



## Building Risk Review Appendix A – Technical Guidance

15<sup>th</sup> June 2020

### Introduction

In March 2020, the Fire Protection Board's first Building Risk Review (BRR) exercise focusing on ACM buildings was successfully completed by Fire and Rescue Services (FRSs). The Board is now working on the next steps towards meeting the ambition set by the Secretary of State for Housing, Communities and Local Government to increase the pace of inspection activity across the estimated 11,000 high rise residential buildings (HRRBs) over 18m in height by December 2021.

On 5<sup>th</sup> September 2019, the Secretary of State for MHCLG stated:

*'I expect all high rise buildings to have been inspected or assured by the time the new building safety regime is in place, or no later than 2021.'*<sup>1</sup>

Following this, the Board commissioned further work from London Fire Brigade (LFB) and Greater Manchester Fire and Rescue Service (GMFRS) to determine the feasibility of conducting full audits/inspections on all 11,000 estimated HRRBs in England. LFB and GMFRS collaboratively examined learning and outcomes from the real experiences of the GMFRS High Rise Team activity across all HRRBs in Manchester and applied the same assumptions to the stock of HRRBs in London as a case study.

This feasibility study determined that to answer the two assurance questions designed by the Board for the first BRR exercise on all HRRBs in London could take LFB more than four years based on average assumptions, and more than eight years based on scenario modelling of worst-case assumptions.

As a result, further advice was produced for the Board proposing that FRSs be supported to take a risk-based approach to HRRBs, targeting intervention activities based on a process of triage, in order to determine which HRRBs should be prioritised for full audit/inspection. On 2<sup>nd</sup> June 2020, the Prime Minister wrote to the Chair of the Grenfell Tower Inquiry, Sir Martin Moore-Bick, outlining the intent that all HRRBs 18m or above in height should be inspected or reviewed by the end of 2021 supported by government funding.<sup>2</sup>

This process will be known as the BRR Programme.

The Board, in partnership with Government, have secured additional funding for FRSs to contribute towards a process of triage, audits/inspections, data gathering, and possible interventions in HRRBs.

The Home Office wrote to all FRSs on 29<sup>th</sup> April 2020 outlining extra funding for Fire Protection. Part of this money is from a grant specifically for FRSs to focus on ensuring fire safety in HRRBs 18m and above in height.

<sup>1</sup> [Address to Parliament by Secretary of State, Robert Jenrick, regarding Building Safety \(5<sup>th</sup> Sept 2019\)](#)

<sup>2</sup> [Letter from the Prime Minister to the Chair of the Public Inquiry into the Grenfell Tower Fire \(2<sup>nd</sup> June 2020\)](#)

## Purpose

These technical notes are issued to enable FRSs to provide returns effectively and consistently to the Board in line with the funding grant conditions detailed by the Home Office. Returns from FRSs will be expected monthly, with the Board collating and reporting progress to the Minister. Quarterly reports will also be expected, which provide an opportunity to give commentary on the progress of the BRR exercise, expenditure and any emerging or evolving issues.

The Board is now requiring returns on a building by building basis on the remaining c.11,000 HRRBs 18m or above in height not already captured by the first BRR exercise, which focused on identified ACM-clad HRRBs.

To fulfil the conditions of funding, all HRRBs are to be assessed on a building by building basis, triaged by a competent Fire Safety Regulator (FSR), and a minimum question set returned.

The intended purpose of a triage is for the FSR to decide if a fire safety audit/inspection is required or if there is confidence that information already held by the FRS from previous inspections or 7 2 d visits is current enough, and the building risk is relatively low, so that an audit/inspection is not required for the purposes of the BRR. This would mean the HRRB is known to the FRS and features already within the local Risk Based Inspection Programmes (RBIPs) where appropriate.

The minimum data capture and triage decision is required for the purposes of BRR responses/returns to the Board via NFCC, but this is not exhaustive. FRSs may consider greater detail is required to inform decisions or to understand risks within their own FRS, and may wish to use this opportunity to improve local data, such as Site Specific Risk Information (SSRI). This remains a matter for each FRS.

Data collected from the BRR process will support future working with the Building Safety Regulator (BSR) and delivery of the proposed Safety Case regime.

## Objectives

- Demonstrate that the portfolio of risk across c.11,000 HRRBs in England is understood by FRSs, targeting resources where risk may be greatest.
- Deliver on the Secretary of State's ambition.

