



Crown Premises' Fire Safety Inspectorate.

Fire Safety Expectations in Prisons.

May 2026.

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Fire Safety Requirements for Residential Prisons.

Introduction.

The Regulatory Reform (Fire Safety) Order 2005 (the Order) requires the employer-responsible person for prisons to assess the life safety risks from fire for all those who may be affected by their activity, and to implement (and maintain in an effective state) appropriate measures to ensure that those people are sufficiently safeguarded from injury through fire.

Where other persons have some individual control of the premises – for example a prison governor or director; a landlord or building owner; a person who controls safety, finance, policy-making, instructions, training, the award and oversight of contracts relating to fire safety or the design, planning, commissioning and oversight of fire safety works – or have a contractual obligation in relation to maintenance, repair and safety at the premises, each person shares the same responsibility as the employer to ensure - to the extent of their individual control or contractual obligations – that in the event of fire people and buildings are as safe as possible.

The duty placed on His Majesty's Prison and Probation Service (HMPPS), the Ministry of Justice (MoJ), and the private operators of prisons is to drive down the fire risk so far as is possible. The risk from fire has changed since the original Fire Safety Expectations was published in 2015:

- Cigarette lighters have been replaced by improvised ignition sources.
- Outcomes from post fire investigations, fire safety inspections, Coroners inquests, HMIP reports and Justice Committee Reports have revealed that the impacts of drug use with the associated organised crime, poor mental health, an ageing prison population, gang culture and debt have increased both the incidence of fire and the level of risk;
- Outcomes from fire safety inspections, HMIP reports and strategic dialogue between stakeholders have identified that prison capacity and operational staffing pressures, a loss of experienced staff and staff retention issue could potentially limit the opportunity to manage fire risk;
- The delay in rolling out in-cell fire detection, the ongoing use of stand-alone smoke alarms and problems with the management and maintenance of automatic fire detection systems have contributed further to the difficulty of managing fire risk; and
- Additional factors affecting fire safety in prisons have emerged from the investigation of fires, including the role of clothing, the effectiveness of the cell fire response procedure and the settings of fire detection equipment.

These factors have combined to keep the level of fire injuries in prison consistently higher than in any other non-dwelling residential sector*, and they remain sufficiently high to require that

interim measures should be immediately introduced where long-term measures are not yet available.

The statutory fire safety minimum standard to satisfy the Order is established through benchmarking against accredited codes of practice and is not open to interpretation, but the actual fire safety measures employed – including management measures - can be integrated in different ways to achieve the statutory standard while also suiting the specific circumstances of any building. The bespoke fire safety expectations for prisons set out in this document have been aligned with just such an accredited code of practice in the attempt to set out how the statutory standard of fire safety could be achieved for prisons.

The responsible persons for prisons can choose to integrate the available fire safety measures differently to the examples in this document, and this will be acceptable provided that the responsible person can demonstrate that the statutory standard of fire safety has been reached.

It should be noted that the PUWER Regulations 1998 place additional duties upon those in control of the work equipment – namely smoke hoods and fire-fighting equipment - used to safeguard prisoners and prison staff from fire. The Health and Safety Executive [HSE] is the enforcing authority for PUWER.

The Order also includes a number of specific requirements in relation to the management of fire safety. The management of fire safety in prisons must discharge a similar higher duty of care to that implemented in care homes and hospitals for ensuring the safety of people who cannot safeguard themselves in the event of fire. This document, therefore, contains a section about the standard of fire safety management that is required for prisons.

The findings of prison inspections are explained to the respective HM Prison Service managers and advisers at the end of each inspection, with each finding receiving its own RAG rating for both the risk created and the management or maintenance factor which is linked to it. CPFSI inspectors will apply the principles, expectations and methodology of the Enforcement Management Model to make consistent and fair enforcement decisions based on clear guidelines and which will be robust if challenged by the employer responsible person and others with a legal responsibility for fire safety in respect of the matters which they control.

Fire Safety Expectations.

The Crown Premises Fire Safety Inspectorate (CPFSI) is the enforcing authority for fire safety in prisons. Its inspectors are required to assess whether the statutory standard of life safety has been achieved, and whether this is sufficiently assured by the fire safety management and maintenance arrangements in place.

The inspection standards contained in this document have been developed by the CPFSI to provide transparency in the assessment of the fire safety measures and supporting arrangements in existing prisons by its inspectors.

BS9999: 2017* provides a benchmark code of practice for the appropriate standard of general fire precautions for existing prison residential buildings, but it does not offer guidance on every element necessary to develop appropriate fire safety solutions for a residential prison wing.

* BS 9999: 2017 Fire safety in the design, management and use of buildings – Code of practice

These inspection standards have been created to fill in the gaps which are neither addressed by BS9999: 2017 nor specifically provided by other codes of practice. They take into account not just the specific statutory duty in Article 7(6) to safeguard prisoners from fires – including from those fires set by the prisoners themselves - but also (under Article 8) the statutory duty to safeguard prison staff members from injury when dealing with cell fires in the face of potential personal safety and security threats.

These bespoke fire precautions address the following prison-specific issues:

- Locked doors to cells, and on evacuation routes
- Cell fire response plan, which is outside the scope of standard evacuation strategies
- Prison atria, which have neither protected routes nor a fire-resisting enclosure
- Corridor approach and horizontally segmented wings without protected routes

The Fire Risk Assessment [Scope].

The most widely accepted UK definition of competency for carrying out a risk assessment is provided by HSE. It sets out that the risk assessor must have sufficient training and experience or knowledge and other qualities that allow them to assist the responsible person properly, depending on the complexity of the situation.

The fire safety measures, safety management arrangements and specific situational factors in prisons means that the prison fire risk assessor must consider a wide range of matters which extend well beyond the scope of fire risk assessments required for non-custodial premises. These include:

- Buildings which do not comply with accredited codes of practice;
- Prison-specific human situational, behavioural and mental health-related factors underlying fire-setting and fires involving prisoners under the effects of medication or drugs;
- The inherent conflict between fire safety and security measures;
- The differences of fire development and spread for different prison building configurations, construction and uses;
- The fire engineering design of prison residential buildings;
- The use of natural, mechanical and pressure-differential smoke control systems in residential blocks;
- The use of water mist suppression systems;

- The performance frailty of mitigatory stand-alone fire detectors outside cells;
- The performance of automatic fire detection systems which are inherently vulnerable to vandalism;
- The use of cause-and-effect matrices in the interfacing of fire alarm, smoke control, fixed water misting and BMS systems to control smoke and fire spread;
- The need for the fire risk assessment to consider both the performance and findings of specialist contractors involved with the inspection and servicing of the fire safety equipment and installations;
- The need to consider local cell fire response arrangements for different sizes and configurations of residential building;
- The use of an in-situ fire-fighting strategy rather than an evacuation-based one;
- The enhanced training requirement for an in-situ fire-fighting strategy;
- The requirement for an accredited fire risk assessment template for buildings in which an in-situ fire-fighting strategy is adopted; and
- The overall high life-risk situation.

