



**NFCC**  
National Fire  
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The professional voice of the  
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Response to the BS 8629: Code of Practice for the design, installation, commissioning and maintenance of evacuation systems for use by fire and rescue services in buildings containing flats of maisonettes Draft for Public Consultation

21 July 2019

To FSH12 British Standards Institute,

**BS 8629: Code of Practice for the design, installation, commissioning and maintenance of evacuation systems for use by fire and rescue services in buildings containing flats of maisonettes Draft for Public Consultation**

Please find attached the National Fire Chiefs Council (NFCC) response to the Drafts for Public Consultation for *BS 8629: Code of Practice for the design, installation, commissioning and maintenance of evacuation systems for use by fire and rescue services in buildings containing flats of maisonettes*.

The NFCC is the professional voice of the UK fire and rescue services and is comprised of a council of UK Chief Fire Officers. This submission was put together through the NFCC's Fire Engineering Technical Standards (FETS) Group underneath the Protection and Business Safety Committee, in consultation with the NFCC's Operations Committee. The Committees are comprised of specialists from across the UK fire and rescue services.

The NFCC supports the standardisation of evacuation control systems in order to achieve consistency across those buildings where they are to be installed. However, the standard does raise several concerns for us which, whilst not necessarily being directly applicable to the standard, we feel should be addressed by the Responsible Committee. These concerns are detailed below.

**Scottish Technical Handbook – Domestic – 2019**

The Introduction for the draft standard outlines the circumstances leading to its formulation in relation to the review and updating of the Technical Handbook guidance for domestic premises in Scotland. This guidance outlines that for buildings with a top

storey height greater than 18m, evacuation alert systems for use by fire and rescue services should be installed.

The NFCC concern is that this aspect of the guidance appears to be taken in isolation without acknowledgement of the other updated aspects required by the Technical Handbook. These updates include the requirements for at least two escape routes and the installation of automatic water suppression systems in blocks of flats or maisonettes with a storey height greater than 18m.

The omission of this additional information about the requirements could lead to evacuation systems being installed in buildings where they may be unsuitable. It is important that any decision to install such a system gives due consideration to the broader fire safety design features of the building (such as the number of escape routes) which will have serious implications for their use by operational firefighters.

### **Installation of Evacuation Systems**

The NFCC is concerned that the standard places a large onus on consultation with fire and rescue services prior to an installation in order to address the need for, and suitability of, an evacuation system. Whereas the Scottish Technical Handbook outlines a series of measures for the whole building, beyond the scope of this guidance, where such systems should be installed, the same is not true for other regions of the United Kingdom. In the commentary for the standard there should be consideration as to whether such systems are only suitable for buildings which include the whole package of measures in the Scottish Technical Handbook. If this is not the case, then details should be given for the building features that are required for whole building safety and circumstances where an evacuation system installation is inadvisable without consideration of other factors including the broader fire safety design features of the building.

### **Use of Evacuation Systems by Operational Firefighters**

The Scope of the draft standard explicitly states that the standard does not address operational firefighting and the use of evacuation systems. The NFCC appreciate that whilst these areas are not within the scope of a technical standard, there are subsequent references throughout the commentary and requirements towards possible actions that could be carried out by the fire and rescue service. At present, there is no operational guidance for use of these systems, and it seems that for their safe use, the standard places a large amount of responsibility on operational decision making.

We have concerns about the installation of an 'Evacuate Whole Building' control, which could endanger safety if used incorrectly. The use of an 'Evacuate Whole Building' control at any stage of an incident, without a risk assessment by the Incident Commander, may unnecessarily lead to the evacuation of residents into a smoke-filled environment, particularly on the fire floor/s. The worst-case scenario would be for the resident to follow the Incident Commander's instruction (through the alarm sounding)

to evacuate through a smoke-filled environment and be overcome by smoke before reaching the stair.

In addition, an 'Evacuate Whole Building' control would also evacuate residents from floors below the fire and potentially slow the escape from floors above the fire and impede fire-fighting operations.

Instead, an evacuation control panel allowing activation of individual floors, would allow Incident Commanders to 'phase and control' an evacuation according to the circumstances of the incident. The control panel would still provide an option to evacuate all if required by activating all of the individual floor controls.

Prior to a British Standard being published, in order to address a need in Scotland, but which has implications for the all regions of the United Kingdom, a working group should be established to consider this in detail, with a view to developing guidance or a required standard governing their use.

### **Vulnerable Persons**

The NFCC has concerns for the installation and potential use of evacuation systems in buildings where vulnerable persons are housed. The housing of vulnerable persons in 'general needs residential high-rise premises' without proper means to evacuate can mean expecting them to be able to descend staircases, particularly in very tall buildings, is increasingly unrealistic. Relying on evacuation as a safety strategy potentially discriminates against disabled and vulnerable people. Evacuation strategies must ensure equity in terms of disabled and vulnerable people and consider individuals' rights to not incur any further deterioration in their health and to maintain their dignity during this process.

The draft standard is based on a false assumption that the fire and rescue service will provide the complete safety for buildings where the alarm needs to be activated. This standard should require building owners to consider the needs of occupants by including a person-centred risk assessment to account for the possibility of an evacuation system being activated.

Yours sincerely,

**Roy Wilsher**

A handwritten signature in black ink, appearing to be 'RW', written in a cursive style.

**Chair, National Fire Chiefs Council**