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The Baroness Barran
Parliamentary Under Secretary of State for the School System
Sanctuary Buildings
Great Smith Street
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20th September 2023

**Re: The Department for Education's Consultation on the revision of Building Bulletin BB100
Guidance – 'Design for fire safety in Schools'**

Thank you for meeting the All-Party Parliamentary Fire Safety & Rescue Group on the 5th September 2023, which was necessarily shortened from one hour to thirty minutes due to the Department's announcement about reinforced autoclaved aerated concrete in schools. You kindly offered a 'follow up' meeting for a convenient time in the future. We will liaise with your PS regarding a date after the Party Conferences.

I hope that you have now received a copy of the recorded draft minutes arising from that meeting. In the meeting, you said:

"The main thing that's important for you to hear from me is that I have heard the level of your concern. I've heard the specificity of the 'ask' in relation to new schools and I will take it back and go around the loop one more time with colleagues to make sure that we're looking at the most accurate information and absolutely undertake to come back and talk to you again. We're also aware that there is a need to update the existing guidance for some of the reasons that you suggested."

Whilst the Cross-Party Group of Members from both Houses remain concerned that the Department hasn't yet made available all the responses to the BB100 consultation which closed over two years ago; the Group's biggest concern is about the Department's complete reversal of the existing policy on automatic fire sprinkler protection in the Design Guide. This initially was that all new schools, except for those considered as low risk, would be expected to have automatic fire sprinkler protection installed. The policy has now changed such that all new schools will not be expected to have automatic fire sprinkler protection installed, except for those FEW schools defined by the DfE:

- **Boarding Schools** – The School itself will not be sprinkler protected – it will just be the separate sleeping accommodation.

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- SEN Schools – How many new Special Educational Needs Schools are likely to be built? With the increasing tendency for many of those in Special Needs to be integrated into mainstream schools, it is likely to be very few. In a letter to former APPG Chairman, the Late Sir David Amess MP, regarding a new SEN school being built in Daventry Hill in 2016, the Schools Minister Nick Gibb MP said:

“The School management team were directly consulted on this issue, and fully supported the omission of sprinklers given the sensitive nature of the children and the adverse reaction that sprinklers may have on the pupils if they were to go off.”
(Which appears to be another category of high risk likely to be removed).

- Schools which have 4+ storeys or exceed 11m– The APPG’s assessment is that there is not likely to be many new schools built which meet this criteria. It would be helpful if it could be confirmed just how many existing schools meet such criteria and what are the projected number of new builds in this category?

The Group acknowledges that you are the first Minister from the Department to have met with the APPG since Lord Agnew attended a meeting on 2nd April 2019. Over a four year period, Sir Gavin Williamson CBE MP, Baroness Berridge, Jonathan Gullis MP and the Permanent Secretary Susan Acland-Hood have all given reasons why they would not be willing to meet with the group. Understandably, this has been incredibly frustrating, particularly given it is a critically important period with the Revised DRAFT new Design Guide for New Schools (Building Bulletin 100). The public consultation for this closed over two years ago, with no indication yet (other than knowing that it was rejected by the whole of the Fire Sector), of what the responses to DfE’s consultation proposals were.

Numerous letters have been exchanged between the Group and Ministers and the Permanent Secretary since the consultation closed, in particular regarding the sharing of data between the Department and Zurich. A term which I understand you used when referring specifically to Zurich at the recent APPG meeting was:

“The advice I received is that it’s just not at a level of granularity, that we can compare yours with ours”.

This is more than a little frustrating in that over the past two years I have offered in correspondence from the Group to bring the RPA and Zurich together at a roundtable meeting with Ministers and APPG Members.

Instead, DfE’s Permanent Secretary asked if the APPG would like to encourage Zurich to share their data which Zurich claim to have already done, except for that which is ‘commercially confidential’.

Following the 5th September meeting with yourself and officials, the All-Party Parliamentary Group’s members and Advisers remained in the Committee Room and continued with the discussions. They considered matters such as the statistical impact on the reduced incidence of fires in schools during the 2020 and 2021 COVID lock-down periods, together with the Department’s reference to buildings rather than schools, in order to illustrate rarity of fires.



