



Ministry of Housing,
Communities &
Local Government

[REDACTED]
*Deputy Prime Minister and Secretary of State for
Housing, Communities & Local Government*
2 Marsham Street
London
SW1P 4DF

Our reference: [REDACTED]

Darren Steward OBE
Area Coroner for Suffolk
HM Coroner's Court
Beacon House
White House Road
Ipswich
IP1 5PB

21 May 2025

Dear Darren Steward OBE,

**RESPONSE TO REGULATION 28: REPORT TO PREVENT FUTURE DEATHS - INQUEST INTO
THE DEATH OF RUTH ANN PINGREE**

Thank you for your letter and investigative report dated 8 April 2025 into the tragic death of Mrs Ruth Ann Pingree, which was made in accordance with Paragraph 7, Schedule 5, of the Coroners and Justice Act 2009 and Regulations 28 and 29 of the Coroners (Investigations) Regulations 2013.

I want to start by offering my sincerest condolences to the family and friends of Mrs Pingree.

I understand that Mrs Pingree died in a caravan fire where the cause of the fire could not be specified. I will go through the changes that have occurred since this tragic fire and what more is being done to improve fire safety.

Modern fire safety legislation sets out high level objectives that must be achieved, both through Building Regulations and the Regulatory Reform (Fire Safety) Order 2005 (FSO). The intention is to allow flexibility in how legislative requirements are satisfied without being overly prescriptive.

Guidance

Under Article 50 of the FSO, the Secretary of State must ensure that appropriate guidance is made available to Responsible Persons (RPs - those responsible for fire safety under the FSO) to discharge their duties. Chief among which is to conduct a case specific fire risk assessment that identifies the fire safety measures necessary and proportionate to the risk at that premises.

Since the tragic death of Mrs Pingree, the Government has enhanced the status of guidance issued under Article 50 through Section 156 of the Building Safety Act, which now means that in any proceedings on a breach of the FSO, the court can consider whether failure to comply with guidance tends to establish if there was a contravention (with the converse point that compliance with guidance may be relied upon to establish there was no contravention).

The relevant guidance at the time would have been the “Do you have paying guests?” guide which was published in 2008 and therefore not long after the commencement of the FSO. As a result, it may have been less definitive in its requirements, to adhere to the non-prescriptive nature of the FSO. It covered a range of premises types from B&Bs to caravans, but in any case, did stress the need for a fire risk assessment which considered the necessary fire safety measures for the premises based on risk and complexity.

The Government published an update to this guide titled “Making your small paying guest accommodation safe from fire” which superseded the older paying guests guide in March 2023 and is available as a free download on GOV.UK. The new guide tends to be more stringent in relation to the fire precautions it recommends.

Maintenance and written records

Your findings relating to the fire indicate that the smoke alarm did not operate. The new guide recommends that for premises in scope, all smoke and heat alarms should be mains powered, with a tamper-proof power supply consisting of a battery, which should improve their reliability. Where these smoke and heat alarms are not already present at the time of the fire risk assessment, the guide recommends that long-life, tamper-proof batteries may be acceptable as a short-term measure of 2-3 years until mains-powered devices are installed. The guide also makes clear the importance of replacing smoke and heat alarms periodically, with a suggested typical lifespan of 10 years.

The guide recommends that smoke and heat alarms should be tested monthly. Additionally, this routine test should be done on each change of occupancy of premises in which staff or owners are not present such as the case with caravans.

The FSO does not have a requirement for keeping records of testing and maintenance, but the new guide recommends this is done through a logbook or electronic record. It also highlights a best practice maintenance and testing checklist to make sure items and equipment are checked.

Since the fire, the Government has also changed the requirements on fire risk assessments where they all now need to be recorded, and it is no longer limited to just ‘significant’ findings but all findings.

Action in case of emergency

The new guidance explains that suitable fire procedures must be developed to ensure that staff, guests and visitors are made aware of what action they need to take in the event of a fire with examples of the types of fire safety signs/notices which should be provided.

Fire risk assessment

In your letter, you raise concerns about a lack of specific guidance on how to conduct a fire risk assessment and what needs to be covered. The new guide mentioned above provides a template for this which should encourage the RP to consider every fire safety measure which might be required.

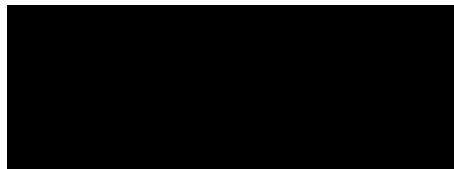
Bespoke guidance

The new guide does not specifically cater for caravans solely and remains a guide that could apply to a broad range of premises that offer short term holiday lets, as such it caveats where some measures would not be appropriate for certain premises types like fire doors in caravans. We are aware that an interested grouping of caravan operators has recently commissioned an independent fire safety consultant to draft bespoke guidance for caravans which is something that we support. We understand that it will be very similar to the guide issued by Government but will have specific measures for holiday caravan and sites. We have asked to be kept informed of progress and will input where necessary to make sure this can consider and address the relevant findings from your letter.

Taken together, these measures should have improved fire safety for guests such as Mrs Pingree going forward.

I would like to thank you for bringing this matter to my attention and, once again, I wish to express my sincere condolences to Mrs Pingree's family and friends.

Yours sincerely,

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