



**Northern Ireland
Fire & Rescue Service**



Our Ref: KO'N/SIM/ETS/14720

25 March 2013

Mr G Houston
Chief Executive
RQIA
9th Floor Riverside Tower
5 Lanyon Place
Belfast
BT1 3BT

Dear Mr Houston

RE: - AUDIT INSPECTIONS BY NORTHERN IRELAND FIRE & RESCUE SERVICE OF REGISTERED RESIDENTIAL CARE HOMES AND REGISTERED NURSING HOMES

I refer to the above and to meetings that Northern Ireland Fire & Rescue Service (NIFRS) has had with RQIA on 3 May 2012 and 17 August 2012, with Health Estates on 9 May 2012 and with both RQIA and Health Estates on 18 October 2012.

Following on from these meetings and the discussions that we have had regarding the current drafting of the Northern Ireland version of the CLG guidance 'Fire Safety Risk Assessment - Residential Care Premises,' NIFRS feels that it is important to clarify its expectations in respect of auditing registered residential care homes and registered nursing homes within Northern Ireland and specifically in relation to the issue of the provision of self-closing devices on bedroom doors.

The current CLG guidance which is freely available to the public on the NIFRS website sets out guidance for owners and relevant persons of registered residential care homes and registered nursing homes on the standard of fire safety that they need to satisfy in order to be deemed to be compliant with both The Fire & Rescue Services (Northern Ireland) Order 2006 and The Fire Safety Regulations (Northern Ireland) 2010.

NIFRS intends to carry out audit inspections of registered residential care homes and registered nursing homes in line with the guidance given in the current CLG guidance in respect to self-closing doors, ie, except where otherwise demonstrated by your fire risk assessment, *each bedroom should be separated from an adjoining hall/corridor by a 30-minute fire-resisting construction. Doors should be of a similar fire-resisting standard, and be self-closing.*

[CLG guidance, p 73]

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The current CLG guidance explains further that *'all corridors that serve sleeping accommodation should be of 30-minutes fire-resisting standard and fitted with self-closing devices.'*

[CLG guidance, p 85]

NIFRS wishes to confirm that based on the above guidance, the expectation will be that all doors on corridors that serve sleeping accommodation (in both existing and new registered residential care homes and registered nursing homes) will be of 30-minutes fire-resisting standard and fitted with self-closing devices. Doors to corridors that serve sleeping accommodation which contain cupboards, service ducts and any vertical shafts linking floors are also required to be of 30-minutes fire-resisting standard and marked 'Fire door – keep locked shut when not in use.'

NIFRS notes that the emphasis of our audit inspections is at variance with the current guidance given in NIHTM 84 in respect to existing residential care premises. NIHTM 84 states that *'In existing premises the need to install suitable automatic self-closing devices including where appropriate 'swing free' arms activated by the operation of the fire detection and alarm system should be continually reviewed as part of the fire safety management arrangements, having regard to the fire risk at all times.'*

[NIHTM 84, p 27]

In essence, the current CLG guidance for Residential Care Premises implies an expectation that self-closing devices will be in place on all doors on corridors that serve sleeping accommodation but that these can be removed if justified by the fire risk assessment whereas NIHTM 84 implies that the bedroom doors do not have self-closing devices fitted and that they only need to be installed when dictated by the fire risk assessment.

Applying the CLG guidance standard to NIFRS' audit inspection programme for registered residential care homes and registered nursing homes, our inspecting officers, in the absence of self-closing devices on all doors on corridors that serve sleeping accommodation being present, will ask to see the significant findings from the fire risk assessment to establish how the owner/relevant person has justified their absence. Where no reference has been made to the absence of self-closing devices in the fire risk assessment, inspecting officers will indicate it as a contravention of the legislation and record it as a deficiency to be addressed by the owner/relevant person.

