

**FIRE SAFETY PRECAUTIONS –
COMPLIANCE WITH FIRE PRECAUTIONS AND PROCESS FOR CHANGE**

This document applies to all stations

<i>Standard</i>		S
Series No.	Role	Issue No.
Bb224	-	03
Persons involved: Station Supervisors Group Station Managers Fire Safety Unit staff Contractors		
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Page 1 of 23		

This standard includes

Objectives
Application
References
Definitions
Responsibilities
Considerations and assurance

- *Safety considerations*
- *Legal considerations*
- *Provisions of procedure*

Background to procedure

- *Legislation*
- *The procedure*
- *Fire safety and protection standards*

LUL premises
Timing of proposal submissions
Temporary exemptions
Exemptions (open-ended)
Contraventions and potential contraventions
Records
Flowcharts
Attachment 1
Attachment 2
Attachment 3
Attachment 3a
Attachment 3b
Attachment 4
Attachment 5
Attachment 5a
Attachment 6

1. Objectives

1.1 This document

- describes the mandatory process for obtaining London Fire and Emergency Planning Authority (LFEPA) and LUL approvals for works that would have an effect on fire precaution details identified on compliance fire plans (section 12 only), workplace regulations and fire certificates
- is a vital part of ensuring LUL's legal obligations with respect to compliance with the fire legislation
- aims to provide consistency of application across all parties that are liable to request a change that may affect a station's compliance fire plan, workplace regulations and fire certification, and ensure a documented audit trail of approvals.

Standard		S
Bb224	-	03
Page 2 of 23		

2. Application

- 2.1 This document applies to new construction, building alterations and changes of room use at LUL premises that changes the entrances or extent of the premises covered by fire legislation.
- 2.2 The procedures outlined in this document are applicable to all parties, both internal and external to LUL. This includes, but is not limited to, the respective Infraco's; Group Station Managers (GSM), all commercial projects, e.g. advertising, phones, vending, etc; external bodies; and any other LUL service providers.
- 2.3 The procedure includes temporary works, temporary structures and any installations of a temporary nature that will be located on any part of the applicable premises.
- Note:** - This excludes temporary hoardings.
- 2.4 The flowcharts in section 14 of this document
- show the process for obtaining LFEPA approvals and revisions to compliance fire plans
 - show the workplace regulations
 - apply to premises with a fire certificate issued under the Fire Precautions Act 1971.

3 References

- 3.1 The text of this document refers to other documents that provide information or guidance. These are listed in attachment 1.
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4 Definitions

The following are used in this document (if from a published source this is indicated in brackets).

Applicant - The person originating proposals for works at stations and taking responsibility for notifying LUL when works commence and for supplying assurance at the completion of works. It is also the applicant's responsibility to notify LUL if approved works are subject to a change or are cancelled. A proposal for change may not necessarily originate from an Infraco.

Application for Change - A drawing, which identifies any changes that the applicant wishes to make to the approval plan. Drawing(s) must clearly define (and cloud) what amendments to the approval plan are required.

Approval plan - A master document (previously known as survey plan) that contains LFEPA approved details taken from design proposals (section 12 stations only).

Assurance - As defined in Safety Control Standard 10 - The process by which an Infraco (or any other party) confirms to LUL that changes identified on the approval plan (or minimal change notice) has been completed to the required standard and configuration.

Authority to use - A document issued by LUL under delegated authority of the LFEPA giving permission to bring into use a changed arrangement of fire detection, compartmentation, suppression systems or means of escape prior to updating of the relevant compliance fire plan.

Compliance fire plan - A legally binding document that reflects how LUL comply with the requirements of The Fire Precautions (Sub-Surface Railway Stations) Regulations 1989.

The key plans and legend on the information sheet on the front of each plan identifies what fire precaution measures must be taken at each individual station. This document also identifies individual exemptions to certain parts of The Fire Precautions (Sub-Surface Railway Stations) Regulations 1989. These exemptions are often referred to as "open ended" or "permanent" exemptions. These must not be confused with "temporary" exemptions.

Standard		S
Bb224	-	03
Page 3 of 23		

4 Definitions - *continued*

Fire Safety Engineer - The person responsible for assurance, standards, audit and other matters relating to Chief Engineers Directorate (CED).

Fire Safety Manager (Operational Support) - The person responsible for implementing the safety arrangements for LUL. Also responsible for all formal contact and submissions to local fire authorities.

