

SINCE 1852

Fire Safety Requirements Policy

Version 10 - May 2020



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1. INTRODUCTION

Since version 9 of this policy issued in December 2019, the Government has released a further ¹Building Regulations consultation in January 2020 seeking views to reduce the height thresholds relating to the use of combustible materials and sprinklers.

Following the direction of our Construction Board, and to reduce risks to our business and our customers, this policy update anticipates the changes to the Building Regulations. We are therefore restricting the use of combustible materials used in external walls for buildings with a storey height **greater than 11m** above the lowest adjacent external ground level outside the building, **in all sectors**.

Our industry is also experiencing a more challenging Insurance market with greater number of restrictions in terms of cover, limitations on services and increased excesses.

It is important that we pro-actively respond to what continues to be a rapidly changing landscape.

This Policy therefore reflects our current position on Fire Safety Requirements and Compliance - <u>and</u> supersedes all previous iterations of this Policy.

Notes:

- 1. Whilst the Building Regulations consultation has been delayed, the Government has confirmed they will reduce the height for sprinklers to 11m from 30m in residential type buildings, we anticipate this will come into force late Q2 early Q3 2020.
- 2. If you require a tracked changes version of this policy, please click **here**.
- 3. For a list of Frequently Asked Question please log in to the Yellow Book: Design and click here.







2. POLICY REQUIREMENTS

The following requirements apply to ALL current projects and to ALL future enquiries, but not to projects in the defect liability period:

A <u>tracker</u> has been prepared to assist teams' understanding of their projects compliance with this Fire Safety Requirements Policy and to record any comments or actions.

Any non-compliances must be reviewed by the local senior team with any agreed actions, or decisions to accept a deviation, recorded in the Tracker.

REF	COMPLIANCE REQUIREMENT
1.	INTERNAL NOTIFICATION - On all projects with an upper storey greater than 11m above the lowest external ground level, the project must be recorded with the National Product Team for their review and guidance using the Project Notification form which can be downloaded by logging into the from the Yellow Book:Design and clicking here
	On all High Rise Residential Buildings (HRRBs) – those which are 10 storeys or higher – the decision to bid, tender and/or execute contracts <u>must</u> be referred to the COO and the National Product Team.
2.	FIRE CONSULTANT APPOINTMENT - On all projects we <u>must</u> ensure that a suitably qualified fire consultant is appointed to our agreed Scope of Services. It is our preference that the Fire Consultant is appointed through the Architect with a Sub-Consultant Collateral Warranty in favour of Willmott Dixon (this is a condition of payment). All appointments should cover all RIBA Work Stages, including retrospective liability provision where appropriate.
	A standard Scope of Services is available in CS-CON-008 Appendix B2 via the Company Secretary's section of The Hub .
	Please refer to the Fire Responsibility Flow Chart appended in section 3 for clarification regarding the potential scenarios and the appointment strategy required in each.
3.	FIRE CONSULTANT SCOPE - The Fire Consultant is required to review, develop and agree the scheme with the full design team to achieve a solution that is satisfactory to the relevant authorities, and to produce the Fire Safety Strategy report. Please refer to the Fire Safety Strategy Guidance appended in section 4.
	Their service <u>must</u> include a review of the external wall build up (design principles / compliance), consider the intended occupancy of the building, inspecting the façade against the agreed façade specification to include a minimum of 30% of the cavity barrier locations, and other duties set out in the agreed Scope of Services.
4.	RESIDENTIAL LENDERS - The EWS1 form was created by The Royal Institution of Chartered Surveyors (RICS), The Building Societies Association (BSA), and UK Finance to help people buy and sell homes and re-mortgage in residential buildings.
	On residential projects with an upper floor greater than 11m above external ground level, we <u>must</u> ask our Customers if they require the <u>EWS1 form</u> to be completed as this will become their responsibility as the building owner.
	Due to the requirement to confirm that cavity barriers are installed to an appropriate standard in relevant locations, the appointed person for the EWS1 form should be involved during the build. This may be an additional service that our appointed Fire Consultant may be able to carry out.









