



Defoe House

Barbican Estate

The City of London Corporation

External Fire Risk Assessment

Prepared by: Turner & Townsend

One New Change, London EC4M 9AF

Site information

Building Name Defoe House
Building Ref
Division Department of Community & Children's Services.
Estate Barbican Estate
Property Name Defoe House
Property Ref

Name of the person responsible for fire safety - Premises Controller (Responsible Person): -

Name of the person: - Estates Supervisor **Department name** DCCS
Telephone xxxx **Mobile:** xxxxxx
Email address:

Name of the responsible person (Building Manager)

Name of the person: - Estates Supervisor **Department name** DCCS
Telephone xxxx **Mobile:** xxxxxx
Email address:

Name of Liaisons managers (FM's) for fire safety matters or (Asset Managers) arranging corrective actions with third party.

Name of the person: - Estates Supervisor **Department name** DCCS
Telephone xxxx **Mobile:** xxxxxx
Email address:

Name of competent persons ** (completing the yearly mandating)

Name of the person: - Estates Supervisor **Department name** DCCS
Telephone xxxx **Mobile:** xxxxxx
Email address:

**Not defined in order. Government direction as dame Judith Hackitt; Training, experience and knowledge create competency.

Name of Contractors. N/A

Name of person- **Company name**
Telephone xxxx **Mobile:** xxxxxx
Email address:

Event planner for the site when applicable: - N/A

Direct contact details: - **Department name**

Office xxxx **Mobile:** xxxxxx

Email address:

Assessor details

Name of the person: - Mobile: Department name Contractor

Telephone

Email address:

Date of the assessment : 03.02.25

Date of first draft reviewed : 18.03.25

Date when finalised : 19.03.25

Date sent to premises controller: : 19.03.25

Date of next assessment : (Use aide-mémoire 2) 03.02.26

Report Signed by Assessor

Signature:

Print Name:

Date: 18/03/2025

Name of Assessors reviewer:

Printed Name:

Signature of Assessor reviewer

Signature:

Date of Review

Date: 18/03/2025

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Minor amendment history

Details of minor amendment history between detailed full assessment intervals, carried out. (Attached to rear of the main assessment)

Date of assessment	Department Assessor name	Brief details	Department Manager responsible for actioning

Preamble

Relevant Legislation –

- The Regulatory Reform (Fire Safety) Order 2005 (as amended)
- The Fire Safety Act 2021
- The Building Safety Act -2022
- The Fire Safety (England) Regulations 2022

The Regulatory Reform (Fire Safety) Order 2005 does not require the detailed fire safety provisions of an existing building to comply with any particular standard in order to achieve a satisfactory fire risk assessment outcome. Rather, the Order places a duty on the responsible person to take such general fire precautions as will ensure, so far as reasonably practicable, the safety of his employees and relevant persons who are not his employees.

However, it is good practice to adopt a recognized standard or code of practice to act as a benchmark against which fire precautions should be assessed*.

This particular fire risk assessment made use of the following publications when assessing the suitability of general fire precautions:

- Local Government Association, Fire Safety in Purpose Built Blocks of Flats guidance
- PAS 79:2 2020 Fire Risk Assessment Part 2 – Housing – Code of Practice.
- Approved Document B Volume 1 Dwellings 2019 ed. Incorporating 2020 amendments.
- BS 9991:2015, Fire safety in the design, management and use of residential buildings.
- Code of practice.
- CP3 Chapter IV Part 1 1971
- Fire Safety in Section 20 Buildings LDSA 1997
- BS 5839 Part 6:2019, Code of Practice for the Design, Installation, Commissioning and Maintenance of Fire Detection and Fire Alarm Systems in Domestic Premises
- BS5839 Part 1:2017 Fire detection and fire alarm systems for buildings Part 1: Code of practice for design, installation, commissioning and maintenance of systems in non-domestic premises
- City of London Housing residential building fire safety policy.

*Particular care should be exercised when using a design guide for new buildings (such as British Standard 9991 or 9999) as a benchmark for the fire safety of an existing building.

The Fire Risk Assessments document reflect the significant hazards associated with the operation of this site and identify suitable controls to minimise risks to life safety which need to be actioned by the CoL person responsible for undertaking corrective actions.

Executive Summary

The building has been rated as a **moderate risk**. This is because the notional flat entrance doors are not fitted with effective self-closing devices.

Overall risk assessment

- ***The overall risk assessment of the building is a Moderate Risk.***

Survey Methodology

This is a **Type 1 Fire Risk Assessment** as defined by Fire Safety in Purpose Built Blocks of Flats (LGG) and has been completed considering the methodology described in PAS79:2 2020 (BSI).

A site visit was carried out to undertake a survey of the building. This included a visual inspection of all accessible common areas of the building, internal communal means of escape, plant rooms and any staff areas.

A sample inspection of service risers was completed.

A 10% sample of flat entrance doors were inspected in the open position.

Compartmentation in accessible areas, was assessed as far as it was reasonably practicable without carrying out an intrusive survey.

In addition, a desk top review was completed of any relevant documentation, or records provided by the City of London.

Note – No Pre-Survey Questionnaire was provided by City of London (COL).

No access areas - It was also not possible to access the flat balconies which are used as secondary means of escape.

Areas not covered by this Fire Risk Assessment –

- The car park – this is covered by a separate fire risk assessment.
- Service tunnels – these are covered by a separate fire risk assessment.
- Swich Gear Room

Specific Site Survey Information

- *Is there evidence on site that fire deficiencies/ faults are addressed in a timely manner.*

Communal Fire Door faults had been noted - see Fire Door question below.

- *Emergency lighting units are charging (diodes normally green or red are illuminated).*

Emergency Lighting in the Tenant Store Areas appears to have been improved since the previous FRA.

