

Freedom of Information request reference number: 8589.1

Date of response: 30/04/2024

Request:

I would like information on:

- 1. When the inspection of Keyham House by LFB took place and what actions were required as a result.*
- 2. What are the remedial works being undertaken and what are the timescales particularly as regards the fire doors in the common areas.*
- 3. Why has the Council not complied with Regulation 10 of the Fire Safety (England) relating to inspections of all fire doors which came into force in January 2023.*

Response:

Our Fire Safety Regulatory Team have advised the last Fire Safety Audit was carried out in 2021.

The Fire Safety Audit confirmed no significant failure to comply with the Regulatory Reform (Fire Safety) Order 2005 (RRO) and as a result the premises were deemed broadly compliant with verbal action only.

I have included a copy of the Fire Safety Audit report. Please note, personal data has been removed from the document under [section 40 of the FOIA – Personal Information](#).

With regards to the last two questions, we do not hold this information and would recommend you contact Westminster City Council for this.

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: <https://www.london-fire.gov.uk/about-us/transparency/request-information-from-us>



Fire Safety Audit Report

Audit Information

Audited By [REDACTED] ([REDACTED])
Audit Completed 26 March 2021

Location summary

File No 01/018051
UPRN 100023618869
Building Name Keyham House
Address KEYHAM HOUSE
 WESTBOURNE PARK ROAD
 LONDON
 W2 5UH
Borough Westminster
Use D - Purpose Built Flats >=4 floors
Responsible Team FSR Westminster
Station Ground A21 - Paddington
Site Risk Score 4.50
Total Floors 20 **Basement floors** 0
Estimated number of sleeping 0
Special Features
Additional detail **NONE**

Premises Description

Purpose built flats consisting of ground and 19 upper floor levels with single staircase lobbied at each floor with two door protection, There is a small convenience store at ground floor street level.

Purpose built block housing 97 flats. It has brick walls, concrete floors and a flat roof.

Environmental Risks NONE

Features assisting fire spread NONE

Site Reinspection date

Heritage Building No

Petroleum redevelopment? No

Known firesetting in area? No

Site lone worker risk

Property Detail (DEFAULT PROPERTY)

Occupier Contact Default Property
Address KEYHAM HOUSE
 WESTBOURNE PARK ROAD
 LONDON
 W2 5UH

Responsible team	FSR Westminster
Occupancy Type	Sole Occupier
Property Use	D - Purpose Built Flats >=4 floors
Valuation Office	R3 - Flats/Mais 4 Flrs and over PB
Original Risk Score	4.50
Reinspection Date	N/A (SAMPLE)
Last Inspection	18 March 2021
Total Capacity	0
Maximum number of people	>100
Property Size for use	Medium 5001m ² to 8300m ²
Environmental Risks	NONE
Occupant Mobility	Average
Fire Loading	Average
Additional detail	

Specific lone worker risk

Primary Authority Partnership N/A

Protection Data (SHARED)

Fire Protection & Warning	Adequate
Unwanted fire signals count	0
AFD remote monitoring	No
Smoke ventilation	Natural
Covers MOE/Common areas?	Yes
Sprinklers Installed?	No
Access for fire-fighting	Average
Water supplies	Average
Special Features	
# Fire fighting shafts	0
Engineered solution?	No
Trade off measures?	No
Evacuation type	Defend in place -Stay Put
History of fires?	No

Contacts**Occupier**

Name	Default Property
Address	WESTBOURNE PARK ROAD LONDON W2 5UH

Owner/Co-Owner

Name	Westminster County Council
Responsible Person	[REDACTED]
Position	Fire Safety Manager
Address	Westminster City Council Westminster City Hall 64 Victoria Street, SW1E 6QP
Email	[REDACTED]

Enforcement history**Articles****Article 9 - Risk assessment**

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Suitable and sufficient FRA completed by WCC on 27/09/2020. Review set to take place on 27/09/2021.
Use of premises, fire safety systems within and evacuation policy all considered. Some deficiencies raised in the FRA with timescales attached.

Article 11 - Fire Safety Arrangements

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Fire safety management managed by WCC. This address is a general needs block. As with most general needs properties there are no members of staff permanently on site. However, regular visits to site are made by cleaning/maintenance staff, and a monthly HSS inspection is carried out by the Area Compliance Team.
FRA and emergency procedures in place for the premises.
The testing and maintenance of the fire safety systems in place are being effectively planned, controlled and organised. AFD, smoke control via AOV and EL. These systems are also being effectively maintained by competent bodies. FANS located throughout the premises.