The above factors are additional to those which must be considered in the fire risk assessments for simple buildings and include many items which require advanced training across a number of specialist fire safety fields to assess fully, as well as good experience of fire safety in a custodial situation.

It is essential that the training of prison fire risk assessors ensures that prison fire risk assessments are undertaken in line with the appropriate occupational standard.

Where the fire risk assessor does not have the full range of competencies for carrying out fire risk assessments of prison buildings such as custodial residential wings, an arrangement should be in place for them to seek and obtain specialist advice and assistance.

Arrangements for Fire Risk Assessment.

The arrangements for carrying out a suitable fire risk assessment must ensure that the responsible person has a valid, suitable and sufficient assessment of the risk from fire.

The most important issue is to ensure that the appointed fire risk assessor has the competencies and specialist competent support to undertake the task successfully in the custodial situation, but the arrangements must also ensure that:

- The fire risk assessor will be given access to all of the necessary information, this could include the documented fire strategy, design and commissioning documentation for the fire safety measures and the records of statutory testing and repair;
- The assessment will be independently checked for missing or inaccurate information by a person with who is familiar with and has appropriate knowledge of the environment being assessed;
- The action points and dates for completion of planned actions will be prioritised on the basis of risk to life and agreed with those with the authority and responsibility to deliver them;
- The fire risk assessment will be kept up to date by being reviewed periodically and when there has been an obvious and significant change, such as a change to the building or how it is being used; and
- The review will be undertaken by a person with adequate specialist fire safety training and experience of fire safety in the custodial situation.

Fire Risk Assessment [Process].

The fire risk assessment will consider the actual hazards and existing fire precautions at the premises for the purpose of establishing the current level of fire risk, and for determining what additional fire precautions will be required to achieve an acceptable level of risk.

- The methodology used will be appropriate for the custodial environment.
- The methodology will benchmark judgments about the adequacy of the general fire precautions and the likelihood and severity of harm against accredited and relevant codes of practice or be supported by fire engineering calculations.
- The process will comprise a sufficiently systematic, comprehensive and structured assessment which considers those actual conditions and events which could foreseeably occur and which could place prisoners and staff at risk.
- The fire risk assessment will consider every group of persons at especial risk of harm and give them sufficient consideration. These groups include:
 - Those with disabilities [permanent or temporary]
 - Prisoners locked in cells.
 - Young offenders

- Elderly prisoners
 - Prisoners on ACCTs [The Assessment Care in Custody Teamwork process in prisons]
 - Prisoners with index offence for arson or are a known fire-setter.
 - Prisoners who are alcohol or drug dependant.
 - Prison staff responding and dealing with fires, including cell fires.
- Fire risk assessments for in-patient healthcare facilities in prisons should reflect the relevant guidance and standards set out in Health Technical Memorandum 05-03: Operational provisions Part K: Guidance on fire risk assessments in complex healthcare premises.
 - Where the application of HTM guidance is likely to conflict with custodial fire safety guidance and security requirements this should be recorded in the fire risk assessment, with the alternative, necessary control measures clearly identified.
 - Where additional fire precautions will be required, the fire risk assessment will identify those interim measures which are necessary to ensure that persons are kept as safe as is possible until appropriate longer-term measures can be introduced.

The fire risk assessment will adequately set out - in an action plan - the additional fire precautions which are required and set appropriate timescales which prioritise the introduction of these measures.

Fire Safety Management.

Article 11 of the Regulatory Reform (Fire Safety) Order 2005 requires the responsible person/duty holder to make and implement arrangements for planning, organising, controlling, monitoring and reviewing the preventative and protective fire safety measures required by the legislation. This requirement is supported by the guidance offered in NFCCs “Enforcers Guidance” document.

BS 9999: 2017 reports that the findings of multi-fatality fire inquiries over the past 50 years point towards management failings as a key factor.

Additionally, the effectiveness of the performance of fire safety provisions in prisons can be seriously diminished through poor management of fire safety.

Large organisations which operate and require continuity of process across multiple sites, such as HM Prison and Probation Service, should adopt the use of an appropriate fire risk management system.

Both BS 9997:2019* and HSG 65* adopt the Plan-Do-Act-Check model, which is an iterative four-step management method used for the control and continuous improvement of processes and/or products.

*BS 9997:2017 – Fire risk management systems – requirements with guidance for use. HSG 65 – Managing for Health and Safety.

BS 9999:2017 identifies two management system levels:

Level 1 demonstrates best practice in which the organisation's management system is determined to meet a management system standard and is the proportionate management level for fire risk in prisons.

BS 9997:2019 *Fire Risk Management Systems. Requirements with Guidance for Use* provides a framework for a formal management system. The standard ensures consistency with other risk management systems such as those specified in BS EN ISO 22301, 45001, 27001 etc.

Whichever system is used it should clearly set out the roles, responsibilities, authorities and accountabilities for fire safety throughout the Service. The system must be capable of ensuring that fire safety measures that have been provided are kept in good working order, and that fire action plans will provide the necessary means for staff and prisoners to remain safe from the effects of fire.

Fire safety risk management systems used in prisons should ensure that:

- Fire safety policy instructions and guidance provides an adequate basis for fire safety compliance.
- Adequate arrangements are in place which ensure that suitable and sufficient assessments of the actual hazards and control measures which are required in prison are carried out.
- Adequate arrangements are in place to implement the fire safety measures which are known to be required and ensure that the existing fire safety measures continue to be effective.
- Day-to-day management controls in prisons ensure that staff and prisoners are safeguarded against the effects of fire.
- Adequate arrangements are in place to ensure that all fire safety roles in the organisation are undertaken by employees with the appropriate knowledge, training and experience.
- Appropriate arrangements are in place for the sharing of risk information between the respective fire safety duty holders.
- Effective arrangements are established for monitoring, checking, reviewing and revising the fire safety management arrangements.
- Adequate arrangements are in place for monitoring the performance of outsourced services, such as facilities management providers.
- An adequate system is in place which ensures the completion of planned maintenance and testing of the fire precaution measures and that any remedial works are completed in timely fashion.
- An accurate record is maintained of the fire precautions measures, and procedures for operating and maintaining these measures.

Articles 4, 7 & 8 – Reducing the Risk of Accidental Fire.

The risk of fire setting is generally higher in prisons than in other buildings so there is a need to normalise this risk from fire so far as is possible.

Accordingly, the day-to-day safety management of prisons must ensure that the essential task of preventing fires from occurring in prisons is embedded throughout the prison workforce, with a culture of risk reduction flowing from senior prison service managers to officers patrolling wings.

The principles of good housekeeping, reducing ignition sources, controlling and storage of fuel loads and electrical/gas safety are all fundamental to reducing the risk of accidental fires and limiting the impact of those fires that do still occur.

