

Freedom of Information request reference number: 7925.1

Date of response: 13 October 2023

Request:

I understand that since the notice of deficiency was issued by the LFB dated 17/12/2021 ref 94/169260 there have been many visits by the London Fire Brigade to Master Gunner Place SE18 4GB and specifically the Buildings Bush House, Bailey House & Butterfield House and the garages beneath.

Can you forward all the inspection reports and Or deficiency reports, call out reports, false Alarms call outs and LFB charges issued since 17/12/2021 to these Buildings Bush House, Bailey House, Butterfield House and the underground garage underneath these Buildings at Master Gunner Place SE18 4GB.

Response:

Please see attached spreadsheets detailing our attendance at Bush House, Bailey House and Butterfield House.

Our Fire Safety Regulatory Team have also provided the most recent notices served the buildings at Master Gunner Place.

Where a Fire Safety Audit (FSA) results in a notice being issued by the LFB, the reports themselves are exempt from release under The Freedom of Information Act (FOIA) provisions under [Section 31 of the FOIA - law enforcement](#) (Section 31(1)(g) combined with 31(2) (a) and 31(2) (c)).

A copy of the Notice of Deficiencies (NOD) issued for Butterfield House can be found below. Enforcement Notices were issued for Bush and Bailey House a copy is below - Personal data has been removed from the NOD document under [section 40 of the FOIA –Personal Information](#).

I hope you find this information of use. Should you have any further questions please do let me know.

We have dealt with your request under the Freedom of Information Act 2000. For more information about this process please see the guidance we publish about making a request [on our website](#)

LFB Visits to Master Gunner PLace

Type	Address	Incident/ Visit ID	Time of call	Description	Job type	Status
Station Visit	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	21812329	27/08/2023	High Rise Premises 7(2)d	Outside Duty	Completed
False Alarm	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	087505-16062023	16/06/2023	AFA		
Station Visit	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	21812328	15/04/2023	High Rise Premises 7(2)d	Outside Duty	Completed
Fire Safety Inspector	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	7847	03/04/2023	Enforcement Notice	Enforcement Notice	Active
Station Visit	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	21812327	04/02/2023	High Rise Premises 7(2)d	Outside Duty	Completed
Fire Safety Inspector	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	46625	25/01/2023	Fire Safety Audit	Fire Safety Audit	Completed
Station Visit	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	21812326	03/11/2022	High Rise Premises 7(2)d	Outside Duty	Completed
Fire	BAILEY HOUSE, BERBER PARADE 6M FROM BAKER ROAD, BAKER ROAD	146636-02092022	02/09/2022	Secondary Fire		
Station Visit	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	21812325	17/08/2022	High Rise Premises 7(2)d	Outside Duty	Completed
Station Visit	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	21812323	24/05/2022	High Rise Premises 7(2)d	Outside Duty	Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057545	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057546	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057542	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057540	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057541	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057547	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057552	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057553	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057558	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057565	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057571	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057554	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057549	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057562	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057556	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057560	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2057551	24/05/2022	Full	Full	Visit Completed
HFSV	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	2054545	17/05/2022	Full	Full	Deleted - Client Declined Visit
Fire Safety Inspector	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	48595	05/05/2022	Fire Safety Audit	Fire Safety Audit	Completed
Station Visit	BAILEY HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4G	21812324	13/04/2022	High Rise Premises 7(2)d	Outside Duty	Completed

Type	Address	Incident/ Visit ID	Time of call	Description	Job type	Status
Station Visit	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	21809048	06/10/2023	High Rise Premises 7(2)c	Outside Duty	Completed
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	134592-03092023	03/09/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	128958-24082023	24/08/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	114688-30072023	30/07/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	114617-30072023	30/07/2023	AFA		
Fire Safety Inspector	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	15527	04/07/2023	Fire Safety Audit	Fire Safety Audit	Completed
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	087535-16062023	16/06/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	087359-16062023	16/06/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	083149-10062023	10/06/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	081743-08062023	08/06/2023	AFA		
HFSV	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	2121281	07/06/2023	Full	Full	Visit Cancelled - Resident Directed to Checker
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	071602-22052023	22/05/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	066298-12052023	12/05/2023	AFA		
False Alarm	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	029721-28022023	28/02/2023	AFA		
Fire Safety Inspector	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	30884	01/09/2022	Fire Safety Audit	Fire Safety Audit	Completed
HFSV	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	2064999	11/07/2022	Full	Full	Visit Completed
HFSV	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	2065000	11/07/2022	Full	Full	Visit Completed
HFSV	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	2064998	11/07/2022	Full	Full	Visit Completed
HFSV	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	2064997	11/07/2022	Full	Full	Visit Completed
Fire	BUTTERFIELD HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18	012737-28012022	28/01/2022	Primary Fire		

Type	Address	Incident/ Visit ID	Time of call	Description	Job type	Status
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	21811600	27/08/2023	7(2)d Inspection, High Rise Premises 7(2)c	Outside Duty	Completed
False Alarm	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	114666-30072023	30/07/2023	AFA		
False Alarm	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	114628-30072023	30/07/2023	AFA		
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	21811599	04/07/2023	7(2)d Inspection, High Rise Premises 7(2)c	Outside Duty	Completed
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	24689959	04/05/2023		Potential High Rise Premises 7(2)c	Completed
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	24256346	13/04/2023	fire safety inspection revisit	Potential 7(2)d Inspection	Completed
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	21811598	04/02/2023	7(2)d Inspection, High Rise Premises 7(2)c	Outside Duty	Completed
Fire Safety Inspection	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	40666	10/11/2022	Enforcement Notice	Enforcement Notice	Active
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	21811597	02/11/2022	7(2)d Inspection, High Rise Premises 7(2)c	Outside Duty	Completed
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	21811596	01/09/2022	7(2)d Inspection, High Rise Premises 7(2)c	Outside Duty	Completed
Fire Safety Inspection	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	30913	01/09/2022	Fire Safety Audit	Fire Safety Audit	Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2061310	17/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2061309	17/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2061316	17/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2061311	17/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2061314	17/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2061313	17/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2059974	09/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2059971	09/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2059890	09/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2058843	01/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2058836	01/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2058827	01/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2058828	01/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2058831	01/06/2022	Full	Full	Visit Completed
HFSV	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	2058842	01/06/2022	Full	Full	Visit Completed
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	21811595	13/04/2022	7(2)d Inspection, High Rise Premises 7(2)c	Outside Duty	Completed
Special Service	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	043168-27032022	27/03/2022	No persons involved	Effecting entry/exit - No persons	
Station Visit	BUSH HOUSE, BERBER PARADE, WOOLWICH, GREENWICH, SE18 4	21811594	10/02/2022	7(2)d Inspection, High Rise Premises 7(2)c	Outside Duty	Completed



The Company Secretary
Rendall and Rittner Limited
13B St George Wharf
London
SW8 2LE

The London Fire Commissioner is the
fire and rescue authority for London

Date 18 July 2023
Our Ref 94/241045 [REDACTED]

Dear Sir/Madam

REGULATORY REFORM (FIRE SAFETY) ORDER 2005 (AS AMENDED): NOTIFICATION OF FIRE SAFETY DEFICIENCIES

Premises: Butterfield House, Berber Parade, Woolwich SE18 4GA

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) hereafter the Fire Safety Order (as amended) in London.

The Commissioner's Inspectors have recently carried out an inspection of the above-mentioned premises. During the inspection, it was noted that some fire safety matters require attention to reduce the risk of fire and/or reasonably ensure the safety of people using the premises. These matters need to be addressed in order to comply with the Fire Safety Order (as amended).

The matters that need to be addressed, together with the Commissioner's recommendations about the actions you should take are explained in the attached schedule. We recommend that action should be taken by **16 January 2024**.

