

Enhancing fire-stopping documentation in the UK construction industry

A call for universal standard
on how fire-stopping
information is recorded

Background

In the increasingly regulated landscape of the UK construction industry, particularly in matters concerning building safety mandated by the Building Safety Act 2022, a fundamental question arises when considering passive fire information:

‘Why is there no universal requirement or standard for storing crucial information related to fire-stopping works?’

Fire-stopping plays a critical role in ensuring the safety of a building, and thereby the safety of its residents. The basic need for passive fire protection is set out in Approved Document B to the Building Regulations. Regulation 38 to the Building Regulations requires information about the design and construction of the building and any fire safety measures incorporated into the building to be handed over to the building owner on completion of works. However, despite the meticulous testing requirements of fire-stopping details, product data information and the absolute need for third-party certification/ accreditation of installers, there exists a notable gap in establishing a universal standard for documenting and storing evidence of fire-stopping details.

The construction industry has witnessed the emergence of proprietary fire-stopping software solutions designed to streamline the recording and handover of fire-stopping evidence. It has to be said that a few of these ‘apparent’ solutions appear better than others. They provide installers with the ability to record key information whilst carrying out the works, including:

- An identification number of each fire-stopping seal;
- Where the seal is located using interactive floor plans;
- The specification of the seal;
- Photographs before, during and on completion of the seal;
- The materials used in construction of the seal;
- A time stamp when the works are completed; and
- The details of who installed the product and their relevant competence.

At HAALO, we consider that the above is the minimum required to demonstrate that a compliant solution has been installed. We don’t see how anything less could possibly satisfy a ‘basic’ compliance test with Regulation 38 of the Building Regulations.

Unfortunately, the reality is, that in an industry which is plagued with the desire to achieve *‘the quickest and easiest route to completion’* – the so-called *“race to the bottom”* – it is too easy to exploit the lack of detailed regulation. Accordingly, we are all too often seeing ‘fire seal registers’ that are sub-standard. In such cases, it is difficult to see how Regulation 38 has been satisfied and why Building Control/ Approved Inspector has approved completion.

In the absence of a universal standard that categorically details item-by-item what should be stored, we fear that the minimum standard of compliance – or less – will continue to prevail.

The recent implementation of the Building Safety Act has introduced the concept of the ‘Golden Thread’ of information. This mandates a comprehensive record of a building’s design, construction, and ongoing maintenance. Fire-stopping, as a crucial element of building safety, is an integral part of the *‘Golden Thread’*. Whilst we await the enactment of the draft legislation *The Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2023*, it is clear that detailed information will be required, in order for the *Principal Accountable Person (PAP)* to demonstrate that they understand their building. Perhaps the PAPs need to take control and specify exactly how they want their fire-stopping evidence to be provided (via their respective consultants), in lieu of a standard to reference?

The Building Safety Act imposing new liabilities on Building Control bodies, finding themselves at the forefront of ensuring building safety. This includes a thorough understanding of the fire-stopping details installed, how they have been installed, and importantly witnessing sufficient evidence to satisfy themselves to provide a Completion Certificate.

So why is there not a universal standard of fire-stopping evidence that can be built into residential development briefs?

Let's break this down...

What are the risks of not having a standardised approach?

1. **Diversity of Formats:** Fire-stopping information is currently stored in diverse formats that provide different levels of detail in terms of what is recorded.
2. **Communication Challenges:** Inconsistency in formats obstructs the seamless flow of fire-stopping information across different phases of a building's lifecycle. For example, having all of the required information from construction, to carry out repairs or reinstatement effectively and safely
3. **Risk of Inaccuracy:** The lack of uniformity increases the risk of inaccuracies in fire-stopping documentation, posing safety concerns. For example, recording the mastic used as 'FR mastic' with no reference to an actual product with a datasheet that demonstrates it has been adequately tested. Unfortunately, this is all too often the case. If you can't evidence it, you can't rely upon it and it will have to be replaced. That could be expensive, for what could have been avoided through proper record keeping.
4. **Determine Compliance:** Without a robust system, it may be difficult to fully understand what has been installed and whether or not it is likely to be compliant. How will those delivering the new Building Control regime, satisfy themselves that penetrations are compliant?

This also poses problems during operation, when looking back at the buildings records and satisfying yourself (perhaps as evidence for a Safety Case Report?) that your installations are compliant. For example, our readers may be aware that a large proportion of fire rated sealants used in the UK, may not be compatible with the plastic sprinkler pipes installed within buildings. If this was raised as a concern in your building, how would you be able to confirm from your records, that there was not a risk of sprinkler pipework failing throughout your building; particularly where you perhaps have lots of data sheets stored on file, but no way to understand specifically where each product has been used?

What influence does The Building Safety Act 2022 have?

1. **New Regulatory Framework:** The Building Safety Act 2022 places a renewed emphasis on building safety, necessitating a comprehensive and standardised approach to fire-stopping information storage.
2. **Compliance Requirements:** The Act introduces stringent compliance requirements, making it imperative for the industry to adopt standardised practices in fire-stopping information management, that ensure a consistent approach to providing building safety.
3. **New Building Control Regime:** The Act introduces a new Building Control regime, which will put an increased emphasis on being able to demonstrate sufficient evidence to determine a compliant installation.

What benefits could we see from a standardised approach?

1. **Enhanced Communication:** Standardisation facilitates clear and consistent communication, aligning with the transparency goals outlined in the Building Safety Act 2022. It allows the Building Operator, AP/PAP, to clearly understand what has been installed and what information that will be provided as part of these works.
2. **Improved Collaboration:** A standardised approach enhances collaboration and coordination throughout the building's lifecycle, ensuring a seamless flow of information from design to maintenance.
3. **Efficient Compliance:** Demonstrating compliance with fire safety regulations in respect of passive fire protection, becomes more efficient and robust with a standardised approach, aligning with the Building Safety Act 2022.

Simplifying the complex

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We identify and mitigate risks to help you secure informed and appropriate investment for your long-term goals.

We work with our clients to create a bespoke service, collaborating with your in-house teams to build great deals with integrity, honesty, reliability and sustainability.

At HAALO, we have a unique, single-minded focus on building to operate and operating safely and efficiently that ensures your projects are manageable and profitable, in both the immediate and long-term future.





020 3875 8037
team@haalo.co.uk
🐦 @HAALO_Ltd
🌐 HAALO Ltd

HAALO Ltd
3rd Floor, 70 Gracechurch Street
London
EC3V 0HR