Guidance document - For application of the Fire Precautions (Sub-surface Railway Stations) Regulation 1989, this describes the interpretation of The Fire Precautions (Sub-Surface Railway Stations) Regulations 1989. It provides the full text of The Fire Precautions (Sub-Surface Railway Stations) Regulations 1989 in red, and in black, guidance on the interpretation and application of each paragraph. The guidance document has been jointly developed and signed by the LFEPA and LUL.

Infraco - The Infrastructure Company employed through the PPP contract to manage the engineering assets at a particular station.

Minimal change - A document issued by LUL under delegated authority of the LFEPA giving permission for proposed changes to approval plans without obtaining formal LFEPA approval. Minimal changes can only be processed where they do not impact on exemptions.

Outline LFEPA approval - A formal document originating from the LFEPA, which confirms that proposals submitted to them by LUL on an approval plan are satisfactory from a fire safety point of view only.

Temporary exemption - A document issued by the LFEPA, valid for a given period of time to allow planned works, which impinge on the fire precautions identified on stations compliance fire plans.

5 Responsibilities

Responsibilities are shown in this section, and within the flowcharts in section 14 of this document. Additional responsibilities are listed in the following paragraphs.

The applicant is responsible for

- submitting design proposals (and application forms) to LUL in electronic and/or hard copy formats
- entering into joint LUL/Applicant/Infraco/Fire Authority consultations when clarification is needed or any non-compliant design proposals are submitted. There will also be the need for consultation when non Infraco initiated proposals are submitted to LUL
- on completion of works, providing assurance that any fire safety measures requested on the approval plan or minimal change are complete and meet the necessary standards.
- ensure that adequate time is allowed between assurance and use of any new rooms/areas.

LUL is responsible for

- receiving design proposals and if non-compliant or originated outside of the Infraco enter into consultation with the relevant Infraco
- submitting, in conjunction with the applicant, the revised approval plan to the LFEPA or where applicable, issue a 'minimal change' notice; or fire risk assessment approval
- supplying LFEPA approvals to applicant, the Infraco responsible for the premises document controller and the relevant landlord; section 12 stations and fire certificate only
- on receipt of assurance of completed works, revise compliance fire plan and where appropriate exemption documents or where applicable issue an 'authority to use' notice;
- submitting revised compliance fire plan to the LFEPA; (section 12 stations only)
- ensuring that each Infraco is supplied with the latest compliance fire plan and the LFEPA approval plan; (section 12 stations only)
- ensuring that revised compliance fire plan is with the relevant GSM, and in the stations fire plans box, (section 12 stations only)
- Risk assessment review.

Standard		S
Bb224	-	03
Page 4 of 23		

6 Considerations and assurance

Safety considerations

- 6.1 This document is concerned with providing controls on the process of implementing changes to compliance fire plans, fire certification and fire risk assessment, ensuring that compliance with the applicable statutory legislation is achieved.

Legal considerations

- 6.2 Failure to comply with this legal procedure may put LUL in breach of legislation, which could result in prosecution.

Provisions of procedure

- 6.3 The requirements of this procedure can be assured by
- design plan review
 - consultation between LUL and relevant applicant
 - appropriate external approvals
 - timely and complete assurance of completed works
 - retention of drawings and other records of validation, approval and assurance process.

7 Background to procedure

Legislation

- 7.1 The Fire Precautions (Workplace) Regulations and The Fire Precautions (Workplace) (Amendment) Regulations 1999 enforce the European Directive relating to health and safety at work. These regulations require that a fire safety risk assessment is undertaken on all workplaces to ensure that appropriate levels of fire safety have been provided for.

The procedure

- 7.2 This procedure describes the administrative arrangements and responsibilities applicable to all projects where alterations affect the premises and will require the station compliance fire plans, fire certification and fire risk assessment to be amended. This procedure should be read in conjunction with the fire precautions operational assurance for engineering work and Interim works inspection procedure.

Fire safety and protection standards

- 7.3 Attention is drawn to current LUL Engineering Standards covering fire safety and protection.

8 LUL premises

- 8.1 The purpose of the procedure is to ensure that works that may affect fire precautions at LUL premises are
- designed in accordance with relevant standards and legislation
 - approved with the Local Fire Authority/ Fire Safety Manager (Operational Support) before they are carried out
 - documented correctly.
- 8.2 The Fire Safety Manager (Operational Support) will
- make available his advice and expertise to applicants
 - receive design proposals and arrange approvals before work begins.
- 8.3 On completion of works (or at a pre arranged agreed stage of completion), the Fire Safety Manager (Operational Support) will revise the applicable legislative document(s).