REF	COMPLIANCE REQUIREMENT
5.	PROFESSIONAL INDEMNITY INSURANCE - When appointing designers or supply chain partners with design responsibility, we must ascertain any limitations of liability in their insurances with respect to fire so that appropriate mitigation measures can be put in place (refer CS-GR-006 on the Company Secretary's section of The Hub).
	We must also ask if they have any existing or foreseeable claims which might adversely affect any 'in the aggregate' limitations of their policy.
6.	TIMBER STRUCTURE INSURANCE NOTIFICATION - Projects with a structural timber element (including Glulam, CLT, Timber Frame and derivatives) are not automatically covered under our Contractors All Risk (CAR) insurance policy.
	There are two scenarios where you will need to notify the Insurance Team of a project which utilises a structural timber element.
	A. If the total project value is more than £5m, or comprises of any building over 3 storeys in height (with a structural timber element), our insurers will wish to collect basic information in order to understand their exposure. The questionnaire here must be completed at least two weeks before work commences on site.
	B. If the total project value is more than £15m it is highly likely that a Project Specific Construction All Risks Insurance will be required. The questionnaire here must be provided to the Insurance Team at the earliest stage possible in the tender process to confirm that the project can be insured, and to establish any additional project premium.
	For all other projects involving structural timber outside of these 2 scenarios, no notification to the Insurance Team needs to be made.
	Please refer to CS-GR-009 on the Company Secretary's section of <u>The Hub</u> .
7.	USE OF APPROVED INSPECTORS - Due to the tightening insurance market, there is an increased risk to our projects through the use of Approved Inspectors. In the event that an Approved Inspector no longer has the insurance cover required to trade, regardless of the project stage a new application would be required with LABC potentially exposing the project to differences in interpretation, the application of new regulations and potentially opening up the works.
	It is therefore agreed that on all projects from 16th December 2019, where the formal appointment of building control has not been made, we must use LABC for all building control approvals, unless approved by the National Product Team and Group Company Secretary.
8.	BUILDING INSURANCE CONSULTATION - At the earliest possible stage we must request to undertake a Building Insurance Consultation process with our Customers and where possible their Insurers.
	This must include collectively agreeing which of the principles of the 'RISC Authority Design Guide for the Fire Protection of Buildings' are to apply, and will help ensure our Customers can economically insure their buildings.
	A suggested template for recording the agreed outcomes of this Consultation can be downloaded here . If the customer refuses to engage with this process it should be recorded in the Project Meeting Minutes.
	All agreed requirements must then be included within the Main Contract, and 'stepped down' to our Supply Chain and designers via their Sub-Contract Orders and Deeds of Appointment.

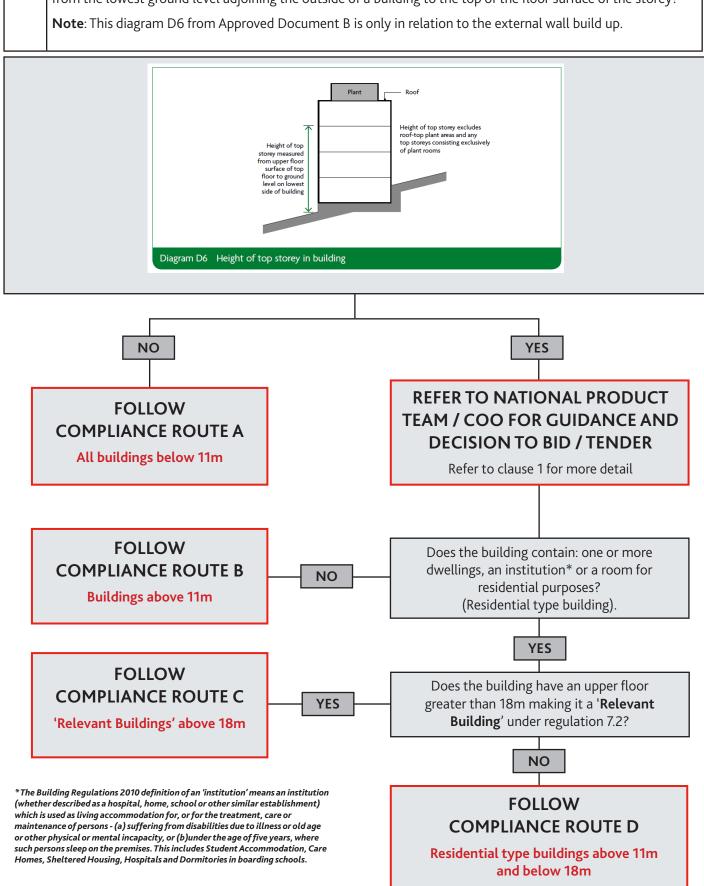








9. **DETERMINING EXTERNAL WALL REQUIREMENTS -** Does the building have an upper storey (excluding storeys consisting exclusively of plant rooms) greater than **11m** above external ground level when measured from the lowest ground level adjoining the outside of a building to the top of the floor surface of the storey?