Article 13 - Detection and warning

SAFETY CRITICAL
Safety Evaluation
 Broadly Compliant

Observations

In line with normal practice for purpose built residential blocks designed to facilitate a 'defend in place' strategy there is no requirement for a fire alarm system to be fitted within the common areas. However a detection system in the staircase enclosure and lobbies on each floor, for the AOVs. The panel for the alarm system and AOV's in on the ground floor in cupboard next to electrical cupboard.

Healthy panel at the time of the inspection.

Article 14 - Emergency routes and exits

SAFETY CRITICAL
Safety Evaluation
 Low Risk

Verbal Advice Given

Observations

In the premises is 97 flats over 20 floors from ground to 19th floor. Each floor apart from ground floor has 5 flats on it and open into protected lobbies, which in turn lead to a single protected escape staircase with two door protection.

Also in lobbies where the flats are,

At ground level there are two exits which lead to places of ultimate safety. One leads through the ground floor lift lobby and exits at the front of the block into Westbourne Park Road. The other leads direct to outside at the east side of the block into the service yard, without the need to go through the ground floor lobby.

The MOE were clear, had EL working in them and fire exit signage throughout. FAN notices in the lobbies to let residents and visitors know what to do in the event of an emergency.

At the time of the inspection it was noted that there were items being stored in the lobbies by residents. This area should be clear and free of obstruction.

Also at the time of the inspection, I was unable to confirm the condition of the flat front doors and whether they have self closing devices, strips and seals. In the FRA it noted that there were some doors that were not compliant.

FAILURES

Article 14 Issues with emergency routes or exits

At the time of the audit the emergency routes or exits were inadequate. It was found that items were being stored in the lobbies by residents.

REMEDY

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 keeping the lobbies clear and free of obstructions.

Article 14
(continued)

Article 14 Flat Front Door Specific

Please refer to Article 17.

REMEDY

Please refer to Article 17.

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

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

The current emergency evacuation procedure at Keyham House is a defend in place stay put policy for the residents.

FANs detailing what residents and visitors to do in the event of an emergency.

Article 17 - Maintenance

SAFETY CRITICAL
Safety Evaluation
Low Risk

Verbal Advice Given

Observations

Competent person employed to maintain the fire safety systems within the block. Fire alarm, emergency lighting and AOV all maintained.

WCC provided the documents to show that the fire alarm, smoke control, dry riser has been maintained.

EL last serviced 23/11/2020.

At the time of the inspection, I was unable to confirm the condition of the flat front doors and whether they have self closing devices, strips and seals. In the FRA it noted that there were some doors that were not compliant.

FAILURE

Article 17(1) Flat doors-Common parts exit routes

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 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 with self closers, strips and seals.

REMEDY

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.

Article 17
(continued)

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.

Article 21 - Training

SAFETY CRITICAL
Safety Evaluation
Not Applicable

Observations

No staff on site permanently. Cleaners attend the premises regularly. WCC personnel are provided with mandatory fire awareness training on joining the organisation and given regular refreshers. This training clearly informs them what to do in the event of fire.

Article 8 - General fire precautions

Safety Evaluation
Broadly Compliant

Observations

Some significant findings raised on the FRA that was completed on 27/11/20. All significant findings were raised on 09/12/2020 with some due for completion by 09/06/2021.

Article 10 - Principles of prevention to be applied

Safety Evaluation

Broadly Compliant

Observations

The main entrance/exit door is secured locked shut by an electromagnetic lock, which can be opened from the outside by resident's fobs, by the phone entry system, or from the inside by pressing the release button.

There is CCTV for the building and rubbish is collected daily from the premises. Signage for no smoking seen in the whole property.

It is policy for WCC to carry out statutory 5 yearly inspections and testing of the landlord's electrical supply system. Records of all testing inspection and maintenance are held centrally, although at present it is difficult for assessors to confirm the date of the last inspection/test. Current systems are being updated.

Article 12 - Elimination or reduction of risks from dangerous substances

Safety Evaluation

Not Applicable

Observations

None

Article 13 - Fire Fighting Equipment

Safety Evaluation

Broadly Compliant

Observations

No FEE on the premises apart from in the lift motor room where there are Co2 extinguishers. No access could be gained to check the lift motor room as it is locked at the time of the inspection.

Article 16 - Measures for dealing with dangerous substances affecting general fire precautions

Safety Evaluation

Not Applicable

Observations

None

Article 18 - Safety assistance

Safety Evaluation

Broadly Compliant

Observations

Competent people employed to maintain fire safety systems.

