

Scottish Government Response to the Grenfell Tower Inquiry Phase 1

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Scottish Government Ministers thoughts remain with the families and friends of the 72 people whose deaths were caused, and those otherwise impacted by, the Grenfell Tower fire on 14 June 2017.

Chapter 1: Scottish Government response to the Grenfell Tower Inquiry Phase 1 report

Introduction

1. On 14 June 2017 a fire broke out in Grenfell Tower which led to the deaths of 72 people. On 15 June 2017 the Prime Minister at the time, Theresa May, announced that there would be a formal Inquiry into the tragedy. The Inquiry, Chaired by Sir Martin Moore-Bick, opened on 14 September 2017 and has two distinct phases. The Inquiry reports its findings to the Prime Minister of the UK Government.
2. Phase 1 focused on the factual narrative of the events on the night of 14 June 2017. Hearings for Phase 1 began on 21 May 2018 and concluded on 12 December 2018. The Chairman published his [Grenfell Tower Inquiry Phase 1 Report](#) on 30 October 2019. Phase 2 of the Inquiry, which is currently underway, examines the causes of the events of the fire, including how Grenfell Tower came to be in a condition which allowed the fire to spread in the way identified by Phase 1.
3. This report is the Scottish Government response to the Grenfell Tower Inquiry Phase 1¹ recommendations. This response was produced for Scottish Ministers by the Scottish Government Grenfell Inquiry Fire Safety Working Group (GIFSWG)².
4. The Scottish Government would like to thank all of those involved in the inquiry, particularly those who gave evidence in Phase 1. Their sometimes difficult testimony has enabled the Inquiry to produce a detailed report and provide a number of recommendations with the aim of strengthening fire safety, particularly in high rise domestic buildings.

Approach to Responding to Recommendations

5. The Scottish Government continues to be committed to effective fire safety to prevent fires, injuries and fatalities. This includes learning from the Grenfell Tower fire to identify potential improvements in fire safety and response in Scotland.
6. The Scottish Government Ministerial Working Group (MWG) on Building and Fire Safety was established immediately after the Grenfell Tower fire and has led a programme of work on frameworks, regulations and guidance to improve fire safety. Under the MWG leadership, actions have already been delivered to strengthen fire safety in Scotland. Some of these are in line with many of the Grenfell Inquiry recommendations.
7. The Inquiry recommendations are, rightly, directed at the fire safety arrangements in England. Scotland has its own fire safety, building standards

¹ Grenfell Tower Inquiry Phase 1 report

² Annex C – Membership and Remit

and housing legislation. There are instances of significant difference between Scotland and elsewhere in the UK, although there is also much similarity in principles and approach, for example in fire safety risk assessment and technical building standards.

8. The approach for Scotland is to focus on outcomes that maintain and strengthen people's safety. The specific responses and actions for Scotland reflect and build on the fire safety regime and practice in Scotland, in a proportionate way. In this regard, the *intention* of the Inquiry recommendations are considered, although the specifics on how these may be achieved differ.
9. The Scottish Government Grenfell Inquiry Fire Safety Working Group Terms of Reference are:

To be collectively responsible for considering the 46 recommendations from the Grenfell Inquiry Phase 1 report; and what actions, if any are needed to implement these recommendations in Scotland, focusing on outcomes. Where it is agreed that recommendations will not be implemented in Scotland, sound reasoning will be provided.

10. This report is the response to all 46 recommendations from the Inquiry Phase 1 (Annex A contains a full list of recommendations). The recommendations are directed at two main groups and were dealt with in two distinct ways:
 - Group 1: 15 recommendations directed at “building owners and managers” of high rise residential buildings (including three for residential buildings with separate dwellings regardless of height) and one for the Government.
 - Group 2: 31 recommendations for the London Fire Brigade (LFB) and emergency services.
11. The Scottish Government GIFSWG assessed and agreed responses to the Group 1 recommendations as set out in Chapter 2. Property law in Scotland is different to that in England and Wales and some high-rise buildings in Scotland do not have a single owner. The response to the recommendations in this report take that fact into account. The Scottish Government [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) (2019) sets out best practice and encourages building owners, or individual flat owners where no single building owner exists, to take on a wider responsibility for their building's fire safety than is currently required under Scottish fire safety law³.
12. The Scottish Fire and Rescue Service (SFRS) is addressing the Group 2 31 recommendations for LFB and emergency services, given the focus on operational matters. Chapter 3 provides a summary and link to the SFRS Action report. The GIFSWG provided co-ordination and oversight for the responses to all the recommendations.
13. Stakeholders in local authority, social and private housing were given the opportunity to provide comments on the Scottish Government approach and

³ The home ownership and fire safety law in Scotland is different from England and Wales. See the 'Fire Safety Law in Scotland' section later in this Chapter for more detail.

proposed direction in response to the main matters. The High Rise Tenants and Residents Panel have contributed to the actions already taken and the Scottish Government will seek to continue to involve this group to inform proposed developments in fire safety in high rise domestic buildings.

14. Whilst it is not possible to eliminate the risk of a fire occurring, prevention and protection remains the priority, with an effective national Fire and Rescue Service able to respond to fires. The Scottish Government is committed to research to monitor and evaluate actions to strengthen fire safety in high rise domestic buildings, including the position for buildings with multiple owners and fire safety enforcement in the longer term.
15. High rise domestic buildings in this report refers to buildings with a storey height in excess of 18m above the ground – generally more than 6 floors – but not above 60m – generally more than 20 floors. This is because specialist advice should be sought for buildings above this height.

Scope

16. Three recommendations (36, 37 and 38) from Phase 1 of the Grenfell Tower Inquiry not only apply to high rise domestic buildings but to “every residential building containing separate dwellings (whether or not they are high-rise buildings)”. The consensus of the Scottish Government GIFSWG was to consider the Phase 1 recommendations for application to high rise domestic buildings only. This was considered a risk proportionate approach.
17. The Group agreed to keep this approach under review. The Scottish Government will continue to work with SFRS and others on the standard of fire safety in buildings under 18m and will ensure that learning from Phase 2 of the Inquiry is also carefully considered. Risk based evidence will be used to inform any potential change of approach.

Fire Safety in High Rise Domestic Buildings in Scotland

Fires and their impact in High Rise Domestic Buildings

18. This section sets out the current position concerning fires and fire safety in high rise domestic buildings in Scotland from available evidence and experience. This context has helped to inform the proposed actions in response to the recommendations in nature and proportion.

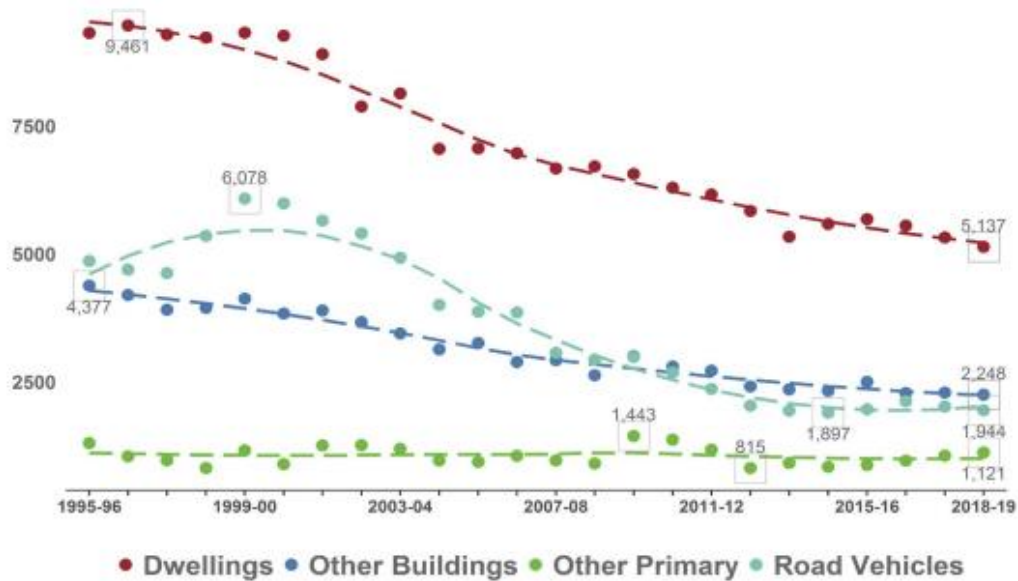
High Rise Domestic Properties in Scotland: Fires