To measure delivery against the above objectives and determine when the programme has been completed, a dataset should be collated by FRSs which will form the basis of reporting requirements outlined in *Appendix B – Reporting Notes*.

It is not expected that FRSs should have to start from scratch, recognising the significant uplift in recent HRRB activity. Where FRSs already have satisfactory current information on known buildings that have been visited, this information should be used to inform the process. *Appendix B* contains guidance on what may be considered a recent audit/inspection.

Although FRSs' own local data collection and recording will be very important, national dataset standards will be required to enable analysis by Government departments overseeing the Programme.

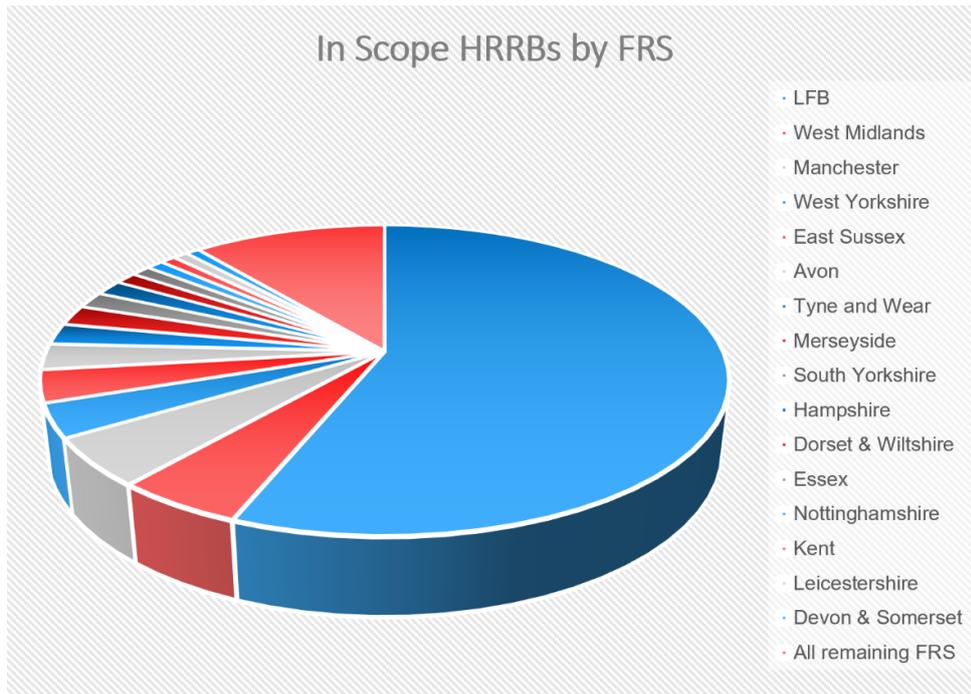
This process will give Government and residents the knowledge that buildings have been visited or triaged by FRSs, and to help ensure priorities for remediation and regulatory work are better informed towards a safer built environment.

## Number of HRRBs

An HRRB for the purposes of the Board's BRR Programme is an HRRB which is 18m or above in height.

The number of HRRBs per FRS and the national proportion of building stock can be seen below. There is a large national disparity, with LFB having approximately 60% of the buildings in scope, which drops to 5.34% for West Midlands Fire Service, who have the second highest number of recorded buildings in scope.

**Diagram 1: In scope HRRBs by FRS**



Questions have been raised around capturing in scope buildings not on the MHCLG supplied data. It is acknowledged that the dataset provided is not complete, however, it is the most complete set available and a tangible benefit of the Programme is improving on this. One of the benefits of the Programme is an opportunity for FRSs to better understand the built environment. Other in scope HRRBs which are known to FRSs but have not been supplied in the list from MHCLG should be included and notified by FRSs to the Board.

***Where FRSs are aware of an in-scope HRRB that does not appear in your local spreadsheet, please notify NFCC by adding it to your reporting spreadsheet.***

***Where FRSs have buildings in your local spreadsheet that you do not believe should be considered in scope, please notify us of this via the Triage question (outcome 5).***

There will be a monthly reporting mechanism through the Board to the Minister of State for Fire to inform delivery against the target and allow a commentary on any significant increases of HRRBs above those estimated.

## Triage of HRRBs

It is acknowledged that there is insufficient capacity within every FRS Protection Department to ensure that all HRRBs are audited/inspected by an FSR by December 2021. Therefore, for all in scope HRRBs to be assessed within the timeframe of the BRR Programme, the triage process should be completed.