Article 19 - Provision of information to employees

Safety Evaluation

Not Applicable

Observations

None

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

Safety Evaluation

Broadly Compliant

Observations

Outside contractors are briefed on the risks that they pose in the residential block before they begin working in there.

No staff are assigned to these contractors whilst they work in the premises although in the event of an emergency, staff would ensure they would leave the premises.

Article 22 - Co-operation and co-ordination

Safety Evaluation

Not Applicable

Observations

None

Article 23 - General duties of employees at work

Safety Evaluation

Not Applicable

Observations

None

Article 37 - Fire fighters switches for luminous tube signs

Safety Evaluation	Observations
Not Applicable	None

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

Safety Evaluation	Observations
Broadly Compliant	Dry riser present at the premises. This is serviced every 6 months and the last test was in September 2020. AOV present on each floor activated by AFD and will open windows at the ends of each floor. Last serviced on 26/02/2021.

Article 24 - Power to make regulations

Safety Evaluation	Observations
Not Applicable	None

Article 27 - Powers of inspectors

Safety Evaluation	Observations
Not Applicable	None

Article 29 - Current alterations notices

Safety Evaluation	Observations
Not Applicable	None

Article 30 - Current enforcement notices

Safety Evaluation	Observations
Not Applicable	None

Article 31 - Current prohibition notices

Safety Evaluation	Observations
Not Applicable	None

Article 32 - Offences

Safety Evaluation	Observations
Not Applicable	None

Overall safety standard

Low Risk

Management compliance level

Management Compliance Level	1 - Well above average
Initial Expectation	Verbal action
Considered EMM?	Yes
Confirmed Action	Verbal action

Audit Conclusion

26/03/2021 10:27

Further to the visit to Keyham house on 17/03/21. I checked that the fire lifts were working at the time of the inspection as per the operational crews station notification to fire safety and the recommendation for a PIB to be installed was sent to Westminster County Council.

26/03/2021 10:24

Initial Expectation: Verbal action

22/03/2021 15:55

This was a reactive FS01 visit on Wednesday 17th March 2021 after operational crew visited the premises advising that the fire lift was not working, there was no PIB or fire safety document box and that the place had poor fire safety management.

Pre-audit checks were carried out using Farynor, fire safety portal, operational risk database, IMS, google maps, imapping and companies house. 5 unwanted fire signals recorded within a 3 year period. EPIP entry for the high rise premises.

I attended this inspection at Keyham House, Westbourne Park Road, London, W2 5UH inspected the all of the common parts of the premises apart from the electrical riser cupboards in the bin store and the lobby areas on each floor as they were locked. I was not met by an RP at the premises due to the current covid situation. I let myself into the property with the fire brigade drop key.

The premises had 1 protected staircase with 2 means of escape from this. One via the main entrance and one via the rear escape on the ground floor.

There were 5 flats on each floor apart from the ground floor where there is two flats. On each upper level there is a dry riser outlet in the lobby with AOV for each floor. There is also a bin chute room on each floor.

The premises covers an area of 5,624m² over 19 floors.

WCC manage the property and provided all the documents for the premises in relatively quick time.

All the areas audited. Minor deficiencies scored for

- Article 14 – At the time of the inspection, the MOE was not suitable and sufficient. Items being stored in the MOE by residents.

Flat front doors – see article 17

- Article 17

Flat front doors not sufficient. I was unable to check if the flat front door were sufficient at the time of the inspection. There were a number of varieties of flat front doors and the latest FRA mentioned that there were still outstanding works to be completed for the doors to be compliant.

From these deficiencies, the audit scored a verbal action. I have confirmed this using the EMM and am happy with this outcome.

I have spoken with [REDACTED] and advised him of the outcome. He is happy with the outcome and will endeavour to get the works completed asap.

22/03/2021 15:50

Initial Expectation: Verbal action

Verbal Advice Given

None recorded

Other Authorities to notify

None

Weeks to Complete Work

N/A

Specific instructions for Admin to Action

None

Compliance calculation & signature

Compliance Level	1 - Well above average
Property Risk Group	B - Sleeping familiar or Licensed Premises
Life Risk	-2.1
Actual Risk Score	4.7
Risk Score	4.75

Audit Timings

Audit Duration
300

Travel Time
45

Post Audit Processing Duration
0

Management Review**Reviewed By**

Review completed no further actions to be taken at this time.