*"There is quite a bit of technical language and jargon included in the content however we are conscious of the fact that this guidance is primarily aimed at those who own, factor, manage, give advice on and enforce standards in high rise domestic buildings. As a committee, we felt it was important to feed into this critical consultation from the perspective of tenants and residents, and we have selected the questions/ focused on the sections of the consultation document only which we felt are relevant for tenants and residents."*

**Organisation**

## Conclusions/Key Points

- On the Fire Safety in Existing High Rise Domestic Buildings Guidance, of those responding the majority responded that it was clear;
  - who the guidance was aimed at
  - how it should work in practice
  - how to prevent the impact of fires
  - how to reduce the impact of fires
- The guidance was praised for being very helpful and also useful to support information sessions. It was also felt that information around physical fire safety was particularly important and useful.
- Common areas were a key theme in this section with multiple mentions; 58% of those that factor/manage properties knew if there was a process for the removal of items in common areas and only 59% were confident the process works. Difficulty around keeping them clear of items was commented on and that more emphasis should be placed around removal of items, in the guidance.
- The majority of respondents felt that there were clear reasons for fire risk assessments and that the 7-step method was also clear. However, the responsibility and competence of those carrying out the fire risk assessments were discussed – who would carry them out? Will they be properly qualified?
- It was also mentioned that fire safety within high-rise buildings should be everyone's responsibility including the residents.

Examples were given of further information to include - best practice examples, ban on smoking, clarity of electrical testing guidance and installation, zero tolerance for items in common areas, continual review and update of the guidance.

# Impact Assessments

## 7.1 Business and Regulatory Impact Assessment (BRIA)

**Question 46. Please give information and views on any business impacts you consider the Fire Safety in Existing High-Rise Domestic Buildings guidance might have.**

There were 19 responses to this question; 2 individual and 17 from organisations.

From the comments there were two main business impacts highlighted;

- Cost
- Resource

Cost was raised multiple times due to the new guidance requiring checks, assessments, training, staff. One organisation highlighted however that the benefit would be fewer fires which in turn would result in cost savings.

Resource wise, organisations mentioned that there may be additional resource required to manage enforcing the guidance for local authorities and to help with landlords tightening up their training and guidance for their tenants.

Timescales to satisfy the guidance had one or two mentions also.

A couple of organisations stated that the guidelines would mean there would be a higher standard of fire safety due to various stakeholders being more engaged and raised levels of competence.

A couple of organisations stated there would be no significant impact due to it just being an update of current guidance.

*“I would question whether Housing Associations and Local authorities are allocated sufficient resources to enable them to police HRRB properly and to ensure that they are properly maintained. Given current skills shortages in the construction industry generally are there sufficient numbers of qualified professional / competent persons that can undertake fire risk assessment to the required standard in Scotland?”*

**Organisation**

*“Given that the guidance does not introduce any additional requirements and seeks to clarify existing legal obligations and guidance, it should not have a significant financial impact on housing organisations. The emphasis on risk assessment and prevention of fire should help to minimise the risk of damage caused by fires.”*

**Chartered Institute of Housing Scotland**

## 7.2 Equality Impact Assessment (EQIA)

**Question 47. Please give information and your views on impacts on groups with protected characteristics as noted above, that implementation of the Fire Safety in High Rise Domestic Buildings guidance might have.**

There were 15 responses to this question; 2 individual and 13 from organisations.

Some organisations felt that these measures would not negatively impact these protected groups, especially if applied and administered correctly and provision built into the guidance to cover them.

One organisation highlighted that everyone should be treated equally unless their disability impairs their use of fire prevention measures.

Another organisation mentioned that high rise blocks attract a range of people from differing backgrounds and that provision of support should be available for all within the policy document. It was raised that those whose first language is not English should be included in this.

One organisation went into detail about how the proposals could potentially negatively impact each of the following protected characteristics: race, age, disability/mobility, pregnancy and maternity and specific comments for each group. Their main concerns were that those with protected characteristics may be given irrelevant information or excluded from fire safety measures and provisions proposed to be implemented as a result of using the guidance document. There was also concern that the document would be used in defence of negligence of protected groups.

One individual suggested that owners should be subject to tighter regulation of their properties and should provide information for their tenants e.g. including fire safety, building insurance, gas servicing, waste disposal, dealing with fires.

With regards to creating the policy document, one organisation raised the importance of contacting vulnerable and minority groups to get their input to ensure the guidance is correctly framed and in an accessible format.

Two other organisations also raised the accessibility of the guidance to ensure those who speak other languages can understand it. Concern was raised over those with age related conditions such as Dementia which may inhibit their understanding of the policy. It was also suggested that the document should be available in multiple formats and supported by infographics, video and other media.