If you are in any doubt about what you need to do to comply with the Fire Safety Order (as amended); or if there is anything in the schedule that you do not understand or need further explanation of then please contact the Inspector named at the end of this letter. If you are dissatisfied in any way with the response given please ask to speak to the Team Leader quoting the above reference.

You may also wish to know that fire safety guidance for businesses can be found on the Commissioner's website at www.london-fire.gov.uk under the heading 'Fire safety at work'. Additionally, guidance on general fire precautions and how to comply with the Fire Safety Order (as amended) can be found at www.Gov.uk under the heading 'Fire safety law and guidance documents for business'.

When undertaking fire safety works at your premises you may need to seek approval for what you are going to do. Examples of this would include:

- any building works for which you are obliged to notify or seek the approval of Building Control;
- if your premises have a listed heritage status, approval from the local authority conservation officer; or
- if your premises are licenced then you may need to consult the relevant licensing or approvals authority.
- It is your responsibility to consult the relevant bodies and obtain any necessary approvals.

I would ask you to note that as well as placing people at risk, operating premises without having adequate general fire precaution in place to remove or reduce fire risk and to ensure people can safely escape if a fire does occur can result in a criminal offence being committed. This letter and its associated schedule are consequently issued without prejudice to any legal action the Commissioner may subsequently take regarding failures to comply with the Fire Safety Order (as amended).

Yours faithfully,

for Assistant Commissioner (Fire Safety)

Directorate of Operations

FSR-AdminSupport@london-fire.gov.uk

Reply to Inspecting Officer [REDACTED]

Direct T 0208 555 1200 [REDACTED]

Enc: Form FS03_01b Legislation Extracts
Form FS03_06 Definitions of standard terms

Cc: The Company Secretary, Samnas Limited, Berkeley House, 304 Regents Park Road, London N3 2JX

[REDACTED]@rendallandrittner.co.uk

[REDACTED]@rendallandrittner.co.uk

Notes to accompany the Notification of Deficiencies schedule.

Important information to consider before taking remedial steps:

1. Certain terms written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises again to check on the action you have taken.
3. **Notwithstanding any consultation undertaken by the Commissioner, before you make any alterations to the premises, you must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.**
4. There may be suitable alternative safety measures to those detailed in this schedule, which would meet the requirements of the Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

THE REGULATORY REFORM (FIRE SAFETY) ORDER 2005

Your rights when Fire Safety Inspecting Officers take action.

The Commissioner has a duty to enforce the Regulatory Reform (Fire Safety) Order 2005.

If an Inspector:

tells you to do something - you have a right to a verbal and written explanation of what needs to be done and why.

Intends to take immediate action - for example by issuing an enforcement notice this will include a written explanation either forming part of the notice or by separate letter.

Issues a formal notice - you will be told in writing about your right to appeal to a magistrates' court. You will be told:

- ◆ how to appeal;
- ◆ where and within what period an appeal may be brought; and
- ◆ that action required by a prohibition/restriction notice is not suspended while an appeal is pending unless the court so directs.
- ◆ that action required by an enforcement notice is suspended while an appeal is pending.

Issues a Notification of Fire Safety Deficiencies - full discussion should have taken place and agreed improvements to bring the premises up to minimal standards should be formulated. A Notification of Fire Safety Deficiencies carries no statutory force but may result in formal action being considered if the agreed improvements do not take place.

The procedures and rights above provide ways for you to have your views heard. If you are not happy with the inspecting officer's action you should contact the Team Leader on the telephone number shown at the head of the covering letter in the first instance.

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005, (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc, Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

SCHEDULE

PREMISES: Butterfield House, Berber Parade, Woolwich SE18 4GA

FILE NUMBER: 94/241045

This schedule should be read in conjunction with the Commissioner's letter dated **18 July 2023**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005, were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 14	At the time of the audit the emergency routes or exits were inadequate. It was found that expanding foam had been incorrectly used to fill holes around pipes and cables running into flats above the false ceiling of escape routes.	Ensure adequate emergency routes and exits, for use by relevant persons in the premises, are available and can be safely and effectively used at all relevant times. This can be achieved by employing competent persons to enter into a program of works to address the deficiencies identified within the compartmentation survey.
Article 17	The corridors, lobbies and stairs used for access to and from flats in the premises (the access route(s)) are intended for use by relevant persons as a PROTECTED ROUTE. This route should provide a safe means of escape in event of fire and must be maintained in an efficient state, in efficient working order and good repair. During the audit it was found that the responsible person for management of the access route has not prevented or addressed deficiencies in the FIRE RESISTANCE of the PROTECTED ROUTE and/or required rectification of defects that have arisen in, and/or alterations made to, the protection to the access route. The PROTECTED ROUTE has been compromised by the fitting of doors that do not provide 30 minutes fire protection to the access route. The front door to flat 5 did not fully self close into its frame.	Ensure the access corridor is returned to its intended state as a PROTECTED ROUTE to afford protection from fire in a flat to relevant persons who may require use of that corridor for safe escape from the premises in case of fire. Remedial work that may be necessary for this purpose, must be assessed and completed by a competent person who is practised in application of the relevant standards for means of escape. Your attention is drawn to the provisions of subsections (2) (3) and (4) of Article 17 of the Regulatory Reform (Fire Safety) Order 2005 in the attached extracts of legislation. You are advised that walls in PROTECTED ROUTES should have a minimum of 60 minutes FIRE RESISTANCE. Openings in the walls leading to accommodation off a PROTECTED ROUTE (including doors in entrance ways, service openings, borrowed light glazing, holes around cables trunking and pipework) should be of a minimum 30 minutes FIRE RESISTANCE. Available means the responsible person could use to comply with Article 17 (1) may include enforcing terms of lease and Landlord and Tenant / Property legislation as lessor/owner.

*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

The Company Secretary
Rendall & Rittner Limited
13b St. George Wharf
London
SW8 2LE

The London Fire Commissioner is the
fire and rescue authority for London

Date 10 November 2022
Our Ref 94/169260

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO :

Name: **Rendall & Rittner Limited**

Address: **13b St. George Wharf, London, SW8 2LE**

Concerning Premises at: **Bush House, Berber Parade, Woolwich, SE18 4GB**

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended), hereafter referenced as ('The Order') in London.

I Charlie Pugsley, Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **27 April 2023** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED].

Signed:

[REDACTED]

Dated: 10 November 2022

Assistant Commissioner
(The Officer appointed for the purpose)

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 020 8555 1200 [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a
FS03_01b
FS03_06

Cc: The Company Secretary, Samnas Limited, Berkeley House, 304 Regents Park Road, London,
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ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc, Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Bush House, Berber Parade, Woolwich, SE18 4GB

FILE NUMBER: 94/169260

This schedule should be read in conjunction with the Commissioner's Notice dated **10 November 2022**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	<p>At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that:</p> <ol style="list-style-type: none">1) The storage of obstructions within emergency escape routes had not been controlled or monitored as a push bike was being stored at the top of the single stair.2) Means to prevent birds accessing the ventilation shaft and depositing nesting material and droppings within the shaft had not been planned or organised.3) Works to remediate the deficiencies identified within the electrical safety report dated 21 June 2022 have not been planned or organised.4) Works to remediate deficient fire doors as identified in the fire door survey dated 29 November 2021 have not been planned or organised.	<p>Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored and reviewed.</p>
Article 14	<p>At the time of the audit the emergency routes or exits were inadequate. It was found that:</p> <ol style="list-style-type: none">1) Pink foam had been incorrectly used to fill gaps inside the door frame to the ground floor water riser cupboard.	<p>Ensure adequate emergency routes and exits, for use by relevant persons in the premises, are available and can be safely and effectively used at all relevant times. This can be achieved by:</p> <ol style="list-style-type: none">1) Employing competent persons to carry out a compartmentation survey within the premises and to enter into a program of works to address identified deficiencies.