19. The three main sources of data and information were used to establish fire safety in high rise domestic buildings in Scotland are: (i) data on trends in fires, fire spread and fatalities; (ii) a survey to evaluate the impact of the fire safety information provided to residents of high rise and (iii) information from SFRS Operational Assurance Visits to High Rise Domestic Buildings.
20. The scale and concentration of high rise domestic buildings are elements informing fire safety policy and its practical application. There are 774 high rise domestic buildings, with over 46,000 individual dwellings in Scotland (as of March 2020). They include those built in pre 1950s to recent, modern blocks. They are in the main cities and larger towns, in 15 of the 32 local council areas, mostly in

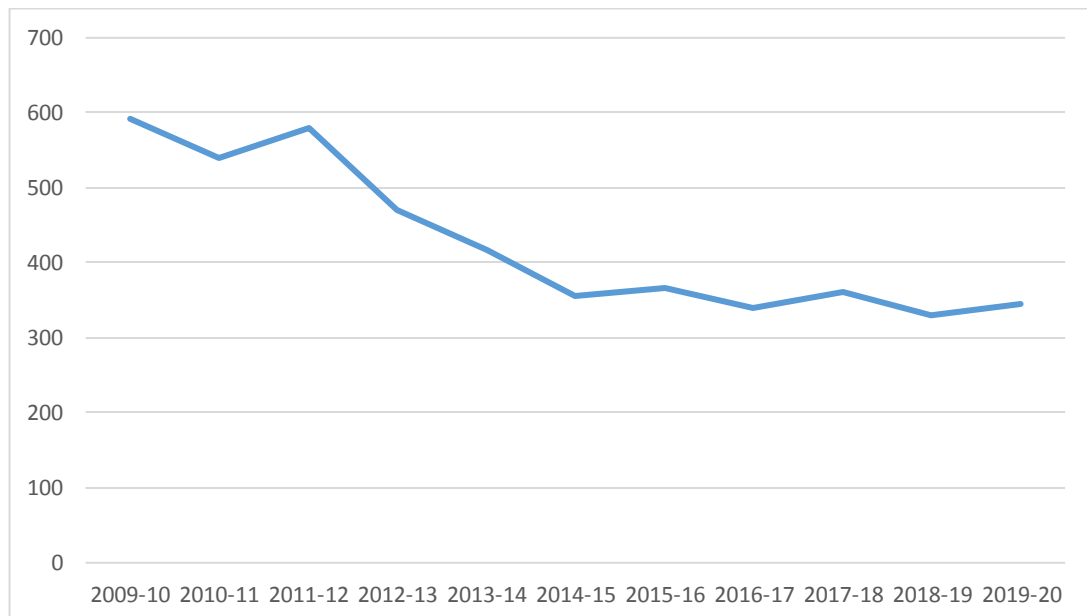
the central belt. High rise buildings are a mix of private, public and social ownership (High Rise Inventory Summary report 2020; Scottish Government).

21. Fires and fire deaths in all domestic premises have reduced significantly in the last 20 years, indicating the successful impact of the delivery of the range of fire prevention and protection measures (Graph 1). In line with this, the numbers of fires in domestic buildings of 6 storeys or higher has reduced (Graph 2). These are a small proportion of all dwelling fires (330 out of 5,137 in 2018/19).

Graph 1 Trends in Primary Fires 1995/96 – 2018/19 (Source: SFRS)



Graph 2 Fires in domestic buildings of 6 storeys or higher (Source: SFRS)



22. Preventing fire and limiting fire spread⁴ is critical to life safety in high rise buildings. This is why buildings have fire separating construction that is designed to contain a fire in the flat of fire origin. Fire spread was a key factor in the fatalities in the Grenfell Tower fire and the Lakanal House fire in 2009 where six people died. Situations where a fire spreads beyond the flat of origin are uncommon and are most often as a result of failings in the building design or construction.
23. In Scotland, most fires in high rise domestic buildings are contained in the flat where the fire originated, and often to the room of origin. There have been no deaths outside the flat of origin in the past decade in Scotland.
24. Whilst this indicates the rarity of fire spread in high rise buildings in Scotland, the Scottish Government and SFRS are committed to continue working to prevent fires and minimise their impact.

Residents' Views

25. Recent research with residents of high rise domestic buildings by Scottish Government on the fire safety leaflets distributed to all high rise dwellings in 2019/20 found a sizable majority (85%) agreed with the statement that they “feel safe from the risk of fire in their home”. In addition, the majority (90%) of respondents could provide examples of actions they take to reduce the risk of fire.

SFRS Quarterly Operational Assurance Visits

26. SFRS have operational intelligence which suggests there is generally a sound position on core fire safety in high rise domestic buildings. The SFRS well-established quarterly Operational Assurance Visits programme means local SFRS crews visit every high rise domestic building every three months. Crews obtain information for operational purposes and check compliance with Regulatory requirements on the maintenance of firefighting facilities in the common areas. They familiarise themselves with vehicular and building access, hydrant locations, internal layout and location of firefighting facilities. They undertake basic checks that firefighting facilities are in good working order.
27. Any deficiencies identified are reported in writing to those responsible for fire safety for remediation to ensure that firefighting facilities work as intended. SFRS reports can also highlight general fire safety concerns for attention e.g. fire doors not closing. Operational Assurance Visits do not include an assessment of external wall cladding systems, but any signs of obvious physical damage may be reported to those responsible for fire safety. SFRS note that remedial works are generally undertaken as quickly as possible on a risk based approach. The Scottish Fire and Rescue Service can provide fire safety advice to residents concerning their homes through the Home Fire Safety Visit programme.

⁴ The spread of fire from one location to another.

High Rise Fire Safety – Position and Recent Actions in Scotland

Scottish Government response to Grenfell Tower fire and Delivery

28. Scottish Government Ministers, through the Ministerial Working Group on Building and Fire Safety, instigated a continuing programme of work on building and fire safety immediately after the Grenfell fire. As part of its work programme, the Ministerial Working Group set up a number of reviews including the Review of the Fire Safety Regime and Regulatory Framework in Scotland in relation to high rise domestic buildings (2018). An overview of this Review is provided below.
29. The Scottish Government [Review of the Fire Safety Regime for high rise domestic buildings in Scotland](#) (2018) concluded that there were no major legislative gaps, although the position with buildings with multiple owners and the issue of fire safety enforcement is to be further considered over the longer-term. The Review made five recommendations for improvements to support, or clarify existing guidance and legislation regarding high rise domestic buildings.
30. This included the Scottish Government publishing a single source of [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) in December 2019. This provides practical fire safety advice on how to prevent fires and reduce the risks from fires in high rise domestic buildings. It assists in the assessment of fire risk and the adequacy of existing fire safety measures. The focus is on communal areas and aspects of building design in private accommodation which could affect the safety of others in the building. As such this Guidance encapsulates many of the Inquiry's recommendations directed at those responsible for fire safety.
31. A strength of the Guidance is having, in one place, accessible and useful information to support effective fire safety in high rise domestic buildings. It is not mandatory and does not instigate any new statutory duties or requirements.
32. A sixth Review recommendation was to introduce [Practical Fire Safety Guidance for Existing specialised Housing and Similar Premises](#). This was in response to the evidence that a disproportionate number of fires involve older people or others with recognisable "contributory factors", including physical, cognitive and mental health issues.
33. The [Practical Fire Safety Guidance for Existing specialised Housing and Similar Premises](#) is intended to improve safety by preventing fires and reducing harm to people in the event of fire. It promotes a person-centred approach to meet the needs of the individual, as well as considering the fire risk in the premises. Whilst not specific to high rise domestic buildings, it is relevant to the Grenfell Inquiry recommendations concerning people with a reduced ability to self-evacuate. The Guidance is primarily to protect those in specialised housing but it may also benefit people who receive care/support in "general needs" housing i.e. accommodation intended for occupation by members of the general public and not those of a specific demographic or vulnerability. The Guidance is established as best practice and not a legal requirement.

Fire Safety Risk Assessment

34. Both sets of Guidance are built on the well-established principles of risk assessment, which is the basis for fire safety law, regulation and practice to

ensure an adequate level of fire safety. The purpose of the risk assessment is to evaluate the risk to people from fire and determine appropriate fire safety measures. Fire risk is a combination of the likelihood of fire occurring and the consequences to residents and others who may be affected by a fire.