A suggestion was raised to phase out the term 'high rise building' and replace it with 'sheltered housing accommodation'.

*“Groups representing disabled people should be expressly canvassed so that the guidance is correctly framed and in an accessible format. It would also be useful to do the same from other minority groups to take into account the need for communications across differing languages and cultures.”*

**Fire Projection Association**

*“Consideration, and amendments to communication methods, should be given to those individuals with disabilities or conditions e.g. age-related conditions such as Dementia that may inhibit their ability to understand and implement the Fire Safety in High Rise Domestic Buildings guidance. Records of individuals with disabilities and conditions that may inhibit their ability to follow the guidance should be maintained by the building owner and communicated to the Scottish Fire and Rescue Service to assist with the information provided to emergency services on the ground. In addition, as there may be many residents who do not have English as their first language, consideration must be given to the delivery of advice by various languages, infographics, video and animation to ensure information is accessible to all.”*

**AXA UK**

**Question 48. Please provide any further comments you have on the Guidance below.**

A further 6 comments were left on the guidance.

It was suggested that it might be useful to have a vulnerable groups register for residents within buildings who may require additional support e.g. mobility issues.

One respondent commended the Scottish Government for making Fire Safety a priority in Scotland especially within densely populated areas.

One of the Local Authorities highlighted that attention should also be paid to the repair and maintenance of ‘common parts’ of tenemental/ blocks in relation to fire safety measures.

One Federation welcomed strengthening fire safety for high rise domestic buildings however they would like it to also include other housing types such as; low rise domestic buildings, sheltered housing, maisonettes all of which may also be at risk. They suggest for the approach to be used cross country. They also firmly stated that tenant involvement and empowerment is key to strengthening fire safety in high rise domestic buildings



*“I'm pleased the Government has addressed this issue and although it might have arisen from the Grenfell tragedy aftermath and we don't have the same incidence of cladding in Scotland, we still have to ensure that Fire Safety is addressed in these densely populated properties - well done and may the good work so far bring good outcomes for all in the future.”*

**Individual tenant**

*“We would suggest a register be kept for those people within the protected groups who have additional needs eg a register kept of all residents within buildings who have a mobility issue*

**Local Authority**

# 8. Annex 1

## 8.1 Respondent profile and opinions

### 8.1.1 Respondent profile

Seventy people responded to the consultation. Exactly half the respondents were individuals and half were from organisations. Organisations that responded included

Individuals renting properties

Local Authorities

Individual owner occupiers

Tenants and residents' associations/networks

Housing groups

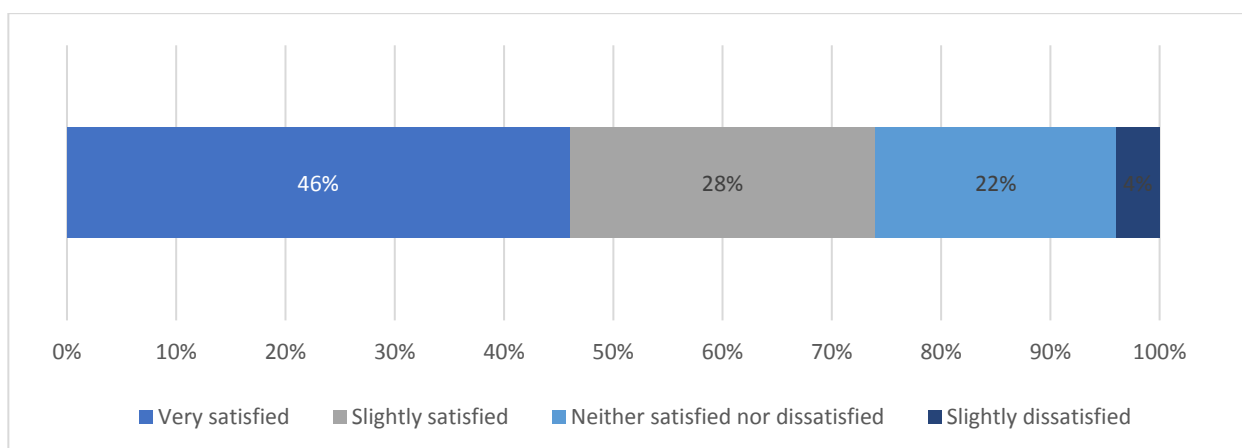
Insurance companies

Fire safety/protection companies

**Note:** throughout the remainder of this report, the commentary highlights key points of the respondents. Care should be taken when interpreting these findings, particularly when they are based on low base numbers of respondents (as indicated in the chart above). Due to low response rate (70), it is not possible for every question to break down whether those responding were individuals or organisations. This is done where possible. The commentary should therefore be regarded as indicative.