Article 14 (Cont'd)	<p>2) Expanding foam had been incorrectly used to fill holes around pipes and cables running into flats above the false ceiling of escape routes as identified within the fire risk assessment.</p> <p>3) Automatic opening vent (AOV) doors to the ventilation shaft did not fully close into their frames on the 2nd and 5th floors.</p>	<p>2) Employing competent persons to carry out a compartmentation survey within the premises and to enter into a program of works to address identified deficiencies.</p> <p>3) Ensuring automatic opening vent doors to the ventilation shaft fully close into their frames.</p>
Article 17	<p>At the time of the audit you had not ensured that a suitable system of maintenance was in place in your premises. It was found that:</p> <p>1) Automatic opening vent doors to the ventilation shaft on floors 2 and 5 did not fully close into their frames.</p> <p>2) Fire doors separating the car park from the stair into Bush House had loose hinges, loose vision panel glass and proud screw heads in hinges which prevented the doors from fully closing into their frames.</p> <p>3) The fire door on the 1st floor between the stair and corridor to flats did not fully close into its frame.</p> <p>4) The break glass in the ground floor manual AOV box was missing.</p>	<p>Arrange initial and ongoing maintenance ensuring fire safety measures are kept in an efficient state, working order and good repair. This can be achieved by:</p> <p>1) Ensuring that automatic opening vent doors to the ventilation shaft close fully into their frames to prevent smoke transferring between floors during an incident.</p> <p>2) Carrying out a survey of all fire doors within the premises and to enter into a program of works to address identified deficiencies.</p> <p>3) Carrying out a survey of all fire doors within the premises and to enter into a program of works to address identified deficiencies.</p> <p>4) Replacing the break glass in the ground floor manual AOV box.</p>
Article 17	<p>The corridors, lobbies and stairs used for access to and from flats in the premises (the access route(s)) are intended for use by relevant persons as a PROTECTED ROUTE. This route should provide a safe means of escape in event of fire and must be maintained in an efficient state, in efficient working order and good repair. During the audit it was found that the responsible person for management of the access route has not prevented or addressed deficiencies in the FIRE RESISTANCE of the PROTECTED ROUTE and/or required rectification of defects that have</p>	<p>Ensure the access corridor is returned to its intended state as a PROTECTED ROUTE to afford protection from fire in a flat to relevant persons who may require use of that corridor for safe escape from the premises in case of fire. Remedial work that may be necessary for this purpose, must be assessed and completed by a competent person who is practised in the application of the relevant standards for means of escape. Your attention is drawn to the provisions of subsections (2) (3) and (4) of Article 17 of the Regulatory Reform (Fire Safety) Order 2005 in the attached extracts of legislation. You are advised that walls in PROTECTED ROUTES should have a minimum of 60 minutes FIRE RESISTANCE. Openings in the walls leading to accommodation off a PROTECTED ROUTE (including doors in entrance ways, service openings, borrowed light glazing, holes around cables trunking and pipework) should be of a minimum 30 minutes FIRE</p>

Article 17 (Cont'd)	arisen in, and/or alterations made to, the protection to the access route. The PROTECTED ROUTE has been compromised by the fitting of doors that do not provide 30 minutes fire protection to the access route. The front door to sampled flat 17 did not close full into its frame.	RESISTANCE. Available means the responsible person could use to comply with Article 17 (1) may include enforcing terms of lease and Landlord and Tenant/Property legislation as lessor/owner.
Article 17	The corridors, lobbies and stairs used for access to and from flats in the premises (the access route(s)) are intended for use by relevant persons as a PROTECTED ROUTE. This route should provide a safe means of escape in event of fire and must be maintained in an efficient state, in efficient working order and good repair. During the audit it was found that the responsible person for management of the access route has not prevented or addressed deficiencies in the ventilation of the PROTECTED ROUTE and/or required rectification of defects that have arisen in, and/or alterations made to the ventilation of the access route. The PROTECTED ROUTE has been compromised by the automatic opening vent at the head of the single stair not being operational, thereby preventing effective ventilation of smoke and fumes in the event of fire.	Ensure the access corridor is returned to its intended state as a PROTECTED ROUTE to afford protection from fire in a flat to relevant persons who may require use of that corridor for safe escape from the premises in case of fire. Remedial work that may be necessary for this purpose, must be assessed and completed by a competent person who is practised in application of the relevant standards for means of escape. The following is provided as advice and does not form any part of the notice: Your attention is drawn to the provisions of subsections (2) (3) and (4) of Article 17 of the Regulatory Reform (Fire Safety) Order 2005 in the attached extracts of legislation. Available means the responsible person could use to comply with Article 17 (1) may include enforcing terms of lease and Landlord and Tenant/Property legislation as lessor/owner.
Article 8	At the time of the audit the general fire precautions required to prevent fire and smoke spread via shafts, risers or ducting were inadequate. It was found that there were holes in the fire stopping around pipes and cables running vertically within a riser cupboard from ground to the fifth floor.	Take the general fire precautions required to prevent fire and smoke spread by ensuring holes around pipes and cables are filled with suitable fire stopping material.
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that it did not consider that the podium level and access ramp were not suitable for a fire appliance as the maximum load bearing weight could not be identified; there is insufficient	The fire risk assessment should be reviewed, with specific consideration given to identifying the correct fire service access level and facilities that should be in place.

Article 9 (Cont'd)	space to turn an appliance around and there are pedestrian type drains present which would not withstand the weight of an appliance.	
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*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

Definitions of standard terms used in means of escape requirements

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

Fire Resisting

1. FIRE RESISTING means construction capable of resisting the action of fire for not less than thirty minutes under the prescribed conditions of test appropriate to such construction in accordance with the provisions of the current British Standard 476 and that:

- a) whatsoever is so designated gives effective separation between those parts of the premises on each side of it;
- b) where the word 'enclosed' is used in connection with this term, the room, escape route or other space so described is completely enclosed with walls, ceilings and floors of FIRE RESISTING construction except for that part of the enclosure consisting of a roof, external wall, or the lowest floor of a building;
- c) where the construction consists of or incorporates a door, the door together with its frame complies with Table A below; and the door
 - i) is effectively self closing by means of an automatic self closing device and the device is to conform to BS EN 1154. As an alternative, where the door is to a duct, shaft or cupboard, it may be locked shut and provided with a notice to this effect:
 - ii) is free from any means of holding the door in an open position except, where permitted an electro-magnetic or electro-mechanical door holder device. BS 7273-4 is the applicable document with regard to these devices.
 - iii) is close fitting to both the frame and, where there are two leaves, between the leaves;
 - iv) is hung on hinges no part of which is made either of combustible material or of non-combustible material having a melting point less than 800°C;
 - v) is permanently marked 'Fire door keep shut' in a conspicuous position except whether the door is to a bedroom or to or within a dwelling (including a flat or maisonette);

vi) is imperforate except for the minimum perforations necessary for the fitting of locks and door furniture;

d) where the construction incorporates glazing, in addition to comply with this definition, the glazing is in a frame fixed shut.

2. Where existing ceilings, soffits, walls, partitions, floors and doorsets are not already FIRE RESISTING and are required to be made FIRE RESISTING the following constructions will be accepted as complying with the definition:

a) CEILINGS AND SOFFITS

The ceilings and soffits covered with lath and plaster in good condition, or with plasterboard or FIRE PROTECTIVE BOARDING with sheets closely butted together and securely nailed or screwed to joints/nogging pieces, as appropriate.

b) WALLS AND PARTITIONS

All perforations and gaps sealed with FIRE RESISTING construction. Partitions made flush with timber or FIRE PROTECTIVE BOARDING and covered with plasterboard, or FIRE PROTECTIVE BOARDING butted together, securely nailed or screwed in position.

c) DOORSETS

See Table B below.