The emergency lighting in the building appears to be provided by a mix of self-contained units and “Standby Lighting” (as defined by BS5266 Part 1) with an alternative power supply provide by a generator. It was not possible to confirm the full locations of the standby units and the adequacy of these installations as part of the fire risk assessment survey. It is understood that CoL are commissioning an emergency lighting survey. **See Action 1**

- *Escape routes not blocked & clearly marked.*

Escape signage in the Tenant Store Areas appears to have been improved since the previous FRA.

CoL has confirmed that the management strategy for the secondary means of escape is as follows – *“All 9 miles of balcony are formally inspected once per year by the House Officer team. Obstructions are labelled with an orange sticker and residents are given a week to remedy. Items if still present, are then removed. This inspection also reports any faults found. Additionally, the window cleaning contractors clean all windows every 6 weeks. They are tasked with fault and obstruction reporting as well. In the resident bulletin CoL regularly run fire safety messages, these include fault reporting and the importance of obstruction free balconies”.*

Privacy Screens on secondary means of escape. It is understood that there is no specific planned preventative maintenance regime for the glazed privacy escape doors/screen along the linking balconies. Weather conditions can affect the door and fixings, and therefore the ease of operation of escape device. **See Action 5**

Housekeeping - Excessive storage was noted on several landings of Block 89-102 – this could impede those escaping or firefighters. **See Action 19**

- *Fire doors with electrical hold open devices are closed by manual operation at 2200hrs (on final walk round in sleeping accommodation or earlier depending on site specifications).*

NA – none seen.

- *Are there any restrictions from Building Control, Planning & Heritage that could have an impact of the premises?*

Yes – This is a Grade II* listed building.

- *Are Salvage & business continuity plans are up to date and suitable and sufficient.*

No information provided but outside the scope of the Type 1 FRA.

- *Is there any neighboring fire risk that could significantly impact on the future fire safety of the building?*

None known.

- *During the inspection did you identified any cladding which was not already provided to you from the client documentation?*

From what can be ascertained from a visual non-intrusive observation from ground level, the external walls appear visually to be masonry brick and/or concrete construction. As such it is considered that there are no obvious features or “specified attachments” which could significantly increase the risk. On this basis, it is considered that no further action is required at this time, however, should additional information become available, which identifies potentially combustible

materials within the external wall or any other aspect which could increase the risk, then a PAS9980 Fire Risk Appraisal External Walls, (FRAEW) may need to be undertaken by a competent fire engineer or specialist, on the nature of, and fire risk associated with the external wall construction including any cladding or other features.

- *Are the onsite PEEPs and GEEPs templates adequate?*

It is understood that, it is CoL policy that they write to all residents, and where residents identify themselves as persons who may require assistance in an evacuation, they are recorded on a Vulnerability List which is retained in the building's Secure Information Box for the information of fire fighters. More detailed information is retained on the CoL housing management system "CIVICA".

Additional legislative requirements and guidance relating to vulnerable persons are expected to be introduced in 2025.

There are no specific physical provisions in the building for Persons with Restricted Mobility. The need for such provision may need to be reviewed in accordance with the new legislation. **See Action 16**

- *Where there any occupant/visitors identified who could be incapacitated and unable to evacuate safely and were not covered under by a PEEPs and GEEPs?*

None known

- *Are there inductions for staff and contractors?*

No staff on site.

- *Is there arrangement in place for the safe evacuations of visitors?*

Not applicable – purpose-built residential block of flats with a Stay Put strategy.

- *Is there a Building Fire Strategy and a Fire Management Plan of the building?*

A draft Fire Management Plan has been developed.

- *During the inspection did you identified any current working practices that could be improved to reduce the fire risk to the property, e.g. removing sources of ignition or reduce the amount of fuel stored?*

Switch Gear Room - There was no access to the switch gear room. **See Action 2**

Cleaners Store

Portable electrical appliances seen in the cleaners Storeroom had no obvious PAT labels. A fan heater was being used next to combustible furniture and cables and a kettle were on the floor where they could be easily damaged. **See Action 3**

Cleaners/Power Sockets

Non-secured 240v “power sockets” are located in the communal corridors – these can easily be used by residents to charge electric bikes, scooters, and mobility scooters which are a potential fire hazard and should not be charged in communal areas. **See Action 24**

- *Is there evidence of up-to-date electrical In-Service Inspection and Testing of Electrical Equipment in place?*

Sample fire extinguishers checked had test labels dated November 2024.

- *Is the fire detection & warning system type adequate for the building use?*

No communal fire alarm is provided as this building has a stay-put strategy.

- *Are the fire action notices compliant provide the reader with relevant instruction and position correctly positioned?*

The Fire Action Notices do not describe the Stay Put strategy. Fire action notices are missing from some of the entrances. **See Action 4**

- *Are there adequate sign to maintain the exit routes e.g. keep clear, floor marking etc.?*

The lifts in the building are not signed to indicate that they should not be used in the event of a fire. **See Action 17**

- *Are the existing active Fire Protection Measures sufficient for the buildings use?*

Smoke Ventilation

There is no smoke ventilation at the head of the non-firefighting stairways (other than some windows that can be opened from the outside only). It appears that there could originally have been open vents at the heads of the stairways which may have been removed by new window installations.

