



Evidence submitted by Chartered Institute of Housing Scotland: 16 July 2019

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world including over 2,000 in Scotland.

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CIH contact:

Ashley Campbell, Policy and Practice Manager

ashley.campbell@cih.org

1. General comments

- 1.1 CIH Scotland welcomes the opportunity to respond to this consultation on strengthening fire safety for high-rise domestic buildings.

We recognise that fire safety regulations are already stringently applied in Scotland but are supportive of any measures which seek to improve understanding and increase awareness of fire safety for both tenants and landlords.

The publication of revised guidance also provides landlords and other building managers with a timely opportunity to review their existing fire safety measures and to ensure the way that they currently communicate fire safety information to their residents is relevant and up to date.

We also support an awareness raising campaign to encourage residents to keep common areas clear to help avoid the risk of fires starting and spreading but any such campaign must be clear about the approach taken, whose responsibility it is to keep these areas clear and why this is so important for all residents.

2. Consultation Questions

- 2.1 Part 1: Fire safety information for people who live in high-rise domestic buildings

Question 1: Please indicate from 1 to 5 what would be your most and least preferred way to get fire safety information (with 1 being the most preferred and 5 being the least preferred):

Printed leaflet:

Written information on a website:

Video/animation on a website:

Notice board/poster in the building:

Mobile device app:

Other (please specify):

Not applicable.

The following questions are about the example of Fire Safety Information given earlier

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

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

The information on fire prevention is clear and is easy to understand.

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

- ☐ Yes
- ☐ No
- ☒ In part

Please explain your answer:

The fire safety information provides advice on fire alarm requirements, fire prevention measures, and planning an escape if there is a fire in the building.

However, the information does not give advice to residents on what they should do if a fire breaks out in their own flat. This information is provided on the Scottish Fire and Rescue Service (SFRS) website (<https://www.firescotland.gov.uk/your-safety/for-householders/multi-storey-flats.aspx>) and it would therefore make sense for this to also be included in the fire safety information for residents.

The fire safety information also gives the following advice:

'You need not leave your home if there is a fire elsewhere in the building. Though, if in doubt, get out.'

However, the advice on the Scottish Fire and Rescue Service website (<https://www.firescotland.gov.uk/your-safety/for-householders/multi-storey-flats.aspx>) is as follows:

'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.'

While the advice in the fire safety information for residents to leave if they are in any doubt about their safety is sensible, it is important that the advice for residents and the advice from the Scottish Fire and Rescue Service is consistent to avoid any confusion.

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.

Question 4: Does the fire safety information help you to understand the reasons behind fire safety advice?

- ☐ Yes
- ☐ No
- ☐ In part

Please explain your answer:

Not applicable.

Question 5: Is the fire safety information easy to understand?

- ☐ Yes
- ☐ No
- ☒ In part

Please explain your answer:

As outlined above, the fire safety information is easy to understand but could be improved by adding in advice about what residents should do if a fire breaks out in their own flat.

The advice to residents around leaving their property if they have any doubts about their safety could also be strengthened to let residents know that they will not be prevented from leaving if they wish to do so.

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

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer:

Not applicable.

Question 7: If you answered yes to question 6, does the process work?

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer:

Not applicable.

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

As outlined above, the information could be strengthened by adding in advice on what residents should do if a fire breaks out in their own property and by making it clear that residents will not be prevented from evacuating their property if they wish to do so.

Question 9: Do you think more information on the 'stay put' policy (as explained on page 5) would be helpful?

- ☐ Yes
- ☐ No
- ☒ In part

Please explain your answer:

The 'stay put' policy is standard practice when dealing with incidents of fire in high rise buildings. However, following the fire at Grenfell Tower, some residents may be wary of following this advice so it is important that this policy is clearly explained to ensure that residents feel confident that they can remain safely in their homes if a fire breaks out in another flat in the building.

As outlined above, guidance should clearly explain the reasoning behind the 'stay put' policy and residents should also be made aware that they will not be prevented from evacuating their property if they wish to do so, even if a 'stay put' policy is in place.

This should also be reflected on the SFRS website to make sure that both sources of information are delivering a consistent message.

Question 10: Please provide any further comments on the information and advice in this section of the consultation:

No further comments.