Notes:

- i) Protection to partitions, ceilings and doors shall be on the risk side, e.g. on the side remote from an escape route, or, in the case of a screen separating an escape route from the lower part of the building, on the side exposed to the lower part of the building. Where a lobby or screen is not carried up to the main ceiling and a false ceiling is provided to complete the separation, it may be necessary to protect the upper surface of the ceiling construction.
- ii) Where the risk is on both sides, the construction shall be protected on both sides.

Fire Protective Boarding

3. Attention is drawn to the desirability of effectively sealing the exposed surface of FIRE PROTECTIVE BOARDING by paint or other suitable methods and protecting exposed edges against damage.

Non Combustible Material

4. NON COMBUSTIBLE MATERIAL means material which satisfies the test for non combustibility prescribed in the current British Standard 476: Part 4 and is deemed to include plasterboard.

Protected Route

5. PROTECTED ROUTE means a route enclosed with FIRE RESISTING construction and which complies with the following conditions.

- a) service, ventilating and other similar ducts or shafts which pass into or out of the enclosure are FIRE RESISTING within the enclosure;
- b) cupboards are enclosed with FIRE RESISTING construction (except where premises are provided with a single staircase only, in which case cupboards are not accepted and must be taken out of use and sealed with FIRE RESISTING construction on the inside);
- c) no combustible storage is allowed other than in cupboards described in (b) above;
- d) stairs and landings are provided with handrails and are adequately guarded on any open side;
- e) sufficient and suitable artificial lighting is provided for the purpose of means of escape; and
- f) the linings have a surface spread of flame classification not inferior to 'Class 0' when tested in accordance with the provisions of the current British Standard 476: Part 7.

Note:

Lavatories and sanitary accommodation which are neither cloakrooms nor contain gas or portable heating appliances other than water heaters and incinerators may be contained within a PROTECTED ROUTE.

Inherently Non-Flammable Material

6. INHERENTLY NON-FLAMMABLE MATERIAL means material which, although non non-combustible and not submitted to a flame-proofing process nor provided with a flame resistant finish is, in fact, non-flammable throughout its thickness.

The standard for fabrics is 'flameproof' when tested in accordance with the provisions of the current British Standard.

The standard for material other than fabrics is 'Class 1' surface spread of flame when tested in accordance with the provisions of the current British Standard 476: Part 7.

Durably Flame Proofed Fabric

7. DURABLY FLAME PROOFED FABRIC means flame-proofed fabric which after being submitted to a washing treatment remains flame-proof as determined by the method of test prescribed in the current British Standard.

Table A - Minimum requires for Construction and materials of doorsets capable of resisting the action of fire for a period of thirty minutes

1. Doors, including frames, are to be tested and installed in accordance with the current British Standard 476: Part 22 (and BS 476: Section 31.1 where the 'S' specification requires smoke stopping) or BS EN 1634 and are to be certified as being capable of resisting the action of fire for a period of not less than thirty minutes as regards the passage of flame (integrity). There are no requirements as to stability or insulation for doorsets. Doors which met the requirements for resisting the action of fire in the British Standard in force at the time the door was manufactured may be accepted.

2. Doors which open into a corridor or lobby with enclosures capable of resisting the action of fire for a period of not less than thirty minutes may open in two directions provided a maximum clearance of 3mm is achieved at the meeting edges.

Any door capable of being opened in both directions shall be fitted with a vision panel of clear fire resisting glazing.

3. Glazing fixed shut may be incorporated in a door if it is capable of resisting the action of fire in accordance with the current British Standard 476: Part 22. Glazing should be fixed either;

- a) in timber frames with wood or metal beads or with a glazing compound in conjunction with springs or clips in panels not exceeding 0.4m² in area; or
- b) in metal frames with metal beads in panels not exceeding 1.2m² in area, all metal having a melting point not lower than 900°C;

The area of glazing shall also satisfy the provisions of any requirements in the accompanying schedule.

Table B - Upgrading existing doorsets to achieve a fire resisting standard of thirty minutes

1. In general, the upgrading of existing doorsets to achieve a standard of fire resistance of thirty minutes is not recommended except in the case of historic buildings. It is preferable that new doorsets are installed.
 2. If a doorset is to be upgraded, a test report will be required confirming that the door and frame are capable of resisting the action of fire for not less than thirty minutes when tested in accordance with the current British Standard 476: Part 22 (and BS 476: Section 31.1 when the 'S' specification requires smoke stopping).
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Cupboard doors required to be fire resisting

3. Cupboard doors of standard size shall be replaced with new doors capable of resisting the action of fire for not less than thirty minutes when tested in accordance with the current British Standard 476: Part 22 (and BS 476: Section 31.1 when the 'S' specification requires smoke stopping).
4. For cupboard doors of less than standard size, a suitable fire resisting door shall be cut to size and fitted with an intumescent strip channelled into the top, hinge and closing edges to resist fire when tested in accordance with the current British Standard 476: Part 22.

GUIDANCE FOR RESPONSIBLE PERSONS

1. Non-statutory guidance on the Order, in the form of information for responsible persons, is available in a series of books that provide advice based on the use of your premises. The document sets out the requirements of the Order in a simple, non-prescriptive, user-friendly style and offers advice about whether the responsible person needs to do anything more than they are already doing in order to comply.
2. Although the books are primarily directed towards responsible persons, it should nevertheless be of assistance to local managers, supervisors, employees' representatives and others who need to know about fire precautions. The Home Office recommends that fire safety officers should also be familiar with its contents and take them into account when responding to requests for advice and in their discussions with employers and others about compliance with the Order.
3. The guides are available from: Fire Safety Guides, PO Box 236, Wetherby LS23 7NB, Tel: 0870 830 7099. Please quote the ISBN when ordering. They may also be downloaded free of charge from the Fire Safety Law Section of the Communities & Local Government website at www.communities.gov.uk/fire/firesafety/firesafetylaw/

LIST OF GUIDANCE PUBLICATIONS

<u>Guide</u>	<u>Use</u>
Fire safety in offices and Shops ISBN 978 1 85112 815 0	All offices and retail premises
Fire safety in factories and Warehouses ISBN 978 1 85112 816 7	All factories and warehouse storage premises
Fire safety in premises providing sleeping accommodation ISBN 978 1 85112 817 4	All places where sleeping accommodation is provided, except hospitals, care homes, places of custody and single private dwellings
Fire safety in residential care premises ISBN 978 1 85112 818 1	Suitable for all residential and nursing homes, out-posted nursing care in single private dwellings and home-based childminders
Fire safety in educational Premises ISBN 978 1 85112 819 8	Teaching establishments ranging from crèches through to universities
Fire safety in small and medium places of assembly ISBN 978 1 85112 820 4	Public houses, clubs, restaurants and cafés, village halls, community centres and libraries accommodating up to 300 people
Fire safety in large places of Assembly ISBN 978 1 85112 821 1	Suitable for premises where more than 300 people gather, eg shopping centres, large nightclubs, exhibition and conference centres, sports stadia, churches, cathedrals, museums and libraries
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REGULATORY REFORM (FIRE SAFETY) ORDER 2005

Article 8 - Duty to take general fire precautions

(1) The responsible person must—

- (a) take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of any of his employees; and
- (b) in relation to relevant persons who are not his employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe.

Article 9 - Risk assessment

(1) The responsible person must make a suitable and sufficient assessment of the risks to which relevant persons are exposed for the purpose of identifying the general fire precautions he needs to take to comply with the requirements and prohibitions imposed on him by or under this Order.

(2) Where a dangerous substance is or is liable to be present in or on the premises, the risk assessment must include consideration of the matters set out in Part 1 of Schedule 1 (of the Regulatory Reform (Fire Safety) Order 2005).

(3) Any such assessment must be reviewed by the responsible person regularly so as to keep it up to date and particularly if—

- (a) there is reason to suspect that it is no longer valid; or
- (b) there has been a significant change in the matters to which it relates including when the premises, special, technical and organisational measures, or organisation of the work undergo significant changes, extensions, or conversions,

and where changes to an assessment are required as a result of any such review, the responsible person must make them.

