

Response ID ANON-4RQ9-81HX-S

Submitted to **Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation**

Submitted on **2018-02-05 12:45:23**

Questions

1 Three fire safety guides are being combined to assist with reference and future updating. Do you have any suggestions for improving the structure of the combined guide?

Three fire safety guides are being combined to assist with reference and future updating. Do you have any suggestions for improving the structure of the combined guide?:

BAFE particularly welcomes the references to the desirability of third party certification of the competence of fire risk assessors in paragraphs 21 – 27. However we do suggest that in Chapter 2 at paragraph 46 that a reference to paragraphs 21-27 is incorporated.

BAFE is concerned that a busy dutyholder / employer who picks up the document or goes online, will look at the contents and go straight to Chapter 2 thinking that reading the introduction can be safely omitted. There is nothing from paragraph 46 onwards about how to carry out the work described.

BAFE believes that this risk could be overcome by an additional sentence in para 46 saying “this chapter should be read in conjunction with paras 21 to 27 above”

In addition, paragraph 67 ought to be strengthened to expand on the phrase specialist advice by adding “See Paras 21 to 27 above”.

2 Are there any changes that should be made to the content of the revised guide?

Yes

Please explain your answer.:

1. Under Scope there is no mention of houseboats or docked ships. BAFE queries their omission.

2. In paragraph 32 why is the fire risk assessor excluded? SFRS should surely highlight concerns about poor or inadequate fire risk assessments.

3. In paragraph 95 BAFE believes that there ought to be a duty on contractors to raise fire safety concerns with the dutyholder.

4. In Chapter 7 and particularly in paragraphs 236 to 244 the maintenance of Emergency Lighting installations ought to be strongly recommended. The text should also say that third party certification schemes are available which can add reassurance for design, installation and maintenance and that it is not just new systems which should comply with BS 5266.

5. In Chapter 8 there is a very welcome section on Unwanted Fire Alarm Signals in paragraphs 275 to 290. However the document completely ignores third party certification of the design, installation and maintenance of fire detection systems. The use of a competent, certificated contractor can provide reassurance that the system is appropriate as well as assist in the reduction and avoidance of UFAS. ARCs can also be third party certificated. BAFE believes that appropriate references should be added to the text.

6. In paragraph 281 a welcome addition would be the mention of a need to revisit or at least to discuss the new system with the fire risk assessor, if applicable, just to check that it does not omit a risk hitherto covered or create a new one.

7. In paragraph 288 a reference to the certification schemes for fire-fighting equipment and its maintenance would seem appropriate as they can assist in selecting, correctly siting and commissioning such equipment and carrying out necessary maintenance.

8. In Table 8 Powder Extinguishers – BAFE would ask that an addition is made that these extinguishers are not recommended for use in enclosed spaces as they may impair visibility when discharged. This reflects the changes made in the latest issue of BS 5306 Part 8.

9. In paragraph 301 BAFE would welcome the inclusion of an additional point as follows:

“It is important to ensure that the Rising Main does not impair or compromise the fire stopping properties of the building.”

3 Is there any information or guidance that is not covered in the revised guidance which you think needs to be included?

No

Please explain your answer.:

BAFE is not aware of the omission of any safety critical information

4 Do you have any other comments on the guidance document?

4. Do you have any other comments on the guidance document?:

BAFE believes that this document is welcome, that is is generally clear and informative and should contribute to greater fire safety in Scotland, especially in support of the Duty Holder.

5 An Equality Impact Assessment and a Partial Business and Regulatory Assessment are also available, and we welcome any comments you may have on each of these documents.

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BAFE has no comments on these documents

About You

What is your name?

Name:

Stephen Adams

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

BAFE (British Approvals for Fire Equipment)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

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?

Yes