It was recommended in the Arup retrospective fire strategy for Andrew House, (which is of a similar design to Defoe House), that for escape purposes Automatic Opening Vents (AOVs) should be installed in the stairways. **See Action 7**

Further to Action 7 above, **in some areas** the smoke ventilation within the means of escape appears to be below the expected levels. Also, where provided, it could not be confirmed if the permanently open smoke vents have been periodically cleaned maintained. **See Action 8**

Communal ventilation system

It is understood that the building is fitted with a communal ventilation system(s) which connects to the multiple bathrooms and kitchens in the flats and is therefore a potential source of smoke/fire spread between flats. It could not be confirmed if the system has a shunt duct design or whether fire dampers are fitted. Also, no records of maintenance of the communal ventilation system were seen. **See Action 18**

- *Is there evidence on site of regularly fire door inspections?*

Fire Door Inspections - It is understood that periodic flat entrance door and communal fire door inspections are being completed as required by the Fire Safety (England) Regulations 2022 but no inspection records were demonstrated. **See Action 9**

- *Having checked 10% of fire Door shutters and curtain were any trends identified that could impact the safety of the building (Please list doors and curtain checked)*

Flat Entrance Doors

The flat entrance doors appear to be of the same type. Based on sample checks in the open position and information provided, they are considered to be notional fire doors, with no effective self-closing device fitted. Therefore, the flat entrance doors do not comply with historic or current fire safety standards or guidance. Many of the flat entrance doors appear to be warped and also do not close tightly into their frames. The side cupboards which form part of the door set and contain storage and electrical meters may also not provide adequate fire resistance as the cupboard doors between the flat and the common stairway can potentially be left open. It is understood that a programme is in place Flat entrance doors are to be renewed as part of CoL's door replacement programme which is replacing the doors with FD60S fire door sets. **See Action 10**

Flat Entrance Doors - Self Closers Sample checks to the flat entrance doors identified that none are fitted with effective self-closing devices. **See Action 11**

Fire-fighting stairs

The fire doors / partitions protecting the firefighting stairs do not comply with current standards (which require 120-minute partitions with FD60S doors). These doors are considered to be notional fire doors only and are fitted with Georgian wired glass side panels. Several of the double door sets have excessive gaps between the meeting edges. Several of the single doors do not close fully into their frames as they are warped and/or have been fitted with anti-slam pads. It is understood these doors will be replaced as part of the fire door replacement project. **See Action 12**

Tenant Store Area Fire Doors

The fire doors to the tenant store areas are generally not in a satisfactory condition – e.g. the door to area 471-496 has cracked glazing. Also, the door to the Pump Room from the Tenant Store has cracked glazing. It is understood these doors will be replaced as part of the fire door replacement project. **See Action 22**

Block 29-42 Tenant Store Area Under Stair Cupboard - Electric cables penetrating a fire door are not fire stopped. **See Action 23**

- *Is there evidence of regularly local checks and annual testing by competent?*

No maintenance records were provided - **See Action 13**

- *Has the site identified emergency responders' routes and fire hydrants and documented these?*

These routes are collated on a notice displayed in the Barbican Estates Office.

Fire Safety England (Regulations) 2022 – requirements - The Fire Safety (England) Regulations 2022 place additional requirements on CoL as a Responsible Person under the Regulatory Reform (Fire Safety) Order 2005. Although a Secure Inform Box is in place It was not confirmed whether the building plans meet LFB requirements, or whether they have been uploaded to LFB in electronic form. Wayfinding Signage (floor level) for Fire Fighters is not compliant. **See Action 6**

Fire Fighting Access - The firefighting access doors are fitted with a lock. It could not be confirmed if keys are provided in the Secure Information Box (SIB). Although there is a 24/4 car park attendant located nearby who should have the keys, it is advised the keys are retained in the SIB as a fallback measure. **See Action 15**

- *Are there any known neighboring activities that could jeopardy a prompt arrival of the emergency responders?*

None known.

- *Is there evidence of anti-social behaviour at the site?*

None known.

- *Are there any seasonal activities undertaken by the site or naturally occurring events which could affect the fire risk profile of the site e.g. bush fires etc?*

None known.

- *Are there any renewable energy source at the site that cannot be readily isolated at source in the event of a fire?*

None seen.

- *Are back up generation tested to ensure they provided adequate supplies to fire safety devices?*

No maintenance records were provided - **See Action 13**

- *Is the premises controller aware of the CoL guidance on Hot Works?*

Understood that the CoL permit process is under review. A robust permit system must be implemented for hot works undertaken on the building.

- *Are they evacuation procedures for all time the building is in used e.g. out of hours procedures for weekend?*

Stay Put strategy applies.

- *Upon review of on-site documentations, how long did it take the building to evacuate?*

N/A – Stay-Put strategy in place.

- *Are security and arrangements adequate to deter deliberate fire attempt (e.g. terrorist and arson) in an event?*

The building has secure entrances.
External areas are kept free of storage.

- *Is large lithium-ion battery charged on site?*

None known.

- *When was thermographic inspection last undertaken at site?*

No maintenance records were provided - **See Action 13**

- *Has the property had any unintentional fires over the last two years if so, please provide details?*

None known.

- *Were there any significant gaps identified in the compartments (please list details)?*

Lift Landing lights - There are light fittings above the lifts. These lights are fitted with metal hoods that separate them from the risers. It was noted that several of these hoods had been displaced, effectively leaving an open hole between the risers and stairwell. **See Action 14**

Block 59-72 - Blacked Out Glazing – Glazing to this flat has been blacked out so it was not possible to confirm that the original Georgian Wired Glass is still in-situ. **See Action 20**

Vents into stairs - Blanking plates are missing from the vents from Flats 51 & 102. It is understood that the vents had been blocked off to mitigate against the risk of smoke entering the communal stairs. **See Action 21**

- *How are contractors fire risk controlled locally?*

Understood that contractors are controlled by the CoL site team and a permit process.

- *Is there up to date maintenance records for all fire systems on site?*

No maintenance records were provided - **See Action 13**

- *Is the fire logbook in accordance with CoL guidance policy (see appendix)?*

Description of site

As this building is at least 7 stories / 18m tall, it is a High-Rise Residential Building (HRRB) as defined by the Fire Safety (England) Regulations 2022.

Defoe House was completed in 1973. It is a terrace block running east to west within the Barbican Estate. The building is of "Brutalist" architecture and is Grade II* listed. The building has concrete construction (floors, stairways and walls), and an arched roof.

Defoe house is one building comprising of twelve independently accessed cores each with its own entrance at the podium level. Each core contains a single common stairway and lift with flats opening directly into the stair. On upper levels, flats have linking balconies which run the whole length of the building and open via doors into the firefighting cores/stairs.