If relevant current information is not held, a visit should take place. This process has been designed, should you choose, to utilise station-based personnel with no prior Fire Protection knowledge, and with only minimal support from FSRs. Where this approach is taken, the required data should be captured and the information collected should be subject to a desktop assessment carried out by an FSR resulting in one of the following determinations:

**1. A recent audit/inspection has been carried out**

In this case, the recent audit/inspection can be used to inform the BRR response and complete the minimum question set.

**2. No prior audit/inspection of the building has been carried out recently<sup>3</sup> and the HRRB is determined to be high risk**

In this case the building will be referred for an audit/inspection by an FSR which will inform the Building Risk Review return once complete.

**3. No recent prior audit/inspection of the building has been carried out, however, the HRRB is determined to be low risk and is placed into FRS RBIP if appropriate**

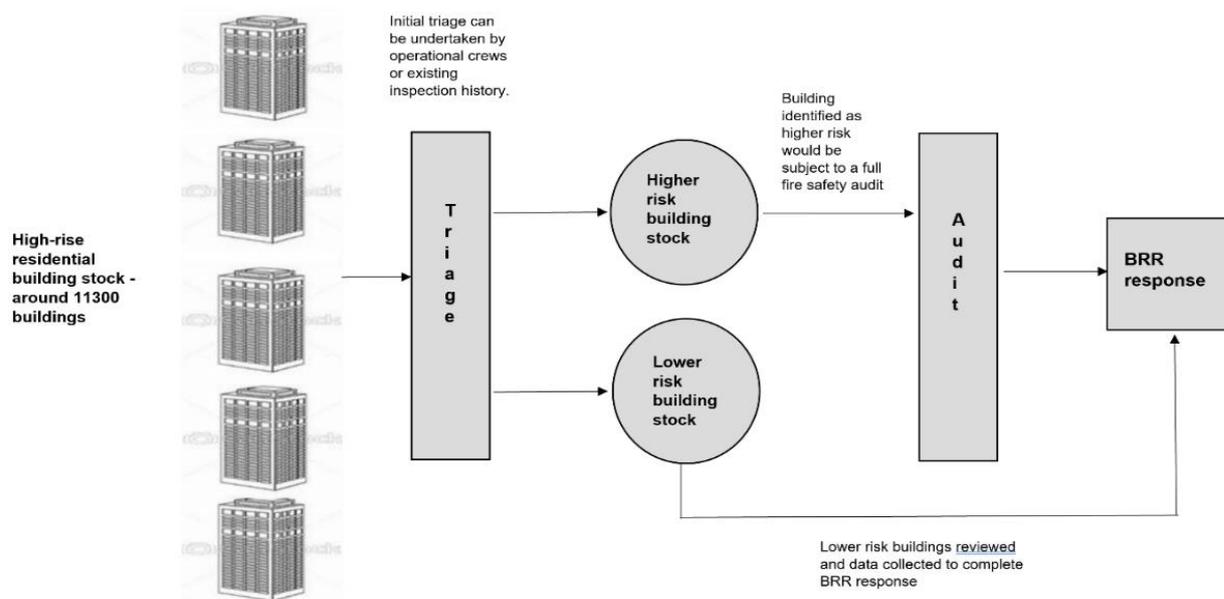
In this case no further audit/inspection is required as part of the BRR and your response and minimum question set should be returned based on the information you collected for the triage.

Diagram 2 below summarises the triage process.

FRSs may wish to proactively write to the Responsible Person/s to raise awareness of [Advice for Building Owners of Multi-storey, Multi-occupied Residential Buildings](#). As a minimum, it is suggested that this step is followed where an HRRB is triaged and not audited/inspected at this time.

The BRR Programme will result in all in scope HRRBs being triaged and the highest risk HRRBs being audited/inspected. As a result, HRRBs requiring further action should be identified and become known to FRSs, so that HRRBs can be incorporated into RBIPs where appropriate.

**Diagram 2: Triage and Audit/Inspection Process**



<sup>3</sup> Appendix B contains guidance on what may be considered a recent audit/inspection.

