



Strengthening Fire Safety for High Rise Domestic Buildings

Consultation

Response from AXA UK

About AXA UK

1. AXA UK (AXA) is part of the AXA Group, a worldwide leader in financial services. AXA Group operates in 61 countries with over 170,000 employees and 105 million customers. AXA has around 11 million customers in the UK and operates through specific operating companies – AXA Insurance and AXA PPP healthcare.

Executive summary

2. AXA UK welcomes the opportunity to submit to this consultation, as we have a history of engaging with the Scottish Government on fire safety issues, especially on the need for regulation to mandate third party accreditation for fire safety risk assessors for high risk buildings, such as high-rise domestic buildings.
3. We raise a number of key points in this submission, especially around the need to ensure communications are simple, free of jargon and inclusive of all residents (e.g. residents for whom English is not their first language or those with disabilities). Using a range of multimedia channels allows core messages to be repeated, with images to support the message and also can be adapted to target different demographics of residents.
4. Fire risk assessments for high risk buildings will be complex and detailed, and we would advocate that only appropriately qualified persons, that are 3rd party accredited, be allowed to undertake such assessments. Moreover, output from these risk assessments should be provided to building owners and management. Although this would increase costs of the assessment itself, it should result in cost savings for Scottish Fire and Rescue Services and the NHS by reducing the likelihood of fire and injury and subsequent agency involvement.

Part 1: Fire safety information for people who live in high-rise domestic buildings

Consultation Question 1:

Please indicate from 1 to 5 what would be your most and least preferred way to get fire safety information. (1 most preferred – 5 least preferred)

5. Printed Leaflet	1	<u>2</u>	3	4	5
Written Information on a Website	1	2	3	4	<u>5</u>
Video/Animation on a website	1	2	<u>3</u>	4	5
Notice Board/Poster in the building	<u>1</u>	2	3	4	5
Mobile device app	1	2	3	<u>4</u>	5

Consultation Question 2:

Does the fire safety information provide good advice on how to stop fires from happening?

6. Yes.
7. AXA would note that consideration, and amendments to communication methods, should be given to residents with disabilities or conditions that may inhibit their ability to understand and implement advice, an example would be braille leaflets to assist those with visual



impairments. We would also encourage amendments to advice in communities where English is not the first language, e.g. using pictograms to aid explanation.

Consultation Question 3:

Does the fire safety information provide good advice on what to do if a fire starts?

8. Yes.

Consultation Question 4:

Does the fire safety information help you to understand the reasons behind fire safety advice?

9. Yes.

Consultation Question 5:

Is the fire safety information easy to understand?

10. In part.

11. However, AXA believe the terminology in fire safety information is not suitable for people with little knowledge of fire safety and would encourage using less jargon and more simplistic language to ensure everyone is able to understand the information.

Consultation Question 6:

Does your high-rise domestic building have a way people can raise concerns about fire safety?

12. N/A.

Consultation Question 7:

If you answered yes to Question 6; does the process work?

13. N/A.

Consultation Question 8:

Please let us know if you think there is any other useful fire safety advice and information that could be included for people who live in high rise domestic buildings.

14. AXA would suggest fire safety bodies engage with the local schools and community groups which residents of high-rise domestic buildings would attend. This engagement would be through regular information sessions or leaflet drops. AXA believe it is important to educate children, as well as adults, and can often be helpful in overcoming language barriers in areas where English is not the first language for many residents.

Consultation Question 9:

Do you think more information on the 'stay put' policy would be helpful?

15. Yes.

16. AXA recognise that the 'stay put' policy will continue to be utilised on several occasions where the structure and management controls remain appropriate for this strategic evacuation option. Nonetheless, the fire at Grenfell Tower on 14 June 2017 resulted in significant criticism of the 'stay put' policy and a subsequent lack of trust in its effectiveness. AXA would



therefore suggest that the Scottish Fire and Rescue Service provide residents with face to face engagement to explain why on some occasions it may be safer for individuals to stay within their flats, if they are aware that the fire and rescue service are in attendance and in control of the event. Every fire is individual, and residents should be encouraged to always follow the advice of the Fire and Rescue Service on site.

17. Moreover, the management of high-rise buildings should be required to undertake specific information and awareness training delivered by the Scottish Fire and Rescue Service where a certificate of attendance is issued and should be refreshed at intervals not exceeding 36 months.

Consultation Question 10:

Please provide any further comments on the information and advice in this section of the consultation in the box below.

18. We think there should be more information on how tenants could adversely impact fire safety strategy. This could include storage of goods in common areas and balconies, damage or changes to doors into flats (resulting in them not being to fire safety standard) that fire safety equipment within a building should not be damaged / should be reported if they are damaged e.g. dry/wet risers cabinets, emergency lighting or self-closure mechanisms on doors.