The building contains a total of 178 flats with 2 flats per floor. The residential accommodation sits above commercial units and a car park.

Several cores have garden flats (below podium level) which can be reached by the lifts, or by external stairs descending from the podium.

The roof tops provide access to the lift motor rooms, and ventilation plant rooms.

Below podium level, the three firefighting stairways descend to the carpark level (01), which is the level which firefighters would access the building.

In cores 1-12 there are also resident storage areas at level 01 (within which there is a pump room), a substation at level 02 no access), and finally access to the service tunnel at level 03. There is a Switch Gear room at level 03.

Core 29-42 also provides access to resident storage areas at level 01.

At core 163-178, the external stairs at podium level lead down to a Estate Cleaners Storeroom.

Means of Escape:

The principal means of escape from the flats is via the single internal stairway that descend to the podium or level 02.

Flats on the upper floors also have secondary means of escape via linking balconies that provide access back into the firefighting stairways.

Use of Site

Purpose-built general needs residential block of flats.

Passive Fire Precautions

Flats entrance doors

The flat entrance doors appear to be of a consistent type. They do not comply with current standards. They are considered to be “Notional” fire doors (as defined by Fire Safety in Purpose Built Blocks of Flats). It is understood that the flat entrance doors are fitted with spring-loaded centre hinges but that these are no longer effective self-closing devices.

Flat entrance doors have wired glass side panels which are considered to provide a notional 30 minutes fire resistance.

It is understood that City of London will be replacing all the flat entrance doors, including side panels and side cupboard doors with certified FD60S door sets.

Construction of flats

The walls between the internally accessed flats and protected means of escape are a concrete/masonry wall with fixed Georgian wired glass windows which can only be expected to provide 30 minutes fire resistance. This is below the normal 60 minutes required between flats and an internal stairway. It is believed that at the time of construction this would have been justified under CP3 Chapter IV as the flats have secondary means of escape via the external linking balconies.

Protection of stairways.

With the exception of the firefighting stairs, the flats exit directly into the common escape stairway. This does not meet current fire safety guidance as the building is more than 3 storeys above ground level. To reduce the risk of fire affecting the common stairway CoL are proposing to replace the existing notional fire doors with FD60S self-closing fire door sets.

The fire doors / partitions protecting the firefighting stairs do not comply with current standards (which require 120 minute partitions with FD60S doors). These doors are at best notional fire doors and are only and are fitted with Georgian wired glass side panels. Several of these door sets have excessive gaps between the meeting edges.

In the access stair to each block, checks identified that the riser cupboard doors are notional asbestos backed doors that often do not adequately close. In addition, there are gaps between the risers and light fittings above the lifts that could allow smoke into the stairways.

It is understood that City of London will be replacing all the communal fire doors, including riser doors, with certified fire door sets.

Communal Ventilation / Shunt Ducts

It is understood that a communal ventilation system ductwork connects the bathrooms and kitchen of the flats. It could not be confirmed if this system is fitted with shunt ducts or fire dampers.

Smoke Ventilation:

The firefighting stairs have Openable Vents (OVs) at the head of the stairs. Manual controls to open the vents are provided at the fire fighters entrances in the Defoe/Shakespeare Tower car park.

The other stairways are not ventilated other than by openable windows, however these windows cannot be opened internally so would provide little benefit in firefighting conditions. It appears there may have originally been Permanently Open Vents at the head of the stair but if so, they have been removed when windows at the head of the stairs were replaced.

There are ventilated lobbies between the car park and stairwells. The ventilation is a mixture of smoke shafts or being open to air.

In some areas the smoke shafts appear to be provide less the expected levels, of ventilation and it could also not be confirmed if the system(s) have been periodically cleaned / maintained.

Sprinklers

The resident store areas are protected by a sprinkler system (linked to the car park system).

Facilities for fire fighters

Firefighting Access

Firefighting access is at street level via the Barbican Road tunnel (Beech Street), and the Defoe/Shakespeare Tower car park.

Secure Information Box (SIB)

There are SIBs containing emergency contact numbers, site and building layout plans, located outside the firefighters' entrances. They could not be opened as no key was provided but COL have confirmed that they contain –

- Anonymised PEEP information for estate.
- Map of estate
- Map of all risers and what they feed
- Block plans for the blocks they serve
- Information about flat types.
- Flat plans
- Contact telephone numbers of all car park boxes and towers (24/7 staff on site)

Dry Rising Mains

Each firefighting stair is fitted with a Dry Rising Main with outlets on the stairway landings and on the roof. The inlets are accessed at street level within the car park.

Manually Openable Vents (OVs).

The firefighting stairs have Manually Opening Vents (OVs) at the head of the stairs. Manual firefighter controls are provided at the fire service entrance levels in the Defoe/Shakespeare Tower car park.

Fire Brigade Liaison

It is understood that LFB regularly undertake familiarization visits of the Barbican Estate.

Fire safety signage

In some areas, particularly below podium level in the stairways, fire safety escape signage is considered to be inadequate.

This had previously been identified and a “Barbican Fire Sign Strategy” was completed by BB7 in October 2021. This detailed strategy highlights the deficiencies and provides recommendations for new signage.

Active Fire System

Fire Alarms

In accordance with fire safety guidance, as the building is a purpose-built block of flats designed to support a stay put evacuation strategy, a communal fire alarm system is not provided in the residential areas.

Fire Shutters

There are automatic fire shutters activated by fusible links protecting the stairwells from the carpark.

Sprinkler System

A sprinkler system is fitted in the resident storage areas, and appears to be linked to the Defoe/Shakespeare car park system.

Emergency Lighting (EML)

Emergency lighting is provided in most areas via “standby lighting” with a backup supply powered by a generator. Self-contained emergency lighting is also provided in some areas.

The adequacy of the emergency lighting could not be confirmed.

