

**UNIVERSITY OF MANCHESTER**  
**DIRECTORATE OF ESTATES & FACILITIES**  
**EPM HS 33 FIRE RISK ASSESSMENT STRATEGY**

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## **1. The Purpose of the University's Fire Risk Assessment Strategy.**

- 1.1 Significant changes during 2023 necessitate a revision to the University's fire safety arrangements. These are:
- Amendments to the primary legislation;
  - A new enforcement approach by Greater Manchester Fire and Rescue Service (GMFRS); and
  - Changes to the provision of fire risk assessments.
- 1.2 This EMP outlines what needs to be done by the University of Manchester to adjust to those changes and specifically to comply with the statutory requirements of the Regulatory Reform (Fire Safety) Order 2005 (the Order) as amended by the Fire Safety (England) Regulations 2022, the Fire Safety Act 2022 and the Building Safety Act 2022.

## **2. Legislation and Compliance.**

- 2.1 The Order imposes a range of duties on the "Responsible Person". Article 3 defines the role of the responsible person and Articles 8 – 22B and 38 specify the primary duties that the responsible person has to discharge.
- 2.2 The original 2005 Order has been amended as a result of the Grenfell Tower fire in 2017. Those amendments mean that adjustment has to be made to the University's fire safety management arrangements.
- 2.3 Article 9 imposes the requirement to complete fire risk assessments (FRA) but Article 9 cannot be considered in isolation because it is inextricably linked and aligned to all the other Articles referenced in 2.1 above. This document also pre-empts the introduction of Article 9A which requires that fire risk assessors and other duty holders (as defined by Article 5) are competent in their roles.
- 2.4 Article 9 also requires that FRAs "*must be reviewed by the responsible person regularly*". The Order is silent on review frequency but the National Fire Chiefs Council recommends an annual review and this is what GMFRS as the principal enforcing authority, expect. (The University has buildings in other authority jurisdictions but adherence to the NFCC guidelines will also meet the requirements of those authorities). This document details how annual FRA reviews are to be done.

### **3. Fire Risk Assessments**

- 3.1 Full FRAs will only be undertaken by suitably qualified fire risk assessors that are independently accredited as competent. The fire risk assessor has full authority to require any action necessary to remediate any immediate threat to life found during an FRA audit. All staff are expected to acknowledge that authority and comply with any instructions given.
- 3.2 As sleeping accommodation student residences present the greatest risk to life. Therefore they will be subjected to a full FRAs every three years. These will be programmed so that approximately one third of the residential estate is completed annually. All other buildings will be fully fire risk assessed on a five yearly cycle.
- 3.3 Any new buildings will be initially fire risk assessed as soon after occupation as practicable and then reassessed as above according to type.
- 3.4 Building refurbishments will be considered individually by the Fire Team to determine any need for a new fire risk assessment.
- 3.5 Additionally there may from time to time be a need to undertake a FRA of leased buildings or parts of buildings if occupied by university staff.
- 3.6 Article 22 imposes a duty upon responsible persons to communicate and co-operate in respect of FRAs and fire safety management. For multi-occupied buildings where the University is the landlord and has some occupation we must take the leading role to ensure that the requirements of this article are fully discharged. This will be led by the Fire Team. The University also has leases with a range of landlords. For these situations it is unlikely that we will have the leading role but we must nonetheless ensure we engage appropriately with the primary responsible person. Again, this will be ensured by the Fire Team.

### **4. Reviews of Fire Risk Assessments**

- 4.1 The purpose of reviews is to ensure that the FRA remains current and up to date and to determine whether:
  - (a) *there is reason to suspect that it is no longer valid; or*
  - (b) *there has been a significant change in the matters to which it relates including when the premises, special, technical and organisational measures, or organisation of the work undergo significant changes, extensions, or conversions,**and where changes to an assessment are required as a result of any such review, the responsible person must make them.*

- 4.2 The mechanism by which such reviews will be done is by completing the pro-forma questionnaire attached at Appendix 1. Whilst this process will be led and supported by the Fire Team, completion of the pro-forma is the responsibility of the Faculty/School/Department occupying the building because as occupiers, they possess the knowledge of the activities and the general building usage.
- 4.3 The Fire Team will consider the completed pro-formas and determine whether any changes are so significant as to require a new FRA to be done. Where this is deemed necessary the Fire Team will make the necessary arrangements and adjust the frequency cycle accordingly.
- 4.4 The FRA process typically and amongst other things includes an audit of all of a buildings preventive and protective measures. However, it is not enough to rely solely on the FRA process to fully discharge all the expectations and requirements of the Order. A key phrase used throughout the Order is “at all material times”. A triennial FRA does not address this phrase to any meaningful extent. Therefore, neither this document nor FRAs more generally should be seen as the whole fire safety management solution. The University needs other systems to operate in parallel and many of those systems will require more localised delivery and management.

## **5. FRA Outcomes and Actions**

- 5.1 FRA reports categorise issues for remediation in one of three ways:

**i. Management Issues.** These are mainly “housekeeping matters” and are the responsibility of the person “owning” the space (as detailed within the Archibus System) to rectify.