COMPLIANCE ROUTE A - All building types with an upper storey less than 11m.

Where we are in control of the design and specification, it is our **preference** that materials classed as BS EN 13501 **Class A2-s3, d2 or better** are used for the principle elements of the external wall build up, such as inner leaf structure, insulation, composite/sandwich wall panels, external leaf/cladding.

Should any materials worse than BS EN 13501 Class A2-s3, d2 be proposed, such as timber frame, timber cladding or CLT, their use must be accepted by the customer, and captured in the Fire Safety Strategy and clause 16 of this policy must be followed.

Accessories such as DPC trays, plastic insulation retaining clips, tube washers, EPDM, VCL's, air bricks, weep vents, gaskets, sealants and similar are not part of this requirement.

COMPLIANCE ROUTE B - All buildings with an upper storey greater than 11m that DO NOT contain one or more dwellings, an institution, hotel or a room for residential purposes.

The principle elements of the external wall build up, such as inner leaf structure, insulation, composite/sandwich wall panels, external leaf/cladding and window spandrel panels etc. **must** be BS EN 13501 **Class A2-s3, d2 or better**.

Accessories such as DPC trays, plastic insulation retaining clips, tube washers, EPDM, VCL's, air bricks, weep vents, gaskets, sealants and similar are not part of this requirement.

COMPLIANCE ROUTE C - All buildings which contain one or more dwellings, an institution, hotel or a room for residential purposes, with an upper storey greater than 18m making it a 'Relevant Building' under Regulation 7(2).

Regulation 7(2) of the Building Regulations sets out rigid requirements in respect of external walls 'relevant buildings' (both for new build & change of use).

With the exception of materials listed in Regulation 7(3) see clause 11, the specification of **all** materials used in all external wall build-ups for the entire height of the building **must** be classed BS EN 13501 **Class A2-s1, d0 or better**.

COMPLIANCE ROUTE D - All buildings which contain one or more dwellings, an institution, hotel or a room for residential purposes, with an upper storey greater than 11m but less than 18m.

Materials classed as BS EN 13501 **Class A2-s1, d0 or better <u>must</u>** be used for all the principle elements of the external wall build up, such as inner leaf structure, insulation, composite/sandwich wall panels, external leaf/cladding and window spandrel panels etc.

Accessories such as DPC trays, plastic insulation retaining clips, tube washers, EPDM, VCL's, air bricks, weep vents are not part of this requirement, unless required by NHBC or other warranty provider.

NOTE: Further clarity will be provided following the conclusion of the current Building Regulations consultation.

10. **EXTERNAL WALL SURFACES** - In addition to the above, the external surface of the outermost material used in external wall build-ups must also meet the reaction to fire performance requirements.

These are set out in **Table 10.1** of Approved Document B - Volume 1 or **Table 12.1** of Approved Document B - Volume 2 as applicable in relation to the overall building height (as measured in accordance with Diagram D4) taking into account any relevant boundaries.









- 11. **EXEMPTED MATERIALS** For 'Relevant Buildings' under Compliance Route C, <u>Regulation 7(2)</u> requires that all materials which become part of an external wall or specified attachment achieve class A2-s1, d0 or class A1, other than those exempted by <u>Regulation 7(3)</u> listed below:
 - Cavity trays when used between two leaves of masonry;
 - Any part of a roof pitched at an angle of less than 70 degrees to the horizontal
 - Door frames and doorsets;
 - Electrical installations:
 - Insulation and water proofing materials used below ground level;
 - · Intumescent and fire stopping materials;
 - Membranes (but note that under Approved Document B membranes as part of the external wall
 construction must achieve a minimum classification of BS EN 13501 Class B-s3,d0;
 - Seals, gaskets, fixings, sealants and backer rods;
 - Thermal break materials where the inclusion of the materials is necessary to meet the thermal bridging requirements of Part L of Schedule 1 and/or
 - Window frames and glass.

