

Page number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Comments	Proposed change
	General comment		<p>General comment, recommendations, and other factors.</p> <p>NFCC welcomes the revision of this standard in outlining the approach for achieving successful maintenance outcomes for a range of facilities, including fire safety systems and measures Any approach that assists facility owners and operators, or those acting on their behalf, in regard to facilities maintenance management in aligning the formulation and implementation of maintenance strategies and policies to the core objectives of the organization in the most efficient and effective way is welcomed.</p>	
33	8	8.11	<p><i>8.11 Fire protection</i></p> <p><i>The organization should ensure that it understands the potential behaviour of materials, components and furnishings in the facilities in the event of a fire and the extent to which fire-retardant substances have been used either in their manufacture or applied subsequently.</i></p>	<p>Add:</p> <p>Where doubt exists, the organization should refer to the premises fire risk assessment or seek advice from a competent person.</p>
34	8	8.12	<p><i>8.12 Fire safety</i></p> <p><i>The organization should recognize its responsibilities for the health, safety and security of people in its facilities and ensure that a responsible person is designated to act upon any matter that might be potentially hazardous or pose some other threat to users.</i></p>	<p>Replace with:</p> <p><i>The organization should recognize its responsibilities for the health, safety, security and welfare of people in its facilities and ensure that a responsible person is designated to act upon any matter that might be potentially hazardous or pose some other threat to users, in accordance with relevant legislation.</i></p> <p>Add:</p> <p>Reference should be made to the premises fire risk assessment to ensure those responsible are aware of the fire safety measures present. BS 9997 <i>Fire risk management systems. Requirements with guidance for use</i> details the requirements of an organizational fire risk management system, the aim of which is to minimize risks to life, property, mission continuity and the environment from the threat of fire which arises as a result of its activities.</p>
36	9	9.5 c)	<p><i>location and servicing arrangements of all fire alarm and call points;</i></p>	<p>Replace with:</p> <p><i>'location and servicing arrangements of all fire detection and alarm</i></p>

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				<i>installations including control and indicating equipment, detectors, sounders and call points.'</i>
36-37	9	9.5 e)	<i>location of all fire compartment walls, doors, floors and screens;</i>	As fire doors are an important component of fire compartmentation and with many relying on self-closing devices, we believe fire doors and self-closing devices should be contained within a line of their own. It would be more normal to refer to fire compartment walls and floors together, with doors referred to separately. In addition, screens would not normally be a category on their own, these would best be referred to as 'other methods of fire resisting separation'.
37	9	9.5 k)	<i>names, home addresses and telephone numbers of key holders, which should be kept up-to-date and should be lodged with the fire and police authorities.</i>	Replace with: <i>names, home addresses and telephone numbers of key holders, which should be kept up-to-date and should be lodged with alarm receiving centres (ARCs) and monitoring stations and on display at the premises in a prominent and accessible location. Individual fire and police authorities may have the facility to store these numbers.</i>
37	9	9.5	The list of systems should be extended.	Add to the list for records of fire protection systems: <ul style="list-style-type: none"> • Evacuation lifts. • Facilities provided for the fire and rescue service (FRS) e.g. Firefighting lifts, dry/wet risers, vehicular access, smoke clearance systems. • Emergency evacuation systems for use by the FRS. • Premises Information Boxes (PIBs). • Emergency lighting systems. • Evacuation strategy.
37	9.5	2 nd paragraph	<i>All records, including those used during construction work, should be verified against the as-built facility. Where a discrepancy is found, full details should be recorded and, wherever practicable, the affected record(s) should be labelled "as subsequently altered".</i>	Replace with: All records, including those used during any construction work, should be verified against the as-built facility and the fire safety information provided under Regulation 38 of the Building Regulations (as amended). Where a discrepancy is found, full details should be assessed to ensure that it is not detrimental to building safety, remediated where necessary and recorded and, wherever practicable, the affected record(s) should be labelled "as subsequently altered".
37	9.5	Note	<i>NOTE Attention is drawn to The Regulatory Reform (Fire Safety) Order 2005 [19] relating to fire risk reduction and fire</i>	Comment:

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			<p><i>prevention and to BS 5839-1. Under The Regulatory Reform (Fire Safety) Order 2005 [19] and The Fire (Scotland) Act 2005 [22], those who have a degree of control over the premises (or certain areas on the premises) might be designated as the “responsible person”, for example, the owner, an agent, an employee or the occupier.</i></p>	<p>This responsibility is considered important enough to highlight and identify outside of a note at the end of the paragraph, albeit repeated, e.g. in clause 8.12.</p> <p>There should also be an addition to the text in relation to the imminent changes on duty holder responsibilities under the new Building Safety Regulator (BSR), e.g.:</p> <p>Attention is drawn to The Regulatory Reform (Fire Safety) Order 2005 [19] relating to fire risk reduction and fire prevention and to BS 5839-1. Under The Regulatory Reform (Fire Safety) Order 2005 [19] and The Fire (Scotland) Act 2005 [22], those who have a degree of control over the premises (or certain areas on the premises) might be designated as the “responsible person”, for example, the owner, an agent, an employee or the occupier. Attention is also drawn to those duty holders who will have responsibility under the imminent building safety bill as overseen by the new Building Safety Regulator.</p>