The use of improvised ignition sources associated with illicit substance abuse has resulted in serious fires involving clothing being worn by persons who may be unable to respond to their situation. The findings from recent fire testing of prison clothing whereby a lit paper taper was placed strategically to sustain burning within the folds of draped clothing demonstrated that the garments when suitably orientated burned quickly and fiercely. The short burn time means that clothing fires are very difficult to detect quickly so as to provide the possibility for staff to intervene before a serious or fatal injury is sustained. Consequently, appropriate measures should be taken to develop and provide prisoners with meaningful information and messaging aimed at discouraging them from illicit acts which can cause them serious harm.

Whilst statistically most fires which occur in prisons are intentionally set, a small number of fires have been accidental. Consequentially, adequate measures must be in place to reduce the risk of accidental fire by ensuring that:

- Ignition sources are kept separate from combustible materials;
- Combustible items are well controlled in cells and common areas, particularly in corridor approach wings;
- Cell furnishings have the necessary fire retardancy crib ratings;
- Informing prisoners of the consequences of fire-setting;
- Portable electrical appliances in cells are being used in a safe manner and are not subject to any unsafe adaptation;
- Electrical apparatus including photocopiers, kettles, microwaves, toasters, fridges etc. is not sited in wing offices on corridor approach areas without adequate fire resistance;
- Wing laundries have suitable management and cleaning arrangements in place; N.B. a separate, a specialist cleaning arrangement away from the residential wing should be considered to launder clothing and bedding which may have been contaminated with

emollient cream in order to avoid spontaneous combustion. HM Prison and Probation Service has advised that it adopts a standard wash cycle at a higher temperature [circa 70° C] which is recommended to help reduce the build-up of emollient residues on prison issued clothing and bedding and other fabrics. Despite this arrangement, the risk of spontaneous combustion and easier ignitability remains prior to the cleaning of contaminated materials.

- Portable electric heaters which have a thermostatic cut-out facility are only used in cells in exceptional circumstances [e.g. cells which have been recorded as regularly experiencing low temperatures] and subject to rigorous fire risk assessment and safety management;
- The storage and charging of electric mobility scooters in residential areas must be subject to rigorous fire risk assessment and safety management.

To underpin the effectiveness of the risk reduction measures requires the active participation of all those with legal responsibilities for fire safety in prisons. This includes the co-operation of prison staff with reporting of defects and perceived deficiencies with fire precaution measures; the response and performance of those responsible for maintenance and repair, such as undertaking periodic inspection of electrical fixed wiring systems; diligent oversight of the fire precaution measures from day-to-day for example checking that remedial works to gas appliances have been completed properly; effective monitoring and necessary challenge to confirm that fire precaution measures are maintained in an efficient state and in good repair in order to assure that the premises are safe to operate.

Articles 4, 7 & 8 – Reducing the Risk of Deliberate Fire.

Fire is used by prisoners for reasons ranging from facilitating drug-taking, to securing a move; to disrupt security; to cry for help following bullying; when struggling with mental health problems or learning difficulties; to relieve boredom; or to interfere with the operation of the prison.

Alongside those uses, it is not clear how commonly fire may have been used by prisoners for self-harming, but prisoners who are placed on ACCT* could potentially be at higher risk from accidental fire and fire-setting in prison due to the risk of suicide or self-harm.

Notwithstanding that, every inquest in recent years has found that the prisoner's death from fire was either accidental or misadventure, meaning that the prisoners had not planned to kill themselves but had misjudged the consequences of setting a fire for other purposes. The clear conclusion from this is that there is value in prison managers implementing suitable control measures to reduce deliberate fire-setting, such as:

*Assessment, Care in Custody Teamwork Programme – A care planning process to support prisoners at risk of suicide or self-harm.

- A sufficient range of carefully worded, purposeful information to deter fire-setting during induction and afterwards about the consequences of setting a fire in a cell.
- Targeted initiatives aimed at reducing fire risks and substance misuse linked to vape pens and tampering with electrical devices in prisons. E.g. The introduction – by HMPPS - of a redesigned vape pen with integrated safety features that prevent tampering and repurposing for fire-setting or drug use.
- Working with the Local Fire and Rescue Service to create and deliver fire prevention programmes aimed at educating and supporting prisoners to reduce acts of fire-setting in prisons.
- Appropriate sanctions should be applied following fire-setting in order to deter prisoners from setting fires.
- The use of positive reinforcement could be used to reward prisoners for following prison rules and resisting acts of fire-setting.
- Prisoners at known higher risk from fire should be located wherever possible in cells fitted with automatic fire detection.
- Where no automatic fire detection is fitted, some mitigation can be achieved by locating prisoners at known higher risk from fire in an atrium wing and as close as possible to the wing office, where their fire-setting behaviour can best be monitored.
- Locating prisoners at known higher risk from fire in corridor approach without in-cell automatic fire detection and mechanical smoke control wherever possible must be avoided.
- Prison staff members and Healthcare staff members should liaise and take action where necessary to manage the use of electrical appliances and other potential ignition sources by prisoners in Segregation Units or Healthcare who are at known higher risk from fire.
- Prison staff should be provided with accurate information regarding those prisoners at known higher risk from fire.

This is not an exhaustive list of the measures which could be employed to reduce the risk of deliberate fire setting, and indeed the data from cell fires demonstrates that prisoners are both motivated and able to improvise the means to create and use fire despite the smoke-free regime in prisons. It is expected that HMPPS and individual prisons will explore and exploit all possible options to limit the deliberate use of fire in prisons.

Articles 4, 7, 8 & 14 – Reducing the Risk of Spread of Fire and Smoke.

Cell doors are not fire doors and so do not prevent smoke escaping from any cell fire which is allowed to develop, which allows smoke to gather in the common space outside the cell.

It should not be possible for smoke to spread from cell to cell via the environmental air ductwork.

Where cells open into an atrium, smoke will mainly accumulate outside that cell door and never attain the energy to force itself into other cells. This is because it generally has too little convective energy to disperse further through an open space, particularly in the early stages of a cell fire.

The accumulation of combustible items in wing atriums should be well controlled so as not to compromise the effectiveness of the natural ventilation smoke control systems which are designed to the fire design size for a cell fire. Control of this “fire-load” is also important in ensuring that any fire remains small and that staff are not prevented from releasing prisoners from cells and safely moving them away from the fire scene.

Where the fire loading within an atrium is excessive it will be necessary to reduce the size of this loading as natural ventilation smoke control systems are designed around the known fire design size for a cell fire.

A dedicated low level air inlet which provides a sufficient free area will be necessary where a natural ventilation smoke control system has been installed in atria of more than one storey and for all mechanical smoke, heat and exhaust ventilation systems.

In the absence of an effective mechanical smoke control system the likelihood of injury for prison staff and prisoners increases very significantly as fire and toxic smoke is able to spread along corridors, including into other cells.

The use of cross ventilation [opening doors to allow air movement through the building] and Tactical Ventilation plans [TVPs] using fans has the potential to spread smoke into unaffected areas and cells. The use of TVPs as mitigation for the absence of an effective smoke control system should be supported by calculations and/or a recorded demonstration and its implementation should be tested by staff during the annual themed drill for that building.

An effective mechanical smoke control system, based on engineering calculations and commissioned by a competent contractor, is required for all closed residential corridor approach units to ensure that the corridors and cells remain tenable from the effects of fire.