NB1. The term “housekeeping matters” relates to the management systems and processes required to prevent fire. Primarily, fire prevention is the process of managing both ignition sources and combustible materials so that they do not come into contact with each other. Article 10 of the Order requires that the *Principles of prevention must be applied*. Therefore any identified “management issue” constitutes a statutory non-compliance and must be rectified as a priority and as soon as practicably possible.

**ii. Repairs.** These are issues mainly caused by fair wear and tear and in most cases, will fall to estates to remediate.

NB1. There are some fire safety assets that are owned and maintained by Faculties/Schools and these remain their responsibility to maintain and repair.

NB2. Article 17 of the Order states “*the responsible person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises under this Order ..... are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair*”. In essence any defect identified with any aspect of the fire safety infrastructure of a building constitutes a statutory non-compliance and must be rectified as a priority and as soon as practicably possible.

iii **Upgrades.** These are issues identified and recommended by the assessor to bring fire protection up to current standards. These are not statutory non-compliances but should nonetheless be considered. Such consideration will be done by the Fire Team who will decide on the best course of action.

## **6. Fire Safety Repairs**

- 6.1 All fire safety related repairs will all be dealt with via the Estates Helpdesk. Repairs identified through the FRA process will be managed and actioned by the Fire Team. However and as referenced in 4.4 above, FRAs are not the only means by which such faults are identified. Local audit procedures will also identify fire safety repairs and these need to be raised for remediation by the local auditor via the Helpdesk in accordance with the published guidance on raising issues with Helpdesk.
- 6.2 Fire risk assessors will be competent in their role. Other people delegated to undertake audits which include fire safety elements also need to be competent to the extent necessary for them to discharge their duties. Article 21 requires appropriate fire safety training commensurate with role responsibilities. Lack of such training is a statutory non-compliance.

## **7. Residencies**

- 7.1 As referenced in 3.2 above, residences present the greatest risk to life and therefore, all identified management issues, repairs and upgrades will be accorded the highest priority. All management issues and all repairs (identified by whatever means) will be actioned and/or remediated immediately.

- 7.2 Whilst upgrades identified by a fire risk assessor remain advisory, upgrades within residences will be prioritised for action by the Fire Team.
- 7.3 Section 156 of the Building Safety Act 2022 amends the original Order and it is now a statutory requirement that FRAs are shared with residents (students within our halls of residence). FRAs are anyway not confidential documents and all FRA reports should be accessible.

S156 significantly changes the compliance landscape in other ways. The Home office has published guidance in support of these changes and the significant points are that:

- The Guidance Documents now have the same status as “Approved Codes of Practice” – namely, that they have to be followed;
- The compliance requirements now have to be seen as a “Must Do”. They are no longer optional; and
- Every aspect of the fire safety management system “must” be recorded.

- 7.4 All FRA reports will be promulgated on the Estates website.

## Annual Audit

As part of the Annual audit of the University Fire Risk Assessment process you are asked to complete this form. Following its initial completion supplementary information may be required.

\* Required

\* This form will record your name, please fill your name.

1. What is the building you are responsible for? \*

2. Does your Faculty/School have sole responsibility for the building? \*

☐ Yes

☐ No



3. What other Faculties/Schools share the building? \*

- ☐ BAL
- ☐ BMH
- ☐ CAC
- ☐ HUM
- ☐ LEA
- ☐ OTH
- ☐ PS
- ☐ RESI
- ☐ SE
- ☐ SHARED
- ☐ SPT
- ☐ UNI
- ☐ Other

4. When did you last review the Fire Risk Assessment \*

5. Where there any managerial actions required from the last FRA (GRATiK Actions) \*

☐ Yes

☐ No

6. Have all the Managerial actions required been assigned/completed? \*

☐ Yes

☐ No

7. Why have all the management issues assigned to your have not been completed? \*

8. Has the building undergone any significant changes since the last FRA? \*

☐ Yes

☐ No

9. What were the significant changes? \*

- ☐ Structural changes affecting Means of Escape
- ☐ Increase in occupancy
- ☐ Change of use
- ☐ Change of process which may increase Risk profile
- ☐ Other

10. Do you undertake **local** Safety Audits of your occupancy? \*

- ☐ Yes
- ☐ No

11. Is there a 'fire' element within your **local** Safety Audit \*

- ☐ Yes
- ☐ No

12. What was the date of the **last local** Safety Audit? \*

13. Are you aware of other (non managerial) issues within the last FRA? \*

☐ Yes

☐ No

14. Are all your staff aware of the Evacuation Procedure for the building? \*

☐ Yes

☐ No

15. How are staff made aware of the Evacuation Procedure for the building? Tick all that apply \*

☐ Initial training

☐ Annual training

☐ Team briefings

☐ Other

16. How do you intend to make your staff aware of the Evacuation Procedure for the building? \*

17. Are there Fire Marshalls in place within the building? \*

☐ Yes

☐ No

18. How many Fire Marshall do you currently have allocated to the building? \*

19. What are you doing to address the lack of Fire Marshalls? \*

20. Are staff aware of the the University General Emergency Evacuation Plans (GEEPS) and Personal Emergency Evacuation Plans (PEEPS) procedures? \*

☐ Yes

☐ No

21. How many PEEPS do you currently have in place? \*