Fire Ignition Sources

Within the common parts the most significant ignition sources are the electrics/cabling located within the service risers. Providing the fixed wiring and any portable appliances in the risers is appropriately maintained and the risers are kept sterile this is considered a tolerable risk.

Fire Training

It is understood that the Estates Manager and staff in the estates team are required to complete CoL’s mandatory fire safety training which includes the use of fire extinguishers.

Make an assessment of the fire risk.

Likelihood of fire occurring at the property

	Medium	
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Likelihood of fire spreading through the building

	Medium	
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Likelihood of loss of life due to fire

	Medium	
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Formulate and document an action plan.

If it is considered that the fire risk and existing fire precautions are such that no improvements are necessary, this should be recorded within the fire risk assessment. The action plan should address both physical fire precautions, managerial issues and should normally prioritise measures so that the appropriate effort and urgency is clear. The measures within the action plan should both practically implement and maintain, taking into account the nature of the building and its occupants. With the best solution to bring about improvement with a possible pragmatic solution.


CoL Specific Hazard identification and Action plan template

Each hazard risk is to be identified in the assessment and is to include the following sections: as the following example: -


- *Location: Specific to the building area i.e. 2nd floor north wing room A23 (use of the standard door marking for monthly testing is good practice as a location point)*
- *Observations: Controls in Place - a list of what controls are in place to control the fire hazard, subjective appraisal*
- *Missing Controls / Problem - an explanation of any missing controls or safety problems identified during the risk survey to include thumbnail photographs where they help to clarify the problem & further action required - the individual actions that should be taken to control the hazards and put corrective actions in place.*
- *Risk Priority - The assessor's opinion of how urgent the action is, that needs be taken to reduce risk to a tolerable level. This is subjective and is based on the CoL Matrix below.*
- *CoL Service level: Time frame for contractors to attend in hours / days as our service level agreement with service providers.*
- *Actioned by: The CoL member on the site who reports the defects.*
- *PSD: Property service desk number given when reporting (undertaken by CoL staff when assessor informs them whilst on site)*
- *Completed date or date followed up (Maximum 28 days for items to be followed up and recorded in the table)*
- *When possible, the assessor is to place a photo below the concerns A9 size 37mm x 52mm.*

Ref No. Location:	Observations	Recommended further action	Observation Pictures	Risk Rating Low Medium High	Priority Level (please refer to table 1)	Action by Whom & When (Person task with action by premise controller	Date Completed
1	<p>Emergency Lighting</p> <p>The emergency lighting in the building appears to be provided by a mix of self-contained units and “Standby Lighting” (as defined by BS5266 Part 1) with an alternative power supply provide by a generator. It was not possible to confirm the full locations of the</p>	<p>If not previously completed, it is advised that a site wide survey should be undertaken of the standby emergency lighting systems in the building (and along external means of escape) by a competent person, to assess their adequacy with a “gap analysis” between the as installed standards and those required</p>		Medium	D		

	<p>standby units and the adequacy of these installations as part of the fire risk assessment survey.</p> <p>It is understood that CoL are commissioning an emergency lighting survey.</p>	<p>by BS5266 Part 1 2016.</p> <p>Any installations or enhancements or replacements required should be in accordance with BS5266 Part 1 2016.</p>					
<p>2</p>	<p>Switch Gear Room</p> <p>There was no access to the switch gear room.</p>	<p>The Switch Gear room should be inspected to ensure fire safety arrangements satisfactory- housekeeping is in order (no accumulation of combustibles), any extinguishers are in date, signage and emergency lighting and escape routes are clear and readily available.</p>		<p>Low</p>	<p>C</p>		


<p>3</p>	<p>Cleaners Store</p> <p>Portable electrical appliances seen in the cleaners Storeroom had no obvious PAT labels. A fan heater was being used next to combustible furniture and cables and a kettle were on the floor where they could be easily damaged.</p>	<p>Ensure any portable electrical appliances used or stored in the Cleaners Store are PAT tested in accordance with CoL policy.</p> <p>This area should be managed to ensure combustibles are kept away from heaters and to ensure electrical appliances and cables are not damaged.</p>		<p>Low</p>	<p>C</p>		
<p>4</p>	<p>Fire Action Notices</p> <p>The Fire Action Notices do not describe the Stay Put strategy.</p> <p>Fire action notices are missing from some of the entrances.</p>	<p>The Fire Action Notices (FANS) should be replaced with signs that describe the Stay Put Strategy.</p> <p>FANS should be displayed at all the entrances to the building.</p> <p>It is understood this will be completed as</p>		<p>Low</p>	<p>D</p>		

		part of the CoL signage project.					
5	<p>Privacy Screens on secondary means of escape.</p> <p>It is understood that there is no specific planned preventative maintenance regime for the glazed privacy escape doors/screen along the linking balconies. Weather conditions can affect the door and fixings, and therefore the ease of operation of escape device.</p>	<p>It is advised that a planned preventative maintenance regime is put in place to ensure that the glazed privacy escape doors/screens remain operable at all times i.e., fixings / bolts remain in a good and easily operable condition. It is recommended the doors be inspected at least annually.</p>		Low	D		
6	<p>Fire Safety England (Regulations) 2022 - requirements</p> <p>The Fire Safety (England)</p>	<p>CoL should ensure that they have suitable arrangements in place to discharge their responsibilities under the Fire</p>		High	D		