Where such systems are installed then it shall be arranged such that it acts only on the corridor / floor level associated with the detected fire.

Effective arrangements are required to ensure that lock-back doors are released where this is significant for the effective performance of mechanical smoke control systems.

Stringent management measures must be in place which ensure that the efficient movement of smoke and air for smoke control systems is not inadvertently hindered, for example by the installation of anti-climb screens.

While the fire loading of most cells is sufficient to enable a serious fire to be set - even before any prisoner possessions are added - there are much larger fire loads in rooms which constitute a special fire risk, such as wing kitchens, wing offices, storerooms and wing laundries. These should be fully enclosed with fire-resisting construction and protected with automatic fire detection in order to provide enough warning and time for prison staff members and prisoners to evacuate the wing safely in the event of a fire in one of these spaces.

Any fire loading in residential corridor approach areas, including electrical appliances and furniture should be removed.

Bedroom corridors in both non-secure residential accommodation where full evacuation by prisoners is possible and secure residential accommodation where prisoners can only self-release from bedrooms, must be a protected corridor with FD30S doors with self-closing devices installed to all rooms.

Note: Bespoke measures for reducing the risk of spread of fire and smoke in in-patient healthcare facilities are included in the section: [Articles 4, 7, 8 & 15 - Emergency Procedures Adapted as Appropriate, sub-section: In-Patient Healthcare Facilities.](#)

Articles 4, 7, 8 & 13 – Warning of Fire.

HM Government Fire Safety Risk Assessment Guidance states that the provision of automatic fire detection and warning systems provide the means of notifying people of the presence of fire at the earliest possible opportunity

Automatic fire detection provides the means for automatically detecting and warning of fire in the quickest possible time. It offers the possibility of carrying out firefighting (because the fire is small) and the maximum period of time to implement the emergency plan for the premises.

BS 9999:2017 Fire safety in the design, management and use of buildings – Code of practice, endorses the HM Guidance by stating: the provision of early fire warning by an automatic fire-detection and warning system can lead to “first aid” or fire and rescue service fire-fighting in the early stages of fire development.

The standard continues: the provision of automatic fire detection systems can be of significant benefit in terms of providing early warning for the occupants by reducing the time to detection. If a fire occurs and grows then the first barrier to its development is by first aid fire-fighting.

The success of this might be dependent on the ability to detect a fire and raise the alarm, and on staff training in first aid fire-fighting.

The standard concludes: in a fire disaster, the uncertainty of the situation in its early stages is usually compounded by a serious delay in warning the occupants in time for them to start to evacuate and reach safety.

BS 5839-1: 2025 Fire detection and fire alarm systems for buildings, recommends the following:

- Automatic fire detection is usually required by legislation to supplement the manual system in premises where people sleep.
- The early detection of fire by automatic means, and rapid summoning of the fire and rescue service in the event of fire, is also important in premises in which people cannot readily be evacuated immediately.
- In certain premises it is also important to give accurate and unambiguous information to staff regarding the location of a fire.
- Where accurate and unambiguous information about the location of the fire is critical to the safety of life, it is sometimes necessary to use only an addressable system.
- Where occupants of a building are likely to need the assistance from staff to evacuate the building the fire detection and fire alarm system should be addressable if the building has facilities for more than 10 people to sleep.

Table A.1 of the British Standard recommends a category M/L5 automatic fire detection and warning system for prisons.

Whilst L5 systems are often designed to satisfy a specific fire safety objective, such as a localized need for fire detection in only part of a building, these systems could also be comprised of comprehensive fire detection throughout large areas of the building.

Accordingly, the protection afforded by a Category L5 system might, or might not, incorporate that provided by a Category L2, L3 or L4 system.

The nature of the security arrangements for fire safety in prisons – in which prison staff cannot take any action to prevent injury or preserve the life of a prisoner until they are made aware of it – means that the fire detection must detect fires in cells as soon as is possible to protect prisoners and staff against serious injury or death.

Correspondingly, it is the professional judgement of CPFSI that in-cell automatic fire detection must be provided.

A risk proportionate approach to prisoner residential units will always include the primary fire safety objective of designing and installing the system in accordance with BS 5839-1 to detect fires sufficiently early and provide warning so that prison staff can intervene to avoid the risk of progressive injury to the cell occupant(s) and staff that can start within six minutes of a fire starting.

Whilst BS5839-1:2025 recommends a category L5 automatic fire detection and warning system for prisons, application of BS9999:2017 identifies a risk profile for prisons as occupants who are likely to be asleep, with a long-term managed occupancy and calculates that the minimum acceptable standard of fire detection and alarm system is an L2 system, i.e. equipment designed to afford “an early warning of fire in specified areas of high fire hazard or high fire risk”.

MOJ’s own technical specification for prisons aligns with this calculation by requiring a Category L2 system to be installed in prison cell blocks.

In accordance with the recommendations of both Health Technical Memoranda [HTMs] and the HMPPS Custodial Fire Safety Design Guide, residential healthcare units should be served by a Category L1 system to offer the earliest possible warning of fire, so as to achieve the longest available time for staff to respond and implement the fire response plan. E.g., The progressive horizontal evacuation [PHE] of dependant or very highly dependent patients.

Despite HMPPS having conducted a series of tests to enhance the positioning of stand-alone smoke detectors [SADs] within the predicted smoke path exiting from a cell door and citing that these devices have detected cell fires since their deployment in 2016, the ability of SADs to alert prison staff to cell fires when fitted externally to the cell varies with the configuration of the cell’s ceiling, window opening and door set, as well as the siting of SADs and the pathway of smoke past and beyond the cell door. It is these variables which mean that SADs do not provide a standard of fire detection and warning in accordance with BS5839-1.

Various types of fire detection systems are available and can be found in cells across the prison estate. Whichever fire detection system is installed, the type of fire detector in cells should nullify attempts, or give warning that attempts are being made to defeat the system and ensure that that appropriate early warning of fire is provided. In the case of point-type detection fitted inside cells prison staff must make frequent checks to ensure that the detector head has not been covered, as most point-type devices have no facility to create an audible or visible fault alert on the fire alarm panel.

Due to the potential for incomplete combustion to occur during cell fires, the use of a multi-sensor fire detector which incorporates a Carbon Monoxide sensor in the detector can enhance early detection of the fire.

Aspirating Smoke Detection [ASD] systems are prone to environmental contamination and blockages attributed to prisoner tampering and are susceptible to flow faults being caused by airborne debris blocking holes in the sampling points and contaminating the sampling pipe, filter and flow sensor along the route to the ASD unit. This susceptibility to airflow faults is exacerbated if the sampling point is in the vicinity of a shower area because the moisture causes the airborne debris to be deposited in the holes of the sampling point and beyond as a solid substance rather than as dust.

It is critical that ASD systems are fully protected from water ingress to avoid the risk of loss of detection and a proactive cleaning regime must be in place for the complete ASD

system. Where the fire alarm engineer cannot always access or work safely inside the cells, this will need to be programmed under another arrangement.