(4) The responsible person must not employ a young person unless he has, in relation to risks to young persons, made or reviewed an assessment in accordance with paragraphs (1) and (5).

(5) In making or reviewing the assessment, the responsible person who employs or is to employ a young person must take particular account of the matters set out in Part 2 of Schedule 1 (of the Regulatory Reform (Fire Safety) Order 2005).

(6) As soon as practicable after the assessment is made or reviewed, the responsible person must record the information prescribed by paragraph (7) where—

- (a) he employs five or more employees;
- (b) a licence under an enactment is in force in relation to the premises; or
- (c) an alterations notice requiring this is in force in relation to the premises.

(7) The prescribed information is—

- (a) the significant findings of the assessment, including the measures which have been or will be taken by the responsible person pursuant to this Order; and
- (b) any group of persons identified by the assessment as being especially at risk.

(8) No new work activity involving a dangerous substance may commence unless—

- (a) the risk assessment has been made; and
- (b) the measures required by or under this Order have been implemented.

Article 10 - Principles of prevention to be applied

Where the responsible person implements any preventive and protective measures he must do so on the basis of the principles specified in Part 3 of Schedule 1 (of the Regulatory Reform (Fire Safety) Order 2005).

Article 11 - Fire safety arrangements

(1) The responsible person must make and give effect to such arrangements as are appropriate, having regard to the size of his undertaking and the nature of its activities, for the effective planning, organisation, control, monitoring and review of the preventive and protective measures.

(2) The responsible person must record the arrangements referred to in paragraph (1) where—

- (a) he employs five or more employees;
- (b) a licence under an enactment is in force in relation to the premises; or
- (c) an alterations notice requiring a record to be made of those arrangements is in force in relation to the premises.

Article 12 - Elimination or reduction of risks from dangerous substances

(1) Where a dangerous substance is present in or on the premises, the responsible person must ensure that risk to relevant persons related to the presence of the substance is either eliminated or reduced so far as is reasonably practicable.

(2) In complying with his duty under paragraph (1), the responsible person must, so far as is reasonably practicable, replace a dangerous substance, or the use of a dangerous substance, with a substance or process which either eliminates or reduces the risk to relevant persons.

(3) Where it is not reasonably practicable to eliminate risk pursuant to paragraphs (1) and (2), the responsible person must, so far as is reasonably practicable, apply measures consistent with the risk assessment and appropriate to the nature of the activity or operation, including the measures specified in Part 4 of Schedule 1 to this Order to—

- (a) control the risk, and
- (b) mitigate the detrimental effects of a fire.

(4) The responsible person must—

- (a) arrange for the safe handling, storage and transport of dangerous substances and waste containing dangerous substances; and
- (b) ensure that any conditions necessary pursuant to this Order for ensuring the elimination or reduction of risk are maintained.

Article 13 - Fire-fighting and fire detection

(1) Where necessary (whether due to the features of the premises, the activity carried on there, any hazard present or any other relevant circumstances) in order to safeguard the safety of relevant persons, the responsible person must ensure that—

- (a) the premises are, to the extent that it is appropriate, equipped with appropriate fire-fighting equipment and with fire detectors and alarms; and
- (b) any non-automatic fire-fighting equipment so provided is easily accessible, simple to use and indicated by signs.

(2) For the purposes of paragraph (1) what is appropriate is to be determined having regard to the dimensions and use of the premises, the equipment contained on the premises, the physical and chemical properties of the substances likely to be present and the maximum number of persons who may be present at any one time.

(3) The responsible person must, where necessary—

- (a) take measures for fire-fighting in the premises, adapted to the nature of the activities carried on there and the size of the undertaking and of the premises concerned;

- (b) nominate competent persons to implement those measures and ensure that the number of such persons, their training and the equipment available to them are adequate, taking into account the size of, and the specific hazards involved in, the premises concerned; and
- (c) arrange any necessary contacts with external emergency services, particularly as regards fire-fighting, rescue work, first-aid and emergency medical care.

(4) A person is to be regarded as competent for the purposes of paragraph (3)(b) where he has sufficient training and experience or knowledge and other qualities to enable him properly to implement the measures referred to in that paragraph.

Article 14 - Emergency routes and exits

(1) Where necessary in order to safeguard the safety of relevant persons, the responsible person must ensure that routes to emergency exits from premises and the exits themselves are kept clear at all times.

(2) The following requirements must be complied with in respect of premises where necessary (whether due to the features of the premises, the activity carried on there, any hazard present or any other relevant circumstances) in order to safeguard the safety of relevant persons—

- (a) emergency routes and exits must lead as directly as possible to a place of safety;
- (b) in the event of danger, it must be possible for persons to evacuate the premises as quickly and as safely as possible;
- (c) the number, distribution and dimensions of emergency routes and exits must be adequate having regard to the use, equipment and dimensions of the premises and the maximum number of persons who may be present there at any one time;
- (d) emergency doors must open in the direction of escape;
- (e) sliding or revolving doors must not be used for exits specifically intended as emergency exits;
- (f) emergency doors must not be so locked or fastened that they cannot be easily and immediately opened by any person who may require to use them in an emergency;
- (g) emergency routes and exits must be indicated by signs; and
- (h) emergency routes and exits requiring illumination must be provided with emergency lighting of adequate intensity in the case of failure of their normal lighting.

Article 15 - Procedures for serious and imminent danger and for danger areas

(1) The responsible person must—

- (a) establish and, where necessary, give effect to appropriate procedures, including safety drills, to be followed in the event of serious and imminent danger to relevant persons;
- (b) nominate a sufficient number of competent persons to implement those procedures in so far as they relate to the evacuation of relevant persons from the premises; and
- (c) ensure that no relevant person has access to any area to which it is necessary to restrict access on grounds of safety, unless the person concerned has received adequate safety instruction.

(2) Without prejudice to the generality of paragraph (1)(a), the procedures referred to in that sub-paragraph must—

- (a) so far as is practicable, require any relevant persons who are exposed to serious and imminent danger to be informed of the nature of the hazard and of the steps taken or to be taken to protect them from it;
- (b) enable the persons concerned (if necessary by taking appropriate steps in the absence of guidance or instruction and in the light of their knowledge and the technical means at their disposal) to stop work and immediately proceed to a place of safety in the event of their being exposed to serious, imminent and unavoidable danger; and
- (c) save in exceptional cases for reasons duly substantiated (which cases and reasons must be specified in those procedures), require the persons concerned to be prevented from resuming work in any situation where there is still a serious and imminent danger.

(3) A person is to be regarded as competent for the purposes of paragraph (1) where he has sufficient training and experience or knowledge and other qualities to enable him properly to implement the evacuation procedures referred to in that paragraph.

Article 16 - Additional emergency measures in respect of dangerous substances

(1) Subject to paragraph (4), in order to safeguard the safety of relevant persons arising from an accident, incident or emergency related to the presence of a dangerous substance in or on the premises, the responsible person must ensure that—

- (a) information on emergency arrangements is available, including—
 - (i) details of relevant work hazards and hazard identification arrangements; and
 - (ii) specific hazards likely to arise at the time of an accident, incident or emergency;
- (b) suitable warning and other communication systems are established to enable an appropriate response, including remedial actions and rescue operations, to be made immediately when such an event occurs;
- (c) where necessary, before any explosion conditions are reached, visual or audible warnings are given and relevant persons withdrawn; and
- (d) where the risk assessment indicates it is necessary, escape facilities are provided and maintained to ensure that, in the event of danger, relevant persons can leave endangered places promptly and safely.

