



# Fire Safety Policy (Housing)

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| <b>Policy Name</b>                  | Fire Safety Policy (Housing)   |
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## **2. Policy Objectives & Scope**

This document establishes the principles, responsibilities and obligations for Wigan Council Local Housing Authority and the working arrangements with Greater Manchester Fire and Rescue Service (GMFRS) to deliver all aspects of fire safety within its housing stock either owned or managed. Taking action to identify, manage and mitigate risks associated with fire in all-relevant areas of the varied portfolio of buildings it owns or manages.

There is a duty to ensure as far as reasonably practicable the safety of the people on Wigan Council premises and this forms part of the wider commitment by Wigan Council to drive an improved Health and Safety culture amongst all staff and contractors. This Policy provides the Framework for fire safety within which all Wigan Council staff and partners will operate to meet these obligations.

The Framework will seek to promote the efficient use of resource, review and inspection as required to give staff and contractors alike a measure of confidence that they are discharging their duty on behalf of Wigan Council under the respective legislation and regulation.

## **3. General Standards and Guidance**

The principal legislation applicable to this policy is The Regulatory Reform (Fire Safety) Order 2005 (The Order). The Order reforms the existing laws relating to fire safety.

The Order places duties on the “responsible person” (the Council) to ensure so far as it reasonably practicable, the safety of employees and non-employees by putting into place general fire precautions. The Fire Safety Order applies to all premises including workplaces and the common parts of all multi-occupied residential buildings. It requires responsible persons where necessary to take certain steps to ensure the safety of residents.

In addition, the Fire Safety (England) Regulations 2022 laid under article 24 of the Fire Safety Order 2005. These Regulations made under article 24 can impose requirements on responsible persons or others, including building owners and building managers, in relation to mitigating the risk to residents for specific premises. This became law in January 2023.

## **4. Additional Policy Direction**

The following documents set out additional direction for landlords in respect of fire safety, and whilst not statutory guidance or approved legislation, there are certain recommendations or proposals which are applicable to this policy:

- Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018).
- Building a Safer Future - Proposals for reform of the building safety regulatory system: A consultation (June 2019).
- Building Safety Act 2023
- Fire Safety Act 2022 (Section 156)

We must ensure we comply with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

#### **4.1 Legislation**

This policy also operates within the context of the following legislation:

- The Defective Premises Act 1972
- Health and Safety at Work Act 1974
- The Occupiers' Liability Act 1984
- Furniture and Furnishings (Fire) (Safety) Regulations 1988
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Gas Safety (Installation and Use) Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR)
- Housing Act 2004
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Building Regulations 2010: Approved Document B Fire Safety
- Homes (Fitness for Human Habitation) Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Electrical Equipment (Safety) Regulations 2016
- Data Protection Act 2018
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Social Housing (Regulation) Act 2023

## 4.2 Guidance

The principal guidance documents applicable to this policy are:

- Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing (Local Authorities Coordinators of Regulatory Services), August 2008.
- Fire safety in purpose-built blocks of flats. This guidance should be viewed as no longer comprehensive; the Home Office is currently working on a revised version but in the interim, it is continued to be made available as it contains relevant and useful information for purpose-built blocks of flats.
- Fire Safety in Specialised Housing (National Fire Chiefs Council), May 2017. This guidance covers sheltered schemes, supported schemes and extra care schemes.
- Housing Health and Safety Rating System Operating Guidance: Housing Act 2004 Guidance about inspections and assessment of hazards given under Section 9 (Ministry of Housing, Communities & Local Government), February 2006.
- Housing Health and Safety Rating System Operating Guidance: Addendum for the profile for the hazard of fire and in relation to cladding systems on high rise residential buildings (Ministry of Housing, Communities & Local Government), November 2018.
- Guidance to support a temporary change to a simultaneous evacuation strategy in purpose-built blocks of flats (National Fire Chiefs Council), fourth edition, August 2022.

