



## **Fire Safety in Schools Post-Grenfell Fire**

**Joint Guidance to School Leaders from the National Education Union (NEU), National Association of Headteachers (NAHT) and the Association of School and College Leaders (ASCL) and endorsed by the Fire Brigades Union (FBU)**

### **Introduction**

The appalling fire at Grenfell Tower in June 2017 brought into sharp focus wider questions about fire safety, including in the education sector, and has led the Department for Education (DfE) and Welsh Government to take certain steps to ascertain whether schools could be at risk. The fire that occurred at Grenfell Tower on 14<sup>th</sup> June 2017 was devastating as it was primarily because of the cladding system that had been applied to its external walls.

This has understandably caused widespread concern in the education sector because many school buildings have cladding systems applied to their external walls. People who use these buildings, and people whose children use these buildings, want to be reassured that they are not exposed to a similar fire risk.

It is important to emphasise that the Grenfell Tower fire occurred in the middle of the night in a building without a common fire alarm system. In contrast school buildings are occupied during the day, have a common fire alarm system and, unlike in tower blocks, practice evacuation procedures. A tower block may be constructed with only one staircase whereas only the smallest school building would be allowed to be built with only one escape staircase. While the risks may be lower, a fire involving combustible cladding on the outside of a school has the potential to cause harm and so the threat must be taken seriously. Now is a good time for schools to consider fire safety issues more broadly and to revisit fire risk assessments in the light of what happened at Grenfell Tower. Expert advice we have received from the Fire Brigade Union (FBU) is that the best response of all schools should be to focus on ensuring that there is good fire risk management, delivered by way of a suitable and sufficient fire risk assessment carried out by a competent person

The purpose of this document is to:

- set out what action DfE, and Welsh Government, have taken and which schools are affected; and
- offer guidance in the form of a Q&A to help school leaders respond to concerns from staff and parents and most importantly to ensure that children and staff are kept safe.

## Background

Concerns, expressed by a number of organisations including teaching unions and fire safety organisations, about fire safety in schools pre- date the Grenfell Tower disaster.

The publication of *Building Bulletin 100: Design for Fire Safety in Schools* in 2007 was a landmark in improving fire safety in schools, setting out what school design teams should do to protect lives as well as the fabric of buildings. In the summer of 2016, however, the DfE conducted a short consultation on a revised version of this Bulletin, proposing to weaken many of the provisions (the Welsh Government did not undertake such a consultation).

The revised draft:

- was 60 pages shorter than the original;
- removed guidance and tools for conducting risk assessments;
- removed wording discouraging the use of combustible cladding;
- deleted wording about the 'expectation' that sprinklers will be fitted in nearly all new schools; and
- included new guidance on compartmentation, permitting an increase in size of a fire compartment in un-sprinklered schools from 800m<sup>2</sup> to 2000m<sup>2</sup> .

The NUT and Fire Brigades Union (FBU) responded to the consultation strongly condemning the proposals. Despite this, the DfE announced, via its website, at the end of August 2016 that the revised Bulletin was in place. In the event of a fire, the proposed changes would, if implemented, have significantly increased the risk to the safety of school users and to those firefighters who would enter a building to carry out a rescue or extinguish the fire. An outcry from the unions, including the FBU, some MPs and other organisations with an interest in fire safety, forced a re-think; however six months later, at the time of the Grenfell Fire, there had been no definitive announcement from the Government on whether they would proceed with the weakened version or retain the existing provisions.

After the Grenfell fire, and following reports in the press in June 2017 suggesting that the Westminster Government would not proceed with the weakened Building Bulletin, confirmation was finally received from the Secretary of State at the end of July 2017 that the 2007 Building Bulletin remains in place. Concerns remain, however, that some of its provisions, particularly in relation to sprinkler installation in new school buildings, have not been followed in the way that was intended in 2007 when it was first published.

## Steps to Identify Combustible Cladding on School Buildings

Given the widespread concerns about the role of the cladding on Grenfell Tower in helping the fire to spread, the issue of cladding on school buildings quickly became an issue of concern following the fire.

On 23 June 2017 the DfE, through the Education and Skills Funding Agency, contacted all 'responsible bodies' for fire safety in schools, attaching a survey, for return by 30 June. A similar process was undertaken in Wales. In some cases the responsible body, eg the LA or academy trust, responded on behalf of all its schools, in other cases, the survey was circulated to individual schools by the responsible body. The survey asked whether schools have buildings of

18 metres or higher, or at least four storeys, if the exact height was not known; or if the school provided overnight accommodation. If schools were in one of these categories, they were asked whether the school had external cladding, and if so what material the cladding was made from. One option listed was the material of concern – Aluminium Composite Material (ACM). The survey required responsible bodies to self-report, there has been no programme of inspection of all schools. **Where school leaders are aware that any of their school buildings are at least 18 metres high, or four storeys, or used for overnight accommodation, and potentially clad in ACM material, and there has been no contact with the DfE, or Welsh Government, they should contact their responsible body as a matter of urgency.**

Where, according to survey responses, cladding on school buildings was suspected to contain this material, affected schools were asked enter the 'testing and inspection' process, but only if the school building was 18 metres or higher (and/or the cladding was fitted on overnight accommodation for pupils).