ASD systems settings must be configured so that an air flow fault condition signal is generated before the accumulation of contamination in the sampling points, tubes and filters results in a deterioration in effective detection performance.

Fire detectors mounted in the ventilation ductwork [aka multi-duct] are not capable of providing a life safety standard of protection and should not be relied upon as a means of fire detection. This is because the smoke from a fire in one cell is diluted by the air being drawn through the ductwork from other cells and may not be detected either at all, or until the fire is already well developed in the cell involved in fire. Therefore, it is not easy to predict at what point in time the fire detector will actuate and in turn this can extend the time before staff are alerted and able to respond and deal with the fire before it becomes injurious to the cell occupant.

In closed custodial buildings it is normal for the fire alarm system to not provide an audible alert to prisoners in residential areas, but an audible alert is necessary in both non-secure residential where full evacuation is possible, and secure residential where prisoners can only self-release from bedrooms.

In closed custodial buildings prison staff are alerted to fires by strobes, radio messages or a local signal from the fire alarm panel located in staff only areas.

Fire alarm panels on residential wings should provide both an audible alert and visual display of any alarm, pre-warning or fault with the automatic fire detection and warning system for the building.

Systems should also be capable of relaying both an audible alert and visual display of any alarm, pre-warning or fault from the automatic fire detection and warning system for residential wings to the Central Indicator Panel in the Prison Control Room.

The Central Indicator Panel should be capable of monitoring incoming circuits from these systems and alerting Control Room staff to any alarms or faults raised by the local fire alarm control panels.

Bespoke arrangements for the effective management and maintenance of fire detection systems must include the following:

- The proactive management of all forms of fire detection equipment which directs sufficient resources to the application of prison rules, positive reinforcement, purposeful information and messaging to deter prisoners from tampering with any form of fire detection equipment.
- The provision of sufficient resources directed to the control and monitoring of fire detection equipment by prison staff. Accommodation Fabric Checks [AFCs], fire alarm panel checks, recording & reporting of faults, monitoring remedial actions, sampling point checks, fire detector checks, standing item at appropriate management forums.]

- The provision of suitable information and instruction for prison staff on the fire detection system so that they are able to carry out meaningful checks on whether it has been tampered with and whether an attempt has been made to defeat it.
- An effective arrangement for those with legal responsibility for fire safety to be informed in the event that:
 - the fire detection system is not in effective working order.
 - scheduled inspections and servicing of fire detection systems have not been completed.
 - remedial works have not been completed in timely fashion.
- A suitable system for the inspection and servicing of all types of fire detection and warning systems. There must also be an effective arrangement which ensures the timely completion of remedial works to system faults.
- Successive inspection and servicing visits should be undertaken at intervals of approximately 6 months. Ref: Clause 43.2.1 BS 5839-1: 2025
- The inspection and servicing must include all components forming part of an ASD system which comprises of the sampling point, sampling tube, filter(s), any water trap, ASD housing, flow sensor, baffle, fire sensors, fan, system controls and exhaust tube.
- The inspection and servicing arrangements should be programmed to ensure that the build-up of contamination in sampling points, tubes and filters never accumulates to an extent that would inhibit appropriate fire detection performance.
- The frequency and method of testing and maintenance of ASD systems should be clearly documented and determined by risk assessment and should consider that systems installed in dirty conditions such as those often found in prisons, need to be checked more thoroughly and at more frequent intervals than in clean and dry environments.
- Effective co-ordination and co-operation between those with legal responsibility for fire safety which allow contractors to undertake inspections and servicing of fire detection systems safely.
- A process for carrying out inspections and servicing which ensures that there is appropriate continuity of fire detection during these works.
- All inspections and servicing of fire detection systems are completed by a competent person.
- A sufficient stock of replacement fire alarm system parts is readily available to support an effective system of inspections and servicing and to avoid a loss of detection.
- Proactive forward planning for the replacement of end-of-life fire detection systems to avoid the need to implement reactive, mitigatory measures.

Articles 4, 7, 8 14 & 15 – Procedures for Evacuation.

The principal fire response plan for dealing with fires in residential wings adopts a stay put approach for those prisoners in cells unaffected by the fire. This allows prison staff to respond and undertake fire-fighting duties and manage safe egress for prisoners from and beyond the cell of fire origin to a place of safety.

However, there may be circumstances where the evacuation of adjacent cells, or a whole spur or wing may be necessary.

The approach to the evacuation of other cells during a cell fire must be appropriate for, and specific to the building configuration.

Where an effective mechanical smoke control system is not present in corridor approach wings, an immediate evacuation of cells in the affected spur or wing may be necessary.

Procedures and equipment for clearing smoke should only be used once a fire has been confirmed as extinguished. These procedures should be developed and tested in collaboration with the Fire and Rescue Service.

The decision on whether other cells need to be evacuated in the event of a cell fire or a fire in the common space should be clearly set out in the fire risk assessment and should be pre-planned and set out in the fire strategy for the building.

A generic plan which directs prison staff members to prioritise the evacuation of adjoining cells above safeguarding the occupant of the cell involved in fire will be unacceptable. Where there is a need to evacuate all the cells in that area – such as within corridor approach without effective smoke control – the evacuation of other cells will normally need to involve additional prison staff members beyond those required to deal with the fire cell.

Accordingly, a sufficient number of prison staff should be available at all material times to ensure that inundation of the affected cell commences as soon as possible once staff have been alerted to the fire and if necessary to undertake the evacuation of other cells.

On wings where prisoners are able to self-release from their cells but require prison staff to release them from the wing, the principal fire response plan must be adapted for such circumstances.

A recent Justice Committee Report* stated that *...older prisoners are the fastest growing group in the prison population, with prisoners aged 60 or over having increased by 82% in the last decade and by 243% since 2002.*

The report continues *...older prisoners carry a greater burden of health conditions compared to their younger peers, with a greater prevalence of chronic diseases, disability, decreased mobility, and sensory impairment among the cohort.*

Whether for a prisoner with a permanent or temporary impairment, the presence of robust arrangements for undertaking an initial Personal Emergency Evacuation Plan [PEEP] is imperative to ensure that appropriate, agreed procedures are in place for their evacuation should it be necessary. These plans must be subject to regular review and prison staff must be familiar

*House of Commons Justice Committee Ageing prison population Fifth Report of Session 2019-21.

with the details of each PEEP and the location of each affected prisoner.

To ensure the effectiveness of these response plans, realistic, scenario-based exercises must be undertaken which test the ability of prison staff to carry out each plan, including the evacuation of vulnerable prisoners, such as those with a PEEP and to confirm the minimum number of staff required to safely effect both the cell fire response plan and an evacuation of an affected spur or wing.

Articles 4, 7, 8 & 13 – Fire-fighting Measures.

Incident data demonstrates that fires in cells present the most common fire risk in prisons and the general fire precautions are overwhelmingly focused on these.

It is generally accepted that the most effective fire-fighting medium for dealing with cell fires is pressurised water misting, which can be delivered using portable water mist equipment, modular pressurised water mist hose-reels or fixed head in-cell pressurised water mist systems.

