

**From:** [REDACTED]  
**To:** [Coroners](#)  
**Cc:** [REDACTED]  
**Subject:** Ref 108578 FAO Mr G Irvine PRIVATE AND CONFIDENTIAL  
**Date:** 15 June 2022 12:02:17  
**Attachments:** [REDACTED]

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Dear Sirs,

Please forward the below to Mr G Irvine, Acting Senior Coroner

Dear Sir

Further to our email of 5 May, I am writing to update you on BSI's response to your Reg 28 report.

Members of BSI's committee FSH/12 - Fire detection and alarm systems have discussed your Reg 28 report.

The committee experts believe the committees which should examine the issues more closely are:

- a. Technical committee FSH/14 - Fire precautions in buildings. The scope of the committee is "the development of National standards for fire safety precautions in residential and commercial buildings, fire risk assessment and fire risk management systems."

Among other standards, FSH/14 is responsible for BS 9991 Fire safety in the design, management and use of residential buildings - Code of practice. That standard is currently being revised, and is due to go for public consultation on 21 July 2022.

- b. Subcommittee FSH/12/1. The scope of the committee is: "Installation and Servicing - the development and maintenance of British Standards and the UK input into CEN/TC72, ISO/TC21/SC3 and their Working Groups in the area of planning, design, installation and servicing of systems".

Among other standards, FSH/12/1 is responsible for *BS 5839-1:2017 Fire detection and fire alarm systems for buildings - Code of practice for design, installation, commissioning and maintenance of systems in non-domestic premises*, and *BS 5839-6:2019+A1:2020 Fire detection and fire alarm systems for buildings - Code of practice for the design, installation, commissioning and maintenance of fire detection and fire alarm systems in domestic premises*.

FSH/12/1 met on 10 June, and have identified the following aspects of BS 5389-1 to be considered as part of a future review, and also to be considered in respect of BS 9991 by FSH/14:

1. Whether BS 5839-1 should include under user responsibilities an informative note that the user may wish to request a complete review of the "addresses" of fire detectors at regular intervals, for example, 5 years.
2. While BS 5839-1 already details a need for users of the standard to check zones and confirm zone plans, it is proposed that commentary be added to 46.2 and/or 23.1 making the risk to life from a lack of a zone plan very clear. The text could also list the lack of a zone plan as a major non-conformity OR the lack of a zone plan immediately rendering the system non-compliant. This may include the absence of an ARC.
3. Regarding ARC connections, the committee noted, many Fire & Rescue Service (FRS) are operating a nil-response policy to AFAs (AUTOMATIC FIRE ALARMS). The standard may include a recommendation the user to determine what the policy is for the local FRS and confirm whether the premises are included or exempt.
4. Currently the standard allows variations to be made and the system still being considered compliant. The committee has proposed the creation of a list of certain variations that cannot be allowed, and that system still be considered compliant. The need to justify the

variation(s) may also be included in the clause.

5. Whether an informative note be included that states an alarm cannot be reset until the cause of the alarm is resolved. However, it was noted any new wording would be added to clauses pertaining to user operation rather than any new recommendations for manufacturers.
6. The committee is considering including a recommendation that the event log should be larger. However, they noted that one issue is that “event” is very broad. As part 1 is a CoP, there are limits to what can be recommended and a EN 54 product standard may be better placed. There are also technical limitations. It has been proposed that text be added to commentary that points out that maximum number of recordable events is 999 but more may be needed, and thought should be given to providing more capacity for addressable systems.

It was also agreed that BS 5839-6:2019+A1:2020 needs to be reviewed against the above list as these changes may need to be made there.

It was suggested that BSI may need to write to or inform all Fire and Rescue Services and possibly the Care Quality Commission (CQC) to inform them of the changes to the standard to encourage attendance to AFAs during the daytime. It was further suggested that the family of the deceased be informed as to the proposed course of action by the relevant authority/organization.

Regarding the matter of key locks, it was agreed subcommittee FSH/12/4 may consider it as part of a forthcoming amendment to BS 7273-4. It may also be covered as part of the ongoing revision of BS 9991 via the inclusion of an informative note to the effect that “if electronic locking is provided on flat entrance doors of individual units of accommodation it should not be necessary or needed to install a code to exist the flat. Means of electric locking should be simple and easy to use (eg a simple lever handle). It is also important that residents understand how to use the electronic lock.”

Finally, it was also suggested that BS 9991 could say that “consideration should be given for ARC connection in certain supported housing” and further guidance can be found in BS 5839-1.

Each of those points will be considered by the responsible committee(s) and we will write again to update progress in due course.

Yours sincerely,

[REDACTED]

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Head of Standards Governance

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