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Where reference has been made to the absence of self-closing devices on all doors on corridors that serve sleeping accommodation in the fire risk assessment, inspecting officers will note the justification for this absence and, if satisfied, will indicate this finding in the audit. However, if the inspecting officer is not satisfied by the justification offered, they will once again note it as a contravention of the legislation and record it as a deficiency to be addressed by the owner/relevant person.

NIFRS notes that in considering the type of self-closing device that should be fitted, it is important that the owner/relevant person takes into account (in their fire risk assessment for the premises) all the relevant factors relating to the occupants who may have to escape through the door which has the self-closing device fitted. Although not directly related to fire safety, factors such as finger trapping/crushing, points of ligature, etc, should be considered. The CLG guide for Residential Homes gives advice on how to comply with the legislation stating that '*Self-closing doors (particularly in corridors) may be an obstacle to the residents during the daily, normal, use of your home. To avoid the risk of doors being wedged open you may wish to install controlled door closing devices with an electromagnetic 'hold open' function which allow the door to close when the fire alarm actuates. Where fitted such doors should be closed at night.*'

[CLG guidance, p 85]

NIFRS notes the ethos in NIHTM 84 that residents in registered residential care homes and registered nursing homes should not be 'room-bound' due to the presence of a self-closing device on the bedroom door. In order to accommodate this, NIFRS has no objections to door closing devices with an electromagnetic 'hold open' function being installed on bedroom doors, preferably linked to the fire alarm system but 'dorgard' type hold open devices will also be deemed acceptable subject to a suitable fire risk assessment. However, to ensure that all residents have an equal chance of escape in the event of fire and can do so safely, if unaided – especially if they are in the room of origin, the fire risk assessment must examine whether the occupant has the capacity to open a closed door which has a self-closing device fitted. Where the occupant of a room does not have the capacity to open a door that has been closed by a self-closing device, then the fire risk assessment should reflect this fact and either recommend the provision of an automatic self-closing device with a 'swing free' arm activated by the operation of the fire detection and alarm system or come up with an alternative method, eg, a management solution that ensures compliance with the legislation.

Technology around the design of door closers has changed substantially over the last 20 years. Doors with swing free 'self-closing' devices fitted can open and operate normally under non-fire conditions yet close automatically in the event of a fire alarm only to be able to be opened again as a normal door (without resistance) to allow an occupant to pass freely through the door before the self-closer on the door is automatically reactivated once the door has been opened passed a certain point, eg, 60°. Whether a swing-free self-closing device is needed on a door opening onto a corridor that serves sleeping accommodation will depend on an assessment of

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the ability of the occupant to overcome a 'standard' self-closing device and needs to be recorded in the fire risk assessment.

Finally, in relation to self-closing devices on door sets where the door set is in the form of a full-size door and a ½ size 'leaf' door, whilst the requirement is for all doors to be self-closing, the expectation is that the self-closing requirement will, in the main, apply to the full-size door only and not the ½ size 'leaf' door which will generally be 'locked' into position when not in use (and marked 'Fire door – keep locked shut when not in use) - similar to the guidance for cupboards and service ducts on bedroom corridors listed above, unless the fire risk assessment specifies that a self-closing device is needed on the ½ size 'leaf' door. All double door sets will require a self-closing device fitted to each individual door.

NIFRS recognises that this may have a large financial impact on some providers of registered residential care homes and registered nursing homes and will be sympathetic in the time-scales associated with the implementation of this provision.

NIFRS will be issuing guidelines to all of its Inspecting Officers with regard to its expectation that all doors on corridors that serve sleeping accommodation in both existing and new Residential Care premises will be of 30-minutes fire-resisting standard and fitted with self-closing devices (except where specified above) with an effective implementation date of 12 January 2013 and consequently requests that you circulate the NIFRS position in respect of how it plans to implement the auditing of this aspect of fire safety throughout the registered residential care homes and registered nursing homes community.

Should you require any further information or advice, please contact Group Commander Kevin O'Neill at Fire & Rescue Service Headquarters.

Yours sincerely



Dale Ashford
Assistant Chief Fire Officer
[Director of Safety Services]