

# Response ID ANON-JG9U-76HM-1

Submitted to **Practical Fire Safety Guidance for Existing Non-Residential Premises Consultation**

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## About You

### What is your name?

**Name:**

Richard Norman

### What is your email address?

**Email:**

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### Are you responding as an individual or an organisation?

Organisation

### What is your organisation?

**Organisation:**

Scottish Branch of the Institution of Fire Engineers

### The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

## Questions

### 1 Five fire safety guides are being combined to assist with reference and future updating, do you have any suggestions for improving the structure of the combined guide?

**Comments:**

In our opinion the combining of the guides does not contribute to the aim of producing a better guide for the end user. The people who most need the guidance (duty holders of single use buildings) will be faced with a combined guide which will contain significant amounts of information which they will need to discount as it will not apply to their building. This will introduce a level of complexity and potentially confusion which the new guide will need to work hard to avoid.

Separate guides are simpler to follow and understand for the duty holder of a single, or limited, use building. these are the end users the guides should be focused on serving.

### 2 Are there any changes that should be made to the content of the revised guide?

**Please indicate changes by reference to paragraph number and include suggested replacement text and the reason for the change.:**

We have not analysed the content of the guides in any detail.

### 3 Is there any information or guidance that is not covered in the revision which you think needs to be included?

No

**Comments:**

### 4 Do you have any other comments on the guidance document?

Not Answered

**Comments:**

The objectives of revising the guidance include:

- Updating outdated terminology to reflect the single Scottish Fire and Rescue Service (SFRS) rather than relating to Fire Authorities in Scotland.
- A requirement to clarify the guidance to satisfy users, some of whom would like more detail and some less.

The Scottish Branch of the Institution of Fire Engineers have considered the proposed consolidation of 5 sector specific fire safety guides into one, in the form of the presented "Practical Fire Safety Guidance for Existing Non-Residential Premises". We are of the opinion that the objective of updating text with reference to the SFRS is entirely desirable and will increase the clarity of the document(s). We also agree with the aim of making the guidance easier to use for the individual duty holder. This individual duty holder is the ultimate target for the information provided and therefore the style, content and format of the document(s) should be focused on their requirements. We do not understand how consolidating the 5 guides into one can be expected to achieve this. Many duty holders will be responsible for single purpose buildings, and this category of duty holder are the ones who might require most help in understanding the concepts of fire safety in their building. To consolidate the 5 guides into 1 will inevitably require this duty holder to disregard significant portions of the text which do not apply to them. This has the potential to make the comprehension of the document more difficult.

Duplication of material between guides is cited as a disadvantage of the current system however we do not see that this is the case. The documents are unlikely to be produced in paper format in any great numbers and as a piece of reference material will be held in electronic form. This means that there is little saving to be made from reducing the page count from 5 documents to 1. Maintaining 5 documents rather than 1 may be easier for the Scottish Government to produce and maintain, but in our opinion this will not benefit the individual duty holder.

Any duty holder who is responsible for complex buildings when more than one use needs to be taken into account would perhaps benefit from the consolidation. We would however argue that as the complexity of buildings increases, the assumed skill and understanding of the duty holder should increase. It is reasonable to expect this duty holder better able to cope with advice from multiple guides and not require the help which a consolidated guide might provide.

In summary we believe that the updating of the existing guides with regard to terminology is important and should go ahead. We do however think that the consolidation of 5 guides to a single document risks confusing average duty holder and could be counterproductive to the aims and objectives of the project.

**5 An Equality Impact Assessment and a Partial Business and Regulatory Impact Assessment are also available, and we welcome any comments you may have on each of these documents.**

**Comments:**

We do not believe that the Business Impact Assessment aspect of this document does not fully acknowledge the impact duty holders being required to ignore sections of the guidance which do not apply to them. We are of the opinion that this additional complexity will detract from the usability of the guide for business.

**Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Very satisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Very satisfied

**Please enter comments here.:**