Standard		S
Bb224	-	03
Page 5 of 23		

8 LUL premises - *continued*

8.4 When legislative document(s) have been revised the Fire Safety Manager (Operational Support) must issue copies of them to the following parties

- Compliance fire plan
 - relevant GSM and station (inclusive of exemption)
 - LUL Company Secretary
 - Home Infraco
 - File copy.
- Fire Certificate
 - relevant GSM or landlord
 - LUL Company Secretary
 - File copy
 - Home Infraco.
- Fire risk assessment
 - relevant GSM or landlord
 - File
 - Home Infraco.

8.5 The appropriate room(s) or areas can then be occupied subject to any other approval that may be required.

9 Timing of proposal submissions

Design proposals

9.1 Applicants should allow a minimum of 10 working days from submission to the fire safety unit and outline approval from the fire authority (section 12 stations only), 60 days for fire certification. For outline approvals on premises covered by the workplace regulations allow 10 working days.

9.2 If it is believed that the nature or scope of work necessitates a longer period of consultation, the applicant will be contacted.

9.3 The consent of the GSM or landlord will be required for any works affecting their premises.

9.4 Assurance

- For revisions to compliance fire plans, applicants should allow a minimum of 22 working days from submission of assurance documentation to the room/area being available for use.

Note:- Of this 22 days, the fire authority require a minimum of 10 working days to respond to the application, and 5 days for station layout amendments.

- Where authority to use documents can be issued, applicants should allow at least 2 working days from submission of assurance documentation to receipt of the authority to use letter.

10 Temporary exemptions

10.1 Applications for temporary exemptions to The Fire Precautions (Sub-Surface Railway Stations) Regulations 1989 concerning obstructions to means of escape are made by the GSM to the local fire authority. These are known as '4(1) exemptions', and most commonly arise on account of hoardings around contractors' working areas (section 12 stations only).

10.2 Applications for all other temporary exemptions to The Fire Precautions (Sub-Surface Railway Stations) Regulations 1989 are made by the Fire Safety Manager (Operational Support) to the LFEPA (section 12 stations only).

10.3 The main purpose of temporary exemptions is to enable any party to carry out works. Detection and suppression systems and passive fire protections may need to be inoperative during the execution of works.

Standard		S
Bb224	-	03
Page 6 of 23		

10 Temporary exemptions - *continued*

- 10.4 Temporary exemptions need to be authorised before such planned works are carried out. There may be conditions imposed concerning compensating measures. The guidance document describes exemption requirements and processes.
- 10.5 Equipment failure is by its nature unplanned and temporary exemptions cannot be put in place instantly; arrangements must be made for compensating precautions depending on the nature of the equipment failure. (The guidance document describes equipment failure arrangements) (section 12 stations only).

11 Exemptions (open-ended)

- 11.1 Open-ended exemptions from The Fire Precautions (Sub-Surface Railway Stations) Regulations 1989 are proposed on approval plans, which are submitted, to the LFEPA for approval (section 12 stations only).
- 11.2 Such exemptions can be granted where it can be shown that the provisions of the sub-surface regulations are either
- inappropriate
 - unnecessary
 - not reasonably practicable.
- An application may require a technical submission to support it (section 12 only).
- 11.3 Exemptions are approved by means of documents issued by the LFEPA which together with the compliance fire plans (which must be consistent with the approval plan proposals) constitute a legal record (section 12 stations only).
- 11.4 Although open-ended exemptions are thus termed, the LFEPA may withdraw them, if LUL fails to adhere to its approvals procedure, or breaches conditions attached to the exemptions (section 12 stations only).

12 Contraventions and potential contraventions

- 12.1 When a contravention or potential contravention is notified, GSM's are responsible for taking steps to rectify the situation and to resolve matters with LUL management.
- 12.2 Where any variance between any fire legislative document and actual site conditions are notified, it will be the GSM's (or employer's) responsibility (via the Fire Safety Manager) to ensure that the relevant document is updated.

13. Records

- 13.1 The following records are produced under this process. LUL retains the following records:
- application (form(s))
 - design plan(s)
 - approval plan(s)
 - letter of approval
 - completion assurance
 - compliance fire plan & exemptions
 - fire certificate application
 - fire certificate approval
 - minimal change notices
 - approval to use documents.

Standard		S
Bb224	-	03
Page 7 of 23		

14 Flowcharts

General

14.1 The activities described in this procedure are illustrated in flowcharts in this section.

The following symbols are used in the flowcharts on pages 8 to 14.

- R** - Responsible for ensuring that the outcome of an activity is achieved and that an audit trail is maintained for mandatory consultations.
- C** - The responsible person must invite the participant to be involved in the consultation process.

Standard			S
Bb224	-	03	
Page 8 of 23			

14 Flowcharts - *continued*
Change process section 12 stations