Further clarification will be required where a 3rd party warranty provider is involved e.g. NHBC, as they have specific interpretations of the Regulations.

NOTE: The Government is currently consulting on Regulation 2 and we expect further changes and clarifications towards mid 2020.

12. **ATTACHMENTS TO EXTERNAL WALLS** - For buildings that contain one or more dwellings, an institution, hotel or a room for residential purposes, all attachments fixed to external walls (e.g. balconies, solar shading or solar panels) on buildings at any height <u>must</u> be fully constructed from materials classed as **BS EN 13501 A2-s1, d0** or better.

The use of laminated glass and other combustible accessories <u>must</u> be agreed with Building Control, our customer, any warranty provider such as NHBC and captured in the Fire Safety Strategy.

13. **ACM CLADDING** - The use of Aluminium Composite Materials (ACMs) is **banned**, irrespective of core material or height.

Note: ACM is a thin aluminium sheet composite panel with a plastic or mineral core, often attached to a subframe used as a drained and ventilated rain screen cladding system. They provide a decorative and protective façade over external insulation. This includes products such as Alucobond, Vitrabond and Alpolic. We do not include steel insulated sandwich panels within this definition.

14. **HPL CLADDING** - Whilst the use of High Pressure Laminate panels (HPL's) within Willmott Dixon are not currently banned below 11m, we are aware of insurance restrictions being placed on this material and we should substitute for an alternative cladding product classed as BS EN 13501 **Class A2-s3, d2 or better** wherever possible.

Note: High Pressure Laminate (HPL) panels are layers of paper saturated with phenolic resin which is fused together under heat and pressure, the curing process transforms the resin into plastic by a cross linking process that converts the paper sheets into a single, rigid laminated sheet. This includes products such as Trespa, Bauclad-Max, Prodema-Prodex, Resopal.









REF	COMPLIANCE REQUIREMENT		
15.	DESKTOP ASSESSMENTS - We will <u>not</u> accept desktop assessments or BS8414 or BR135 tests to support the use of Combustible materials on any part of the façade/envelope of a building.		
16.	FIRE SAFETY STRATEGY - The Fire Safety Strategy <u>must</u> be included as part of the Main Contract, at the highest possible level in terms of contractual hierarchy to provide a clear position to all parties - refer to CS-GR-008 on the Company Secretary's section of <u>The Hub</u> on this matter.		
17.	MATERIAL SUBSTITUTION - After Main Contract execution, no design or element involving fire rating, fire protection, or any life safety systems can be substituted for an alternative unless that change has been approved in writing by our Fire Consultant and acknowledged by the Customer. The Fire Safety Strategy is a live document and must track any changes or revisions as and when they are agreed.		
18.	PRODUCTS - All fire protection products and systems (specified by our Designers and those Supply Chain Partners with design responsibility) <u>must</u> hold third party certification by a UKAS accredited body to an appropriate product or performance standard (e.g. BS EN 13501 or BS476, Certifire, etc.) for the context within which they are to be used ('right product for the right location').		
19.	DOORSETS - We <u>must</u> only purchase and install certified Fire Doorsets and never separate the procurement of doors and frames.		
	With regards to ironmongery we will only install products compatible with the doorset's fire door certification.		
	We must <u>never</u> post-fix any item to a fire door or carry out any modification (vision panels etc.) which will invalidate its fire certification. If in doubt written approvals <u>must</u> be obtained from our Fire Consultant, our Mandated Doorset Supplier and all relevant Manufacturers/Suppliers.		
20.	SUPPLY CHAIN COMPETENCE - Everyone in our Supply Chain responsible for the installation of fire protection products/systems <u>must</u> be appropriately trained, and documentary evidence provided for each relevant individual. At operative level, this could consist of a tool box talk on the products being installed. At supervisor level, to sign off the works they are required to hold a relevant NVQ, or other recognised qualification demonstrating competence in the products they are installing.		
	For new orders from 1st January 2020, we will insist upon evidence of third party certification from a UKAS accredited body for all Supply Chain Partners installing fire protection products/systems. Our Supply Chain Partners must obtain certification (or provide evidence that they are working towards formal accreditation - for example being enrolled on a scheme and awaiting assessment).		
	Please refer to the Training and Competency requirements appended.		
21.	REGULATION 38 - In accordance with Regulation 38 of Approved Document B (Volume 1 and Volume 2), a 'Fire Safety Strategy' document <u>must</u> be developed by the Fire Consultant with the input of the full design team and Customer during the design development process, monitored during the construction phase by our Operational Teams, and then provided to our Customer prior to Practical Completion; in order to enable our Customer to progress their own statutory obligations.		
	Any changes must be approved by the Fire Consultant, relevant authorities (including Building Control, Warranty providers) and the Customer, with an updated Fire Safety Strategy produced by the Fire Consultant.		