35. A Fire Safety Risk Assessment involves an organised and methodical consideration of the premises, the potential for a fire to occur and the harm it could cause to people. Fire safety includes the physical measures in premises which are underpinned by Building Regulations and standards of management. Person-centred fire safety uses risk assessment to identify if a person's characteristics, behaviour and capabilities increase risk of fire or affect their ability to recognise and respond to a fire or warning of fire and to identify additional fire safety measures.
36. Both sets of Guidance offer advice on a range of fire safety measures and provide benchmarks for the risk assessment. The benchmarks are mostly derived from Building Regulation guidance and British Standards. When deciding what fire safety measures are appropriate, existing provision can be compared against the benchmarks. Benchmarks should not be applied prescriptively as measures should always be risk appropriate and a standard lower or above a benchmark may be appropriate depending on the overall level of risk and the particular circumstances.
37. It is a principle of fire safety risk assessment that measures to address shortcomings in fire safety should be proportionate to the risk. This means that the cost, practicality and benefit gained should all be taken into account. The Guidance propose that significant findings from the fire safety risk assessment, and any action taken, or to be taken, should be recorded and retained and a fire safety risk assessment is provided as a useful template. Any fire safety risk assessments should be available on request to residents, in the interests of transparency.

Learning and Improvement

38. Public consultations⁵ took place during 2019 and found support for, and approval of both the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) and [Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises](#). Both will be monitored and evaluated in 2020/21 to assess their reach and impact and this will inform further developments as necessary. Additional measures, including legislation, will be considered and implemented if deemed to be required to mitigate risk and achieve a satisfactory level of fire safety. The planning for this evaluation is at an advanced stage, although it has been delayed due to the impact of COVID-19.

High Rise Inventory

39. The programme of work from the Ministerial Working Group established an Inventory of all high rise domestic buildings in Scotland. This provides information

⁵ Links Annex D to analysis of Consultation on Strengthening Fire Safety for High Rise Domestic Buildings, and Consultation on Practical Fire Safety Guidance for existing Specialised Housing and other supported domestic accommodation.

on key aspects of high rise building construction and fire safety features i.e. external wall systems and fire safety measures, such as fire doors on flat entrances and to stairwells, automatic fire suppression systems, and wall cladding systems. It is collated from local authority building warrant records and information from SFRS Operational Assurance Visits. A summary is publicly available: <https://www.gov.scot/publications/high-rise-inventory-summary-report/>.

40. The Inventory is used to inform Scottish Government policy on building and fire safety and gives an overview of any fire safety issues. It has been shared with SFRS who have checked it against their own records.

New regulations and guidance on high rise buildings

41. The Scottish Government, as a result of a Ministerial Working Group reviews, has introduced new regulations and guidance to make Scotland's high-rise buildings even safer including:

- Lowering the height at which combustible cladding can be used from 18 metres to 11 metres to align with fire-fighting from the ground.
- Tighter controls over the combustibility of cladding systems on hospitals, residential care buildings, entertainment and assembly buildings regardless of building height.
- Developing new fire safety guidance to assist in determining the fire risk posed by external wall systems (including cladding) on existing multi-storey residential buildings.
- Introducing fire service activated "evacuation alert systems", floor and dwelling indicator signs and two escape stairs in all new high rise domestic buildings.
- Extending the minimum standard for smoke and fire alarms that already applied in the private rented sector to all housing tenures, ensuring the highest level of protection whether they own their home or rent from a social or private landlord.
- Legislation extending requirements for sprinkler systems in new buildings to all flats, all social housing and certain multi-occupancy dwellings was introduced on 9 September 2020 and will come into force on 1 March 2021.

42. The Scottish Government continues to review new information and evidence and will consider any further action which may be required to improve the fire safety of buildings.

Fire Safety Law in Scotland

43. The Scottish Government response to Phase 1 of the Grenfell Tower Inquiry has considered the intended outcomes of the recommendations and how these can be achieved in the context of current Scottish fire safety arrangements. This section summarises the fire safety legislation position in Scotland relevant to the Grenfell Inquiry.

44. The Grenfell Inquiry requires most recommendations for those responsible for fire safety to be implemented "in law" and draws on the legal position in England. The position in Scotland is different; as fire safety is a devolved matter, the legal

requirements and responsibilities are contained in different fire safety, building standards and housing legislation. The proposed changes to fire safety legislation for England and Wales will not apply in Scotland.

45. Building Regulations apply to; new building work such as the erection of a new block of flats; extension of an existing block; buildings being converted to flats or; alterations to the building. They impose requirements for various fire safety measures including means of escape, structural fire precautions, smoke control, automatic fire suppression and facilities for the fire and rescue service.
46. Separate fire safety legislation applies to existing buildings. Part 3 of the Fire (Scotland) Act 2005 (“the 2005 Act”) and the Fire Safety (Scotland) Regulations 2006 (“the 2006 Regulations”) provide the legislative framework for fire safety in Scotland. The legislation consolidates and rationalises previous fire safety legislation for workplaces and incorporates a number of EU Directives. As such, it applies mainly to non-domestic premises such as offices, manufacturing premises, leisure facilities, schools, hospitals and hotels.
47. Responsibility for compliance in these types of premises rests with employers and others with control of the premises (known as dutyholders). Dutyholders must undertake and regularly review a fire safety risk assessment of the premises and take measures to ensure people are safe from fire. They must nominate “competent persons” to provide assistance, implement fire evacuation procedures and, where necessary, firefighting measures. The 2005 Act specifies enforcing authorities and sets out their duties and powers, as well as detailing offences, statutory notices, appeals and dispute determination procedures.
48. Throughout the UK, most private dwellings (i.e. people’s own homes) are excluded from fire safety legislation. People are encouraged to be responsible for fire safety in their own home.
49. In Scotland, blocks of flats may be owned by a local authority, a housing association, or be in wholly private ownership with flats owned individually. They may also be mixed tenure and involve a combination of these.
50. Where there is no single building owner, the owners of the individual flats are normally jointly responsible for the maintenance of the building as a whole and its common parts. The title deeds of each flat will usually determine what the flat owner is responsible for by the rules and conditions set out in the deeds. As title deeds are drawn up for each individual property there can be variances.
51. In Scotland, the 2005 Act and the 2006 Regulations apply to “relevant premises”, which is a defined term in the 2005 Act. “Domestic premises” (which means premises occupied as a private dwelling along with their common parts, such as halls, stairways and landings used in common) are not “relevant premises” for the purposes of the Act or the Regulations⁶. Therefore, in general, private dwellings

⁶ There are exceptions to the rule; for example: properties which require a licence to operate as a “House in Multiple Occupation” are excluded from the definition of “domestic premises” and so are “relevant premises” under the 2005 Act.

are exempt from the requirements of Scottish fire legislation, meaning that owner(s) of flats do not have statutory obligations under fire legislation to ensure fire safety in flats or blocks of flats. That said, the 2006 Regulations require owners of private dwellings to ensure that any measures already provided in the common areas of private dwellings for the safety or use of firefighters are maintained in efficient working order. Owner(s) must also ensure compliance with Building Regulations where modifications to the building's fabric are made.

52. All occupiers, whether owners, tenants or residents, do have further duties to keep common areas free of combustible substances and anything which might obstruct egress from and access to the property in the event of fire under the Civic Government (Scotland) Act 1982. SFRS under this Act have the power to enter the common property to determine compliance. Where there is an immediate risk of fire likely to endanger life, SFRS can take all necessary steps to remove that risk including the seizing and retention of items. SFRS can recover from occupiers the expense of removing items or substances. SFRS can issue notices requiring occupiers to remove or render safe items or substances in common property. It is an offence to fail to comply with a notice from SFRS.
53. The Scottish Government Review of the Fire Safety Regime (2018) recognised that there are three challenges for effective removal of items from common areas; difficulty in identifying the occupant responsible; access to equipment and skills to remove items; and appropriate and effective use of public services personnel and equipment. A Framework, for those responsible for Fire Safety in High Rise buildings, to support working in partnership to deal with materials left in common areas, building on models in operation, was produced as per the Review's recommendation and included in the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#).
54. Although legal duties under the 2005 Act and 2006 Regulations are very limited in respect of domestic buildings, Scottish fire safety guidance encourages building owners, or individual flat owners where no single building owner exists, to take on a wider responsibility for their building's fire safety. This is often reflected in practice and some individual flat owners may use the services of others to act on their behalf, such as building managers, property factors and managing agents.
55. Throughout this report, references to "those responsible for fire safety" should be interpreted in this context. It does not imply any specific statutory obligations for fire safety beyond the duty to maintain common areas and existing firefighting facilities, as required under the 2006 Regulations and to keep common areas free from combustible material and obstructions under the Civic Government (Scotland) Act 1982.
56. In England and Wales, common areas are covered by the Regulatory Reform (Fire Safety) Order 2005. Owner(s) are required by law to ensure a suitable and sufficient fire risk assessment of the common parts is carried out, acted upon and regularly reviewed. It is enforced by Fire and Rescue Authorities in England and Wales. The housing system in England and Wales means that this is normally the responsibility of the building "freeholder"; an entity that does not exist in Scotland.