(2) Subject to paragraph (4), the responsible person must ensure that the information required by article 15(1)(a) and paragraph (1)(a) of this article, together with information on the matters referred to in paragraph (1)(b) and (d) is—

- (a) made available to relevant accident and emergency services to enable those services, whether internal or external to the premises, to prepare their own response procedures and precautionary measures; and
- (b) displayed at the premises, unless the results of the risk assessment make this unnecessary.

(3) Subject to paragraph (4), in the event of a fire arising from an accident, incident or emergency related to the presence of a dangerous substance in or on the premises, the responsible person must ensure that—

- (a) immediate steps are taken to—
 - (i) mitigate the effects of the fire;
 - (ii) restore the situation to normal; and
 - (iii) inform those relevant persons who may be affected; and
- (b) only those persons who are essential for the carrying out of repairs and other necessary work are permitted in the affected area and they are provided with—
 - (i) appropriate personal protective equipment and protective clothing; and
 - (ii) any necessary specialised safety equipment and plant,

which must be used until the situation is restored to normal.

(4) Paragraphs (1) to (3) do not apply where—

- (a) the results of the risk assessment show that, because of the quantity of each dangerous substance in or on the premises, there is only a slight risk to relevant persons; and
- (b) the measures taken by the responsible person to comply with his duty under article 12 are sufficient to control that risk.

Article 17 – Maintenance

(1) Where necessary in order to safeguard the safety of relevant persons the responsible person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises under this Order or, subject to paragraph (6), under any other enactment, including any enactment repealed or revoked by this Order, are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.

(2) Where the premises form part of a building, the responsible person may make arrangements with the occupier of any other premises forming part of the building for the purpose of ensuring that the requirements of paragraph (1) are met.

(3) Paragraph (2) applies even if the other premises are not premises to which this Order applies.

(4) The occupier of the other premises must co-operate with the responsible person for the purposes of paragraph (2).

(5) Where the occupier of the other premises is not also the owner of those premises, the references to the occupier in paragraphs (2) and (4) are to be taken to be references to both the occupier and the owner.

(6) Paragraph (1) only applies to facilities, equipment and devices provided under other enactments where they are

provided in connection with general fire precautions.

Article 18 - Safety assistance

(1) The responsible person must, subject to paragraphs (6) and (7), appoint one or more competent persons to assist him in undertaking the preventive and protective measures.

(2) Where the responsible person appoints persons in accordance with paragraph (1), he must make arrangements for ensuring adequate co-operation between them.

(3) The responsible person must ensure that the number of persons appointed under paragraph (1), the time available for them to fulfil their functions and the means at their disposal are adequate having regard to the size of the premises, the risks to which relevant persons are exposed and the distribution of those risks throughout the premises.

(4) The responsible person must ensure that—

- (a) any person appointed by him in accordance with paragraph (1) who is not in his employment—
 - (i) is informed of the factors known by him to affect, or suspected by him of affecting, the safety of any other person who may be affected by the conduct of his undertaking; and
 - (ii) has access to the information referred to in article 19(3); and
- (b) any person appointed by him in accordance with paragraph (1) is given such information about any person working in his undertaking who is—
 - (i) employed by him under a fixed-term contract of employment, or
 - (ii) employed in an employment business,

as is necessary to enable that person properly to carry out the function specified in that paragraph.

(5) A person is to be regarded as competent for the purposes of this article where he has sufficient training and experience or knowledge and other qualities to enable him properly to assist in undertaking the preventive and protective measures.

(6) Paragraph (1) does not apply to a self-employed employer who is not in partnership with any other person, where he has sufficient training and experience or knowledge and other qualities properly to assist in undertaking the preventive and protective measures.

(7) Paragraph (1) does not apply to individuals who are employers and who are together carrying on business in partnership, where at least one of the individuals concerned has sufficient training and experience or knowledge and other qualities—

- (a) properly to undertake the preventive and protective measures; and
- (b) properly to assist his fellow partners in undertaking those measures.

(8) Where there is a competent person in the responsible person's employment, that person must be appointed for the purposes of paragraph (1) in preference to a competent person not in his employment.

Article 19 - Provision of information to employees

(1) The responsible person must provide his employees with comprehensible and relevant information on—

- (a) the risks to them identified by the risk assessment;
- (b) the preventive and protective measures;
- (c) the procedures and the measures referred to in article 15(1)(a);
- (d) the identities of those persons nominated by him in accordance with article 13(3)(b) or appointed in accordance with article 15(1)(b); and
- (e) the risks notified to him in accordance with article 22(1)(c).

(2) The responsible person must, before employing a child, provide a parent of the child with comprehensible and relevant information on—

- (a) the risks to that child identified by the risk assessment;
- (b) the preventive and protective measures; and
- (c) the risks notified to him in accordance with article 22(1)(c),

and for the purposes of this paragraph, "parent of the child" includes a person who has parental responsibility, within the meaning of section 3 of the Children Act 1989, for the child.

(3) Where a dangerous substance is present in or on the premises, the responsible person must, in addition to the information provided under paragraph (1) provide his employees with —

- (a) the details of any such substance including—
 - (i) the name of the substance and the risk which it presents;
 - (ii) access to any relevant safety data sheet; and
 - (iii) legislative provisions (concerning the hazardous properties of any such substance) which apply to the substance; and
- (b) the significant findings of the risk assessment.

(4) The information required by paragraph (3) must be—

- (a) adapted to take account of significant changes in the activity carried out or methods or work used by the responsible person; and
- (b) provided in a manner appropriate to the risk identified by the risk assessment.

Article 20 - Provision of information to employers and the self-employed from outside undertakings

(1) The responsible person must ensure that the employer of any employees from an outside undertaking who are working in or on the premises is provided with comprehensible and relevant information on—

- (a) the risks to those employees; and
- (b) the preventive and protective measures taken by the responsible person.

(2) The responsible person must ensure that any person working in his undertaking who is not his employee is provided with appropriate instructions and comprehensible and relevant information regarding any risks to that person.

(3) The responsible person must—

- (a) ensure that the employer of any employees from an outside undertaking who are working in or on the premises is provided with sufficient information to enable that employer to identify any person nominated by the responsible person in accordance with article 15 (1)(b) to implement evacuation procedures as far as those employees are concerned; and
- (b) take all reasonable steps to ensure that any person from an outside undertaking who is working in or on the premises receives sufficient information to enable that person to identify any person nominated by the responsible person in accordance with article 15 (1)(b) to implement evacuation procedures as far as they are concerned.

Article 21 – Training

(1) The responsible person must ensure that his employees are provided with adequate safety training—

- (a) at the time when they are first employed; and
- (b) on their being exposed to new or increased risks because of—
 - (i) their being transferred or given a change of responsibilities within the responsible person's undertaking;
 - (ii) the introduction of new work equipment into, or a change respecting work equipment already in use within, the responsible person's undertaking;
 - (iii) the introduction of new technology into the responsible person's undertaking; or
 - (iv) the introduction of a new system of work into, or a change respecting a system of work already in use within, the responsible person's undertaking.

(2) The training referred to in paragraph (1) must—

- (a) include suitable and sufficient instruction and training on the appropriate precautions and actions to be taken by the employee in order to safeguard himself and other relevant persons on the premises;
- (b) be repeated periodically where appropriate;
- (c) be adapted to take account of any new or changed risks to the safety of the employees concerned;
- (d) be provided in a manner appropriate to the risk identified by the risk assessment; and

- (e) take place during working hours.

Article 22 - Co-operation and co-ordination

(1) Where two or more responsible persons share, or have duties in respect of, premises (whether on a temporary or a permanent basis) each such person must—

- (a) co-operate with the other responsible person concerned so far as is necessary to enable them to comply with the requirements and prohibitions imposed on them by or under this Order;
- (b) (taking into account the nature of his activities) take all reasonable steps to co-ordinate the measures he takes to comply with the requirements and prohibitions imposed on him by or under this Order with the measures the other responsible persons are taking to comply with the requirements and prohibitions imposed on them by or under this Order; and
- (c) take all reasonable steps to inform the other responsible persons concerned of the risks to relevant persons arising out of or in connection with the conduct by him of his undertaking.