- 22. **INSTALLATION QUALITY** To validate that the Fire Safety Strategy has been implemented correctly, the following evidence of fire protection installations <u>must</u> be collated by the project team and issued to our Customer at practical completion:
 - Photographic evidence* of ALL fire stopping penetrations, fire barriers, cavity barriers, fire dampers and
 fire collars noting its location (fire stopping to penetrations should also have a physical label adjacent
 confirming who, what and how long the fire rating has been applied)
 - Door schedule indicated all fire doors and their performance
 - All certification that supports the use of the products installed (fire doorsets, cavity barriers, fire-rated expanding foam, fire dampers, fire collars, facade materials, etc.) to be provided by our supply chain partners
 - Test and commissioning certificates for all fire life safety systems (film thickness for intumescent coatings, sprinklers, AOV systems etc.)
 - Any derogations from the original Fire Safety Strategy must be identified and the relevant approval evidenced (Fire Officer, Fire Consultant, Building Control, etc.)
 - With regards to the Fire Detection and Alarm System, a signed and approved G1 design certificate prior to the installation phase, together with signed and approved G2 and G3 certificates on completion of the installation and commissioning stages for the same (M&E or Specialist Supply Chain Partner to provide).

The Willmott Dixon project team are to lead on, and take overall responsibility, for the above validation process.

All active and passive systems will require some degree of periodic inspection of maintenance which we <u>must</u> advise our customers. Operation and maintenance instructions must be provided including inspection regimes for all Fire life Safety systems.

*The photographic records can be made via Field View or a 3rd party system (such as Bolster, Firetronic, etc.) however this must also be available as standalone information i.e. not accessed via a 3rd party website or platform. A PDF download would be suitable. This information will serve as a record for the future maintenance of the life safety systems in our buildings.

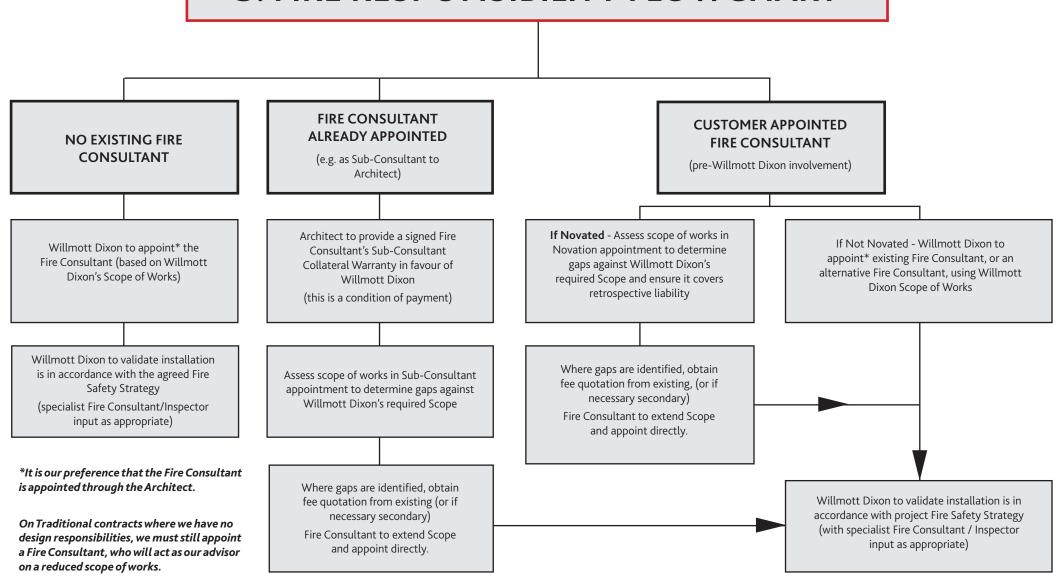




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3. FIRE RESPONSIBILITY FLOWCHART











4. FIRE SAFETY STRATEGY GUIDANCE

A Fire Safety Strategy document is required to present the Building Regulations Fire Safety Strategy for a project.