Samples of the cladding were then sent for testing by the Building Research Establishment, the recognised experts in this field. There is nothing to suggest that all types of ACM are dangerous but it is important that combustible types are not used.

The DfE has advised that two schools failed these tests and both have been inspected by the Fire and Rescue Service who confirmed that appropriate measures were in place to mitigate the risks and that the buildings were safe for continued use. The checks covered 77,000 school buildings, but survey respondents were only asked further questions about the use of cladding where the responsible body indicated the school was four storeys/18 metres or higher. The survey was not compulsory but 99 per cent of responsible bodies had responded as of end of August 2017. The DfE has confirmed that all non-responders will be chased up. No schools in Wales failed the tests. **Where school leaders have not yet responded to the survey (in cases where the responsible body has circulated the survey to individual schools), NEU, NAHT and ASCL would urge that the survey be completed as soon as possible.**

The unions have raised concerns with the DfE that only schools 18 metres or higher, with ACM cladding, were included in the testing process. Even in buildings where other fire precautions are well-maintained and which are not used for overnight accommodation, understanding the type of the cladding on a particular building and the extent of its combustibility will help inform the risk assessment and property protection process.

Although high rise buildings, including residential flats, hospitals and schools, pose the greatest risk, once this problem has been contained, the NEU, NAHT and ASCL believe that all schools, regardless of height, should be inspected to ascertain whether the cladding (whether ACM or another material) might pose a danger, and that schools with SEN pupils should be prioritised. However, the DfE has confirmed that, in accordance with advice from the DCLG, they have no plans at the current time to check schools with buildings under 18 metres high. The FBU has set out that in buildings up to 18 metres high, fires can be fought from the outside with hoses and ladders, which does provide some reassurance.

## **Questions which school leaders may have about the cladding and other fire safety issues and questions that may be asked by parents and staff**

### **My school was not asked to complete the DfE survey. What action should I take?**

If you haven't heard anything, it is likely that liaison took place between the DfE/Welsh Government and your local authority, academy trust or diocese (as the 'responsible body') so please check with your responsible body in the first instance whether that happened. If your school has buildings fitted with Aluminium Composite Material Cladding but those buildings are less than 18 metres, or four storeys, high, or not used for overnight accommodation, your school will not have been included in the programme. If, however, your school has buildings which are 18 metres high or more, or are used for overnight accommodation, and are known or suspected to be fitted with Aluminium Composite Material Cladding, then such buildings will need to be checked. If you are unable to obtain advice from the LA, academy trust or diocese then contact the DfE direct at [FireSafety.EFACAPITAL@education.gov.uk](mailto:FireSafety.EFACAPITAL@education.gov.uk).

### **My school has no buildings over 18 metres (or four storeys) high. Does this mean that I need take no action?**

Your school does not meet the criteria to participate in the DfE/Welsh Government cladding check programme. NEU, ASCL and NAHT, however, are urging the DfE and Welsh Government to conduct a full survey of the school estate to establish and log all school buildings clad in Aluminium Composite Material, or similar materials that may be, to a greater or lesser extent, combustible. Currently, however, there are no plans to do so. In the interim our advice is that if you, your staff or parents have concerns, it would be prudent to review the fire risk assessment for your school.

### **How can I find a competent fire risk assessor?**

The Fire Sector Federation is an organisation that encompasses the whole fire industry. Part of the Fire Sector Federation is the *Fire Risk Assessment Competency Council*.

The Fire Risk Assessment Competency Council is a collection of fire safety experts who together created a generic competency standard for fire risk assessors. A number of third party accreditation organisations have picked up this standard and they register fire risk assessors who meet its requirements.

