

# A CONSULTATION ON THE REVISION OF THE SCOTTISH GOVERNMENT PRACTICAL FIRE SAFETY GUIDANCE FOR CARE HOMES AND THE QUALITY ASSURANCE OF PERSONS WHO OFFER RISK ASSESSMENT SERVICES



## RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

Organisation Name

Barnardo's Scotland

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### 3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate  Yes  No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate  Yes  No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

## CONSULTATION QUESTIONS

### 1. Do you think the new structure of the guide makes it easier for those persons that are responsible for the management of care homes to use?

Yes  No

The inclusion of technical details provides non-technical persons with an idea of the details required in refurbishing a care home, which Barnardo's Scotland welcomes.

The guide appears to be a suitable reference point when dealing with Building Standards as on occasions Building Standards Officers have been unable to agree to alternative risk assessed approaches.

### 2. Do you think that the emphasis in the guide adequately reinforces that fact that the benchmarks in the guide are non-prescriptive?

Yes  No

However, Barnardo's Scotland has concerns that point (167) in the guidance, which highlights the various categories that care homes internal linings 'should generally' achieve in preventing the spread of fire; can contradict with (258) which states that retrospective installation of a fire sprinkler system where other fire safety measures cannot be improved, such as internal linings, can be an appropriate solution.

It took Barnardo's over a year to finally agree a suitable solution with one Local Authority Building Standards Department with regards to a care home application due to an issue with internal linings and retrospective installation of fire safety measures.

Our experience has shown that Building Standards Officers can, in practice, still require care homes to have both the fire suppression system as well as achieve the levels of internal lining set out under (167) and are not prepared to relax these levels even when a suitable fire suppression system is in place.

We believe that retrospectively installed fire safety measures provide suitable protection, if internal linings do not achieve the levels set out under (167). This should be made explicitly clear in the proposed guidance in order to avoid re-interpretation by Building Standards Officers.

### 3. Are there any changes that should be made to the content of the revised guide? Please provide any detailed comment you have on any of the guide content.

Yes  No

Barnardo's Scotland believes that some relaxation of some of the guidance should be afforded when a suitable fire suppression system is installed.

With the introduction of so many enclosures and compartments, care homes become very institutional, which can have an effect on the residents of the home. Barnardo's Scotland works with vulnerable children and our aim is to make our care homes as welcoming and home like as possible.

We appreciate that protected areas are required in care homes, but a sprinkler system should provide adequate protection to allow the building to be 'opened up'.

For example, point (154) advises that consideration should be given when selecting a suitable door closing device, but in our experience, Building Control Officers demand a standard fire door closes with 50Kn of force. A door with such force can often be very difficult to open for frail older people or wheelchair users. The installation of a sprinkler system should allow a significant reduction in the number of fire doors required.

**4. Is there any information or guidance that is not covered in the revision which you think needs to be included?**

Yes  No

Barnardo's Scotland welcomes the introduction of the three dependency categories, as previously some Building Control Officers have applied the logic that all care homes were for high dependency persons and that isn't always the case.

**5. Do you think there are any problems with the quality of fire risk assessments by external fire risk assessors? What evidence do you have of this?**

Yes  No

Comments

**6. Is there sufficient access to information and guidance to judge the competency of companies or persons who advertise their services as fire risk assessors?**

Yes  No

The FireLaw website suggests a search via an internet search engine for a suitable Fire Risk Assessor when it should be ideally directing persons to a registered body for fire risk assessors.

**7. Do you think that the establishment of criteria for the competency of risk assessors, in conjunction with further guidance for duty holders on the selection of risk assessors, would provide sufficient quality assurance control of fire risk assessors?**

Yes  No

Comments

**8. If you think further control or assurance is necessary, how could this be achieved in a practical and cost effective way?**

The Properties and Facilities Team at Barnardo's Scotland has used a variety of different fire risk consultants from individuals to large multi-disciplinary companies, and based on those experiences we believe there is sufficient information available for individuals to undertake suitable checks to clarify the competency of assessors.

We have, however, experienced difficulties when dealing with Building Standards Departments when applying for a Building Warrant. At times they have been unwilling to agree to a non-prescriptive solution and refer to the Building Standards as the prescriptive solution which is not always the most suitable solution.