

Call for evidence: the Regulatory Reform (Fire Safety) Order 2005

About you and your response

Q1. What is your name?

Douglas Masterson

Q2. Are you answering individually or on behalf of an organisation?

On behalf of an organisation

If answering individually, what is your job or sector of activity? If answering on behalf of an organisation, what is your role, the organisation's name and how many people does the organisation employ?

Technical Manager Guild of Architectural Ironmongers 6 Employees

Q3. Contact details (email address or main postal address including postcode): We will acknowledge receipt of all the responses to the call for evidence.

douglas.masterson@gai.org.uk

Q4. Is your response on behalf of a trade body or other representative group of individuals or organisations?

Yes

If yes, please provide a brief description of its objectives and membership:

The Guild of Architectural Ironmongers (GAI) is the only trade body in the UK that represents the interests of the whole architectural ironmongery industry - architectural ironmongers, wholesalers, hardware manufacturers and door manufacturers. Its reputation is built on three key areas: education, technical support and its community activities. Its qualifications, education and CPD programmes are widely respected in the UK and overseas, including the GCC and Hong Kong. Its technical information service is the only specialist service of its kind, providing members with comprehensive advice on issues relating to the legislation, regulations and standards governing the use of architectural ironmongery and related hardware. Its awards recognise and reward personal and business excellence. There is a range of company and individual membership options for those working in and around the architectural ironmongery industry depending on their role, their qualifications and their experience.

Q5. Would you like your response to remain anonymous?

No

Section 1: Introduction

Q6. Which of the next section(s) do you wish to use to respond?

Section 2: Fire Safety Order scope and objectives

Section 3: issues specific to multi-occupied residential buildings

Section 4: general application - workplaces and other non-domestic premises

Section 5: higher risk workplace buildings and fire safety

Section 2: Fire Safety Order and objectives

Q7. To what extent do you agree or disagree with the scope of the Fire Safety Order?

Neither agree no disagree

Q8. In your experience, does the Fire Safety Order enable a risk-based approach to fire safety, adaptable to any non-domestic premises?

Yes

Q10. In your experience, does the Fire Safety Order make those in control of regulated premises take responsibility for ongoing fire safety and protection measures – as Responsible Persons?

No

Please explain your answer.

There is concern that the responsible person needs sufficient training in elements related to fire doors and architectural ironmongery/building hardware. a lack of competence in these areas are of grave concern. There is also concern regarding the competence of the operatives/organisations that undertake the inspections and assessments, plus those who undertake the actual repair and maintenance. We often see situations where worn out or damaged hardware, hinges, closers, locks etc have been replaced by the wrong items – normally to save money and the responsible person is not able to see the difference due to a lack of training and awareness. GAI are also concerned that despite section 17 stating as follows regarding maintenance "17.—(1) Where necessary in order to safeguard the safety of relevant persons the responsible person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises under this Order or, subject to paragraph (6), under any other enactment, including any enactment repealed or revoked by this Order, are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.) it is often the case that fire doors which are a vital element of passive fire protection in a building - and their corresponding ironmongery are not regularly inspected and maintained. it is our view that this is of vital importance.