	<p>Regulations 2022 place additional requirements on CoL as a Responsible Person under the Regulatory Reform (Fire Safety) Order 2005.</p> <p>Although a Secure Inform Box is in place It was not confirmed whether the building plans meet LFB requirements, or whether they have been uploaded to LFB in electronic form.</p> <p>Wayfinding Signage (floor level) for Fire Fighters is not compliant.</p>	<p>Safety (England) Regulations 2022.</p> <p>In summary –</p> <p>For high-rise residential buildings (a multi-occupied residential building at least 18 metres in height or 7 or more storeys), responsible persons must:</p> <p>share electronically with their local fire and rescue service (FRS) information about the building’s external wall system and provide the FRS with electronic copies of floor plans and building plans for the building.</p> <ul style="list-style-type: none"> • Keep hard copies of the building’s floor plans, in addition to a single page orientation plan of the building, 					
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		<p>and the name and UK contact details of the responsible person in a secure information box which is accessible by firefighters</p> <ul style="list-style-type: none"> • Install wayfinding signage for fighters in all high-rise buildings which is visible in low light conditions. • Establish a minimum of monthly checks on lifts which are for the use of firefighters in high-rise residential buildings and on “essential items of firefighting equipment”. 					
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		<ul style="list-style-type: none"> • Inform the FRS if a lift used by firefighters or one of the items of essential firefighting equipment will be out of order for longer than 24 hours. <p>For multi-occupied residential buildings over 11 metres in height, responsible persons must:</p> <ul style="list-style-type: none"> • Undertake quarterly checks on all communal fire doors and annual checks on flat entrance doors. <p>In all multi-occupied residential buildings, responsible persons must:</p>					
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		<ul style="list-style-type: none"> • Provide residents with relevant fire safety instructions and information about the importance of fire doors. <p>Guidance on these duties is available here - Check your fire safety responsibilities under the Fire Safety (England) Regulations 2022 (accessible) - GOV.UK</p>					
7	<p>Smoke Ventilation</p> <p>There is no smoke ventilation at the head of the any of the stair (other than some windows that can be opened from the outside only or OV's in the firefighting stairs). It appears that there could originally have been open vents at the heads of the stairways but</p>	<p>Due to the height of the building, and because the flats open directly into the stairs, it is advised that AOVs are installed to provide 1m² of smoke ventilation at the heads of all the staircases from which the flats are accessed.</p>		Medium	E		

	<p>if so that they may have been removed by new window installations.</p> <p>It's recommended in the Arup retrospective fire strategy for Andrew House, which is of a similar design to Defoe House, that for escape purposes Automatic Opening Vents (AOVs) should be installed in the stairways.</p>						
<p>8</p>	<p>Smoke Ventilation</p> <p>Further to action 7 above, the smoke ventilation in the building appears to be below the expected levels.</p>	<p>It is advised CoL should commission an expert appraisal by a smoke ventilation specialist to consider the adequacy of the existing smoke control arrangements in the building, including any links to the car park.</p>		<p>Low</p>	<p>D</p>		


		<p>The smoke control appraisal should review the adequacy of the existing smoke control arrangements, their condition and any planned preventative maintenance regime. The appraisal should also consider if any additional smoke ventilation measures are required.</p> <p><i>NB – it is anticipated that such an appraisal may be considered necessary as part of the Safety Case required under the Building Safety Act 2022.</i></p>					
9	<p>Fire Door Inspections</p> <p>It is understood that periodic flat entrance door and</p>	<p>Ensure that up to date records are being maintained to demonstrate that fire doors (including flat</p>		Medium	C		

	<p>communal fire door inspections are being completed as required by the Fire Safety (England) Regulations 2022 however, at the time of the assessment no inspection records were provided.</p>	<p>entrance doors) are being checked in accordance with the Fire Safety (England) Regulations 2022. Communal fire doors requiring evidence of inspection include the stairway doors and lobby doors, and riser/service cupboard doors.</p>					
10	<p>Flat Entrance Doors</p> <p>The flat entrance doors appear to be of the same type. Based on sample checks in the open position and information provided, they are considered to be notional fire doors, with no effective self-closing device fitted. Therefore, the flat entrance doors to not comply with historic or current fire safety</p>	<p>Considering the age and condition of the existing flat entrance doors, it is advised that the door sets are replaced with certified fire doors which meet current fire safety standards.</p> <p>It is understood that Flat entrance doors are to be renewed as part of CoL's door replacement programme, which is replacing these doors with FD60S,</p>		Medium	D		

	<p>standards or guidance.</p> <p>Many of the flat entrance doors appear to be warped and also do not close tightly into their frames.</p> <p>The side cupboards which form part of the door set and contain storage and electrical meters may also not provide adequate fire resistance as the cupboard doors between the flat and the common stairway can potentially be left open.</p> <p>It is understood that a programme is in place Flat entrance doors are to be renewed as part of CoL's door replacement programme which is replacing the doors</p>	<p>self-closing fire door sets.</p>					
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	with FD60S fire door sets.						
11	<p>Flat Entrance Doors - Self Closers</p> <p>Sample checks to the flat entrance doors identified that none are fitted with effective self-closing devices.</p>	<p>The existing flat entrance doors should be self-closing to minimise the risk of smoke entering the means of escape.</p> <p>All flat entrance doors must be fitted with effective self-closing devices (i.e. an overhead self-closer).</p>		High	C		
12	<p>Fire-fighting stairs</p> <p>The fire doors / partitions protecting the firefighting stairs do not comply with current standards (which require 120-minute partitions with FD60S doors). These doors are considered to be notional fire doors only and are fitted</p>	<p>In the short term, ensure all the communal fire doors protecting the fire-fighting stairs are fully self-closing into their frames when released from any angle.</p> <p>CoL have confirmed that longer term, these fire door are to be replaced as part</p>		Medium	C		

	<p>with Georgian wired glass side panels. Several of the double door sets have excessive gaps between the meeting edges. Several of the single doors do not close fully into their frames as they are warped and/or have been fitted with anti-slam pads.</p> <p>It is understood these doors will be replaced as part of the fire door replacement project.</p>	<p>of the CoL communal fire door replacement project.</p> <p>It is advised that where any new FD60S fire doors are fitted, the side panels that separate the firefighting stairs from the lift/accommodation lobbies are at least REI 60-minute fire rated.</p>					
<p>13</p>	<p>Planned Preventative Maintenance (PPM)</p> <p>No PPM / statutory inspection records were provided.</p>	<p>Ensure the maintenance of the following systems is up to date:</p> <ul style="list-style-type: none"> • Fixed Electrical Wiring (including Thermographic 		<p>Medium</p>	<p>C</p>		


