



<REDACTED>

Director
HMP Lowdham Grange
Old Epperstone Road
Lowdham
Nottingham
NG14 7BZ

Our Ref: 4703/802/01
Please Ask For: Paul Wood
Direct Line/Ext: M: <REDACTED>
Date: 6th June 2017

Dear Sir,

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

Premises: HMP Lowdham Grange, Lowdham, Nottingham, NG14 7BZ

Following the fire safety inspection of the above premises on 16th & 17th May 2017, 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.

I have included additional information to assist you with planning what action to take which should be read in conjunction with the RAG Risk Rating form that has been forwarded separately:

1. The schedule identifies in each case the 'immediate' (i.e. what has its roots at the establishment) and the likely 'underlying' (i.e. corporate) causes of the failures identified during the inspection.
2. The RAG Risk Rating form for the inspection provides a clear risk-based decision framework and a risk score for individual RAG outcomes.
3. Final risk ratings for the fire safety measures and 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 and the risk ratings will be revised during any follow-up inspection. This will be shown as a second bar on the chart, demonstrating the improvement made.

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.

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

Yours faithfully

<REDACTED>

Crown Premises Fire Inspector

Appointed Inspector on behalf of Nottinghamshire Fire & Rescue Service

CC – <REDACTED>

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Schedule

Premises: HMP Lowdham Grange, Lowdham, Nottingham, NG14 7BZ

File Number: 4703/802/01

Sheet: 1 of 4

This schedule should be read in conjunction with the CFRA letter dated 6th June 2017.

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	c. Prisoners with a history of fire-setting and those at known risk of self-harm through fire are not located in cells where they are most appropriately safeguarded from fire:	c. Prisoners at known risk from fire should be located wherever possible in cells fitted with automatic fire detection, near to water misting equipment, and on the top landing of an atrium wing, in that order of preference.	Within 28 days
9	Immediate Cause of Failure: <i>The fire risk assessor did not identify the opportunity to reduce risk</i>	Locating prisoners at known risk from fire in corridor approach without automatic fire detection and mechanical smoke control must be avoided.	
9	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>	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>	
9	e. Inadequate provisions are not in place to ensure ignition sources are kept separate from combustible materials. Immediate Cause of Failure: <i>The fire risk assessor did not identify the significance of the risk</i>	e. Ignition sources should be separated from combustible materials.	
9	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>	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>	
9	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>		

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
Articles 4(1)(a) & 8	<p>a. The coverage of cells by automatic fire detection was insufficient to provide effective early warning of fire and control the risk to an acceptable level.</p> <p>Immediate Cause of Failure: <i>The identified action point was not implemented</i></p> <p>Likely Underlying Safety Management Failure: <i>There are inadequate arrangements to ensure that the action points arising from the fire risk assessment are acted upon.</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>Domestic fire detectors can be used to mitigate the risk where there is currently no automatic in-cell fire detection. This can offer an acceptable interim measure whilst an automatic fire detection system is procured.</p> <p>Safety Management Remedy: <i>Arrangements must be put in place to ensure that the action points arising from the fire risk assessment are acted upon.</i></p>	Within 28 days
11	<p>e. Measures to reduce the spread of fire and smoke were inadequate.</p> <p>Immediate Cause of Failure: <i>No suitable measure was in place</i></p> <p>Likely Underlying Safety Management Failure: <i>Arrangements for the day-to-day management of fire safety were inadequate.</i></p>	<p>e. i) Fire hazard rooms – these are defined in BS9999 - giving onto common spaces in residential wings should be enclosed with fire-resistance.</p>	
11	<p>ii) The fire resistance protecting the escape routes must control the spread of smoke where this could cause potential harm to persons using escape routes.</p> <p>Safety Management Remedy: <i>Adequate arrangements are required for the day-to-day management of fire safety.</i></p>		
11	<p>f. The existing smoke control arrangements for areas of corridor approach are inadequate to prevent smoke spread to other cells in the event of a cell fire.</p> <p>Immediate Cause of Failure: <i>No suitable measure was in place</i></p> <p>Likely Underlying Safety Management Failure: <i>The arrangements in place for carrying out fire risk assessments do not ensure that the level of risk is judged through comparison with relevant and accredited benchmarks of safety.</i></p>	<p>f. An effective mechanical smoke control system, based on engineering calculations and commissioned by a competent contractor, is required for areas of corridor approach to ensure that they remain tenable.</p> <p>Safety Management Remedy: <i>The arrangements in place for carrying out fire risk assessments must ensure that the level of risk is judged through comparison with relevant and accredited benchmarks of safety.</i></p>	
9			

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	d. There was insufficient evidence available to demonstrate that emergency lighting provides sufficient illumination to safeguard prisoners and prison staff.	d. Evidence should be provided which demonstrates that a survey of emergency lighting has been undertaken to confirm the adequacy of lux levels i.e. for task based working.	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 11 5	a. The cell fire response plan is not time based Immediate Cause of Failure: <i>No suitable measure was in place</i> Likely Underlying Safety Management Failure: <i>Fire safety policy not followed.</i>	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. Safety Management Remedy: <i>The fire safety policy must be followed.</i>	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 11 13 & 15	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. Immediate Cause of Failure: <i>The planned fire safety measure had been removed</i> Likely Underlying Safety Management Failure: <i>The arrangements do not ensure that sufficient trained persons are available when necessary to carry out the fire</i>	b. i) 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. ii) All prison staff members working in residential wings during night state should be up to date with their training in RPE wearing, using inundation equipment and carrying out the cell fire response plan. Safety Management Remedy: <i>The arrangements must ensure that sufficient trained persons are available when necessary to carry out the fire action</i>	Within 28 days

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	<i>action plan successfully and safely.</i>	<i>plan successfully and safely.</i>	
11	<p>c. The number of trained prison response staff members available was not always sufficient to implement the cell fire response plan effectively</p> <p>Immediate Cause of Failure: <i>No suitable measure was in place</i></p> <p>Likely Underlying Safety Management Failure: <i>The arrangements do not ensure that sufficient trained persons are available when necessary to carry out the fire action plan successfully and safely.</i></p>	<p>c. A sufficient number of prison response staff members should be available at all material times to ensure that they can implement the cell fire response plan sufficiently to safeguard the prisoner within six minutes of the fire starting, including the time for fire detection.</p> <p>Safety Management Remedy: <i>The arrangements must ensure that sufficient trained persons are available when necessary to carry out the fire action plan successfully and safely.</i></p>	
13 & 15			

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.