



CHELSEA HOUSE, 8-14 BROADWAY
HAYWARDS HEATH, WEST SUSSEX, RH16 3AH
+44 (0) 1444 447300
www.britishparking.co.uk info@britishparking.co.uk

Fire Safety Unit
2 Marsham Street
Fry Building
London
SW1P 4DF

Email: FireSafetyUnitconsultations@homeoffice.gov.uk

31 July 2019

Dear Fire Safety Unit

The Regulatory Reform (Fire Safety) Order 2005: call for evidence

We represent the UK parking and traffic management profession. Our 750 plus corporate members includes local government, commercial providers and parking system operators, as well as consultants and academics. In addition, we represent over 500 individuals and have a separate membership structure to support their professional development.

We have received support from CROSS as we have been raising awareness of the risks associated with fires in car parks to our members.

Q. 4.9.

We support the proposal to establish reporting systems in organisations and for the lessons learned from these reports to be disseminated across the industry, following the methods used by CROSS.

We support Structural-Safety's view that:

1. The existing voluntary CROSS reporting system for structural safety issues will be enhanced by the addition of reporting for fire safety issues to improve public safety.
2. The introduction of mandatory reporting will also improve public safety and should be for occurrence where the level of risk for affecting life safety is high in buildings above 18m in height.
3. Voluntary reporting through CROSS should be applied across all buildings, both above and below 18m in height.

Q. 4.10.

CROSS has been very helpful in the BPA raising awareness and of the risks associated with fires in car parks and is currently supporting the BPA in its work to bring about more understanding on the subject at every level in the industry from consumer / customer up to operators and indeed government. This has been achieved by means of reporting of incidents and also knowledge sharing on the subject together with attendance at meetings / forums and introduction to associated parties in order to bring about improvement.

A 'just culture' is necessary and one of the ways this can be achieved is with the system of reporting that CROSS have painstakingly devised over time and built up trust in. The confidential reporting system is crucial to protect the people reporting the issues and will play an increasingly important role in capturing and sharing lessons learned with support from government. The system should be valued as it plays an important part in improving structural safety and preventing unnecessary deaths from unsafe structures.

4.15.

We believe the reporting of system should be voluntary. Any action to increase awareness of 'near misses' which have been avoided through design whether this be through following process as described in CDM regulations or otherwise, should be seen as valuable.

The benefit of improving awareness of potential areas of a design which may result in safety issues, and an example of how to avoid these is rather obvious and subject to the practicalities of how this reporting is carried out. It could be a very straightforward way to improve safety in construction design.

The support we have received from CROSS has been very helpful and for this reason we believe the work of CROSS can help to achieve a just culture in industry and government:

(i) Industry

- The CROSS confidential reporting system has gained wide acceptance and has been successful in influencing changes in safety culture.
- An important feature of CROSS is the 'just culture' approach which informs without attributing blame.
- CROSS is industry led for the public good.
- By expanding CROSS, more safety issues will be captured and the lessons learned shared with industry to help to prevent future failures.

(ii) Government

- By backing CROSS, the Government will show a commitment to support a proven system for improving safety in the construction industry.
- The proposed extension of CROSS to collect and share reports on fire safety issues will give the fire engineering and firefighting communities a valuable tool to share fire safety information.

We recommend additional funding to run a communications programme: hold and attend events, improve the searchability and ease of access to the reports online, increase communication on platforms including LinkedIn which is B2B. This would extend awareness and further stimulate industry discussion. Currently CROSS do this through their newsletter and produce reports.

In Summary

We work closely with government, especially the Department for Transport and the Ministry of Housing, Communities and Local Government, as well as recently with the Department of Food and Rural Affairs and the Law Commission, to develop parking policy and traffic management. We are happy to assist you with any further information in relation to this very important area of public policy.

Please do not hesitate to contact my colleague **Sarah Greenslade** by emailing consultations@britishparking.co.uk or calling **01444 447 300** if you need more information.

Yours faithfully

A handwritten signature in black ink that reads "Kelvin Reynolds". The signature is written in a cursive style with a horizontal line at the end.

Kelvin Reynolds
Director of Corporate and Public Affairs