		<p>imagine where required)</p> <ul style="list-style-type: none"> • Emergency Lighting (and any back-up generator) • Dry Risers • Firemen’s Lifts • Smoke Vents - Opening Vents (OVs) • Lightning Protection • Sprinkler System 					
<p>14</p>	<p>Lift Landing lights</p> <p>There are light fittings above the lifts. These lights are fitted with metal hoods that separate them from the risers.</p> <p>It was noted that several of these hoods had been displaced, effectively leaving an open hole</p>	<p>All of the lift landing lights should be checked to ensure that the metal covers are in place with no gaps. Where gaps are identified they should be sealed to ensure that there is at least 30 minutes imperforate compartmentation between the riser and lift lobby.</p>		<p>Medium</p>	<p>D</p>		


	between the risers and stairwell.						
15	<p>Fire Fighting Access</p> <p>The firefighting access doors are fitted with a lock. It could not be confirmed if keys are provided in the Secure Information Box (SIB).</p> <p>Although there is a 24/4 car park attendant located nearby who should have the keys, it is advised the keys are retained in the SIB as a fallback measure.</p>	<p>It is advised that keys for the access door(s) are provided in the new secure premises information box to facilitate fire fighter's access.</p> <p>For clarity, the SIB should be labelled with the building name.</p>		Low	D		
16	<p>Vulnerable Persons</p>	<p>City of London should ensure that they remain up to date with and</p>		Advice	Advice		


	<p>Additional legislative requirements and guidance relating to vulnerable persons are expected to be introduced in 2025.</p>	<p>implement the relevant requirements of legislation and guidance relating to vulnerable persons (persons with cognitive or physical impairments).</p> <p>There are no specific physical provisions in the building for Persons with Restricted Mobility. The need for such provision may need to be reviewed in accordance with the new legislation.</p>					
<p>17</p>	<p>Lift Signage</p> <p>The lifts in the building are not signed to indicate that they should not be used in the event of a fire.</p>	<p>The lifts should be signed so that it is clear to those in the communal areas that they should be used in the event of a fire.</p>		<p>Low</p>	<p>D</p>		

<p>18</p>	<p>Communal ventilation system</p> <p>It is understood that the building is fitted with a communal ventilation system(s). It is understood that these systems link between all flat bathrooms and kitchens and are therefore a potential source of smoke/fire spread between flats. It could not be confirmed if suitable shunt ducts or dampers are fitted in the system and maintained.</p>	<p>It is advised that a survey of the communal ventilation systems is undertaken by a competent person to appraise whether the system incorporates suitable features to restrict the risk of smoke spread between flats, and whether any remedial measures are necessary.</p> <p><i>NB – it is anticipated that such an appraisal may be considered necessary as part of the Safety Case required under the Building Safety Act 2022.</i></p>	<p style="text-align: center; font-size: 48px; opacity: 0.3;">COL</p>	<p>Medium</p>	<p>D</p>	
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<p>19, Block 89-102</p>	<p>Housekeeping</p> <p>Excessive storage was noted on several landings in Block 89-102. This could impede those escaping or fire fighters accessing the building.</p>	<p>The communal lobbies should be kept clear of storage to ensure the means of escape are unobstructed, and that there is no unnecessary fire load in the communal areas.</p>	<p style="font-size: 48pt; opacity: 0.5; text-align: center;">CO</p>	<p>Low</p>	<p>C</p>		
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20, Block	<p>Compartmentation</p> <p>The glazing to this flat has been blacked out so it was not possible to confirm that the original Georgian Wired Glass is still in-situ.</p>	<p>CoL should confirm that the glazing between the flat and the stair will provide at least 30 minutes of fire resistance (e.g. that it is Georgian Wired Glazing).</p>		Medium	C		
21	<p>Vents into stair</p> <p>Blanking plates are missing from the vents.</p> <p>It is understood that the vents had been blocked off to mitigate against the risk of smoke entering the communal stairs.</p>	<p>It is advised that the blanking plates over the stair vents are replaced.</p>		Low	C		

<p>22</p>	<p>Tenant Store Area Fire Doors</p> <p>The fire doors to the tenant store areas are generally not in a satisfactory condition – e.g. the door to area 471-496 has cracked glazing.</p> <p>Also, the door to the Pump Room from the Tenant Store has cracked glazing.</p> <p>It is understood these doors will eventually be replaced as part of the communal fire door replacement project.</p>	<p>In the short term, ensure all the communal fire doors in the Tenant Store areas are fully self-closing into their frames when released from any angle. Any broken glazing should be replaced or covered by a fire resisting material.</p> <p>Longer term, it is advised that all of the existing communal fire doors should be replaced as part of the CoL communal fire door replacement project. It is advised that at least FD30S fire doors are fitted.</p>		<p>Low</p>	<p>C</p>	Empty blue-shaded cells
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<p>23</p>	<p>Block 29-42 Tenant Store Area Under Stair Cupboard</p> <p>Electric cables penetrating a fire door are not fire stopped.</p>	<p>The service penetrations should be sealed with an appropriate for firestopping material to provide at least 30 minutes fire resistance.</p>		<p>C</p>	<p>D</p>		
<p>24</p>	<p>Cleaners Sockets</p> <p>Non-secured 240v “power sockets” are located in the communal corridors – these can easily be used by residents to charge electric bikes, scooters, and mobility scooters which are a potential fire hazard and should not be charged in communal areas.</p>	<p>It is advised that the communal electric sockets are fitted with locks to prevent them being used by unauthorised persons, and specifically so they are not used to charge equipment which utilise Lithium-Ion Batteries, in communal areas.</p>		<p>Advice</p>	<p>Advice</p>		

Action time frame in accordance with CoL service level agreements

Table One Priorities for remedial action listed below; - & time frame.