2.2 Part 2: Fire safety campaign regarding common areas

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

- ☐ Yes
- ☐ No
- ☒ In part

Please explain your answer:

Any information which makes fire safety messages clearer for residents is to be welcomed and providing clearer information on the dangers of leaving items that will burn in common areas may help to discourage this behaviour.

In order for this 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.

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?

- ☐ Yes
- ☐ No
- ☒ In part

Please explain your answer:

Images highlighting the dangers of leaving items in common areas, alongside written fire safety information, may be helpful for residents who struggle with reading or for those where the fire safety information is not provided in their first language.



However, while this may be helpful in encouraging residents not to leave items that burn in common areas, landlords and building managers must also ensure that this is properly enforced.

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:

No comments.

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?

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer:

Not applicable.

Question 15: If you answered yes to question 14, does the process work?

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer:

Not applicable.

Question 16: What is the best way to get information on keeping common areas safe from fire, with 1 being most preferred and 5 being least preferred?

Email:

Printed leaflet by post:

SFRS home fire safety visits:

Video/animation on a website:

Notice board/poster in the building:



Printed information from owner/landlord when first moving in:

Via local residents' groups meetings:

Other (please specify):

Not applicable.

2.3 Part 3: Fire safety in existing high-rise domestic buildings?

Chapter 1: Guidance on fire safety in high rise domestic buildings

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?

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

No further comments.

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

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

No further comments.

Question 19: Is it clear how the guidance should be used in practice?

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:



No further comments.

Question 20: Is there further information that should be included?

- ☐ Yes
- ☐ No

Please explain your answer:

No further comments.

Question 21: Please provide any further comments on this chapter:

No further comments.

Chapter 2: Fire safety design in high-rise domestic buildings

Question 22: Do you think that 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?

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

No further comments.

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

- ☐ Yes
- ☐ No

Please explain your answer:

No further comments.

Question 24: Please provide any further comments on this chapter:

No further comments.

Chapter 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?

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

No further comments

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

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

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.

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

- ☐ Yes
- ☒ No
- ☐ In part

Please explain your answer:

No further comments.

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?



- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer:

Not applicable.

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

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer:

Not applicable.

Question 30: Please provide any further comments on this chapter:

No further comments.

Chapter 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?

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

No further comments

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

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

No further comments

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

☐ Yes

☒ No

Please explain your answer:

The chapter appears to be comprehensive and covers a range of common causes of fire and recommendations on how these can be limited. However, while we agree with the need for clear policies on combustibles and obstruction in common areas, the Scottish Government will be aware that the storage or dumping of goods in common areas has been a challenge for some time. While many landlords do make a concerted effort to outline rules in tenancy agreements and other communication, they can be particularly challenging to enforce.

Question 34: Please provide any further comments on this chapter:

No further comments.

Chapter 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?

☒ Yes

☐ No

☐ In part

Please explain your answer:

No further comments

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

☐ Yes

☒ No

Please explain your answer:



No further comments

Question 37: Please provide any further comments on this chapter:

No further comments.

Chapter 6: Risk management - ongoing control

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

- ☐ Yes
☒ No

Please explain your answer:

No further comments.

Question 39: Please provide any further comments on this chapter:

No further comments.

Chapter 7: The law on fire

Question 40: Do you think this is useful information to have in the guidance?

- ☒ Yes
☐ No
☐ In part

Please explain your answer:

It is useful to have the relevant legislation listed and explained. However, this section will need to be regularly reviewed to take account of any changes in legislation. Assuming that the Scottish Government will review and update the guidance following any changes and make this available online, it might be useful for the guidance to encourage readers to check the online version to make sure they access the most up to date guidance.

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

- ☒ Yes
☐ No
☐ In part

Please explain your answer:

No further comments

Appendix 3: Fire risk assessment template

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?

- ☒ Yes
☐ No
☐ In part

Please explain your answer:

The template is clearly set out and should be easy to use. It might be helpful to include a completed template as an example.

General questions on the guidance

Question 43: Can you suggest ways to let people know this guidance is available once it is published?

A media campaign via housing trade media (i.e. Scottish Housing News) and social media would be a useful way to get this information out to people. CIH Scotland would also be happy to share the guidance with our members.

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 buildings?

- ☒ Yes
☐ No
☐ In part

Please explain your answer:

No further comments.



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

- ☒ Yes
- ☐ No
- ☐ In part

Please explain your answer:

No further comments.

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:

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.

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:

No comments.

Question 48: Please provide any other comments you have on the guidance:

No comments.