## Reporting

Each FRS will be required to report on the following to the Board as stated within the grant funding agreement from the Home Office:

- An initial brief description on trajectory of their programme with milestones
- Monthly return on BRR spreadsheet
- Quarterly commentary on progress and expenditure

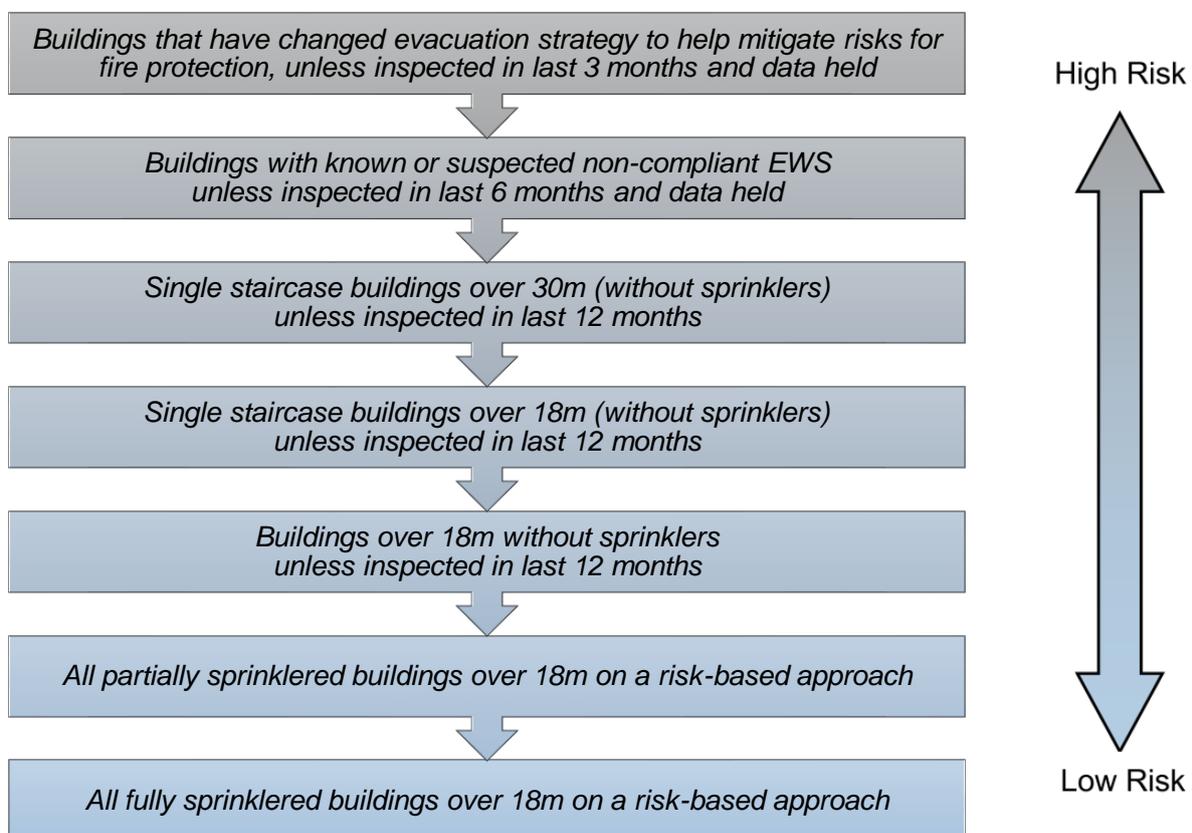
The Board are required to report to the Minister of State for Fire on the BRR Programme and break this down to individual FRS level. Please refer to *Appendix B* for further details on reporting.

## Quality Assurance

The Board advise that a suitable quality assurance process is included in any triage process. It would be reasonable to randomly sample 5-10% of the lower risk building stock triaged by FRSs, and for which it has been initially determined that no audit/inspection is required. This 5-10% of buildings can then be subject to a full audit/inspection return in the same manner as the higher risk buildings. This is intended to promote consistency and ensure the FRS assessment of risk can be benchmarked.

The diagram below demonstrates an example risk hierarchy which could be developed from the dataset and existing inspection history where information is available and up to date. This categorises the HRRB stock from perceived highest risk at the top, with risk reducing as you move down the flow chart.

**Diagram 3: Example Hierarchy**



## Building Risk Review Process – Question Set

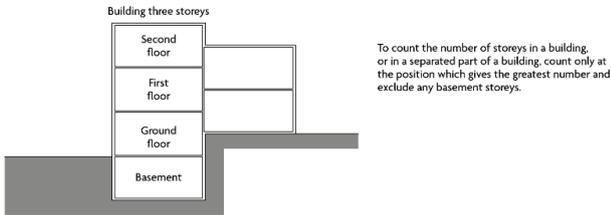
This guidance provides FRSs with a framework to collate information against the data that they are providing. The guidance is not exhaustive, and many FRSs will already have underpinning measures in place alongside additional context or risk mitigation that has already been established over and above that suggested. For others, the guidance can provide a framework to check and balance the arrangements in place to support your responses and is a means to provide additional consistency across FRSs.

