



Ministry for Housing, Communities & Local Government

Fire Safety: Risk Prioritisation in Existing Buildings

Response from AXA UK

1. AXA UK (AXA) is part of the AXA Group, a worldwide leader in financial services, operating 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 welcome the opportunity to comment on the Government's call for evidence. AXA has previously engaged with the Government on fire safety issues including on the Interim Report of the Independent Review of Building Regulations and Fire Safety.
3. As a leading property insurer, AXA is acutely aware of the significant costs associated with property damage resulting from fire. AXA support the Government's plan to commission research to develop an evidence base on fire safety risk in buildings. The proposals will enable a better understanding of the complexity of building safety risks and support the wider programme of safety reforms for both existing and new buildings.

Questions

Question 3 - Do you agree that a case by case risk-based approach should be taken for existing buildings?

4. Yes, AXA agree that a risk-based approach should be taken for existing buildings as per the recommendations in Dame Judith Hackitt's report. A case by case risk-based approach enables a more accurate assessment of the risks associated with the building.

Question 4 – What factors, aside from height, do you think should be considered when classifying building risk? Please provide evidence to support your answer.

5. There are a number of factors which impact the level of risk in existing buildings. AXA believe these factors include:
 - a) Whether the building is purpose built or converted (such as from office blocks, hotels, large single occupancy buildings which have been converted into multiple units) for current use.
 - b) Whether the building is still its original structure or has been extended or altered.
 - c) The nature of the materials utilised in external building elements of construction e.g. whether the materials are combustible.
 - d) The profile of residents including an individual's age, mobility, health and care needs.



- e) Location and accessibility, particularly the ability for fire and rescue services to respond to incidents. For example, some rural locations may restrict capabilities and slow-down response times.

Question 5 – How significant do you consider height to be when classifying building risk? Please provide evidence to support your answer.

- 6. AXA believe the height of buildings to be a significant factor in classifying building risk. The height of a building influences the ability to evacuate a building quickly, particularly when the primary route for escape is blocked or compromised. Moreover, the height of a building impacts the time it can take fire and rescue services to reach the location of a fire.
- 7. Whilst building height is a significant factor, is not the sole driver of building risk. Vulnerability of the occupants, reliance on fire service interventions and risks associated with work activities are examples of risks that are also considered when determining building risk.
- 8. Furthermore, the availability of high reach aerial firefighting appliances varies should be considered. Availability is largely limited to the centre of metropolitan cities and large towns, where the majority of high-rise buildings are located. The current availability of high reach aerial appliances results in significant issues for response times in smaller, rural counties where multiple aerial appliances are not readily available. A number of fire & rescue services are reliant on supplementary resources from neighbouring brigades.

Question 6 – Please specify areas the research on the prioritisation of risks in buildings should consider.

- 9. There are a number of research areas related to the prioritisation of risk in buildings AXA believe should be considered. These include:
 - a) Gaining a better understanding of the levels of toxicity given off from building materials involved in fire, for example cladding where there is foam insulation. The toxicity of contents are well understood from recent [research](#) by the University of Central Lancaster, however, AXA believe there is a gap with regard to building materials.
 - b) Analysis of the long-term resilience of buildings developed using Modern Methods of Construction (MMC) particularly the level of partial structural damage to buildings that results from a fire and the time it takes to make these buildings safe and useable again. Whilst traditional methods of construction are well understood, and repair is able to be completed by wide range of contractors, MMC can take a lot longer if a specialist build has taken place and/or partial repair is very difficult and requires specialist contractors. AXA is concerned that small damage could result in a disproportionate loss as a result of limited knowledge of this area.
 - c) The impacts on fire safety of retrofitting homes to enable people to live independently in their homes for longer. Examples of these alterations include responses to restricted movement, ageing and age-related health conditions such as dementia. Equally there should be research into the types of special arrangements that will be required to ensure



that retrofitted homes are safe from the perspective of fire risk, and the challenges that may subsequently arise.

- d) Whether there should be statutory requirements for emergency services to have access to a central database of homes with special provisions that may require changes to their deployment response following incidents. This would be particularly relevant to blocks of flats where multiple challenges could be present.
- e) The impact of poorly maintained fixed electrical installations in the UK and poor adherence to recommended time periods for regular inspections. Research could similarly identify whether a more stringent enforcement strategy would lead to a positive reduction in fire from faulty electrical installations.

Question 7 – Please specify approaches and evidence the research should consider when prioritising action between different buildings.

- 10. AXA would encourage evidence, research and case studies to be gathered from a wide range of sources and should not be limited to sources within the United Kingdom. Valuable understanding can be developed from analysing case studies from across the world.

Question 8 – Please provide innovative ideas and supporting evidence of approaches to assessing risk in existing buildings.

- 11. AXA would encourage utilising a number of approaches in order to improve the effectiveness of assessing and mitigating risk in existing buildings. Solutions should not exclude innovations that can be delivered through the Internet of Things. By using IoT and cloud computing, powerful intelligence on existing fire risks can be gathered at both a local or national level. Energy insight solutions could identify faults in electrical appliances and implement measures in order to mitigate the risk such as trigger warnings, auto-disconnecting power from the appliance or notifying a qualified engineer to investigate the issue.

If you need to get in touch regarding the information in this submission, please get in touch with Public Affairs Executive, Jonathon Murphy, at jonathon.murphy@axa-uk.co.uk or on 07866032309.