57. The Review of the Fire Safety Regime acknowledged that buildings with multiple owners and the issue of fire safety enforcement in high rise domestic buildings should be further considered over the longer-term, including potential changes to housing and fire law. The Scottish Government has made a commitment to take forward recommendations from a Parliamentary Working Group on Tenement Maintenance and, within this, fire safety could be an element. This includes a recommendation for a mandatory owners' association constituted as a legal entity for all blocks of flats. A realistic, achievable timescale for any new legislation is currently considered to be more than 5 years.

Conclusion

58. The evidence available points to sound fire safety measures in place, however there is a commitment to continue and strengthen this by pro-actively seeking to learn to improve fire safety, to continue to reduce fires and their impact. The response to the Grenfell Inquiry recommendations in Chapter 2 is one element in this learning and improvement. The planned research to assess the reach and impact of the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) and [Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises](#) will also be important to inform any further action. Additional measures, including legislation, will be considered and implemented if deemed to be required to mitigate risk and achieve a satisfactory level of fire safety. This contributes to the continuous work to review and improve fire safety where necessary and directly contributes to the national outcome for a Scotland where “we live in communities that are inclusive, empowered, resilient and safe”.

Chapter 2: Responses to recommendations for “building owners and managers”

Introduction

60. This Chapter deals with the 15 recommendations directed at “building owners and managers” and Government. The Scottish Government accepts the intended outcomes these recommendations seek to achieve in principle. This report proposes the Actions where this was identified as necessary, in the context of the fire safety regime and practice in Scotland, to achieve required outcomes. The Actions are set out in response to each recommendation.
61. The Scottish Government GIFSWG recognised the different legal and practical arrangements in Scotland compared to England and Wales. In the Scottish context, the term “those responsible for fire safety” is used rather than “building owners and managers” as stated in the Inquiry recommendations. Also, it was agreed at the outset that the response would focus on fire safety outcomes rather than on the format of the recommendations that are proposed. Therefore, the Actions are proportionate and both reflect and build on the fire safety regime and existing practice in Scotland.
62. This section sets out each recommendation; the established fire safety regime and practices; the relevant Scottish Government actions following the Grenfell Tower fire; and further actions by Scottish Government, and others as identified, as deemed necessary.
63. [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) (Scottish Government: 2019) is referred to in many of the responses and primarily sets out good practice in relation to fire safety. There is no legal requirement to follow the Guidance.

Responses to Recommendations for those Responsible for Fire Safety

Recommendation 1 – That the building owner and manager of every high rise residential building be required by law to provide their local fire and rescue service with information about the design of its external walls, together with details of the materials of which they are constructed and to inform the fire and rescue service of any material changes to them.

Rationale for the recommendation

64. The Inquiry report states: “A sound understanding of the materials used in the construction of any high-rise building is essential if the fire and rescue service is to be properly prepared to carry out its function in relation to that building. The risk of fire of the kind that occurred at Grenfell Tower may be low, but knowledge is the key to proper planning and effective training”.

Response & Action

65. There are established practices in place so that SFRS obtain information on the design and construction of external walls, including external wall cladding.
66. For new builds and new or replacement external wall systems, SFRS is a statutory consultee for Building Warrant applications for domestic buildings over 18m in height (under Regulation 11 of the Building (Procedure) (Scotland) Regulations 2004). SFRS should be consulted and provided with the relevant information when material changes are made to the building that require a building warrant. SFRS can review building warrant submissions for compliance with the Technical Handbooks' functional standards and guidance regarding fire. SFRS also review and respond to proposed alternative or "Fire Engineered" solutions.
67. Since the Grenfell Tower fire, the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) and the High Rise Inventory have been introduced and relevant SFRS Operational Procedures have been reviewed and strengthened.
68. As the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) sets out, a Fire Safety Risk Assessment for high rise should include consideration of external facades, including cladding. Where potential fire risks, including unsafe cladding are identified, SFRS should be consulted. Those responsible for fire safety should consider what interim mitigation measures are to be put in place, prior to full remediation of the cladding. Part of the mitigation measures may include SFRS adjusting their response to incidents.
69. This method that is "reporting by exception" is a proportionate way of complementing the other existing data gathering processes. While there is a very low risk that a building with unsafe cladding is not identified, the data from the Inventory indicates that there are few buildings with, what is considered, unsafe cladding in Scotland.
70. In addition, the High Rise Inventory gives SFRS access to data on external wall systems including cladding and provides a source of assurance to SFRS that they are aware of relevant buildings.
71. In dealing with a fire in a high rise domestic building, SFRS Operational policies and procedures, recently updated, include the consideration of external wall systems including cladding. The Incident Commander's dynamic risk assessment requires that external wall systems including cladding is considered. SFRS pro-active and continuous monitoring of operational measures for all high-rise domestic buildings during an incident include:
 - Personnel to maintain a constant 360 degree assessment of the building's external façade for early identification of any external fire spread.
 - If external fire-spread is identified then Operations Control are to be alerted immediately so they may alter ongoing advice to people in the building.
 - Any change in tactics will be informed by a Dynamic Risk Assessment by the Incident Commander and update to Operations Control.

72. Together these measures ensure a consistent approach to fire safety with due understanding and consideration to the potential for fire spread on external wall systems during a fire incident.
73. These existing arrangements to keep SFRS informed, based on risk, of the external walls will be continued. This approach will be kept under review, including consideration for a requirement for legislation and statutory enforcement.

Action:

The existing arrangements are continued to inform SFRS about external wall construction, including cladding.

Recommendation 5 – That the owner and manager of every high-rise residential building be required by law to provide their local fire and rescue services with up-to-date plans in both paper and electronic form of every floor of the building identifying the location of key fire safety systems.

Recommendation 6 – That the owner and manager of every high rise residential building be required by law to ensure that the building contains a premises information box, the contents of which must include a copy of the up-to-date floor plans and information about the nature of any lift intended for use by the fire and rescue services.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

74. The Inquiry report states: “No plans of the internal layout of the building were available to the London Fire Brigade (LFB) until the later stages of the fire. However, because each floor of the building above floor 3 was laid out in the same way, the LFB was not unduly hampered in its attempt to fight the fire and rescue occupants by the absence of those plans. In another case, however, the lack of floor plans might easily have far more serious consequences.”

Response & Action

75. Firefighters familiarise themselves with building layouts and test the operation of firefighters lifts as part of their quarterly Operational Assurance Visits. As statutory consultees, SFRS should also be provided with floor plans for high rise domestic buildings as part of the Building Warrant consultation process. This information informs the Operational Intelligence of buildings. Sufficient information on the layout of buildings is known to, and accessible by, crews. Providing and holding further data in Premises Information Boxes is not considered to be required to improve fire safety outcomes.
76. Many high rise buildings also display standard external information plates with core information on the building services and firefighting facilities. This approach is recommended by the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#). To strengthen information on building layout, the Scottish Government, working with relevant parties, will act to ensure these are on high rise domestic buildings where they are not currently. There are likely to be cost implications for those responsible for fire safety.

77. The assessment is that these existing provisions, strengthened as proposed meet the intention of the recommendations.

Action:

SFRS continue with established processes to gather information on the layout of high rise domestic buildings.

Scottish Government will work with relevant parties to have external information plates on all high rise domestic buildings in line with the Guidance.

Recommendation 8 – That the owner and manager of every high rise residential building be required by law to carry out regular inspections of any lifts that are designed to be used by firefighters in an emergency and to report the results of such inspections to their local fire and rescue service at monthly intervals.

Recommendation 9 – That the owner and manager of every high rise residential building be required by law to carry out regular tests of the mechanism which allows firefighters to take control of the lifts and inform their local fire and rescue service at monthly intervals that they have done so.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

78. The Inquiry report states: “When the firefighters attended the fire at Grenfell Tower they were unable to operate the mechanism that should have allowed them to take control of the lifts. Why that was so is not yet known, but it meant that they were unable to make use of the lifts in carrying out firefighting and search and rescue operations. It also meant that the occupants of the tower were able to make use of the lifts in trying to escape, in some cases with fatal consequences. The ability of fire and rescue services to take control of firefighting or fire lifts in a high-rise building is often key to successful operations.”

Response & Action

79. Under the 2006 Regulations, SFRS have enforcement powers to require those responsible for fire safety to maintain firefighting facilities in efficient working order and good repair, including firefighting lifts. Lift inspections are part of SFRS’s Operational Assurance Visits activities and deficiencies are reported to those responsible for fire safety. Local fire stations are also notified of deficiencies and details added to turnout information by Operations Control to ensure crews are aware on approach of any issues.

80. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) recommends that firefighters lifts should be subject to monthly inspections, annual testing and regular maintenance. It is recommended that those responsible should refer to BS EN 81-72 for guidance on testing and servicing of firefighters lifts. An assessment of the impact and effectiveness of the Guidance will be carried out in 2020/21. This will include whether further details on testing fire fighter lifts and whether maintenance of passenger lifts should be included in

the Guidance. The Guidance could advise those responsible for fire safety to report any defects to SFRS.

Action:

Continue with current approach under Operational Assurance Visits.

Amend the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) to advise those responsible for fire safety to report any defects to SFRS.

Consideration will be given as to whether further details on testing fire fighter lifts and whether maintenance of passenger lifts should also be included in the Guidance.

Encourage those responsible to make results of safety checks available to residents where requested.

Recommendation 30 – That the owner and manager of every high rise residential building be required by law to draw up and keep under regular review evacuation plans, copies of which are to be provided in electronic and paper form to their local fire and rescue service and placed in an information box on the premises.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

81. The Inquiry report states: “There were no plans in place for evacuating Grenfell Tower should the need arise.”

Response & Action

82. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings Guidance](#), advises that residents are made familiar with “Stay put” or the evacuation strategy (where one is required to be in place). This Guidance also advises those responsible for fire safety to consult SFRS where potential fire risks have been identified, and together consider interim mitigation measures to be put in place.

“Stay Put” and general principles for evacuation

83. High rise domestic buildings are built with the principles of ‘Stay Put’ in mind. Other than in exceptional circumstances, ‘Stay Put’ will be the default strategy in place for these buildings in Scotland. The fire separating construction is designed to contain a fire in the flat of fire origin. Accordingly, people in flats who are not affected by fire or smoke are normally safe to stay where they are. In some circumstances, residents might be at greater risk if they do leave their flat. This is the basis of the ‘Stay Put’ policy in response to fires in high rise properties. It has been in guidance since the 1960s and is the basis for high rise domestic building design. It is an appropriate strategy in the majority of such buildings.

84. Consequently the vast majority of buildings will not need to have evacuation plans in place beyond the “stay put” strategy. It is only those that have identified specific fire safety risks or are fitted with evacuation alert systems (post October 2019) that would require such plans.

85. Where there is a fire, SFRS will give initial advice over the phone to residents that call. Upon arrival, firefighters will take control of the incident and may advise further. There may be fires where, for operational reasons, SFRS decides that a partial or total evacuation of a high rise is necessary. These uncommon situations include where a fire spreads beyond the flat of origin. Any deviation from 'Stay Put' at an incident will be initiated and led by SFRS. For buildings without evacuation alert systems, SFRS would advise residents directly of the need to evacuate.
86. The speed and extent at which an incident is escalating will dictate the urgency of the evacuation plan. The Incident Commander will need to consider the safest and most effective way to warn and inform the residents that they need to escape from the building. This could include, for example:
- Use of intercoms or door entry systems.
 - Use of public address systems.
 - Use of fire alarms.
 - Use of building evacuation systems.
 - Use of the media and social media.
 - Internal telephones.
 - Systematic door knocking.
 - Forcing of doors to flats.
87. This approach is supported in the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#).
88. The alternative to a 'Stay Put' is an evacuation where all, or a number of residents, evacuate the building together. Ideally, this requires a system to alert all the residents to the need to evacuate, particularly if a full evacuation is required. As noted earlier, the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) advises that where serious fire risks are identified, which require a change to the 'Stay Put' strategy residents should be informed and, SFRS should be consulted. Those responsible for fire safety should consider what interim mitigation measures are to be put in place, in liaison with SFRS, until the deficiency has been resolved. There are, rightly, a very few examples of this needing to happen in practice at an incident.
89. To support 'Stay Put', effective action with residents to reinforce and raise awareness is important. This can build on the recent work by SFRS, those responsible for fire safety in high rise domestic buildings, and the Scottish Government. This was, most notably, the [fire safety information leaflets](#)⁷ delivered to all 46,000+ flats in domestic high rise buildings in 2019/20.
90. Research into the impact of the fire safety leaflets found that over three quarters of respondents agreed they feel well informed about what they need to do in the event of a fire. Most knew what to do if there was a fire in their flat. Fewer were clear on what to do if there was fire in the building, but not in their flat, with two thirds not knowing they should 'Stay Put'. Half of respondents agreed that most

⁷ Keeping yourself and others safe from fire in your high rise building - Fire safety leaflet

high rise blocks in Scotland are built to resist the spread of fire, but 35% were unsure and 16% disagreed. This shows there is further work required to raise awareness regarding 'Stay Put' and what to do in event of a fire, that should be clear and included in information provided to residents by those responsible for fire safety in the building and SFRS.

Action:

Those responsible for fire safety of the building, supported by SFRS, continue to reinforce and raise residents' awareness of "Stay Put" and other actions which may be required in the event of fire in high rise domestic buildings.

Recommendation 31 – That all high rise domestic buildings (both those already in existence and those built in the future) be equipped with facilities for use by the fire and rescue services enabling them to send an evacuation signal to the whole or a selected part of the building by means of sounders or similar devices.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

91. The Inquiry report states: "There were no plans in place for evacuating Grenfell Tower should the need arise."

Response & Action

92. From October 2019, the [Domestic Technical Handbook](#), which supports the Building Regulations, requires the installation of an evacuation alert system in newly built high rise domestic buildings to allow SFRS to initiate a partial or full evacuation in the unlikely event that a 'Stay Put' strategy is no longer appropriate. The building manager should give contact details to SFRS so that assistance to reset the alarm/undertake maintenance can be summoned without delay. An evacuation alert system is an additional measure to aid partial or full evacuation in buildings that are normally considered as safe.
93. Only a small proportion of buildings will have evacuation alert systems. Such systems are a requirement only for those for which a building warrant is applied from 1 October 2019.
94. Building Standards are not usually retrospective. Upgrading existing buildings to meet current benchmarks should be done where the level of fire risk justifies it, taking into account the time, cost and disruption to building occupants involved.
95. Due to the high level of fire separation and containment in a building containing flats, it would be unusual for there to be a need to evacuate the fire floor or the entire building in the event of a fire. The level of fire separation should be such that, other than in the flat of fire origin, residents are safe to remain within their own flat. Circumstances may arise in which fire-fighters consider it necessary to evacuate residents from a small number of other flats and, on very rare occasions, the entire building.
96. If this happens in existing buildings without evacuation systems, SFRS have confirmed they have procedures in place that could include knocking on doors, using loud hailers and Operations Control advising callers of the need to

evacuate. This includes calling people back who had previously been told to ‘Stay Put’.

97. The National Fire Chiefs Council (NFCC) and the Ministry of Housing, Communities and Local Government (MHCLG), comprise the Stay Put Technical Steering Group. This is overseeing research on means of escape from a design, management and operational perspective. The Scottish Government and SFRS awaits the research findings, as they are key to informing future approaches for evacuation.

Action

Continue with the current approach for evacuation alert systems in new buildings only, but to review new research findings when they are available.

Scottish Government, working with SFRS and others, will use the outcomes of the Stay Put Technical Steering Group research on means of escape, once available to review, and consider potential improvements to the current approach.

Recommendation – 32 That the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition).

Recommendation – 33 That the owner and manager of every high-rise residential building be required by law to include up-to-date information about persons with reduced mobility and their associated PEEPs in the premises information box.

Rationale for the recommendations as noted in the Grenfell Inquiry Phase 1 Report

98. The Inquiry report states: “There were no plans in place for evacuating Grenfell Tower should the need arise.”

Response & Action

99. A disproportionate number of fires and fire fatalities involve older people or others with recognisable “contributory factors”, including physical, cognitive and mental health issues and who may have trouble self-evacuating in the event of a fire. As noted above, to address this the Scottish Government produced the [Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises](#), (Scottish Government: 2020). Its main purpose is to strengthen fire safety for people who receive care or support in any specialised housing or similar premises (not limited to high rise). It has been designed to also be useful for those receiving “care at home” services or support in general needs housing.

100. The central tenet is that risk will be reduced significantly if fire safety measures meet the needs of the individual, as well as the premises as a whole. The Guidance explains how a person-centred approach can best protect those who are most at risk from fire. It provides information on the formulation of personal emergency evacuation plans (PEEPs) in appropriate settings, such as

in supported housing and small care homes where they can be kept up to date and where staff may be available to provide evacuation assistance, if required.