Answers in this question set are likely to require input from multiple departments across your FRS, depending on your local governance and structures. It is not intended that all questions can necessarily be answered by fire safety departments alone (e.g. in respect of pre-planned response) and FRSs should ensure appropriate internal processes are in place.

Category	Question	Answer and Commentary
<b>Address Information</b>	Name of Premises	<i>If answers differ from the information supplied from MHCLG, please populate the supplied box next to the prepopulated information.</i>
	Address	
	Postcode	
	UPRN	
<b>FRS Information</b>	<b>Triage Question 1</b> As part of the triage, was a physical visit to the building undertaken by any personnel?	<b>Yes / No</b>
	<b>Triage Question 2</b> What was the outcome of the triage?	<ol style="list-style-type: none"> <li>1. <i>Fire Safety audit/inspection is required as part of BRR</i></li> <li>2. <i>No further action required due to recent<sup>4</sup> audit/inspection of the building</i></li> <li>3. <i>No further action required due to building being deemed to be low risk (despite no inspection history)</i></li> <li>4. <i>No audit/inspection required due to point 2 or 3 above, but building selected for audit/inspection as part of the QA process</i></li> <li>5. <i>Building not in scope of the programme</i></li> </ol>
	<b>Audit Question 1</b> Where an audit/inspection forms one of the outcomes <sup>5</sup> of the triage process – What was the outcome of this audit/inspection?	<ul style="list-style-type: none"> <li>• <b>Satisfactory</b> (no further action)</li> <li>• <b>Informal advice</b> (oral advice)</li> <li>• <b>Non-statutory written advice</b> (any letter or non-statutory notification of deficiencies/contraventions with or without action plan or follow up)</li> <li>• <b>Formal statutory action</b> (Enforcement Notice, Alteration Notice, Prohibition Notice)</li> </ul>

<sup>4</sup> Appendix B contains guidance on what may be considered a recent audit/inspection.

<sup>5</sup> Either Triage outcome 1: a new audit/inspection is required as part of the BRR or Triage outcome 2: a recent audit/inspection of the buildings has been relied upon to respond to the BRR.

<b>FRS Information</b>	<p><b>Audit Question 2</b></p> <p>What was the date of the audit/inspection referred to under Audit Question 1?</p>	<p><b>DD/MM/YYYY</b> – Currency of this could form a valid risk metric as an audit/inspection is a snapshot in time.</p>
	<p>As far as you can reasonably assess, have you got an effective pre-planned response in place for this building to protect life and property in the event of a fire?</p>	<p><b>Yes / No</b></p> <p>Responses provided should be based on FRS use of National Operational Guidance and any additional measures that have been put in place. This could include:</p> <ul style="list-style-type: none"> <li>• Changes to Pre-Determined Attendance</li> <li>• Additional training and operational risk gathering</li> <li>• Wider FRS understanding of premises in area</li> <li>• Specific crew and flexi officer guidance</li> <li>• Resident engagement events</li> <li>• Frequency of site visits and inspections</li> <li>• SSRI gathered</li> <li>• Deviation from agreed procedure specific to the premises based on identified risk or specific operational concerns</li> <li>• Frequency of site training and awareness visits</li> <li>• Processes in place for testing and validating your plan</li> </ul> <p>Should a <b>No</b> response be given, the Board would ask that you provide:</p> <ul style="list-style-type: none"> <li>• Clear indication as to the reasons why confirmation cannot be provided</li> <li>• What measures are being taken to remedy the situation</li> <li>• Timescales for the rectification of the situation and provision of a positive response</li> <li>• Do you require NFCC support to help remedy the situation</li> </ul>
<b>Building Information</b>	<p>Number of storeys</p>	<p><b>Numerical value</b></p> <div style="text-align: center;">  </div>
	<p>Is there a basement?</p>	<p><b>Yes / No</b></p>
	<p>Number of staircases</p>	<p><b>Numerical value – from 1</b></p>
	<p>What is the evacuation strategy?</p>	<ul style="list-style-type: none"> <li>• <b>Stay put</b></li> <li>• <b>Simultaneous</b></li> <li>• <b>Temporary simultaneous</b></li> <li>• <b>Other</b></li> </ul>