The use of portable [gas] pressurised water misting equipment must be avoided due to their short duration of operation and has been withdrawn from service by the Prison Service since April 2019.

Within an agreed strategy and in combination with effective automatic fire detection for cells, the use of pressurised water mist could avoid the potential for significant injury to the prisoner, prison staff or subsequently to the members of a Control & Restraint [C&R] team once the smoke has been cleared.

The effect of discharging pressurised water mist into the cell is both to suppress the fire and also to scrub a high proportion of toxic gases from inside the cell. This effect is not achieved using low pressure hose-reel spray.

The Prison Service applies the HMPPS Cell Fire Safe System of Work, which includes the use of pressurised water mist suppression and Respiratory Protective Equipment [RPE].

The conditions for backdrafts and flashovers are unlikely to be present during the initial stages of cell fires, and not at all after a short period of effective inundation, so prison staff members would avoid the risk from a backdraft or flashover by carrying out initial inundation with pressurised water mist fire-fighting equipment.

Each residential wing must be equipped with the appropriate fire-fighting equipment, must be appropriately located and immediately available to allow a cell fire response plan to be carried out effectively and safely by prison staff.

Similarly, each wing must be equipped with appropriate ancillary fire-fighting equipment including, RPE Hoods, inundation port keys, anti-barricade tools and torches.

A sufficient stock of RPE Hoods should be available within the prison or region, so that prisons have sufficient replacement sets whilst used sets are sent away for servicing and/or to deal with a spate of copycat fires.

Where portable pressurised water misting equipment is utilised, arrangements must be in place so that the water supply for the unit can be quickly augmented by hose reels, or by some other easy means in the event of a protracted cell fire incident. Additionally, robust arrangements must be in place to ensure both a primary and secondary power supply for portable misting units are available.

As with other life safety fire systems, the fire main pumps for both modular and fixed pressurised water misting systems must provide a warning signal to a monitored fire alarm system in the event of a fault condition and, a secondary electrical power supply (or sufficiently sized standby diesel pump) with local automatic change-over in the event of loss of the primary electrical supply.

A suitable tool for removing the observation panel glazing must be appropriately located and always available for quick intervention for instances in which prison staff cannot access the inundation port in the cell door for firefighting because it has been obstructed or cannot be removed.

Where a prisoner has defeated a fixed in-cell misting head, an alternative means of applying pressurised water-mist into the cell must be readily available.

To avert such eventualities, effective measures must be developed and implemented to deter prisoners from tampering with in-cell misting heads.

Despite cell fires presenting the most common fire risk, bespoke fire-fighting arrangements will be required for other cellular residential locations:

- Prison staff face both access problems and the potential risk of violence when fighting fires under night-san arrangements.
- Fires in larger rooms – including dormitories and even many healthcare bedrooms – fall outside normal cell fire procedures because prison staff are instructed not to enter in RPE.
- Fires set inside a cell ablution area which is enclosed behind a full-length door set.
- Fires which occur in areas of residential wings where there little or no fire compartmentation and the ability to limit the spread of fire is unlikely.
- Fires which occur in residential wings where prisoners can self-release from their cells but require prison staff to release them at wing exits*.

Articles 4, 7, 8 & 15 – Emergency Procedures Adapted as Appropriate.

A generic cell fire response plan must be adapted to suit circumstances in which fighting the fire with the prisoner in situ is not the safest available approach. This is the case for cell blocks where prisoners are not confined to their cells during patrol and night states, so that there is an opportunity for the cell block to be evacuated quickly.

*Refer to section: Articles 4, 8 & 21 – Fire Training and Drills

Partial Evacuation.

In closed prisons, it is not unusual to encounter a residential wing in which prisoners are able self-release from their cells and can either await release by prison staff at the wing exits or self-evacuate from the [non-secure] building into a secure compound.

On those wings where self-release from the cell is possible, appropriate procedures must in place which ensure that prison staff are alerted and can respond within a pre-determined time to release prisoners from the wing.

In cases where release from the wing exits is controlled remotely prison staff operating the prison control room must have immediate access to clear and simple instructions for the method of releasing prisoners.

Where prisoners can self-evacuate from the wing appropriate instructions must be provided to prisoners for the operation of a suitable emergency exit device on final exit doors, or the activation of a manual call point or electro-mechanical release mechanism [Green Box] if present.

Night Sanitation.

A small number of prisons in England still rely on night-sanitation facilities because individual cells do not have in-cell sanitation. The arrangement is used during patrol and night state, when prisoners are locked in their cells and prison staff are not present on the wings. It allows prisoners to be released individually from their cell to use the communal toilet and washing facilities.

Individual prisoners request to visit the communal toilet and washing facility by using the in-cell intercom button to speak with the Control room staff, who then release the cell door remotely to allow the prisoner onto the landing. On completion of their ablutions, the prisoner returns to his cell and the door is remotely secured by the Control Room.

Whilst an individual is released from their cell, no other cell doors or security doors onto the wing landing can be released.

In the event of an emergency, there is a key available to prison staff which can be used to manually over-ride the electronic locks, as well as an electronic override of the remote door release system which can be operated by the Prison Control Room.

Whilst a Cell Fire Response Plan can be implemented for fires set by a prisoner within a locked cell, a separate bespoke fire response plan must be developed for a fire in the common spaces of a wing with night-sanitation facilities. This plan must consider:

- Do staff operating the prison control room have access to simple and clear instructions for – on request - automatically releasing the doors onto the affected wing landing and the cell doors. Are staff familiar with the night-sanitation operating system?
- Are suitable procedures and equipment in place for providing prisoners with appropriate with instructions to ensure their safety?

- Are operational prison staff familiar with the procedures for making safe access and dealing with fires in the common spaces of wings with night-sanitation.
- Are operational prison staff suitably resourced to make entry onto the affected wing landing in the face of a violent prisoner or prisoners to deal with a fire in the common spaces of wings with night-sanitation.
- Are operational prison staff familiar with the procedures, facilities and equipment for dealing with fires set in the common spaces of wings with night-sanitation, particularly when safe access onto the landing is not possible.

In all the above scenarios, realistic, practical exercises are necessary to ensure that the emergency procedures are appropriate, and to confirm that prison staff can safely implement each bespoke fire response plan.

In-Patient Healthcare Facilities.

The intention of these expectations is to provide a safe and secure environment where prisoners can receive care and treatment.

HTM 05-03 Part K – Guidance on FRAs in complex healthcare premises states that where healthcare facilities are under control of the Crown (such as prisons), the enforcing authority will be the Crown Premises’ Fire Safety Inspectorate.

The HTM 05 series provides guidance on the fire safety arrangements to be applied to secure healthcare buildings containing people who could place other patients, staff or members of the public at risk, so its approach is fully applicable to residential healthcare units in prisons.

Accordingly, CPFSI will use the standard of protection set out by the HTM guidance documents to regulate fire safety in residential healthcare units in prisons.