The document is intended to:

- Establish the strategy employed to meet the Building Regulations regarding fire safety
- Be incorporated into the building contract to record the agreed strategy at point of contract
- Support a Building Regulations submission for a project
- Inform the design team and supply chain partners of the key fire safety requirements for the building to enable further detailed design and to assist in the planning and costing of a project
- Form part of the Fire Safety Information, as required by the Regulatory Reform (Fire Safety) Order 2005 and should be issued to the Responsible Person in accordance with Regulation 38 of the Building Regulations 2010.

When it is required?

A Fire Safety Strategy <u>must</u> be completed for all projects and incorporated into the building contract.

The main aims of the fire strategy will be to address:

- · Life safety with regard to the proposed arrangements for the buildings
- The development brief for the project

With respect to the Building Regulations, the fire strategy will address the key fire safety design aspects specifically related to Approved Document B (Volume 1 and 2) parts B1 to B5 and consequently cover:

- Requirement B1: Means of warning and escape
- Requirement B2: Internal fire spread (linings)
- Requirement B3: Internal fire spread (structure)
- Requirement B4: External fire spread
- Requirement B5: Access and facilities for the fire service

Who compiles the Strategy?

The Fire Consultant is responsible for compiling the Fire Safety Strategy and issuing it to the project Architect who, as Lead Designer, has overall PI responsibility for ensuring compliance.

Limitations of the Strategy

The document should address life safety requirements only. Where property protection or business continuity measures are required, the enhancements should be included within this document as agreed through the Building Insurance consultation with our Customer's insurers.









Structure of the Strategy

The document should be presented following the general format of the Building Regulations, i.e. Sections B1 to B5 with a specific section on the proposed management strategy of the building.

Where fire engineering has been adopted, the key principles and results of the alternative approach must be presented in the main body of the document. Where necessary, fire engineering concepts can be further supported by detailed calculations contained within appendices.

Typical Areas to address in a Fire Safety Strategy

1. Introduction

This section should include:

- Set the scene of the report and identify key stakeholders such as Customer, Designers, Principle Designer, Building Control body etc.)
- Provide an overview of the project (explanation of the buildings, the layout, proposed use and arrangement of accommodation and areas)
- Identify the aims of the strategy, the performance requirements and approach to fire safety design (e.g. ADB, BS9999
 or Fire Engineering), and compliance, and the boundaries for the strategy.
- State all the proposed occupancies of the project (commercial, residential, parking, energy centre, etc..)
- · Fire Safety Principles being following in the strategy
- The evacuation philosophy for the project (stay-put or full evacuation, etc..)
- When working in or adjacent to occupied buildings, the Fire Engineer must engage with the responsible person and
 ensure that the existing fire safety requirements are considered in relation to the proposed works and captured in the
 Fire Safety Strategy.

2. Change Tracker

• List all revisions to the Fire Safety Strategy detailing the change, approving body and date.

3. Means of Warning and Escape (B1)

To meet the Building Regulations Part B1, appropriate provisions for early warning of fire and the means of escape should be made. This is to be identified for all areas/uses/tenures of the building.

- Types and location of detection
- Void detection provision
- Means of escape from rooms and dwellings
- Common Areas
- · Separation from fire
- · Protection from smoke and travel distances
- Fire doorsets
- Stairs
- Escape from basement/car parks
- Escape from other ancillary areas
- Fire-fighting lifts

4. Internal Fire Spread (Linings) B2

Classification of lining for ceilings, walls and rooflights





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5. Internal Fire Spread (Structure) (B3)

- · Load-bearing elements of structure
- Compartmentation
- · Unseen fire spread
- Concealed spaces (Cavities)
- · Protection of openings and fire stopping

6. External Fire Spread (B4)

- Space separation
- · Relevant boundaries
- · Surface spread of flame
- · Combustibility classification of through wall build up materials
- · Combustibility classification of specified attachments
- Combustibility classification of ancillary items (cavity trays, vents, membranes, etc..)