<b>Building Information</b>	Are balconies present	<b>Yes / No</b>
	Can the make up of the External Wall System (EWS) be identified?	<p><b>Based on information readily available to you from the RP at this time</b></p> <p><b>Yes / No / Don't know</b></p> <p><b>Please note</b> more information on EWS can be found in MHCLG <a href="#">Identifying Details of External Wall Systems – Technical Note</a></p>
	Type of cladding	<p><b>Based on the information available to you, from the RP – if the type of cladding is unknown, please select 'Do not know'</b></p> <p>Please answer using drop down box (more than one can be selected), answers in line with EWS classifications below:</p> <ul style="list-style-type: none"> <li>• <b>Glass</b></li> <li>• <b>High Pressure Laminate (HPL)</b></li> <li>• <b>Aluminium Composite Material (ACM)</b></li> <li>• <b>Other Metal Composite Material</b></li> <li>• <b>Metal Sheet Panels</b></li> <li>• <b>Render System</b></li> <li>• <b>Brick Slips</b></li> <li>• <b>Brick</b></li> <li>• <b>Stone Panels / Stone</b></li> <li>• <b>Tiling systems</b></li> <li>• <b>Timber/wood</b></li> <li>• <b>Do not know</b></li> <li>• <b>Other</b></li> </ul>
	Type of Insulation	<p><b>Based on the information available to you, from the RP – if the type of insulation is unknown, please select 'Do not know'</b></p> <p>Please answer using drop down box (more than one can be selected), answers in line with EWS classifications below:</p> <ul style="list-style-type: none"> <li>• <b>Mineral Wool</b></li> <li>• <b>Polyurethane rigid foam (PUR) / Polyisocyanurate foam (PIR)</b></li> <li>• <b>Phenolic foam</b></li> <li>• <b>Expanded and Extruded Polystyrene (EPS/XPS)</b></li> <li>• <b>Glass wool</b></li> <li>• <b>Wood fibre</b></li> <li>• <b>None</b></li> <li>• <b>Do not know</b></li> <li>• <b>Other</b></li> </ul>
If you have provided a cladding or insulation type above, how was the external wall system information	<ul style="list-style-type: none"> <li>• <b>Information from O&amp;M Manuals</b></li> <li>• <b>Information from Building Control Body / Application</b></li> <li>• <b>Product Specification Sheet</b></li> <li>• <b>BBA Certificate</b></li> </ul>	

	confirmed by the Responsible Person/s?	<ul style="list-style-type: none"> <li>• <b>Fire Risk Assessment</b></li> <li>• <b>Fire Engineers Report</b></li> <li>• <b>Other Specialist Report</b></li> <li>• <b>Other</b></li> </ul>
	Type of any firefighting facilities including access and instructions if required	<p>Answer using drop down boxes, more than one can be selected:</p> <ul style="list-style-type: none"> <li>• <b>Dry riser</b></li> <li>• <b>Wet riser</b></li> <li>• <b>Smoke control (AOV, vents, pressurisation etc.)</b></li> <li>• <b>Firefighting lifts</b></li> <li>• <b>Premises Information Box (PIB)</b></li> <li>• <b>Suitable access for fire appliance</b></li> </ul>
	Is there a fire suppression system in the building (sprinkler system, water mist etc.)	<b>Yes / No</b>
	Is there a gas supply to the building?	<b>Yes / No</b>

## Impact of COVID-19

COVID-19 could impact on decisions to undertake physical visits and inspections. The BRR Programme has been developed to enable FRSs to use a desktop approach where practicable and appropriate, using existing information held to inform the triage process.

While work on some elements of local RBIPs may be paused, reduced, or suspended due to the impacts of COVID-19, we would encourage FRSs, where practicable, to take the opportunity to undertake any desktop based triaging or data cleansing which could support the objectives of this exercise. Please see NFCC's [COVID-19 Scenario Based Guidance Auditing Premises](#) for more information.

## Guidance to Date

Government [Advice for Building Owners of Multi-storey, Multi-occupied Residential Buildings](#)

NFCC [Simultaneous Evacuation Guidance](#)

If you require further assistance or would like to discuss or raise questions concerning the BRR Programme, please email [BuildingRiskReview@nationalfirechiefs.org.uk](mailto:BuildingRiskReview@nationalfirechiefs.org.uk) or join the [BRR Workplace page](#).