101. The Guidance advises that fire safety risk assessments should be conducted by people with appropriate responsibility, suitable skills and involve other people as required. Where there are multiple relevant parties, one person should be responsible for instigating, managing and coordinating the assessment and action plans and ensuring they are shared. This will normally be whoever is responsible for the specialised housing or similar premises.
102. It is recognised that housing providers may not know the status of all residents, especially in general needs housing. In such cases, and in line with the Guidance, person-centred risk assessments for vulnerable people could be carried out by a family member or a care provider or personal assistant with appropriate skills and level of responsibility.
103. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) will be updated to cross refer to the Specialised Housing Guidance for relevant cases.
104. In the event of a fire, SFRS would undertake a rescue of any person who is unable to self-evacuate and who is affected by fire or smoke, immaterial of whether there is a PEEP. They may also provide assistance in the event of a partial or full evacuation.
105. This approach is consistent with, and supported by, existing Guidance and will be straightforward to implement. It gives those responsible the tools to help prevent a fire in a vulnerable person's home as well as keeping them, and others, safe in the event of fire.

Action

Continue to disseminate and support the use of the [Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises](#) to improve fire safety for vulnerable people, including PEEPs in relevant settings.

Carry out research to monitor and learn the impact this Guidance is having and to inform possible further improvements to fire safety for vulnerable people at home.

Update the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings Guidance](#) to cross-refer to the [Specialised Housing Guidance](#).

Recommendation – 39 That all those who have responsibility in whatever capacity for the condition of the entrance doors to individual flats in high-rise residential buildings, whose external walls incorporate unsafe cladding, be required by law to ensure that such doors comply with current standards.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

106. The Inquiry report states: “Among the experts, views differ about the desirability of requiring existing fire doors to be brought up to modern standards and if necessary be replaced with doors that comply with the requirements

currently in force in relation to new buildings. However, the importance of fire doors in maintaining compartmentation and protecting parts of the building other than that in which a fire has occurred is plain and in my [Sir Martin Moore-Bicks] view justifies the expense that would inevitably be incurred.”

Response & Action

107. In 2018 the Scottish Government wrote to Local Authorities and Housing Associations highlighting the emerging issue around fire doors.
108. New guidance on fire doors was produced as a result of UK Government fire tests on Glass Reinforced Plastic (GRP) composite fire doors. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings Guidance](#) makes reference to this issue.
109. Guidance entitled “Advice for building owners on assurance and replacing of flat entrance doors” was issued to Local Authorities and can be found online <https://www.gov.scot/publications/sample-testing-of-fire-doors-letters-to-local-authority-verifiers/> (updated 2 August 2018).
110. For buildings that have an identified fire safety issue, such as unsafe cladding, there should be adequate interim safety measures in place to prevent fire, provide early warning and provide adequate protection from fire. All flat entrance doors should be in good condition and working order, regardless of any external cladding issues.
111. This approach continues the established practice for fire resisting doors in high rise domestic buildings.

Action

Continue with current approach, as set out in the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) updating advice to local authorities as required.

Recommendation – 35 That in all high-rise buildings floor numbers be clearly marked on each landing within the stairways and in a prominent place in all lobbies in such a way as to be visible both in normal conditions and in low lighting or smoky conditions.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

112. The Inquiry report states: “The landings in the staircase at Grenfell Tower were not clearly marked with the relevant floor number and where floor numbers were marked they did not reflect the additional floors created during the refurbishment. As a result, firefighters were unable to identify floors clearly when carrying out firefighting or search and rescue operations within the building.”

Response & Action

113. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) advises those responsible for fire safety that “floor levels and flats should be

clearly numbered so that firefighters can identify them in a fire.” From October 2019, a new requirement for floor and flat signage was added to the Domestic Technical Handbook which complements Building Regulations for new building work.

114. In the SFRS Operational Assurance Visits the absence of floor/flat signage are deficiencies reported to those responsible for fire safety for remediation.

Action

Continue with current approach, as set out in the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) and via the SFRS Operational Assurance Visits, and Guidance.

Recommendations for residential buildings containing separate dwellings whether or not it is a high-rise building

115. The following three recommendations apply beyond high rise domestic buildings to all residential buildings containing separate dwellings. As noted in the Scope section of the report (paragraph 17), the consensus of the GIFSWG was to consider the Phase 1 recommendations for application to high rise buildings only.

Recommendation – 36 That the owner and manager of every residential building containing separate dwellings (whether or not it is a high-rise building) be required by law to provide fire safety instructions (including instructions for evacuation) in a form that the occupants of the building can reasonably be expected to understand, taking into account the nature of the building and their knowledge of the occupants.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

116. The Inquiry report states: “The evidence... indicates that many occupants of Grenfell Tower were unable to read or understand the fire safety instructions placed in the lobbies throughout the building. Such information is important because it helps to save lives. In the case of Grenfell Tower, fire safety advice was prominently displayed in the lobbies, but it was written only in English, despite the fact that many of the occupants were unable to read English easily or at all. These considerations apply to residential buildings of all kinds containing separate dwellings.”

Response & Action

117. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) contains advice and information on communicating with residents on fire safety, such as using residents’ handbooks and other media to engage and communicate fire safety information, and to have a channel for receiving concerns from residents. To complement this, Scottish Government and SFRS jointly produced a fire safety information leaflet for residents of high rise domestic buildings which was delivered to every high rise home in Scotland. This was

designed to be clear and accessible, using graphics and easy to read language. Translations into the main five languages used in Scotland, in addition to English are available from the SFRS website for ongoing use by those responsible for fire safety.

118. In addition, SFRS have accessible fire safety information for all domestic premises available to the public on the SFRS website. SFRS also provide home fire safety visits on a risk based priority to any home.
119. These actions ensure that those responsible for fire safety in high rise domestic buildings have Guidance that includes advice on communicating fire safety information with residents with consideration on their ability to understand the information.

Action

Continue with current approach, as per the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings and SFRS Community Fire Safety information.

Recommendation – 37 That the owner and manager of every residential building containing separate dwellings (whether or not they are high-rise buildings) carry out an urgent inspection of all fire doors to ensure that they comply with applicable legislative standards.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

120. The Inquiry report states: “One important reason why fire doors failed to perform their essential function [during the Grenfell Tower fire] was the absence of effective self-closing devices, some of which were broken or had been disabled or removed. Fire doors play an essential role in preventing or inhibiting the spread of smoke and toxic gases and in preserving effective compartmentation of buildings. In many cases they are critical to saving life.”

Response & Action

121. Following the Metropolitan Police investigation and fire testing of Manse Masterdor composite fire doors fitted on the Grenfell Tower, which were found to be deficient, the Scottish Government wrote to all Local Authorities and Housing Associations to bring to their attention the situation. The Ministry for Housing, Communities and Local Government provided details from the order book for Manse Masterdor fire doors to specifically flag details to relevant bodies. All bodies were advised although this was not a comprehensive list. A [Scottish version of the guidance note for existing fire doors](#) was produced and issued to all local authorities in August 2018.
122. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) contains advice on the testing and maintenance of fire doors for those responsible for fire safety. The testing regimen is proportionate and aligns with existing standards.
123. For high rise domestic buildings, SFRS check fire doors on firefighting stairs and lobbies during their Operational Assurance Visits. Relevant deficiencies are

reported to those responsible for fire safety for remediation and checked again during the next quarterly Operational Assurance Visit.

Action

Continue with current approach, as set out in the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#).

Recommendation – 38 That the owner and manager of every residential building containing separate dwellings (whether or not they are high-rise buildings) be required by law to carry out checks at not less than three-monthly intervals to ensure that all fire doors are fitted with effective self-closing devices in working order.

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

124. The Inquiry report states: “One important reason why fire doors failed to perform their essential function [during the Grenfell Tower fire] was the absence of effective self-closing devices, some of which were broken or had been disabled or removed. Fire doors play an essential role in preventing or inhibiting the spread of smoke and toxic gases and in preserving effective compartmentation of buildings. In many cases they are critical to saving life.”

Response & Action

125. In Scotland there are already standards and regulations in place regarding the maintenance regime of fire doors in buildings, which includes inspection of the self-closing device. Regulation 24 of the Fire Safety (Scotland) Regulations 2006 require those with control of the common parts of high rise domestic premises to ensure the common areas and facilities, equipment and devices for firefighter protection or use are maintained in good repair and efficient working order. British Standard 9999 recommends 6 monthly inspections, which is reflected in the Guidance.

126. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) contains a section on testing and maintenance of fire doors, which includes consideration of self-closing devices. For high rise domestic buildings, SFRS check fire doors on firefighting stairs and lobbies during their quarterly Operational Assurance Visits. Any deficiencies with the fire doors, including issues with self-closing devices, are reported to those responsible for fire safety for remediation and checked again during the next quarterly assurance visit.

Action

Continue with current approach, as set out in the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#).