The Fire Risk Assessment Competency Council has published a document called '*A guide to choosing a competent fire risk assessor*' that signposts users toward these third party accreditation organisations. The guide can be found here and the FBU recommends its use:

<http://firesectorfederation.co.uk/update/resources/choosing-a-competent-fra-ver-2-1.pdf>

### **Shouldn't other types of cladding be tested?**

The NEU, NAHT and ASCL believe it would be prudent, once issues in high rise and residential buildings have been addressed, to conduct a survey of all school buildings to determine whether any other sort of cladding has been inappropriately used in their construction. The presence of combustible cladding on a school building may have ramifications for the existing fire evacuation procedures. For example, it may be prudent to relocate an evacuation assembly area further away from a particular building that is clad with such a material, even when such a building is low rise, or to consider the safety of existing evacuation routes. Because the DfE, in following advice from the DCLG (which acts on advice from its Independent Expert Advisory Panel), has no plans

to survey or investigate other types of cladding, either on schools at least 18 metres in height, or below, as set out above, schools may wish to check that their fire risk assessment is up-to-date. The situation in Wales is the same. Such action would be likely to help allay concerns from staff and parents. See advice above on finding a competent fire risk assessor.

### **What about independent schools?**

The current initiative is only in relation to the public sector estate in England. Sixth form colleges and FE colleges were included in a separate survey. Independent schools were not included in the DfE survey but received a letter from the DfE advising that they are able to send samples of ACM cladding for testing by the BRE, where it is on buildings of 18 metres or higher, or overnight accommodation for pupils; school leaders should seek expert advice from their fire risk assessor if they suspect their school has buildings clad in ACM materials that are used for residential accommodation, or are over 18 metres (four storeys) in height. There is of course nothing to stop advice being sought from fire risk assessors even where these precise criteria are not met, and this would be prudent. In Wales FE colleges were included in the survey and assurances were also sought from independent schools.

### **What about removal of cladding?**

Because the cladding checks were limited to the circumstances described above, there may, understandably, be questions from parents and staff about the nature of the cladding on their school building and to what extent, if any, it poses a risk and whether it should be removed. Again, this is an issue best addressed by a competent risk assessor and is a reason why a revised risk assessment would be helpful, in light of the Grenfell Tower fire. Staff and parents may have legitimate concerns if a school building has been clad in a material that makes it more likely to burn, unless they can be satisfied that expert advice has confirmed that other mitigating steps, for example a sprinkler system, are in place

### **My school contains asbestos. Is it possible that checks on cladding could disturb it?**

This is a very pertinent issue since nearly 90 per cent of schools contain asbestos. Checks on cladding may disturb in situ asbestos, potentially exposing both those performing the work and any staff or pupils in the vicinity. Some schools may not be well placed to manage contractors conducting invasive installations or investigations. It is critical that contractors are made aware of known asbestos in a school, and can recognise asbestos that may not be recorded.

Some schools may be considering the installation of extra protective systems, particularly sprinklers. This is an excellent idea but it is essential that work is performed safely and without exposing contractors, staff and pupils to asbestos materials that may be present. Rachel Reeves MP, who chairs the Asbestos in Schools Group, has written to Education Secretary, Justine Greening, urging her to ensure that the specifications for this work make full and thorough provision for the risk of disturbing asbestos in any school where works may take place. The letter is available online at <http://www.juac.org.uk/rachel-reeves-mp-writes-to-the-secretary-of-state-regarding-the-asbestos-implications-of-fire-safety-checks-on-schools/>.

The NEU, NAHT and ASCL, along with the other teaching and support staff unions are members of the Joint Union Asbestos Committee which campaigns for improved asbestos management in schools. More information and guidance on managing asbestos in your premises is available on the JUAC website at <http://www.juac.org.uk/>. DfE guidance on managing asbestos in schools is here <https://www.gov.uk/government/publications/asbestos-management-in-schools--2>.

## **How should information be shared with parents and staff?**

NEU, NAHT and ASCL advocate a policy of total openness and transparency. Staff briefings and meetings for parents will help reassure the school community once school leaders have all the facts at their disposal.

It is suggested that school leaders be mindful of the terminology used when addressing staff and parents. The DfE refers to cladding that is to some extent combustible as being '*not of limited combustibility*'. The unions have pointed out that adding a negative to the phrase 'limited combustibility' makes it opaque and confusing. 'Limited combustibility' is a technical term used in Approved Document B to the Building Regulations. The term 'limited combustibility' was coined to describe plasterboard. When exposed to fire, the tin paper face of plasterboard burns a little (so it cannot be described as 'non-combustible'), but the burning is only very slight and in general, plasterboard actually provides good protection against fire spread (so it would be wrong to describe it as 'combustible'). In essence, a building material of 'limited combustibility' is one that displays the burning characteristics of plasterboard.

Certain ACM materials do not provide this protection against the spread of fire. They are therefore described as not having properties that inhibit the spread of fire, hence the term 'not of limited combustibility'. This is confusing to the general reader, so in the event that a school has ACM cladding of this type we suggest that this is explained to staff and parents, alongside the fire protection systems that mitigate the spread of fire.

Also please remember to consult with trade union health and safety representatives, as this is not only good practice but is required under the Safety Representatives and Safety Committees Regulations 1977, known as the Brown Book.