

Crown Premises Fire Inspection Group



Date: 30th November 2016

<REDACTED>

Governor
HMP Lincoln
Greetwell Road
Lincoln
Lincolnshire
LN2 4BD

Crown Premises Fire Inspection Group
Fire and Resilience Directorate
Crime, Policing and Fire Group
2nd Floor NW Fry Building
2 Marsham Street
London
SW1P 4DF

Our Ref: 4007/801/01

Please reply to: <REDACTED>
@homeoffice.gsi.gov.uk

Dear Sir,

The Regulatory Reform (Fire Safety) Order 2005 (the Order)

Premises: HMP LINCOLN, GREETWELL ROAD, LINCOLN, LN2 4BD

Following the fire safety inspection of the above premises on the **22nd and 23rd November 2016**, I am writing to confirm my opinion that the identified individuals or groups of people would be at risk in case of fire. You will need to take action to ensure their safety.

In the event that a long-term solution cannot be implemented immediately, you will need to introduce interim measures to reduce the level of risk whilst longer-term measures are being prepared.

Fire safety measures are largely interactive, and fire risks can be controlled in many ways. Therefore, whilst the schedule refers to solutions you could adopt, I am not directing you to choose any one of them. It will be acceptable for you to implement any measures which achieve an appropriate standard of safety from fire.

Successful approaches to assessing and managing risk can be provided by accepted guidance, BS9999: 2008 or fire engineering calculations. Each of these requires the involvement of a person with comprehensive training or experience.

This letter should be read in conjunction with the attached RAG Risk Rating form, I have included additional information to assist you with planning what action to take. The schedule identifies in each case the 'immediate' (i.e. what has occurred at the establishment) and the likely 'underlying' (i.e. corporate) causes of the failures identified during the inspection. The final risk scores for the fire safety measures and risk scores for key areas of fire safety management are also set out in bar charts at the end of the RAG rating form. The RAG Risk Rating Form will be revised during any follow-up inspection, and this will result in a second bar on the chart, showing the improvement made.

The RAG Risk Rating form provides a clear decision framework for assigning RAG outcomes, which will also include a score for each bespoke General Fire Precaution. This is intended to improve/demonstrate consistency of judgments, and also to provide better information to you about the success of the safety management arrangements at managing risk.

I informed you at our meeting that my initial enforcement decision was to allow you the opportunity to comply in a timely manner. The next steps are, therefore, for you to develop your planned action plan, and to confirm the plan and date of completion to me within 28 days of receiving this letter.

Please note that, given the level of risk involved, I can only maintain an informal enforcement approach where you are able to evidence your commitment and ongoing progress towards compliance.

If you do not undertake the necessary improvements, then you may be served with a Crown enforcement notice.

There is no formal right to appeal against this letter but if you would like clarification of its contents or to comment on your experience of the visit, please contact either me or the CPFIG Team Leader on cpfig@homeoffice.gsi.gov.uk.

Yours faithfully

<REDACTED>

Crown Premises Fire Inspector

Crown Premises Fire Inspection Group
Office of the Chief Fire & Rescue Adviser

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Schedule

Premises: HMP LINCOLN. GREETWELL ROAD, LINCOLN, LN2 4BD

File Number: 4007/801/01

Sheet: 1 of 4

This schedule should be read in conjunction with the CFRA letter dated 30th November 2016

