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Our Ref: AD/jh

The Rt Hon Justine Greening MP
Department for Education
Great Smith St
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31 August 2016

Dear Madam

BUILDING BULLETIN 100 - DESIGNING AND MANAGING AGAINST THE RISK OF FIRE IN SCHOOLS - THE PROVISION OF AUTOMATIC FIRE SPRINKLERS

We are writing to you with reference the recent consultation launched by your Department into proposed revisions to Building Bulletin (BB) 100: Design for fire safety in schools.

The current (2007) version of BB100 clearly acknowledges the devastating impact fires in schools have on pupils and on the local communities they serve, and announcements by your predecessor appear to similarly recognise the significant impact of disruption in children's education. The dreadful fire that occurred at The Academy, Selsey on 21 August and the extent of the damage that occurred has sadly only served to reinforce these facts.

BB100 (2007) signposts users to a tool kit developed by the Building Research Establishment (BRE) that assesses the risk of a fire, and the results of that assessment quite correctly determines the level of fire protection required. As we would expect, the revised draft focuses quite correctly on the safety of occupants and their safe evacuation; it would appear however, that little cognisance is now given to the protection of the building fabric itself. Moving to '*a life safety only approach*' is a mistake in our view. We believe that guidance incorporating best practice for property protection is important because school buildings are funded by the taxpayer and in most cases some arm of government is the owner. BB100 should therefore present the owner's perspective and give guidance on what is necessary to protect a public asset from fire.

One of the justifications offered for the change appears to be that the numbers of fires in educational establishments has fallen in recent years, and whilst this is not disputed, this statistic tells only part of the story. According to DCLG estimates, the average cost of school fires between 2000 and 2004 was £58 million per year. The Fire Protection Association (FPA), collects and collates large loss statistics on behalf of UK insurers. Clearly, not all schools are insured and FPA does not claim 100% coverage however, the statistics held do give an indication of trend. Between 2009 and 2014, the 119 fires recorded by FPA cost in excess of £150 million with an average cost of £1.3 million per incident. More worrying is that the average cost is increasing; in 2009 it was approximately £330,000 but in 2014 it had risen significantly to £2.8 million; these fires are getting larger, their impact more devastating and as such there would appear to be little logic in reducing measures needed to maintain property protection.

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As you will be aware, one of the most fundamental changes in the revised text is the removal of the expectation that most new school buildings should be fitted with a sprinkler system. We believe that this is wrong and the logic behind the decision flawed. The change in policy by government in 2007 followed long campaigns from a broad range of stakeholders across the fire sector, which included the Association of British Insurers, FPA, the Local Government Association, the Chief Fire Officers Association, the National Union of Teachers and the Fire Brigades Union. None of those organisations have altered their support for sprinklers in schools, and as far as we can ascertain, none were consulted or asked their advice regarding the proposed change.

There is little doubt that sprinklers implemented within a balanced range of fire protection and fire risk management measures are effective. The National Fire Sprinkler Network collects information on sprinkler saves, and from their database we have been able to establish that between 2012 and 2015 at least 16 schools have benefited from much reduced damage as a result of a fire and little or no disruption to the education of their pupils because of the presence of an automatic fire sprinkler system.

We see no reason to change the current policy of a risk based approach for the requirement to install sprinklers in schools, since experience suggests that this policy is currently working as intended. We therefore urge the Department to reconsider removing the expectation that most new school buildings will be fitted with a sprinkler system and to allow the tool kit to do its job. We are genuinely concerned that watering down this wording or removing the expectation altogether, as is currently proposed, will result in few if any schools being fitted with sprinklers in the future, regardless of risk.

We look forward to your response.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andy Dark', with a stylized, cursive script.

ANDY DARK
Assistant General Secretary