### 8.1.2 Respondents' opinions of the consultation

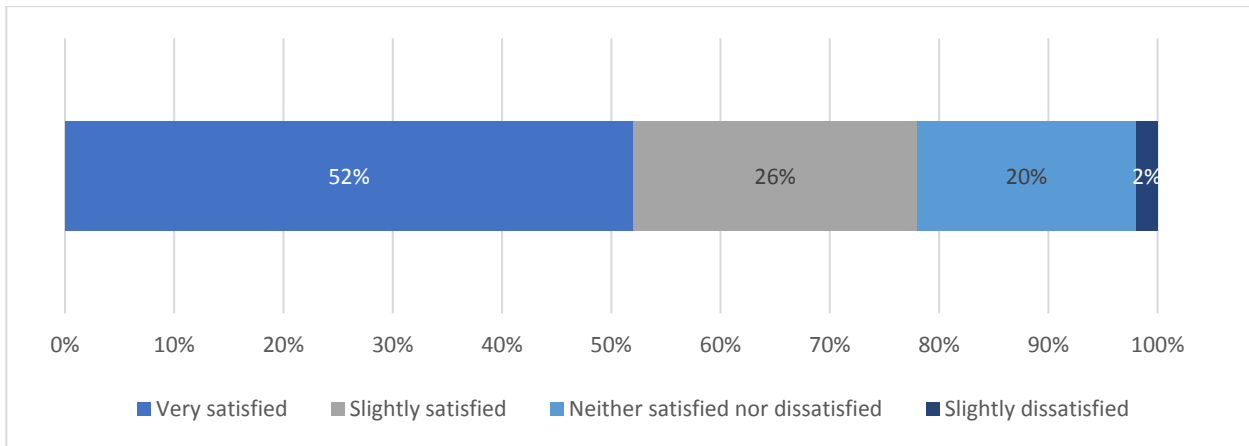
Figure 36. Satisfaction with the consultation



Base: 50

Few respondents expressed dissatisfaction with the consultation with 4% stating that they were dissatisfied. 74% of respondents were either very or slightly satisfied with the consultation.

Figure 37. Respondents' Satisfaction with using Citizen Space

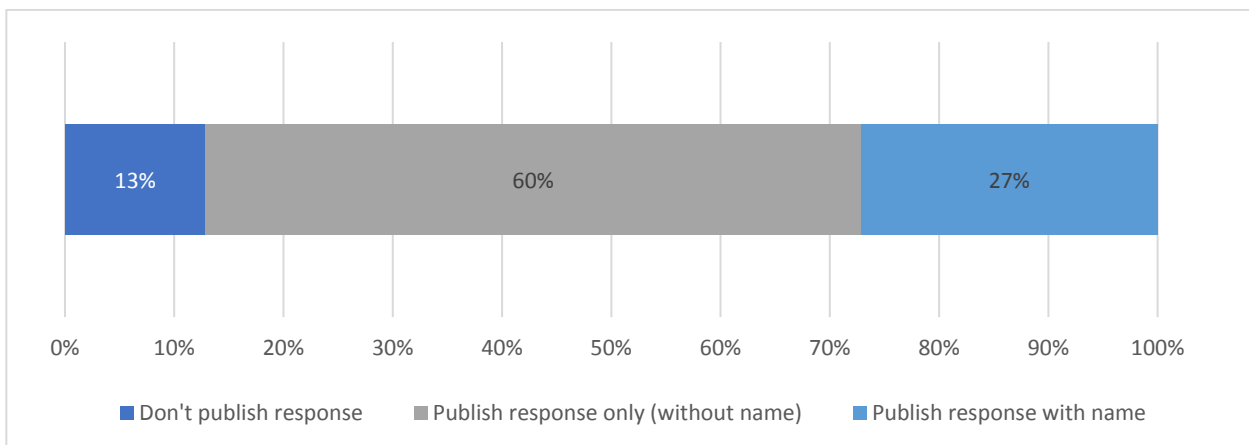


Base: 50

Overall most respondents were satisfied or very satisfied (78%) with Citizen Space. Only 2% of respondents were dissatisfied.

## 8.2 Anonymity and sharing responses

Figure 38. Willingness to have response published



Base:70

The majority of respondents requested that their response be published anonymously (60%). 27% were happy to allow attributed publication of their response. A small percentage advised that their response may not be published (13%).



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