(2) Where two or more responsible persons share premises (whether on a temporary or a permanent basis) where an explosive atmosphere may occur, the responsible person who has overall responsibility for the premises must co-ordinate the implementation of all the measures required by this Part to be taken to protect relevant persons from any risk from the explosive atmosphere.

Article 23 - General duties of employees at work

(1) Every employee must, while at work—

- (a) take reasonable care for the safety of himself and of other relevant persons who may be affected by his acts or omissions at work;
- (b) as regards any duty or requirement imposed on his employer by or under any provision of this Order, co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with; and
- (c) inform his employer or any other employee with specific responsibility for the safety of his fellow employees—
 - (i) of any work situation which a person with the first-mentioned employee's training and instruction would reasonably consider represented a serious and immediate danger to safety; and
 - (ii) of any matter which a person with the first-mentioned employee's training and instruction would reasonably consider represented a shortcoming in the employer's protection arrangements for safety,

in so far as that situation or matter either affects the safety of that first-mentioned employee or arises out of or in connection with his own activities at work, and has not previously been reported to his employer or to any other employee of that employer in accordance with this sub-paragraph.

Article 38 - Maintenance of measures provided for protection of fire-fighters

(1) Where necessary in order to safeguard the safety of fire-fighters in the event of a fire, the responsible person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises for the use by or protection of fire-fighters under this Order or under any other enactment, including any enactment repealed or revoked by this Order, are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.

(2) Where the premises form part of a building, the responsible person may make arrangements with the occupier of any premises forming part of the building for the purpose of ensuring that the requirements of paragraph (1) are met.

(3) Paragraph (2) applies even if the other premises are not premises to which this Order applies.

(4) The occupier of the other premises must co-operate with the responsible person for the purposes of paragraph (2).

(5) Where the occupier of the other premises is not also the owner of those premises, the reference to the occupier in paragraphs (2) and (4) are to be taken to be references to both the occupier and the owner.

The Company Secretary
Rendall & Rittner Limited
13b St. George Wharf
London
SW8 2LE

The London Fire Commissioner is the
fire and rescue authority for London

Date 3 April 2023
Our Ref 94/169088

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO :

Name: **Rendall & Rittner Limited**

Address: **13b St. George Wharf, London, SW8 2LE**

Concerning Premises at: **Bailey House, Berber Parade, Woolwich, SE18 4GD**

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended), hereafter referenced as ('The Order') in London.

I Charlie Pugsley, Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **2 October 2023** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

Signed: [REDACTED] **Dated:** 3 April 2023

A
(The Officer appointed for the purpose)

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 020 8555 1200 [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a
FS03_01b
FS03_06

Cc: The Company Secretary, Samnas Limited, Berkeley House, 304 Regents Park Road,
London, N3 2JX

 [@rendallandrittner.co.uk](mailto:rendallandrittner.co.uk)

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc, Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Bailey House, Berber Parade, Woolwich, SE18 4GD

FILE NUMBER: 94/169088

This schedule should be read in conjunction with the Commissioner's Notice dated **3 April 2023**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that management have not planned, organised or reviewed the provision of signage on the smoke ventilation boxes explaining which vent the box activates.	Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored or reviewed.
Article 14	At the time of the audit the emergency routes or exits were inadequate. It was found that pink and yellow foam had been incorrectly used to fill gaps inside the door frame in multiple riser cupboards on multiple floors, and to fill holes around pipes and cables running into flats above the false ceiling of escape routes.	Ensure adequate emergency routes and exits, for use by relevant persons in the premises, are available and can be safely and effectively used at all relevant times. This can be achieved by employing a competent person to carry out all necessary remedial works.
Article 17	At the time of the audit you had not ensured that a suitable system of maintenance was in place in your premises. It was found that: 1) Multiple common fire doors were showing signs of damage and not closing fully into their frames. 2) Multiple common fire doors had damaged or missing cold smoke seals.	Arrange initial and ongoing maintenance ensuring fire safety measures are kept in an efficient state, working order and good repair. This can be achieved by: 1-2) Employing a competent person to conduct necessary remedial works to ensure that the doors are maintained in good working order.
Article 8	At the time of the audit the general fire precautions required to prevent fire and smoke spread via shafts, risers or ducting were inadequate. It was found that there was use of pink or yellow foam to fire stop vertical breaches within the riser cupboards.	Take the general fire precautions required to prevent fire and smoke spread by employing a competent person to conduct all necessary remedial works.

Article 8	At the time of the audit the general fire precautions as identified in the significant findings of your fire risk assessment had not been implemented. It was found that identified issues with fire doors not closing to frame, compartmentation breaches within the basement above the false ceiling, and the use of pink and yellow foam as fire stopping had not been addressed at the time of the audit.	Implement the significant findings of your fire risk assessment, in particular the issues with the fire doors not closing to frame, compartmentation breaches within the basement above the false ceiling, and the use of pink and yellow foam as fire stopping.
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that it did not consider that the podium level and access ramp were not suitable for a fire appliance as the maximum load bearing weight was not identified, there is insufficient space to turn an appliance around and there are pedestrian type drains present which would not withstand the weight of an appliance.	The fire risk assessment should be reviewed, with specific consideration given to identifying the correct fire service access level and facilities that should be in place.

*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

GUIDANCE FOR RESPONSIBLE PERSONS

1. Non-statutory guidance on the Order, in the form of information for responsible persons, is available in a series of books that provide advice based on the use of your premises. The document sets out the requirements of the Order in a simple, non-prescriptive, user-friendly style and offers advice about whether the responsible person needs to do anything more than they are already doing in order to comply.
2. Although the books are primarily directed towards responsible persons, it should nevertheless be of assistance to local managers, supervisors, employees' representatives and others who need to know about fire precautions. The Home Office recommends that fire safety officers should also be familiar with its contents and take them into account when responding to requests for advice and in their discussions with employers and others about compliance with the Order.
3. The guides are available from: Fire Safety Guides, PO Box 236, Wetherby LS23 7NB, Tel: 0870 830 7099. Please quote the ISBN when ordering. They may also be downloaded free of charge from the Fire Safety Law Section of the Communities & Local Government website at www.communities.gov.uk/fire/firesafety/firesafetylaw/

LIST OF GUIDANCE PUBLICATIONS

<u>Guide</u>	<u>Use</u>
Fire safety in offices and Shops ISBN 978 1 85112 815 0	All offices and retail premises
Fire safety in factories and Warehouses ISBN 978 1 85112 816 7	All factories and warehouse storage premises
Fire safety in premises providing sleeping accommodation ISBN 978 1 85112 817 4	All places where sleeping accommodation is provided, except hospitals, care homes, places of custody and single private dwellings
Fire safety in residential care premises ISBN 978 1 85112 818 1	Suitable for all residential and nursing homes, out-posted nursing care in single private dwellings and home-based childminders
Fire safety in educational Premises ISBN 978 1 85112 819 8	Teaching establishments ranging from crèches through to universities
Fire safety in small and medium places of assembly ISBN 978 1 85112 820 4	Public houses, clubs, restaurants and cafés, village halls, community centres and libraries accommodating up to 300 people
Fire safety in large places of Assembly ISBN 978 1 85112 821 1	Suitable for premises where more than 300 people gather, eg shopping centres, large nightclubs, exhibition and conference centres, sports stadia, churches, cathedrals, museums and libraries
Fire safety in theatres and Cinemas and similar premises ISBN 978 1 85112 822 8	Suitable for all theatres and cinemas
Fire safety at open air events and venues ISBN 978 1 85112 823 5	Suitable for all open air events, eg theme parks, zoos, music concerts, sporting events, fairgrounds and county fairs