Part 2: Fire safety campaign regarding common areas

Consultation Question 11:

Would having clearer information on the dangers of leaving items that will burn in common areas, encourage people not to do this?

19. Yes.
20. Yes, this is a significant issue and the consequences of leaving items in common areas need to be made clear to all residents. We believe this should extend to the storage of goods on balconies, which is an increasing issue across the UK resulting in rapid fire spread. AXA have raised this issue with managing agents in recent years and following the recent fire in Barking on 9 June 2019, the Expert Advisory Group have issued specific warnings to storage on balconies. In addition, the issues with BBQ's on balconies should be highlighted and must not cover just the increase of fire but the risk of Carbon Monoxide poisoning.

Consultation Question 12:

Would images to highlight the damage caused by fires started in common areas be helpful to encourage people not to leave items that will burn in those areas?

21. Yes.
22. Yes, we believe photos or videos which highlight the consequences, alongside specific case studies, of fires started in common areas would be beneficial in communicating with residents.



Consultation Question 13:

Please let us know if you have any further comments about the fire safety campaign regarding common areas in high rise domestic buildings.

- 23. We believe multimedia communication would be best to communicate and that different campaigns or case studies should be used to target communicating with different ages or other demographics.

Consultation Question 14:

If you live in a high-rise domestic building, is there a process in place for the assessment and removal of items left in common areas?

- 24. N/A.

If you answered No or Don't know to Question 14, please skip Question 15.

Consultation Question 15:

If you answered yes to question 14; does the process work?

- 25. N/A.

Consultation Question 16:

What is the best way to get information on keeping common areas safe from fire? Please indicate from 1 to 5 (1 most preferred – 5 least preferred) what would be your most and least preferred.

26. Email	1	2	3	4	<u>5</u>
Printed Leaflet by post	1	2	3	<u>4</u>	5
SFRS home fire safety visits	1	<u>2</u>	3	4	5
Video/Animation on a website	1	2	3	4	5
Notice Board/Poster in the Building	<u>1</u>	2	3	4	5
Printed information from owner/landlord when first moving in	1	2	3	4	5
Via local residents group meetings	1	2	<u>3</u>	4	5

- 27. Resident group meetings could be extended to include local schools, community groups or local religious groups. This would help to increase attendance and communicate the messages of fire safety to a wider audience.

Part 3: Fire safety in existing high-rise domestic buildings (questions related to Annex 1)

Questions related to Chapter 1 in the Guidance

Consultation Question 17:

Is it clear that the Guidance is aimed at those that own, factor, manage, give advice on and enforce standards in high rise domestic buildings?

- 28. Yes.



Consultation Question 18:

Is the purpose of the Guidance clear for those expected to use it?

29. Yes.

Consultation Question 19:

Is it clear how the Guidance should be used in practice?

30. Yes.

Consultation Question 20:

Is there further information that should be included?

31. Yes.

Consultation Question 21:

Please provide any further comments on this chapter

32. N/A.

Questions related to Chapter 2 in the Guidance

Consultation Question 22:

Do you think the Fire Safety measures are clearly explained in the Guidance to those that own, factor, manage, give advice on and enforce standards in high rise domestic buildings?

33. Yes.

Consultation Question 23:

Do you think there is further information that should be included?

34. Yes.

35. Various studies completed by the Fire Protection Association and the Fire Industry Association have found that multi sensor fire detectors can be considered as the most appropriate form of detection. Moreover, these studies highlight that by installing multi sensor detectors the number of Unwanted Fire Alarm Signals (UFAS) will reduce. The level of UFAS is stated as a financial drain on all fire services in the UK as they direct fire crews away from other activities to false alarms. Although AXA recognise that multi sensor detectors are expensive, their effectiveness in the context of the financial strains from UFAS mean that they should not be optional.

Consultation Question 24:

Please provide any further comments on this chapter

36. We would highlight the importance of considering how waste storage areas are designed, and also the layout and enforcement of restrictions of car parking. Waste areas and cars are known to be targeted by those engaged with wilful fire raising and proximity to property is a danger. Car parking layout or enforcement of restrictions of parking is also important for fires caused by faulty electrical system but also impeding access or deployment of Fire and Rescue Services.



Questions related to Chapter 3 in the Guidance

Consultation Question 25:

Do you think the reasons for carrying out a Fire Risk Assessment in high rise domestic buildings are clearly explained?

37. Yes.

Consultation Question 26:

Do you think how to carry out a Fire Risk Assessment in high rise domestic buildings is clearly explained in the 7-step methodology for assessing fire risk in the Guidance?

38. Yes.

39. AXA has long called for Fire Risk Assessments in high-rise domestic buildings to only be undertaken by individuals who have appropriate knowledge in fire safety, can demonstrate previous experience in undertaking fire risk assessments in high rise domestic buildings, who are third party accredited and have appropriate levels of Professional Indemnity (PI) insurance in place.