The requirements are referenced in a number of sections of this document but the principal general fire precautions and progressive evacuation strategy required for dependent patients are set out in this section.

Bedrooms for elderly patients and those with mental illness are classed as fire hazard rooms in HTM 05-03 Part B Appendix 2. Applying this standard means that bedrooms in residential healthcare units in prisons should be fitted with a fire resisting door.

Other fire hazard rooms including dayrooms, storerooms, laundries, consultation rooms, offices and rooms should also be enclosed with appropriate fire-resisting construction and fire doors.

The use of cell doors to bedrooms in residential healthcare units, especially where fitted with a drop down or sliding hatch or window allows smoke to escape from the bedroom into the corridor and to interfere with the safe evacuation of prisoners. Where cell doors are in use they must be mitigated by a mechanical smoke control system which is demonstrated by design and test to provide the time required for evacuation by preventing smoke spread into other cells and the build-up of smoke in evacuation routes.

An evacuation strategy involving the safe implementation of one of either the staged, simultaneous or horizontal evacuation of prisoners in the event of fire will all require there to be effective compartmentation and sub-compartmentation in residential healthcare units. Where the levels of fire compartmentation and sub-compartmentation do not provide a sufficient period of fire resistance for progressive evacuation this can be mitigated with an automatic fire suppression system in all hazard rooms to extend the time available for staff to implement the evacuation.

An automatic fire suppression system can extend the time available for evacuation by mitigating:

- The lack of fire resisting doors and compartmentation
- The absence of other fire-fighting equipment which can be used to suppress fires in larger rooms such as dorms/wards which are occupied by several prisoners.

The HTM 05 guidance follows the same ASET/RSET* approach that CPFSI applies to regulating all aspects of fire safety in prisons. The guidance does not accept in-situ fire-fighting as the default strategy for safeguarding persons in residential healthcare units in prisons.

*ASET - Available Safe Egress Time - calculated time available between the ignition of a fire and the time at which the conditions for escape become untenable to the occupants. RSET – Require Safe Egress Time - calculated time required for the safe evacuation of the occupants of a building after the signalling of the fire.

Accordingly, an evacuation strategy of progressive evacuation may be required, and those working in in-patient healthcare facilities should be provided with clear instructions so that they can safely implement the progressive evacuation of prisoners in the event of fire.

In instances where the use of in-situ fire-fighting is considered for individual patients, this must be individually assessed for its appropriateness in safeguarding patients and staff from fire.

Separate bespoke instructions will be necessary for those who are expected to assume the supervisory role of incident [Bronze] command of progressive evacuation during fire-related incidents. These instructions must ensure that procedures are correctly followed and safety equipment is deployed effectively to ensure the safe evacuation of prisoners.

Details of the emergency plan for the healthcare facility should be readily available and included as part of the fire safety training programmes for those working in in-patient healthcare facilities.

Articles 4, 7, 8, 15 & 19 – Staff Instructions for Cell Fires.

In 2005 the Building Research Establishment conducted an independent review* of the existing levels of fire safety precautions, practices and procedures in prisons on behalf of Ministry of Justice.

These tests predicted that a sufficient fire load was present in a cell to produce fires that if not suppressed, or the occupant rescued, could easily prove fatal to the occupant. The baseline test recorded that without any form of fire-fighting intervention a cell fire would cause injury from

* BRE Report: 223698 Fire Survey & Recommendations. 7th June 2005

six minutes of the first ignition, unconsciousness within seven minutes, and death within a further minute.

Separate research into the use of water mist technology for the extinguishment of prison cell fires was carried out by the Building Research Establishment on behalf of the Ministry of Justice in 2007*. These tests recorded that conditions within the cell for an unsuppressed fully developed fire became life threatening for the occupant of a cell at mid-height level after approximately 10 minutes from ignition.

The 2007 tests showed that the application of fixed or portable water misting systems within 6 minutes of ignition would provide a tenable atmosphere where the cell door is opened after 10 minutes from ignition and then remained open for a period of at least 3 and ½ minutes to simulate a rescue by prison staff.

HMPPS has implemented a safe system of work which whilst protecting employed prison staff from the risk of injury at cell fires, does not safeguard prisoners so far as is possible. To discharge the duty imposed by the Order to protect prisoners so far as is possible from the risk of injury or death requires additional factors beyond the HMPPS Cell Fire Safe System of Work to be included in the staff instructions for cell fires.

Any cell fire response plan must be time-based, with immediate priority being given to dealing with the fire and the occupant in the affected cell because the asphyxiant gases** and heat produced by a fire is a dynamic and growing hazard as time passes, and delay directly increases the likelihood of serious injury. In addition, different people receive different levels of injury from the same exposure to asphyxiant gases, so the instructions must, therefore, direct prison staff to commence inundation as soon as possible.

Whilst both the 2005 and 2007 tests showed that the use of pressurised water-mist equipment progressively reduces the temperature inside the cell, the results from the 2007 tests have shown that the level of asphyxiant gases present increases whilst the cell door remains closed. What remains unclear from the 2007 testing is whether the rise in the level of asphyxiant gases will cause a life-threatening level of exposure to these gases where the cell door remains closed, despite inundation into the cell with water mist continuing.

To ensure that a prisoner does not experience prolonged exposure to asphyxiant gases, staff should be instructed to open the door to the fire cell and safely remove the prisoner as soon as possible.

The conditions for backdrafts and flashovers are not present if the window of the fire cell is open or after a short period of effective inundation. The instructions for staff should therefore recognise that staff will be safe from the risks of backdrafts and flashovers when opening cell doors in either of those situations.

On its own, a cell door which is warm to the touch is only an indicator that there has been a fire in the cell, not that a fire is still burning and represents a risk to staff. An actively burning fire will produce new smoke, and staff should be instructed to monitor the density of the smoke (i.e. whether visibility in the cell is improving or worsening) in order to judge whether the inundation is effective and the fire has been suppressed.

* BRE 246912 – Fire Safety in prison cells – effectiveness of water mist systems. 31st October 2008.

** carbon monoxide, hydrogen cyanide, carbon dioxide and low oxygen hypoxia

Once staff have secured and maintained sufficient vision into the cell during a fire, it is vital that they confirm the fire has been successfully suppressed and visually check that the threat of violence against them can be safely controlled by their standard operating procedures.

Subject to a dynamic risk assessment undertaken by the prison Bronze Incident Commander, staff should be instructed to remove the observation panel glass if their vision into the cell has been obstructed.

To ensure that prison staff remain safe from the risk of assault it may be necessary for them to continue inundating and applying their standard operating procedures, before implementing Control and Restraint procedures so as to allow them to safely remove the prisoner as soon as possible.

Oncoming staff reinforcements should also be instructed to look for water running back out under the cell door within a short time after inundation is commenced. That is an indicator that the pressurised water mist is being obstructed, and should trigger an immediate change of response, with staff breaking the observation panel and inundating through that instead.

This should be used as a reasonable benchmark for planning and testing a full cell fire response plan.