When statistics are being used to determine the safety measures necessary for controlling and suppressing fires, they need to be accurate and taken over a sufficiently stable, illustrative and predictable period, whilst providing some contingency.

The first School COVID lockdown occurred in March 2020, a second lockdown in November 2020 and a third lockdown in January 2021. During this ten month period, Zurich Municipal Insurance issued a Press Release dated 5th November 2020 which stated:

"40 schools a month are hit by fires. A parliamentary petition has been launched to urge Government to change the law on sprinklers in schools.

A new study from Zurich Municipal reveals 480 primary and secondary schools endured fires in 2019, a staggering 40 incidents every month. As a result, almost 20,000 school children have had their education impacted or have been displaced from their usual school building over the same period. The research was compiled by the Zurich data science team through a freedom of information request to the UK Fire and Rescue Services.

Further data analysis by Zurich, a leading insurer of schools in the UK, shows that last year over 15,000m² of classroom space was damaged during blazes last year across 271 primary and 209 secondary schools. Only 2% (seven) of the schools had sprinkler protection in place. According to official figures, only 15% of all new schools built and open in the UK since 2011 have been fitted with sprinklers. Whilst sprinklers are provided in all new or major refurbished school buildings in Scotland and Wales, this is not the case in England.

Firefighters have been called to nearly 2,000 school blazes in England alone in the last three years. Malfunctioning appliances or equipment, faulty electrics, arson and kitchen blazes are among the leading causes of school fires. Larger fires in schools cost on average £2.8 million to repair and in some cases over £20 million.

Despite being far riskier than average property when it comes to fires, many schools also lack the equipment and adequate fire protection needed to prevent small fires becoming major disasters.

Of more than 1,000 school inspections carried out by Zurich, two thirds (66%) were rated as having 'poor' fixed fire protection systems, such as sprinklers, which are proven to significantly reduce the damage caused by fire. Just 14% were rated 'good' or 'excellent'. A further quarter (24%) were judged 'poor' for fire detection measures, such as smoke detectors and fire alarms.

In June 2020, The then Prime Minister pledged £1bn to fund a decade long school rebuilding and repair programme and a further "£560m in early August. Based on large fires alone, Zurich estimates that the repair for school fires could hit £320 million over 10 years – a significant portion of the government's stated investment. Zurich wants the government to ring-fence some of its promised investment to improve the resilience of schools at high risk of fire.



The findings also led Zurich to launch a parliamentary petition to urge MPs to change the law on sprinklers in schools.

Tilden Watson, Head of Education at Zurich Municipal, said: "With children's education already severely impacted by the Covid-19 pandemic, the last thing we need is further disruption as a result of preventable school fires. As insurers, we work closely with schools to help them manage their fire risks but a simple solution such as the installation of sprinklers could minimise the dangers from the outset, avoiding months or even years of upheaval while the repairs are being carried out. It also preserves the community space, for which schools are often used out of hours.

As well as protecting pupils, sprinklers drastically reduce the extent of damage when there is a blaze, often confining the fire to a single room. This gets children back into schools and classrooms quicker as well as saving taxpayers' money so why is Government not willing to make this investment now, minimising the impact on our children, potentially saving lives and millions of pounds in repair costs?

It makes clear and unchallengeable economic sense to have sprinklers fitted; it has huge support amongst teachers and parents and has universal support amongst fire service professionals and the wider fire community. It is impossible to imagine why Government has dragged its heels on this issue.

Raising the level of fire protection and prevention in schools 'ticks all the boxes': protecting the education of students; protecting the community assets which the school infrastructure provides; reducing the damage caused by smoke and fire; and reducing the risks to both school-users and the firefighters who are called upon to extinguish the fires. It's time for the government to stop prevaricating. It's time for MPs of all parties to press for the government to urgently the mandatory fitting of sprinklers in all schools."