Fire safety in healthcare Premises
ISBN 978 1 85112 824 2

All healthcare premises

Fire safety in the transport premises and facilities
ISBN 978 1 85112 825 9

Suitable for all transportation terminals and interchanges, tunnels and subsurface railways

Fire Safety in Animal Premises and Stables
ISBN 978 1 85112 884 6

Suitable for animal premises, stables, livery yards and stables within zoos, large animal sanctuaries or farm parks

Means of Escape for Disabled People
ISBN 978 1 85112 874 7

Supplements other guides and gives advice on accessibility and means of escape

Definitions of standard terms used in means of escape requirements

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

Fire Resisting

1. FIRE RESISTING means construction capable of resisting the action of fire for not less than thirty minutes under the prescribed conditions of test appropriate to such construction in accordance with the provisions of the current British Standard 476 and that:

- a) whatsoever is so designated gives effective separation between those parts of the premises on each side of it;
- b) where the word 'enclosed' is used in connection with this term, the room, escape route or other space so described is completely enclosed with walls, ceilings and floors of FIRE RESISTING construction except for that part of the enclosure consisting of a roof, external wall, or the lowest floor of a building;
- c) where the construction consists of or incorporates a door, the door together with its frame complies with Table A below; and the door
 - i) is effectively self closing by means of an automatic self closing device and the device is to conform to BS EN 1154. As an alternative, where the door is to a duct, shaft or cupboard, it may be locked shut and provided with a notice to this effect:
 - ii) is free from any means of holding the door in an open position except, where permitted an electro-magnetic or electro-mechanical door holder device. BS 7273-4 is the applicable document with regard to these devices.
 - iii) is close fitting to both the frame and, where there are two leaves, between the leaves;
 - iv) is hung on hinges no part of which is made either of combustible material or of non-combustible material having a melting point less than 800°C;
 - v) is permanently marked 'Fire door keep shut' in a conspicuous position except whether the door is to a bedroom or to or within a dwelling (including a flat or maisonette);

vi) is imperforate except for the minimum perforations necessary for the fitting of locks and door furniture;

d) where the construction incorporates glazing, in addition to comply with this definition, the glazing is in a frame fixed shut.

2. Where existing ceilings, soffits, walls, partitions, floors and doorsets are not already FIRE RESISTING and are required to be made FIRE RESISTING the following constructions will be accepted as complying with the definition:

a) CEILINGS AND SOFFITS

The ceilings and soffits covered with lath and plaster in good condition, or with plasterboard or FIRE PROTECTIVE BOARDING with sheets closely butted together and securely nailed or screwed to joints/nogging pieces, as appropriate.

b) WALLS AND PARTITIONS

All perforations and gaps sealed with FIRE RESISTING construction. Partitions made flush with timber or FIRE PROTECTIVE BOARDING and covered with plasterboard, or FIRE PROTECTIVE BOARDING butted together, securely nailed or screwed in position.

c) DOORSETS

See Table B below.

Notes:

- i) Protection to partitions, ceilings and doors shall be on the risk side, e.g. on the side remote from an escape route, or, in the case of a screen separating an escape route from the lower part of the building, on the side exposed to the lower part of the building. Where a lobby or screen is not carried up to the main ceiling and a false ceiling is provided to complete the separation, it may be necessary to protect the upper surface of the ceiling construction.
- ii) Where the risk is on both sides, the construction shall be protected on both sides.

Fire Protective Boarding

3. Attention is drawn to the desirability of effectively sealing the exposed surface of FIRE PROTECTIVE BOARDING by paint or other suitable methods and protecting exposed edges against damage.

Non Combustible Material

4. NON COMBUSTIBLE MATERIAL means material which satisfies the test for non combustibility prescribed in the current British Standard 476: Part 4 and is deemed to include plasterboard.

Protected Route

5. PROTECTED ROUTE means a route enclosed with FIRE RESISTING construction and which complies with the following conditions.

- a) service, ventilating and other similar ducts or shafts which pass into or out of the enclosure are FIRE RESISTING within the enclosure;
- b) cupboards are enclosed with FIRE RESISTING construction (except where premises are provided with a single staircase only, in which case cupboards are not accepted and must be taken out of use and sealed with FIRE RESISTING construction on the inside);
- c) no combustible storage is allowed other than in cupboards described in (b) above;
- d) stairs and landings are provided with handrails and are adequately guarded on any open side;
- e) sufficient and suitable artificial lighting is provided for the purpose of means of escape; and
- f) the linings have a surface spread of flame classification not inferior to 'Class 0' when tested in accordance with the provisions of the current British Standard 476: Part 7.

Note:

Lavatories and sanitary accommodation which are neither cloakrooms nor contain gas or portable heating appliances other than water heaters and incinerators may be contained within a PROTECTED ROUTE.

Inherently Non-Flammable Material

6. INHERENTLY NON-FLAMMABLE MATERIAL means material which, although non non-combustible and not submitted to a flame-proofing process nor provided with a flame resistant finish is, in fact, non-flammable throughout its thickness.

The standard for fabrics is 'flameproof' when tested in accordance with the provisions of the current British Standard.

The standard for material other than fabrics is 'Class 1' surface spread of flame when tested in accordance with the provisions of the current British Standard 476: Part 7.

Durably Flame Proofed Fabric

7. DURABLY FLAME PROOFED FABRIC means flame-proofed fabric which after being submitted to a washing treatment remains flame-proof as determined by the method of test prescribed in the current British Standard.

Table A - Minimum requires for Construction and materials of doorsets capable of resisting the action of fire for a period of thirty minutes

1. Doors, including frames, are to be tested and installed in accordance with the current British Standard 476: Part 22 (and BS 476: Section 31.1 where the 'S' specification requires smoke stopping) or BS EN 1634 and are to be certified as being capable of resisting the action of fire for a period of not less than thirty minutes as regards the passage of flame (integrity). There are no requirements as to stability or insulation for doorsets. Doors which met the requirements for resisting the action of fire in the British Standard in force at the time the door was manufactured may be accepted.

2. Doors which open into a corridor or lobby with enclosures capable of resisting the action of fire for a period of not less than thirty minutes may open in two directions provided a maximum clearance of 3mm is achieved at the meeting edges.

Any door capable of being opened in both directions shall be fitted with a vision panel of clear fire resisting glazing.

3. Glazing fixed shut may be incorporated in a door if it is capable of resisting the action of fire in accordance with the current British Standard 476: Part 22. Glazing should be fixed either;

- a) in timber frames with wood or metal beads or with a glazing compound in conjunction with springs or clips in panels not exceeding 0.4m² in area; or
- b) in metal frames with metal beads in panels not exceeding 1.2m² in area, all metal having a melting point not lower than 900°C;

The area of glazing shall also satisfy the provisions of any requirements in the accompanying schedule.

Table B - Upgrading existing doorsets to achieve a fire resisting standard of thirty minutes

1. In general, the upgrading of existing doorsets to achieve a standard of fire resistance of thirty minutes is not recommended except in the case of historic buildings. It is preferable that new doorsets are installed.
 2. If a doorset is to be upgraded, a test report will be required confirming that the door and frame are capable of resisting the action of fire for not less than thirty minutes when tested in accordance with the current British Standard 476: Part 22 (and BS 476: Section 31.1 when the 'S' specification requires smoke stopping).
-

Cupboard doors required to be fire resisting

3. Cupboard doors of standard size shall be replaced with new doors capable of resisting the action of fire for not less than thirty minutes when tested in accordance with the current British Standard 476: Part 22 (and BS 476: Section 31.1 when the 'S' specification requires smoke stopping).
4. For cupboard doors of less than standard size, a suitable fire resisting door shall be cut to size and fitted with an intumescent strip channelled into the top, hinge and closing edges to resist fire when tested in accordance with the current British Standard 476: Part 22.