1. MEASURES TO REDUCE THE RISK OF FIRE.			
Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure	Action Plan Required
Articles 4(1)(a) & 8	<p>a. There are inappropriate sanctions to deter prisoners from setting fires or interfering with fire detectors.</p> <p>b. The induction programme does not include sufficient information about the consequences of fire-setting and the actions to be taken on discovering a fire</p>	<p>a. Appropriate sanctions should be applied following fire-setting in order to deter prisoners from setting fires or interfering with fire detectors.</p> <p>b. The prisoner induction should include all potentially useful messages for deterring fire setting and the actions to be taken on discovering a fire.</p>	Within 28 days
9	<p>Immediate Cause of Failure: <i>The risk had not been correctly assessed</i></p>	<p>Safety Management Remedy: <i>Adequate arrangements are required for the day-to-day management of fire safety</i></p>	
11	<p>Likely Underlying Safety Management Failure: <i>Arrangements for the day-to-day management of fire safety were inadequate</i></p>		
9	<p>Immediate Cause of Failure: <i>The risk had not been correctly assessed</i></p>	<p>Safety Management Remedy: <i>The fire safety policy must direct compliance in this matter.</i></p>	
5	<p>Likely Underlying Safety Management Failure: <i>The fire safety policy did not direct compliance in this matter.</i></p>		

2. PROTECTION OF STAFF AND PRISONERS.

WARNING OF FIRE – MEASURES FOR FIRE-FIGHTING – RISK OF FIRE SPREAD – SECURING THE MEANS OF ESCAPE

Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure	Action Plan Required
<p>Articles 4(1)(a) & 8</p> <p>9</p> <p>11</p> <p>9</p> <p>9</p> <p>9</p> <p>5</p> <p>9</p> <p>9</p>	<p>a. The coverage of cells by automatic fire detection was insufficient to provide early warning of fire and control the risk to an acceptable level.</p> <p>Immediate Cause of Failure: <i>The risk had not been correctly assessed</i></p> <p>Likely Underlying Safety Management Failure: <i>Arrangements for the day-to-day management of fire safety were inadequate</i></p> <p>b. There was insufficient fire-fighting and ancillary equipment to effectively carry out the cell fire response plan.</p> <p>Immediate Cause of Failure: <i>The risk had not been correctly assessed</i></p> <p>Likely Underlying Safety Management Failure: <i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</i></p> <p>c. Normal and/or emergency lighting doesn't provide sufficient illumination to safeguard prisoners and prison staff.</p> <p>Immediate Cause of Failure: <i>The risk had not been correctly assessed</i></p> <p>Likely Underlying Safety Management Failure: <i>The fire safety policy was not followed.</i></p> <p>d. Measures to reduce the spread of fire and smoke were inadequate.</p> <p>Immediate Cause of Failure: <i>The risk had not been correctly assessed</i></p> <p>Likely Underlying Safety Management Failure: <i>The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors</i></p>	<p>a. The automatic fire protection for cells must ensure that prison staff members are alerted to cell fires sufficiently early to enable them to implement the cell fire response plan before foreseeable injury can be caused to prisoners and prison staff.</p> <p>Safety Management Remedy: <i>Adequate arrangements are required for the day-to-day management of fire safety</i></p> <p>b. Sufficient water misting equipment, hose-reels & ancillary equipment should be provided so that, allowing for the predicted time for fire detection, water-mist inundation is commenced within six minutes from ignition.</p> <p>Safety Management Remedy: <i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i></p> <p>c. An assessment should be carried out to determine LUX levels in areas where a cell fire response/Risk/Task working/Evacuation is required.</p> <p>Safety Management Remedy: <i>The fire safety policy must be followed.</i></p> <p>d. Fire hazard rooms – these are defined in BS9999 - giving onto common spaces in residential wings should be enclosed with fire-resistance.</p> <p>Safety Management Remedy: <i>The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</i></p>	<p>Within 28 days</p>

Relevant article of the Order	Insufficient information was available to evidence compliance in respect of the following matters:	Information required:	Date Required
Articles 4(1)(a) & 8	e. There was insufficient evidence available to demonstrate that the existing smoke control arrangements for CSU are adequate to prevent smoke spread to other cells in the event of a cell fire.	e. Evidence should be provided which demonstrates that an effective mechanical smoke control system, based on engineering calculations and commissioned by a competent contractor, is provided for all areas of the corridor approach within CSU.	Within 28 days

3. STAFF INSTRUCTIONS FOR ACTIONS IN THE EVENT OF FIRE.

CELL FIRE RESPONSE.

Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure	Action Plan Required
Articles 4(1)(b), 7(6), 8 & 14	<p>a. The fire fighting plan is not time based</p> <p>b. There is no a plan to use water mist equipment as soon as possible in every case, and always within every case within 5 minutes.</p> <p>Immediate Cause of Failure: The risk had not been correctly assessed</p> <p>Likely Underlying Safety Management Failure: The arrangements for carrying out fire risk assessments do not ensure that there is a systematic process in place for identifying all relevant factors.</p>	<p>a. The cell fire response plan must be time-based. Allowing for the predicted time for fire detection, the fire-fighting plan must ensure that water-mist inundation has been commenced by six minutes from ignition and can be effectively sustained for a period of up to 20 minutes (e.g. non compliant prisoner).</p> <p>b. The fire-fighting plan should be time-based, starting from when the fire is started, and taking into account the predicted time for fire detection. By six minutes from ignition – including the time for detection - the fire-fighting plan must ensure that water-mist inundation has been commenced.</p> <p>Safety Management Remedy: The arrangements for carrying out fire risk assessments must ensure that there is a systematic process in place for identifying all relevant factors.</p>	Within 28 days

4. EFFECTIVENESS OF STAFF ACTIONS TO TAKE IN THE EVENT OF FIRE.

FIRE TRAINING – EVACUATION

Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure	Action Plan Required
Articles 4(1)(c), 7(6), 8 & 14	a. The training package delivered to staff does not provide sufficient practical instruction on the use of Inundation equipment	a. The training package should ensure that new staff members are sufficiently trained to be able – under suitable supervision – to take an effective part in the cell fire response plan, including using inundation equipment.	Within 28 days

9	<p>b. An insufficient number of prison staff members working in residential wings are in date with their training in RPE wearing, using inundation equipment and carrying out the cell fire response plan.</p> <p>Immediate Cause of Failure: <i>The action plan did not set out a timescale for implementing corrective measures which was appropriate to the seriousness of the risk.</i></p> <p>Likely Underlying Safety Management Failure: <i>The fire safety policy was not followed.</i></p>	<p>b. An adequate number of prison staff members working in residential wings should be up-to-date with their training in RPE wearing, using inundation equipment and carrying out the cell fire response plan.</p> <p>Safety Management Remedy: <i>The fire safety policy must be followed.</i></p>	
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General Maintenance.			
Relevant article of the Order	Specific Failure to Comply with the Order	Steps considered necessary to remedy the failure to comply, including an illustrative example of a compliant measure	Action Plan Required
<p>Articles 4(1)(d), 7(6), 8 & 17</p> <p style="text-align: center;">17</p> <p style="text-align: center;">17</p>	<p>a. There was insufficient evidence available to demonstrate that the fire safety measures being tested and maintained were in good condition and effective working order</p> <p>Immediate Cause of Failure: <i>Contractor had not carried out the remedial works</i></p> <p>Likely Underlying Safety Management Failure: <i>There were inadequate arrangements for the maintenance of general fire precautions</i></p>	<p>a. Evidence should be provided which demonstrates that the fire safety measures being tested and maintained were in good condition and effective working order</p> <p>Safety Management Remedy: <i>The arrangements for maintenance must ensure that the general fire precautions are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.</i></p>	<p>Within 28 days</p>

Where appropriate, a plan may form part of this Schedule to illustrate the steps which, in the opinion of the Crown Premises Fire Inspection Group, need to be taken in order to meet the requirements of the Order.

Note: Notwithstanding any consultation with other enforcing authorities undertaken by the Crown Premises Fire Inspection Group, before you make any alterations to the workplace which constitutes building works you must apply to your local building control body (the local authority or an approved inspector) for any necessary approvals and to any other body which has a statutory interest in the workplace if their permission is required for those alterations to be made.