Responses to Recommendation for Government

The following recommendation was the only one directed at the UK Government, **Recommendation 28** – That the Government develop national guidelines for carrying out partial or total evacuations of high-rise residential buildings, such guidelines to include the means of protecting fire exit routes and procedures for evacuating persons who are unable to use the stairs in an emergency, or who may require assistance (such as disabled people, older people and young children).

Rationale for the recommendation as noted in the Grenfell Inquiry Phase 1 Report

127. The Inquiry report states: “There were no plans in place for evacuating Grenfell Tower should the need arise.”

Response & Action

128. The National Fire Chiefs Council (NFCC) and the UK Government’s Ministry of Housing, Communities and Local Government (MHCLG), comprise the Stay Put Technical Steering Group. This is overseeing research on means of escape from a design, management and operational perspective. The research findings will be considered by the Scottish Government and SFRS with an assessment of the need for changes to the current arrangements. New guidelines on evacuation procedures could be integrated into the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#).

129. Some residents of Grenfell Tower said they did not receive information on what to do in the event of a fire. The [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#) will continue to recommend that those responsible for fire safety ensure that consistent messaging on what to do in the event of a fire is provided to all residents on a regular basis.

Action

Use the findings from the Stay Put Technical Steering Group research on means of escape from a design, management and operational perspective.

This research to inform potential changes to guidance on evacuations of buildings, including means of escape and evacuation assistance procedures and where necessary, integrating these into a revision of the [Practical Fire Safety Guidance for Existing High Rise Domestic Buildings](#).

Chapter 3: Recommendations directed at London Fire Brigade and emergency services

Introduction

130. This Chapter deals with the 31 recommendations directed at the London Fire Brigade and Emergency Services. SFRS are addressing these recommendations as they are focused on operational matters, with oversight by the GIFSWG. This is in line with SFRS's commitment to learning all lessons from the fire and taking appropriate actions that will build on the improvement work already taken.

Process to Assessing and Responding to the Recommendations

131. The SFRS routinely review policy and procedure to capture operational learning, and the lessons learned from Grenfell will inform this process. In responding to the Phase 1 report, SFRS carried out a gap analysis of all the recommendations.

132. This analysis concluded that in all instances, SFRS have existing policies and procedures which address, to some degree, the core issues raised by the 31 recommendations within the Phase 1 report. SFRS have arrangements in place, within the Scottish operating and regulatory context, which meet the intention of 11 recommendations. Of the remaining 20 recommendations work is ongoing to build on existing arrangements to ensure that the lessons learnt from Grenfell Tower are incorporated into SFRS procedures and much of this work is aligned to existing workstreams. An action plan has been developed with priority timescales and an overview is provided below.

133. An SFRS Grenfell Tower Phase 1 Recommendations Working Group has been created within the SFRS to develop and coordinate a detailed action plan, which focuses on the above areas. This is Chaired by the Prevention and Protection Function, which retains overall responsibility for the reporting of all post-Grenfell work relating to the Phase 1 recommendations. Due to the nature of the recommendations, this working group also comprises senior representatives from the Response and Resilience and Training functions within the SFRS.

134. In addition to this work being directly undertaken within the SFRS, engagement will continue with relevant partners as progress is made in learning lessons from this tragedy. These partners include the Scottish Government (including the Ministerial Working Group, the Fire and Rescue Unit, and Building Standards Division), the National Fire Chiefs Council, local authorities, and those responsible for building fire safety.

Overview of Recommendations

135. The recommendations made to LFB and other emergency services cover the following areas;

- personnel understanding of risks associated with fire in buildings' external walls;

- inspections and familiarisation visits to high rise buildings, including availability of premises plans;
- communications between Incident Commanders, Operations Control and bridgeheads;
- policies and training for Control Operators, including the provision of fire survival guidance for large numbers of callers simultaneously, and the transmission and displaying of this information to bridgeheads;
- development of policies to manage the transition from *stay put* to evacuation, including how Control Operators handle this change and convey appropriate advice to callers;
- management of calls received by other FRS or emergency service control rooms, and reading each other's messages;
- better control over the deployment of resources, including the gathering of information from personnel returning from deployments;
- communications equipment for breathing apparatus wearers;
- provision, and training in the use, of Command Support Units;
- provision of *smoke hoods* to assist in the evacuation of occupants;
- communications in relation to the declaration of a Major Incident;
- communications when utilising airborne assets;
- management of information about survivors.

136. This work will be subject to a future thematic inspection and associated reporting by HMFSI ([Her Majesty's Fire Service Inspectorate](#)), at an appropriate time.

137. HMFSI undertake independent external scrutiny of the SFRS, with the purpose of assuring the public and Scottish Ministers that the SFRS is working in an efficient and effective way, and to promote continuous improvement in the Service.

138. More detailed information on the work SFRS are doing regarding the Phase 1 recommendations can be found at the following location:
https://www.firescotland.gov.uk/media/2240919/20200917_CSDC23_20_Grenfell_Tower_Update_Action_Plan.pdf

Conclusion

139. Implementation of these recommendations in the majority via best practice guidance, is a proportionate approach to strengthening fire safety in line with the spirit of the Grenfell Tower Inquiry Phase 1 recommendations. Scottish Government will continue to monitor and evaluate this approach on a continual basis going forward, and implement any further changes as appropriate.

Annex A: Full list of Grenfell Phase 1 report recommendations

Grenfell Phase 1 Report - Recommendations	
1	that the owner and manager of every high-rise residential building be required by law to provide their local fire and rescue service with information about the design of its external walls together with details of the materials of which they are constructed and to inform the fire and rescue service of any material changes made to them
2	that all fire and rescue services ensure that their personnel at all levels understand the risk of fire taking hold in the external walls of high-rise buildings and know how to recognise it when it occurs.
3	that the LFB review, and revise as appropriate, Appendix 1 to PN633 to ensure that it fully reflects the principles in GRA 3.2;
4	that the LFB ensure that all officers of the rank of Crew Manager and above are trained in carrying out the requirements of PN633 relating to the inspection of high-rise buildings.
5	that the owner and manager of every high-rise residential building be required by law to provide their local fire and rescue services with up-to-date plans in both paper and electronic form of every floor of the building identifying the location of key fire safety systems;
6	that the owner and manager of every high-rise residential building be required by law to ensure that the building contains a premises information box, the contents of which must include a copy of the up-to-date floor plans and information about the nature of any lift intended for use by the fire and rescue services.
7	I also recommend, insofar as it is not already the case, that all fire and rescue services be equipped to receive and store electronic plans and to make them available to incident commanders and control room managers.
8	that the owner and manager of every high-rise residential building be required by law to carry out regular inspections of any lifts that are designed to be used by firefighters in an emergency and to report the results of such inspections to their local fire and rescue service at monthly intervals;
9	that the owner and manager of every high-rise residential building be required by law to carry out regular tests of the mechanism which allows firefighters to take control of the lifts and to inform their local fire and rescue service at monthly intervals that they have done so.
10	that the London Fire Brigade (LFB) review its policies on communications between the control room and the incident commander;

11	that all officers who may be expected to act as incident commanders (i.e. all those above the rank of Crew Manager) receive training directed to the specific requirements of communication with the control room;
12	that all control room operators (CROs) of Assistant Operations Manager rank and above receive training directed to the specific requirements of communication with the incident commander;
13	that a dedicated communication link be provided between the senior officer in the control room and the incident commander
14	that the LFB's policies be amended to draw a clearer distinction between callers seeking advice and callers who believe they are trapped and need rescuing;
15	that the LFB provide regular and more effective refresher training to CROs at all levels, including supervisors;
16	that all fire and rescue services develop policies for handling a large number of Fire Survival Guidance (FSG) calls simultaneously;
17	that electronic systems be developed to record FSG information in the control room and display it simultaneously at the bridgehead and in any command units;
18	that policies be developed for managing a transition from "stay put" to "get out";
19	that control room staff receive training directed specifically to handling such a change of advice and conveying it effectively to callers.
20	that steps be taken to investigate methods by which assisting control rooms can obtain access to the information available to the host control room.
21	that the London Ambulance Service (LAS) and the Metropolitan Police Service (MPS) review their protocols and policies to ensure that their operators can identify FSG calls (as defined by the LFB) and pass them to the LFB as soon as possible
22	that the LFB develop policies and training to ensure better control of deployments and the use of resources;
23	that the LFB develop policies and training to ensure that better information is obtained from crews returning from deployments and that the information is recorded in a form that enables it to be made available immediately to the incident commander (and thereafter to the command units and the control room).
24	that the LFB develop a communication system to enable direct communication between the control room and the incident commander and improve the means of communication between the incident commander and the bridgehead.
25	that the LFB investigate the use of modern communication techniques to provide a direct line of communication between the control room and the bridgehead, allowing information to be