7. Access and Facilities for Fire Service (B5)

- · Access to site
- · Access within buildings
- Dry/wet rising mains
- · Fire hydrant provision
- · Fire service information
- Basement/car park ventilation

8. Active Systems

- Sprinkler systems
- · Common area smoke ventilation
- Natural smoke shafts
- · Mechanical smoke shafts
- · Natural smoke ventilation via automatic opening vents direct to outside
- · Emergency lighting
- · Car Park ventilation
- · Emergency power

9. Building Management

- Specific Management Requirements
- Fire Safety Management and the Regulatory Reform (Fire Safety) Order 2005
- · Construction, Design and Management Regulations
- Extreme Events (arson, terrorist attack, etc..)

10. Confirmation of Compliance

 The Consultant responsible for compiling the Fire Safety Strategy must confirm its compliance with Building Regulations.









5. TRAINING AND COMPETENCY REQUIREMENTS

Competency requirements for fire protection product and services.

The training, qualification and certification provision in the UK is currently varied, uncoordinated, poorly controlled and loosely regulated. For Willmott Dixon to be able to demonstrate that Supply Chain Partners, Supervisors and Operatives are competent to install fire protection products and systems, we require the following levels of training and certification.

ТҮРЕ	WHAT IS REQUIRED
Supply Chain Partner	Company appropriately certified through a UKAS accredited certification body (FIRAS, IFC, BRE etc)
Supervisor or person signing QD Checklist	 NVQ Level 2 in relevant trade NQV Level 2 in Passive Fire Protection CITB approved course in relevant trade
Installer / Operative	Specific training on the products being installed: Tool Box Talk Manufacturer training

Any unfamiliar information submitted as evidence of certification or qualification should be reviewed and investigated prior to acceptance. Please contact the National Product Team or your local Quality Managers for further advice.

Where fire protection products or systems are being installed by a subcontractor to our Supply Chain Partner, it is the specialist subcontractor that requires the certification rather than the Supply Chain Partner. For example, where an M&E SCP employs a specialist fire damper installer, we require evidence of competency from the fire damper installer.

Fire Protection Products and services that requires proof of the competency of the Operatives, Supervisors and Supply Chain Partners.

Whilst the following list is a guide to the most common fire protection products and systems we encounter, it is not exhaustive and any company and operative supplying and installing elements that could be described as fire protection should be appropriately trained and certified.

Active Fire Protection

- Fire alarms including disabled refuge systems
- Fire door hold open/activate open devices
- · Fire-fighting lifts and evacuation lifts
- Active fire curtains and smoke curtains
- Automatic Opening Vents (AOV's)
- Sprinkler system (including water mist systems)
- Fire suppression systems (kitchens, science labs, server rooms etc.)
- Fire shutters
- Smoke fans





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Passive Fire Protection

- Fire doors (timber, steel, glass and composite)
- · Intumescent paint
- Fire stopping to service penetrations through compartment walls (including pipe collars, ablative batt, intumescent wrap, intumescent pillows, intumescent mastic, proprietary fire stopping products, fire rated foam)
- Fire stopping at junction of compartment wall and compartment floor and other walls (linear seals)
- Cavity barriers (rainscreen façade, masonry walls, internal voids such as access floors and soffits)
- Fire rated ductwork
- Fire dampers, smoke dampers and associated damper supports
- Fire rated partitions and linings
- · Fire rated glazed partitions
- · Fire rated movable walls
- Fire rated access panels
- Putty pads to electrical components that penetrate compartments walls (including refuge call points, media plates and other large electrical components)
- Fire curtains (non-active)
- · Lifts with fire rated doors
- · Dry and Wet Risers

Although masonry and concrete elements form fire rated walls, partitions and floors, the nature of the material means that further accredited certification in relation to fire protection is not required by this policy.

Strict adherence to good practice guidelines for masonry and concrete installation is required to ensure elements are well constructed and meet the generic fire performance data for those structures.

Separate certification and competence **is required** for cavity barriers in masonry and any fire stopping installed within a concrete frame (movement joints) as noted above.