In contrast DfE's Permanent Secretary states from an analysis by the Government Actuary Department (GAD) during its consultation, that fires in schools are infrequent with less than 450 fires per year in an estate of 65,000 buildings. 90% of these fires cause no damage at all, are limited to the first item ignited or impact only one classroom.

Turning now to the Impact of fires on pupil's attainment from time lost due to fire incidents, DfE's Permanent Secretary said:

"Given it has been raised so strongly, the Department has invited the APPG and Zurich to offer us any data they have received on this, which might help us to consider it further."

The All-Party Group assumes that an Impact Assessment of the DfE's recommendation based upon a cost/benefit analysis must have been undertaken as part of DfE's consultation but these have not been published. As you know, the APPG has enormous expertise and experience at its disposal and we would be very grateful to see these two documents and offer constructive comments upon them.



Further, we would point to Baroness Morgan's report into the damage which short breaks have on young people's futures: <https://www.gov.uk/government/news/short-breaks-damage-young-peoples-futures>

In this context, and as part of the Consultation we had to point out a second major omission from the Department's proposals. There was no limit proposed on the size of a compartment for a single storey school built without automatic fire sprinkler protection (which meant that a new single storey school built could be several acres in size without fire suppression). The Department has since responded to this oversight with a limit of 4,000 sq.mtrs on a single storey school compartment without automatic fire sprinkler protection.

Given that single storey retail shops are restricted to a 2,000 sq. mtrs. compartment size without automatic fire sprinkler protection, following the death of a firefighter tackling a fire in a retail shop incident, it would be interesting to learn where the Department received its advice for arriving at 4,000 sq.mtrs for a single storey school, and what impact that would have on fire incidents.

In conclusion, I would wish to raise two important matters moving forward:

1. It is clear from our meeting and from correspondence previously received, that the Department is being advised not to have sprinklers in new schools, so can we please know who the Department's advisers are on Fire safety matters and can we meet with them?
2. Secondly, as indicated above, the Group would very much like to see the full risk and cost benefit analysis which led the DfE to identify the criteria which determine which schools it regards as 'High Risk' thus qualifying for automatic fire sprinkler protection. Additionally, the impact assessment of applying these criteria to identify which schools qualify for automatic fire sprinkler protection on such criteria.

The Group's indications for School sprinkler systems cost between 1% and 3% of the total build cost, which is minimal for new builds in terms of the value of the asset (equating approximately to the cost of the floor coverings).

When measured against the likelihood of the risk of fire, schools are almost twice as likely as any other non-residential building to suffer a fire. Between January 2018 and November 2020, firefighters were called to nearly 2,000 school fires, increasing their risk during the operational response to incidents and exposure to toxic contaminants.

Finally, the magnitude of the damage when the event does occur; which in November 2020 Zurich revealed that 15,000 sq.mtrs of damage to school spaces occurred at 271 Primary Schools and 209 Secondary Schools in 2019, impacting the Education of almost 20,000 children.

Schools are not just attended by children but represent community assets with spaces used for a range of activities often rented out after the school day and on weekends to a range of local societies, clubs, and organisations, as well as serving as community hubs. As such, the loss of these spaces as a result of fire can have a significant impact on local communities lacking accommodation for events, night classes, and meetings. However, in contrast, sprinklered schools that experience a fire are often back in action the same day, rather than the typical two years that it takes to rebuild a school after a major fire.



Fire trends should not be based over a short period as these trends can easily change – the investment needs to be made when newly built, in order to protect this vital community asset over its lifetime not just during a selective period.

On the 5th of September, there was a significant presence of expertise within the room. I hope this serves as a reminder of the apology made to the Grenfell Public Inquiry by Jason Beer KC on behalf of DLUHC, when he said that perhaps they should have listened to what the APPG (Fire Safety) was telling officials and more importantly we might have acted upon some of them. When lives are at risk, it is fundamental that ever precaution is taken.

I look forward to our follow up meeting. If you have any further questions, please do not hesitate to get back in touch at the earliest convenience.

Kind Regards,

A handwritten signature in blue ink, appearing to read 'Bob Blackman'.

Bob Blackman CBE MP

Chairman of APPG Fire Safety & Rescue