## 4.3 Additional guidance and policy direction

The following documents set out clear direction for landlords in respect of fire safety, and whilst not statutory guidance or approved legislation, there are certain recommendations or proposals which are applicable to this policy:

- Fire Sector Federation – Approved Code of Practice: A National Framework for Fire Risk Assessor Competency (November 2020).
- Fire Sector Federation – A Guide to Choosing a Competent Fire Risk Assessor (Version 3, October 2020).
- Grenfell Tower Inquiry: phase 1 report. Volume 1 – 4 (October 2019).
- Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018).

## 5. Sanctions

Failure to discharge our responsibilities and obligations properly could lead to sanctions, including: prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; prosecution by the Fire and Rescue Service under the FSO; and via a regulatory notice judgement from the Regulator of Social Housing.

## 6. Obligations

Wigan Council is the 'responsible person' for the purposes of legislation laid down by the Building Safety Regulator, because we own and manage homes and buildings where residents and leaseholders live. Wigan Council has appointed a Principal Accountable Person (PAP) as is required by the Regulatory Reform (Fire Safety) Order 2005 (the Fire Safety Officer) in the Role of Building Safety Manager to oversee this responsibility on its behalf.

The PAP must ensure a fire risk assessment (FRA) for the purpose of identifying the general fire precautions and other measures needed to comply with the FSO is carried out on all premises which fall under the requirements as laid out in the FSO. Although under the FSO this requirement only applies to common parts of premises, in practice the PAP considers the entire premises, including units of residential accommodation.

The PAP must ensure process are in place to implement all necessary general fire precautions and any other necessary measures identified by an FRA.

The PAP must ensure a suitable system of maintenance is in place and only competent persons are used to implement any procedures that have been adopted.

The PAP must periodically review FRAs in a timescale appropriate to the premises and/or occupation fire risk level. This timescale is determined by the fire risk assessor carrying out the FRA and agreed with the PAP.

### **Fire Safety Act 2021**

*The Act amends the FSO by clarifying that in buildings with two or more sets of domestic premises, the FSO applies to:*

- *The structure and external walls of the building, including cladding, balconies and windows.*
- *All doors between the domestic premises and the common parts, for example, entrance doors to individual flats which open on to common parts.*

Wigan Council must ensure that FRAs comply with the criteria outlined above by appointing a competent person to review them (if the FRAs do not already comply). See Section 11 for competency requirements.

### **Fire Safety (England) Regulations 2022**

Wigan Council is required to carry out the following under these regulations:

- **All buildings with two or more sets of domestic premises:** provide residents with fire safety instructions and information on fire doors.
- **Buildings over 11 metres in height:** undertake quarterly checks of communal fire doors and annual checks of flat entrance doors.
- **Buildings over 18 metres in height:** provide the fire and rescue service with building plans and external wall information, install and maintain secure information boxes, install wayfinding signage and undertake checks on lifts for use by firefighters and other key pieces of firefighting equipment.

### **Building Safety Act 2022 – Section 156**

Section 156 of the Building Safety Act amends the FSO and requires Responsible Persons to do the following:

- Record FRAs in full and record fire safety arrangements.
- Record the name of the individual and/or organisation undertaking the FRA and share with residents.
- Identify other Responsible Persons/Accountable Persons and cooperate with them.
- Share relevant fire safety information with other Responsible Persons and residents.
- Provide residents with easy to understand, relevant fire safety information.

There will be an additional requirement to appoint a competent person to undertake and review FRAs which will come into force later, which may result in future changes to this policy.

## **7. Statement of Intent**

Wigan Council acknowledge and accept our responsibilities under the FSO as outlined in Section 5.

Each property requiring an FRA will have one in place which has been carried out by a competent fire risk assessor, and which is compliant with the British Standards Institution's PAS 79:2 specification.

All our FRAs have been reviewed/will be reviewed by a competent person to ensure they meet the requirements set out in the Fire Safety Act 2021 within three months of issue.

Fire evacuation strategies will be determined on a building-by-building basis and agreed with the Building Safety Team in accordance with the recommendations of the competent fire risk assessor.

All FRAs will be reviewed no later than the review date set within the most recent FRA for that building.

The FRA for a building will be reviewed in the event of:

- A fire
- Change in building use
- Change in working practices that may affect fire safety
- Following refurbishment works, or
- If required following an independent fire safety audit
- Changes in regulation or legislation.