To support the above approach, clear instructions must be provided to prison staff so that they can deploy pressurised water-misting equipment and commence fire-fighting in the cell and to release the prisoner from the fire cell as soon as possible.

In addition to national instructions, local instructions may be necessary so that permanent staff, newly qualified staff or those on detached duties are familiar with wing configurations, the location and operation of the on-site cell fire response equipment, adapted procedures for dealing with fires in cells with rebated doors and the anticipated response from supporting wing and intervention staff during both day and night states.

Separate instructions will be necessary for senior officers and custody managers who are expected to assume the supervisory role of incident [Bronze] command during fire-related incidents. These instructions must ensure that prison staff working at the cell door are following procedures correctly and safely. Bronze Commanders can refer to the HMPPS Orderly Officers aide memoire to assist them when making operational decisions and carrying out a dynamic risk assessment of an incident.

It is imperative that the dynamic risk assessment undertaken by Bronze Commanders throughout the stages of a cell fire incident considers the hazards and risks associated with cell fires and reviews the suitability of the control measures introduced. There are many factors to consider including, the effect of water misting in suppressing the fire, the duration of RPE use by prison staff, the behaviour and state of the prisoner and – most crucially - the length of time the prisoner has been exposed to fire conditions within the cell.

Staff operating prison control rooms and other staff must have access to simple and clear instructions for releasing any security-controlled doors on request, interrogating and relaying information from the main fire alarm panel and the procedures for summoning and receiving the Fire and Rescue Service into the prison.

Note: Bespoke staff instructions for dealing with fires which occur in in-patient healthcare facilities are included in the section: [Articles 4, 7, 8 & 15 - Emergency Procedures Adapted as Appropriate, sub-section: In-Patient Healthcare Facilities.](#)

Articles 4, 7, 8, 13 15 & 21 – Effectiveness of Staff Actions in the Event of a Cell Fire.

Prison staff must be able to demonstrate the ability to carry out the cell fire response plan.

Prison staff must be able to demonstrate the ability to use pressurised misting equipment, RPE Hoods, other ancillary equipment, the removal of inundation ports, anti-barricade devices and the methods available for augmenting the water supply to portable pressurised water misting equipment.

Any staff who will be working on residential wings during night state must be able to demonstrate the ability to use RPE and deploy all inundation equipment on their own, whilst awaiting support from staff responding from elsewhere in the prison.

Prison staff working in residential wings must be able to demonstrate a sufficient understanding of the type, equipment location and working principles of the fire detection systems in cells and of carrying out meaningful checks on whether prisoners have interfered with it.

Prison staff who are expected to assume a supervisory role such as incident [Bronze] command must be able to demonstrate the ability to carry out the tasks associated with that role with these being reviewed and tested during refresher training and practical exercises.

Staff operating prison control rooms and other staff must be able to demonstrate the ability to release security-controlled doors on request, interrogate and relay information from the main fire alarm panel and summon and receive the Fire and Rescue Service into the prison.

A sufficient number of fire trained prison staff must always be available to deal with cell fires safely and effectively.

A co-ordinated and co-operative relationship between the prison training department and prison detail will help to ensure that sufficient fire trained prison staff are always available for rostering.

Note: Those working in in-patient healthcare facilities must understand and be able to follow the bespoke instructions for staff actions to take in the event of a fire in an in-patient Healthcare Facility. This is covered in section: [Articles 4, 7, 8 & 15 - Emergency Procedures Adapted as Appropriate, sub-section: In-Patient Healthcare Facilities\).](#)

Articles 4, 8 & 21 – Fire Training and Drills.

The statutory requirement for training prison staff to deal with cell fires is related to the level of risk to which they are exposed. As the level of risk to which prison staff members are exposed at a cell fire is significant, so the fire training for staff must be frequent and rigorous.

Unless a sufficient proportion of prison staff members have received initial training and undertaken recent refresher training in dealing with cell fires, it cannot be ensured that an adequate number of trained prison staff members will be available in every wing both day and night to carry out the cell fire response procedure quickly and safely.

Those with legal responsibilities for fire safety in prisons must ensure that prison staff working in residential wings receive training which provides them with a sufficient understanding of the type, equipment location and working principles of the fire detection systems in cells so that they can carry out meaningful checks on whether prisoners have interfered with it. Examples of checks are confirming that smoke detector anti-tamper tags are in place and that cell ventilation grilles, or aspirating smoke detection system “pepper pots” are not blocked.

Initial and refresher training packages being delivered by competent local trainers must include both theoretical and practical elements which cover the use of pressurised water misting equipment, RPE Hoods, other ancillary equipment, the removal of inundation ports and anti-barricade devices. Where portable pressurised misting units are present, this training should also cover the methods available for augmenting the water supply in the event of a protracted incident.

These practical elements should be tested by completing simulated, scenario based practical exercises which cover the three cell fire response scenarios, barricading and the evacuation of other cells.

Prison staff who are expected to assume a supervisory role such as incident [Bronze] command, should receive appropriate initial training for carrying out the tasks associated with that role with these being reviewed and tested during refresher training and practical exercises.

The use of regular toolbox training exercises is a useful, additional tool to support mandatory initial and refresher fire training. It can act as a prompt to staff so that they are always primed to follow emergency procedures and deploy the correct fire-fighting equipment in the proper sequence and in timely fashion at the cell door.

Staffing levels are lower during night state conditions, so night state staffing levels should be used during practical exercises to replicate the actual conditions that would be present.

Effective management arrangements must be in place to ensure that fire training can be delivered so that a sufficient number of trained prison staff are always available for shift rostering.

Any staff who will be working on residential wings during night state must be able to use RPE and deploy all inundation equipment on their own, whilst awaiting support from staff responding from elsewhere in the prison.

The initial training for prison staff members must ensure that new staff members are sufficiently trained to be able – under suitable supervision – to take a safe and effective part in the cell fire response plan, including using RPE and all inundation equipment.

Fire training for prison staff members must be enhanced by localised training so that permanent staff, newly qualified staff or those on detached duties are familiar with wing configurations, the location and operation of the on-site cell fire response equipment, adapted procedures for dealing with fires in cells with rebated doors and the anticipated response from supporting wing and intervention staff during both day and night states.

Localised training will also be required for staff operating prison control rooms and other staff who may be required to release security-controlled doors on request, interrogate and relay information from the main fire alarm panel and summon and receive the Fire and Rescue Service into the prison.

Where bespoke fire-fighting arrangements are required to deal with fires occurring, for example, in residential wings with little or no fire compartmentation - where limiting the spread of fire is unlikely - or in residential wings where prisoners can self-release from their cells but require staff to release them at wing exits, appropriate theoretical and practical fire training will be necessary to ensure that staff can safely assist with the evacuation of prisoners from these wings.

Note: Bespoke expectations for those working in in-patient healthcare facilities should include appropriate training and drills so that they can safely implement and oversee the progressive evacuation of prisoners in the event of fire in line with the instructions provided under [Articles 4, 7, 8 & 15 - Emergency Procedures Adapted as Appropriate, sub-section: In-Patient Healthcare Facilities.](#)