Consultation Question 27:

Do you think there is other information that should be included?

40. No.

Consultation Question 28:

If you own, factor, manage, give advice on and enforce standards in high rise domestic buildings: is there a process in place for the assessment and removal of items left in common areas?

41. N/A.

Consultation Question 29:

If you answered yes to question 28: do you have confidence that the process works in practice?

42. N/A.

Consultation Question 30:

Please provide any further comments on this chapter

43. N/A.

Questions related to Chapter 4 in the Guidance

Consultation Question 31:

Do you think it is clearly explained how to prevent the impact of fires in high rise domestic buildings?

44. Yes.



Consultation Question 32:

Do you think it is clearly explained how to reduce the impact of fires in high rise domestic buildings?

45. Yes.

Consultation Question 33:

Do you think there is further information that should be included?

46. Yes.

47. Short case studies or sharing best and worst practice could be helpful.

Consultation Question 34:

Please provide any further comments on this chapter

48. N/A.

Questions related to Chapter 5 in the Guidance

Consultation Question 35:

Do you think the physical fire safety measures in high rise domestic buildings are clearly explained?

49. Yes.

Consultation Question 36:

Do you think there is further information that should be included?

50. No.

Consultation Question 37:

Please provide any further comments on this chapter

51. N/A.

Questions related to Chapter 6 in the Guidance

Consultation Question 38:

Do you think there is further information that should be included?

52. No.

53. There should be stronger messaging around the selection and monitoring of contractors undertaking maintenance or renovation to property – this is the most common area where problems arise.



Consultation Question 39:

Please provide any further comments on this chapter

54. We would suggest that there should be guidance and possibly compulsion for contractors to be required to provide photographic or video evidence to the building owner or manager where works have been undertaken and the area of work concealed. This should include evidence of appropriate fire stopping having been completed e.g. service risers or condition of ceilings above fire doors.

Questions related to Chapter 7 in the Guidance

Consultation Question 40:

Do you think this is useful information to have in the Guidance?

55. Yes.

Consultation Question 41:

Is the information on legislation in this section of the guidance clear?

56. Yes.

Questions related to Appendix 3 in the Guidance

Consultation Question 42:

Do you think that those responsible for carrying out a fire risk assessment will find the included Fire Risk Assessment template easy to use to carry out an effective assessment?

57. No.

58. AXA believes that the simplistic assessment template provided is inappropriate to carry out a fire risk assessment of highest risk residential buildings in Scotland. We would recommend that the template is removed, and a comprehensive assessment carried out by a suitably qualified person will be required for an effective approach.

General questions on the Guidance

Consultation Question 43:

Can you suggest ways to let people know this Guidance is available once it is published?

59. AXA believes that using a range of multimedia channels would be the best method to communicate a consistent message, to ensure that this message can be repeatedly communicated and adapted to different demographics.

Consultation Question 44:

Will this Guidance be straightforward to use by those that own, factor, manage, give advice on and enforce standards in high rise domestic buildings?

60. Yes.



Consultation Question 45:

Do you think the content is clear and easy to understand?

61. Yes.

Business and Regulatory Impact (BRIA)

Consultation Question 46:

Please give information and views on any business impacts you consider the Fire Safety in Existing High-Rise Domestic Buildings guidance might have.

62. AXA believe it will result in building owners more actively considering that the advice, services and contractors that are engaged in fire safety are appropriate and competent. This may result in higher fees or costs; however, it will improve fire safety which should result in cost savings for Scottish Fire and Rescue Service (SFRS) and the NHS.

Equality Impact Assessment (EQIA)

Consultation Question 47:

Please give information and your views on impacts on groups with protected characteristics as noted above, that implementation of the Fire Safety in High Rise Domestic Buildings guidance might have.

63. Consideration, and amendments to communication methods, should be given to those individuals with disabilities or conditions e.g. age-related conditions such as Dementia that may inhibit their ability to understand and implement the Fire Safety in High Rise Domestic Buildings guidance. Records of individuals with disabilities and conditions that may inhibit their ability to follow the guidance should be maintained by the building owner and communicated to the Scottish Fire and Rescue Service to assist with the information provided to emergency services on the ground. In addition, as there may be many residents who do not have English as their first language, consideration must be given to the delivery of advice by various languages, infographics, video and animation to ensure information is accessible to all.

Consultation Question 48:

Please provide any further comments you have on the Guidance below.

64. N/A.

Respondent Information Form

This submission is on behalf of an organisation, AXA UK. Please direct all contact to Public Affairs Executive Jonathon.murphy@axa-uk.co.uk, 07866032309 or Jonathon Murphy, AXA UK, 5 Old Broad Street, London, EC2N 1AD.

AXA UK consent to this submission being published with the name of our organisation and consent to the Scottish Government contacting AXA UK in future.