We will operate robust processes to implement all mandatory fire precaution measures identified by the FRAs.

To comply with the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, which came into force on 1 October 2022, we will install, test and replace (as required) battery operated and/or hard-wired smoke alarms and carbon monoxide alarms as part of the annual gas safety check visit (or at void stage).

Personal Emergency Evacuation Plans (PEEPs) will be carried out by a competent person, reviewed annually, and made available to the Fire and Rescue Service in the event of an evacuation, as follows:

- For any disabled resident and/or employee within any building where we provide care services and are the employer (i.e. sheltered or supported housing schemes); and
- For any resident within a building where we have a responsibility for carrying out an FRA, where we have been notified that they are storing oxygen in their home for medical use.
- For any resident within a building where we have a responsibility for carrying out an FRA, where the resident has self-notified to us that they would require assistance in the event of a fire.

When letting properties, we will consider the suitability of the accommodation for the prospective resident in respect of fire safety.

If we are made aware that a customer has an issue with mobility or a cognitive impairment, a person-centred fire risk assessment (PCFRA) will be completed.

We are committed to working with Greater Manchester Fire and Rescue Service to create safer places to live and work. This joint working may include sharing information, having FRAs reviewed, and staff training.

We will ensure appropriate evacuation policies are in place across our blocks which are in accordance with the recommendations of the

competent fire risk assessor and any guidance from Greater Manchester Fire and Rescue Service. We will operate robust processes to gain access should any resident or leaseholder refuse access to carry out essential fire safety inspection and remediation works (as tested in the case Croydon Council v. Leaseholder 1st August 2014). The new Fire Safety Act 2021 will require us to check residential doors within our housing blocks.

We will operate robust processes to gain access to properties where resident vulnerability issues are known or identified (including hoarding), whilst ensuring we safeguard the wellbeing of the resident.

We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis and acceptable Permits to Work are granted before contractors enter our buildings.

We will operate a robust process to manage immediately dangerous situations identified during fire safety programmes.

We will adopt a sterile environment approach in all internal communal areas, requiring residents to remove combustible materials from corridors and fire escape routes. We will review approach to their sheltered & supported living schemes and confirm it with the Housing Management Team.

We will not permit the storage of mobility scooters within internal communal areas.

We will establish and maintain a risk assessment for fire safety management and operations, setting out our key fire safety risks and appropriate mitigations.

To comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be in place for all repairs work to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement and refurbishment works.

To comply with the requirements of the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002, we will consider the safety of our workplaces and plant/boiler rooms of our residential blocks.

We will operate robust processes to record and action any fire safety related 'near misses'. A 'near miss' is an unplanned event which does not result in an injury but had the potential to do so.

We will ensure the Mandatory Occurrence Report (MOR) database is available to the BSR as part of our safety case for all identified HRB.

We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to fire safety.

We will review all existing buildings to check whether any fall under the requirements of the Building Safety Act and ensure all High-Risk Buildings identified have an appropriate Safety Case.

## **8. High Risk Building Mitigation Programme**

As mitigation against the installation of sprinkler systems in our High-Rise Buildings which were not accepted by the residents under consultation in 2021, we work closely with GMFRS to ensure we can ensure we manage the risk in our High-Risk Buildings. To this end we have installed new Fire Alarm systems, Automatic Ventilation in stairwells, Emergency Voice Evacuation Systems and addressable Refuge points at each stairwell landing. We will replace every flat entrance Fire door and communal Fire Door to new standards and ensure Fire compartmentation across corridors and dry risers is appropriate and managed with the correct certification.

## **9. Inspection Programmes**

FRA's - We will ensure all our communal blocks and other properties (supported schemes/offices/shops/depots), that we own or manage, have an FRA in place where we have the legal obligation to do so.

Thereafter, we will maintain a programme of FRA reviews, in a timescale appropriate to the premises and/or occupation fire risk level. This timescale will be determined by the fire risk assessor carrying out the FRA (between one and three years) with all high-rise blocks on an annual programme.

All FRA's will be Type 3 surveys. Type 2 and Type 4 surveys will only be commissioned where it is deemed appropriate for a particular property.

