

LONDON BOROUGH OF CAMDEN	WARDS: ALL
REPORT TITLE: BS9997: Fire risk management system audit	
REPORT OF DIRECTOR OF PROPERTY MANAGEMENT	
FOR SUBMISSION TO: Housing & Fire Safety Advisory Panel	DATE: 22 October 2024
<p>SUMMARY OF REPORT In 2023/24 the Council commissioned an independent audit of the Camden's arrangements for fire risk management against the BSI Fire Risk Management System BS9997 criteria as part of the oversight and delivery of the Resident Safety Programme. This report sets out the findings of the Audit and actions the Council will be taking in response.</p> <p>Local Government Act 1972 – Access to Information No document that require listing have been used in the preparation of this report</p> <p>Contact Officer: Michal Jankowski, Head of Resident & Building Safety Email Michal.jankowski@camden.gov.uk</p>	
<p>RECOMMENDATIONS</p> <p>That the Panel note the findings of the Audit report.</p>	

Signed:



Director of Property Management

Date: 10th October 2024

1. Purpose of Report

- 1.1 In 2023/24 the Council commissioned an independent audit of the Camden's arrangements for fire risk management against the BSI Fire Risk Management System BS9997 criteria as part of the oversight and delivery of the Resident Safety Programme.
- 1.2 The Resident Safety Programme is designed to deliver compliance with fire and building safety regulation and implementation of BS9997 is also referenced in the 2023 Voluntary Undertaking on fire risk actions, which the Council entered into with the Regulator of Social Housing.
- 1.3 This report sets out the findings of the Audit and actions the Council will be taking in response.

2.0 BS9997 independent audit

- 2.1 The commission for the independent audit of the Council's fire safety management system was to review systems and practice against British Standards Institute best practice accreditation criteria (BS9997).
- 2.2 BS9997 is the British Standards Institute criteria set for the audit and certification of enhanced fire safety management systems. It is designed to improve accountability and help create an audit trail, ensuring that the management of all stages of fire risk management (FRM) can be tracked through robust change control processes.
- 2.3 The level of the FRM system (i.e., the extent of documentation and resources devoted to it) depends on factors such as the scope of the system, the size of the organization, the nature of its activities and services, and organizational culture. The approach can be applied to an organization operating on multiple sites with separate management divisions and also to individual premises within a single organization.
- 2.4 An FRM based on BS9997 refers to the need for fire safety management throughout the life of a building starting from design and construction through to occupation stages.
- 2.5 A formalised FRM system can define, document, implement and maintain procedures to ensure that an adequate level of fire safety information is developed and retained for the lifecycle of a building.
- 2.6 The BS9997 applies the "Plan Do Check Act" principles to implementation and improvement of the FRA system and is based on continuous review of the effectiveness of the system and constant enhancement of its components.

3.0 Audit Findings

- 3.1 The Audit found that:
 - The Council has an extensive Fire Safety Management System in place.

- That there is a clearly stated Fire Risk Management (FRM) policy setting out Camden's understanding of how to comply with the requirements of the Regulatory Reform (Fire Safety) Order: 2005 & associated legislation.
 - There is clear leadership from the Corporate Management Team.
 - Staff throughout the Council have a sound appreciation of the need for fire safety management and how it affects their own job roles.
- 3.2 The findings are largely consistent with the requirements of the BS9997 standard and this is a strong indication that Camden Council has based its FRM system on the key principles outlined in the standard.
- 3.3 The Audit identified four '*non-conformities*' against BS9997 criteria these are:
1. LBC's management of fire safety places the residents voice at the heart of this process, however LBC's work on capturing the residents voice for fire safety has no specific route to capture this for disabled people. The Council should develop this on borough-wide basis in addition to making provision on a case-by-case basis.
 2. The current Fire Policy primarily covers residential buildings; in practice other building types are included within the FRA program but the policy does not adequately cover this and should be revised. The policy should cover the requirements to review FRA's carried out by third parties in buildings where they may present a risk to a LBC building, such as a shop that is part of a residential building.
 3. The Fire Policy does not set out a description of the fire safety management organisation across the whole Council. Differing aspects of fire safety management rest with differing teams. This should be described in the fire safety management document as well as the roles of the various LBC committees and Boards involved in fire safety management.
 4. The Policy should be developed and implemented to ensure that people engaged in fire safety work are competent and that this is clearly specified when using sub-contractors. Where internal staff need to demonstrate competence an internal system of assurance should be developed.
- 3.4 The auditors also identified two '*opportunities for improvement*', which are not a requirement of BS9997 accreditation but which they recommend that the Council also implement:
- Opportunity For Improvement 1.** The maintenance of fire safety systems should be strengthened by easily accessible validation that planned maintenance had been completed correctly.

Opportunity For Improvement 2. LBC is establishing a process for managing the golden thread of information that is seen as vital to manage risk in the built environment. The focus from Regulators has been for new and existing High-Rise Residential Buildings (HRRB); the Council should explore taking the opportunity to extend this principle (the golden thread of information) to all buildings which would then act as a single source of truth for the built environment.

4.0 Regulator of Social Housing Voluntary Undertaking

4.1 The audit is referenced in the Voluntary Undertaking with the Regulator of Social Housing (RSH) which was developed following the Regulatory Notice issued in July 2023. The Notice made clear that the Council needs to build on the work it has already carried out and become more effective in the delivery of fire actions, noting this required significant support across a range of service areas.

4.2 With the monthly progress reporting in place, alongside the additional governance arrangements, we are closely tracking the completion of all overdue FRA actions. It is expected that all remaining overdue actions will be completed by December 2025.

5.0 Next Steps

5.1 The Council will implement an action plan to put in place an updated FRM system which is aligned with BS9997 and addresses the recommendations of the audit, with a particular focus on:

- continued proactive work to identify vulnerable residents across high-rise buildings and ensure such residents are given a voice with regards to fire safety matters. Once successfully implemented this approach will be rolled out to the other Council homes across Camden.
- as part of enhancing the FRM system and its policies, the scope of the system will be revised to ensure it fully incorporates all types of buildings, such as commercial or non-residential uses within the housing portfolio.
- the fire safety policy will be updated to fully reflect the current operational and governance framework in Camden
- a competency framework for both internal and external staff and contractors operating within the FRM system environment will be established. It must be noted that all staff working in the Fire Safety Team, the Building Safety team and the Council's fire risk assessing consultants are already subject to a competency framework.

5.2 The action plan and progress will be reported to the Panel. Implementation of BS9997 will also support the Council's work on its Building Safety Cases and adherence to the Regulator's consumer standards.

6.0 Finance Comments of the Executive Director Corporate Services

6.1 The report sets out the findings of the Audit and actions the Council will be taking in response to independent audit of Camden's arrangements for fire risk management.

6.2 Once the workstreams described in 5.1 and 5.2 have been developed further, the resource impact of recommendations will be considered in the updates reported.

7.0 Legal Comments of the Borough Solicitor

7.1 The Borough Solicitor has been consulted and has no comments to add.

8. Environmental Implications

8.1 The proposals have no environmental impacts.

REPORT ENDS