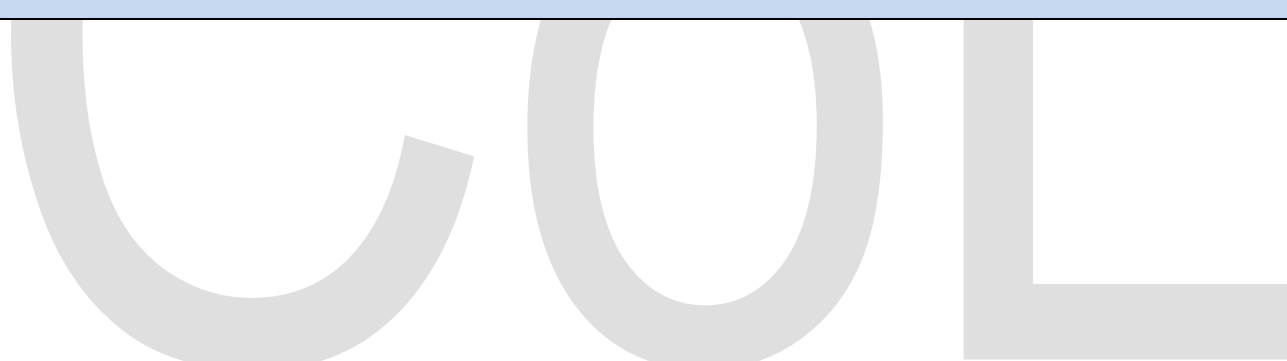
Recommend priority code

Priority Action AA	Immediate action taken whilst on site attendance.	(P1) 2-hour
Priority Action A	Immediate action required	(P2) 24 Hours
Priority Action B	Action required in the short term	(P3) 4 Days
Priority Action C	Action required in the short term	(P4) 28 Days
Priority Action D	Remedial action required in the long term	3 Months.
Priority Action E	Action to be consider when refurbishing	Project Planning Stage
Priority Action H/S	Health & Safety Information	(P2) Action 24 hrs.
P3A	over weekend when attendance will wait until Monday for attendance not warranting a 24hr P2.	

Additional Comments to the assessment:

This Fire Risk Assessment should be reviewed annually and whenever there is a material change in the use of the premises or part of the premises (including numbers of occupants) or when significant structural or layout changes to the premises are proposed or carried out. The table below is provided for the 'Responsible Person' at the premises to maintain a record of reviews and provides space for simple comments. If the review indicates significant change, then a new complete Fire Risk Assessment by our professional assessment providers should be carried out and fully documented.

Date	Reason for review	Results / Comments	Name, Position & Signature



Appendix One

Pre-Survey Questionnaire

Information Required Pre-Site Visit (21 days)

List of restriction applied by Building Control, Planning & Heritage interest impinging on the risk assessment.	
Salvage and Business Continuity of the building	
Structural alteration of the property, any project works being undertaken at the time of the assessment which could impinge on the assessment decision.	
Change of use of the property/process undertaken.	
Planning permission for new structures nearby.	
Structural use of decorative timber cladding/aluminum.	
Change in use of activities of the premises.	
Alcohol use on site by staff off duty or visitors.	
Unfamiliar surrounding for staff or visitors.	
Number of disabilities of staff/visitors.	
Surrounding risks which have the likelihood to affect business continuity of the premises.	
<p>Building Fire Strategy for the site:</p> <ul style="list-style-type: none"> • Means of Warning and Escape • Emergency lighting and Signature • Internal Fire Spread (lining) • External Fire Spread (structure) • Fire Service Access 	
<p>Fire Management Plan covering:</p> <ul style="list-style-type: none"> • How you manage fire safety day-to-day • PEEPS, particularly in housing the procedures for residents to follow in the event of Fire (stay put policy) • Number of Safety/Fire Marshall to cover site. • Method of calling the Fire Service • Full site evacuation plans, gas escape, planned and unplanned power failures. • Route for emergency service personnel and vehicles to the premise's day & night with the expected pre-determined attendance time from local authority fire station and works fire service i.e. Heathrow Animal Reception Centre. (HARC). 	
<p>Security onsite covering:</p> <ul style="list-style-type: none"> • anti-social behaviour • Protection from the threat of arson • CCTV-log 	
Secondary/Life Safety power generation on site.	
Permit to work system:	

<ul style="list-style-type: none"> • Hot work permits to (CoL guidance note) • Roof Access • Fire Stopping Register for (internal & external contractor works/repairs) • Hazards introduced by contractors (<i>Acetylene cutting is not permitted on sites</i>). 	
Occupants in satellite buildings under the control of the site.	
Commercial Shop Units to detail areas of: <ul style="list-style-type: none"> • Location • Floor area • Activities undertaken. 	
Listed building (grade 1 or 2 or code ABC)?	
Entertainment licences in force <ul style="list-style-type: none"> • Seasonal activity undertaken by the site which affects the fire risk assessment 	
Fire Detection & Alarm Systems installed. Type and description including operation, fire detection and alarm interfaces with zone plan.	
List of enforcement/deficiency actions out-standing matters.	
AFA automatic fire alarms, AFA History of calls in rolling 12-month period of unwanted fire signals.	
Salvage /disaster recovery plans.	
Floor marking of wheelchairs in seating areas.	
Previous history of fires on the site over 20-year period	
Fire Safety arrangements which are in place including compromised fire safety due to external safety related event occurring (Terrorist Marauding) improvised devices.	
Fire Assembly Points suitable with alternative secondary available.	
Firefighting systems incorporated within the premises e.g. Pressurised staircases, Fixed installation water or gas systems, firefighting mains, Protection for Fire-Fighters	
COMAH sites within 800m	
COSHH cabinet on site Cleaning products	
Acetylene cylinders used within 250M	