We will ensure that a pre-occupation FRA is carried out on all new build schemes or new acquisitions where we have an obligation to do so, followed by a post-occupation FRA, once the tenant has occupied the building.

Properties will have a fire risk assessment carried out in the event of a change of use of a building.

Properties managed by others – We will obtain FRA's where our properties are managed by a third party. If the third party does not provide the FRA, we will carry out the FRA and re-charge them for the cost of this work.

Fire door audits - We will undertake a six-monthly audit of all communal fire doors, and an annual audit of 25 per cent sample of flat entrance doors. This sample will increase if issues are found on the initial sample.

Servicing - We will carry out a programme of servicing, maintenance and testing, in accordance with all relevant British Standards and manufacturer's recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings we own or manage.

Regular inspections – We will carry out a programme of regular inspections to all blocks with a fire risk assessment in place to audit that all required management actions are taking place.

### **10. Follow up Work**

We will ensure robust processes are in place to implement all mandatory fire precaution measures identified by FRAs, in accordance with the following priorities and timescales:

- Intolerable risk – within 1 week
- High risk – within 4 weeks.
- Medium risk – within 12 weeks.
- Low risk – within six months or delivered as part of a planned programme within 12 months.

As agreed with our current FRA contractor Wigan Council will use the date the FRA is received from the fire risk assessor, to ensure it has been through a validation process, as our timeframe to start completing FRA actions.

We will ensure there is a robust process in place to manage follow-up works arising from fire door audits, and servicing and maintenance checks to fire systems and equipment.

### **11. Data Record and Asset Keeping**

We will maintain a core asset register of all properties we own or manage on Cloud C365 software, setting out which properties require an FRA. We will also set out which properties require fire safety servicing and maintenance regimes (for example, fire alarms, emergency lighting and smoke/heat detection) this information will all be kept digitally within Cloud C365 for each property.

We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not

omitted from fire safety programmes and the programme remains up to date.

We will keep fire safety logbooks securely on site where practical, for all properties on the FRA programme.

We will complete fortnightly checks on communal areas, which will be manually logged by the care taking team, scheme managers and recorded in the Fire Log.

We will keep all records for at least two years and have robust processes and controls in place to maintain appropriate levels of security for all fire safety related data.

## **12. Key Roles and Responsibilities**

Wigan Council has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, Wigan Council will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).

For assurance that this policy is operating effectively in practice, Wigan Council will receive regular updates on its implementation, fire safety performance and non-compliance.

The Senior Leadership Team within the Place Directorate will receive monthly performance reports in respect of fire safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.

The Assistant Director, Property and Assets has strategic responsibility for the management of fire safety and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.

The Statutory Compliance Manager has operational responsibility for the management of fire safety and will be responsible for overseeing the delivery of these programmes.

The Building Safety Manager is the Responsible Person and has contract management responsibility and will be responsible for overseeing the delivery of the fire safety programmes.

Housing Teams will provide support where gaining access to properties is difficult.

Under the requirements of the Social Housing (Regulation) Act 2023 we have appointed a Senior Health and Safety Consultant as our Health and Safety Lead.

### **13. Competent Person**

The Building Safety Officer/Senior Building Safety Officer will hold the NEBOSH Certificate in Fire Safety (or equivalent). If they do not have this already, they will obtain it within 12 months of the approval of this policy.

Only suitably competent contractors, fire risk assessors and fire engineers will undertake FRAs or works to fire safety equipment, systems and installations. These must be certified by FIRAS/BAFE or equivalent and on a UKAS accredited certification scheme that meets the competency criteria established by the Fire Risk Assessment Competency Council.

Only suitably competent fire safety consultants and contractors will provide third party technical quality assurance checks.

All contractor checks will be undertaken during procurement and then on an annual basis and evidenced appropriately.

### **14. Training**

We will deliver training on this policy and the procedures that support it, including team briefings; basic fire safety awareness training; and on the job training for those delivering the programme of FRAs and other fire safety programmes, planned maintenance and repairs works as part of their daily job. All training undertaken by staff will be formally recorded.