	transmitted directly between the control room and the bridgehead and providing an integrated system of recording FSG information and the results of deployments.
26	that the LFB urgently take steps to obtain equipment that enables firefighters wearing helmets and breathing apparatus to communicate with the bridgehead effectively, including when operating in high-rise buildings;
27	that urgent steps be taken to ensure that the command support system is fully operative on all command units and that crews are trained in its use.
28	that the government develop national guidelines for carrying out partial or total evacuations of high-rise residential buildings, such guidelines to include the means of protecting fire exit routes and procedures for evacuating persons who are unable to use the stairs in an emergency, or who may require assistance (such as disabled people, older people and young children);
29	that fire and rescue services develop policies for partial and total evacuation of high-rise residential buildings and training to support them;
30	that the owner and manager of every high-rise residential building be required by law to draw up and keep under regular review evacuation plans, copies of which are to be provided in electronic and paper form to their local fire and rescue service and placed in an information box on the premises;
31	that all high-rise residential buildings (both those already in existence and those built in the future) be equipped with facilities for use by the fire and rescue services enabling them to send an evacuation signal to the whole or a selected part of the building by means of sounders or similar devices;
32	that the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition);
33	that the owner and manager of every high-rise residential building be required by law to include up-to-date information about persons with reduced mobility and their associated PEEPs in the premises information box;
34	that all fire and rescue services be equipped with smoke hoods to assist in the evacuation of occupants through smoke-filled exit routes.
35	that in all high-rise buildings floor numbers be clearly marked on each landing within the stairways and in a prominent place in all lobbies in such a way as to be visible both in normal conditions and in low lighting or smoky conditions
36	that the owner and manager of every residential building containing separate dwellings (whether or not it is a high-rise building) be required by law to provide fire safety instructions (including instructions for evacuation) in a form that the occupants of the building can reasonably be expected to understand, taking into account the nature of the building and their knowledge of the occupants.

37	that the owner and manager of every residential building containing separate dwellings (whether or not they are high-rise buildings) carry out an urgent inspection of all fire doors to ensure that they comply with applicable legislative standards;
38	that the owner and manager of every residential building containing separate dwellings (whether or not they are high-rise buildings) be required by law to carry out checks at not less than three-monthly intervals to ensure that all fire doors are fitted with effective self-closing devices in working order.
39	that all those who have responsibility in whatever capacity for the condition of the entrance doors to individual flats in high-rise residential buildings, whose external walls incorporate unsafe cladding, be required by law to ensure that such doors comply with current standards.
40	that each emergency service must communicate the declaration of a Major Incident to all other Category 1 Responders as soon as possible;
41	that on the declaration of a Major Incident clear lines of communication must be established as soon as possible between the control rooms of the individual emergency services;
42	that a single point of contact should be designated within each control room to facilitate such communication;
43	that a "METHANE" (Major incident declared, Exact location, Type of incident, Hazards, Access, Number and type of casualties, Emergency services present and required) message should be sent as soon as possible by the emergency service declaring a Major Incident.
44	that steps be taken to investigate the compatibility of the LFB systems with those of the MPS and the LAS with a view to enabling all three emergency services' systems to read each other's messages.
45	that steps be taken to ensure that the airborne datalink system on every NPAS helicopter observing an incident which involves one of the other emergency services defaults to the National Emergency Service user encryption.
46	that the LFB, the MPS, the LAS and the London local authorities all investigate ways of improving the collection of information about survivors and making it available more rapidly to those wishing to make contact with them.

Annex B: Table of recommended actions for MWG consideration

The table below sets out the Scottish Government's proposed response to the 15 Grenfell Phase 1 Recommendations that weren't directed at the emergency services.

Recommendation number	Recommended Action	New legislation required?	Update to existing guidance required?
Recommendation 1	The existing arrangements are continued to inform SFRS about external wall construction, including cladding.	No	No
Recommendation 5 & 6	SFRS continue with established processes to gather information on the layout of high rise domestic buildings. Scottish Government will work with relevant parties to have external information plates on all high rise domestic buildings in line with the Guidance.	No	No
Recommendation 8 & 9	Continue with current approach under SFRS Operational Assurance Visits. Amend the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings to advise those responsible for fire safety to report any defects to SFRS. Encourage those responsible to make results of safety checks should be available to residents where requested. To will include whether further details on testing fire fighter lifts and whether passenger lifts should be included in the Guidance in the planned research.	No	Yes
Recommendation 28	Use the findings from the Stay Put Technical Steering Group research on means of escape from a design, management and operational perspective. Research to inform potential changes to guidance on evacuations of buildings, including means of escape and evacuation assistance procedures and where necessary, integrating these into a revision of the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings .	No	Potentially
Recommendation 30	Those responsible for fire safety of the building, supported by SFRS, continue to reinforce and raise residents awareness of "Stay Put" and other actions which may be required in the event of fire in high rise domestic buildings.	No	No

Recommendation 31	<p>Continue with the current approach for evacuation alert systems in new buildings only, but to review new research findings etc. when they are available.</p> <p>Scottish Government, working with SFRS and others, will use the Stay Put Technical Steering Group research on means of escape, once available to review, and consider potential improvements to the current approach.</p>	No	Potentially
Recommendation 32 & 33	<p>Continue to disseminate and support use of the Practical Fire Safety Guidance for Existing Specialised Housing and Similar Premises to improve fire safety for vulnerable people, including PEEPs in relevant settings.</p> <p>Carry out research to monitor and learn the impact this Guidance is having and to inform possible further improvements to fire safety for vulnerable people at home.</p> <p>Update the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings Guidance to refer to the Specialised Housing Guidance.</p>	No	Yes
Recommendation 35	<p>Continue with current approach, as set out in the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings and via the SFRS Operational Assurance Visits, and Guidance.</p>	No	No
Recommendation 36	<p>Continue with current approach, as per the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings and SFRS Community Fire Safety information.</p>	No	No
Recommendation 37	<p>Continue with current approach, as set out in the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings.</p>	No	No
Recommendation 38	<p>Continue with current approach, as set out in the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings.</p>	No	No
Recommendation 39	<p>Continue with current approach, as set out in the Practical Fire Safety Guidance for Existing High Rise Domestic Buildings updating advice to local authorities as required.</p>	No	No

Grenfell Inquiry Fire Safety Working Group

Terms of Reference

Purpose

- 1) The Group will be collectively responsible for considering the 46 recommendations from the Grenfell Inquiry Phase 1 report recommendations; and what actions, if any are needed to implement these recommendations in Scotland, focusing on outcomes. Where it is agreed that recommendations will not be implemented in Scotland, sound reasoning will be provided.
- 2) 23 of the recommendations are directed at London Fire Brigade (LFB), 14 are directed at those who own or are responsible for high rise buildings; 8 are directed at LFB, the London Ambulance Service (LAS) and the Metropolitan Police Service (MPS) jointly; 1 is directed specifically at the UK Government.
- 3) The Group will also be responsible for ensuring that the final 2 recommendations for the Fire Safety Regime Review Group are implemented (Specialised Housing Guidance and a Common Areas safety campaign).
- 4) The Group will have overall responsibility for the monitoring and evaluation of all the outputs of the 6 recommendations made by the Review Group to the Ministerial Working Group.

Action and Timescales

- 5) An agreed work plan will be developed, informed by initial consideration of all the recommendations prior to, and decisions by, the next MWG meeting of 11 June 2020.
- 6) This assessment will include approximate timeframes to deliver any actions identified.

Reporting Structure

- 7) The Group will report to Deputy Director for Safer Communities and Deputy Director for Better Homes once in place, and then the Ministerial Working Group.

Meetings

- 8) The Group will meet at least monthly, but more frequently if required. This frequency will be assessed as work the recommendations are implemented.

Annex D: References

Grenfell Tower Inquiry (2019) Phase 1 report. Retrieved from: <https://www.grenfelltowerinquiry.org.uk/phase-1-report>

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Scottish Government (2018) [Sample testing of fire doors: letters to local authority verifiers](https://www.gov.scot/publications/sample-testing-of-fire-doors-letters-to-local-authority-verifiers/). Retrieved from: <https://www.gov.scot/publications/sample-testing-of-fire-doors-letters-to-local-authority-verifiers/>

British Standards

BS 9999: Code of practice for fire safety in the design, management and use of buildings⁸

⁸ British Standards can be purchased or subscribed to online at <https://shop.bsigroup.com/> or <https://www.bsigroup.com/en-GB/standards/britishstandards-online-database/> respectively.



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