### **15. Performance Reporting**

We will report robust measures for fire safety. These will be provided to the Leadership Team and to the regulator monthly and to the Cabinet quarterly. As a minimum, we will report:

Data – the total number of:

- Properties – communal blocks and other properties
- Properties on the FRA programme
- Properties with a valid and in date FRA
- Properties without a valid and in date FRA
- Completed, in-time and overdue actions arising from the programme (split by priority).

Narrative - an explanation of the:

- Current position

- Corrective action required
- Anticipated impact of corrective action; and
- Progress with completion of follow-up works.

In addition:

- Compliance with the fire safety equipment, systems and installations servicing and maintenance programme.
- The number of RIDDOR notifications to the HSE with regards to fire safety.
- Details of any enforcement notices from the Fire and Rescue Service or other enforcement bodies.
- Recording and reporting on property fires to identify trends and target awareness campaigns.

## **16. Quality Assurance**

We will ensure there is a programme of external quality assurance audits of FRAs (field and desktop), on a five per cent sample basis.

We will internally review 100 per cent of FRA actions.

We will carry out property inspections to properties with an FRA to audit that the required management actions have been completed, across the portfolio looking to achieve 100 per cent coverage of all properties within any three-year period.

We will only allow certified contractors to carry out FRA actions related to building fabric work and all works will require certification to be submitted for inspection upon completion.

## **17. Non-Compliance**

Our definition of non-compliance is, any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred or becoming aware of it.

Any non-compliance issue identified at an operational level will be formally reported to the Assistant Director of property & Assets in the first instance, who will agree an appropriate course of corrective action with the Building Safety Manager and report details of the same to the Leadership Team.

In cases of serious non-compliance, Leadership Team and Cabinet will consider whether it is necessary to disclose the issue to the Regulator of

Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

### **18. Resident Engagement**

We consider good communication essential in the effective delivery of fire safety programmes, therefore we will establish a resident engagement strategy and communication programme. This will support residents in their understanding of fire safety, advise them of how they can keep themselves and other residents safe, and encourage them to report any fire safety concerns.

We also aim to successfully engage with vulnerable and hard to reach residents. We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on electronic boards in our HRBs.

We will also aim to provide residents of HRBs with a Fire Safety Booklet and a full version of the FRA will also be made available upon request.

## 19. Glossary

This glossary defines key terms used throughout this policy:

**BAFE:** Is the independent register of quality fire safety service providers, who are certified to ensure quality and competence to help meet fire safety obligations.

**BSR:** Building Safety Regulator under the Health and Safety Executive

**FIRAS:** FIRAS is a voluntary, third party certification scheme for installation contractors of both passive and active fire protection systems, operated by Warrington fire and accredited by UKAS to BS EN ISO/IEC 17065:2012

**FRA:** A fire risk assessment is an assessment involving the systematic evaluation of the factors that determine the hazard from fire, the likelihood that there will be a fire and the consequences if one were to occur.

**FRA survey:** The FSO states that an FRA is required, however, it does not prescribe how intrusive or destructive this should be. There are four types of FRA:

- Type 1 – common parts only (non-destructive), basic level to satisfy the FSO.
- Type 2 – common parts only (destructive), element of destruction on sample basis.
- Type 3 – common parts and flats (non-destructive), considers means of escape and fire detection within at least a sample of flats.
- Type 4 – common parts and flats (destructive).

**FSO:** Regulatory Reform (Fire Safety) Order 2005.

**IFSM:** The Institute of Fire Safety Managers.

**NEBOSH:** The National Examination Board in Occupational Safety and Health

**PAP:** Principal Accountable Person as defined in the Building Safety Act 2023

**PAS79 2:** A publicly available specification published by the British Standards Institution which focuses on making sure that all the required information that pertains to both an FRA and its findings are recorded.

**PEEP:** A personal emergency evacuation plan is a bespoke escape plan for individuals who may not be able to reach an ultimate place of safety unaided or within a satisfactory period of time in the event of any emergency.

**UKAS:** The National Accreditation Body for the United Kingdom, appointed by government to assess and accredit organisations that provide services including certification, testing, inspection and calibration.