

**THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
HOUSING AND COMMUNITIES SELECT COMMITTEE**

20 JULY 2020

**REPORT BY HEAD OF FIRE SAFETY AND DIRECTOR OF HOUSING
MANAGEMENT**

UPDATE ON HOUSING FIRE RISK MANAGEMENT STRATEGY

This report seeks to update Members on progress in respect of the fire risk management strategy previously reported on in December 2019, including, but not limited to, our response to the recommendations contained within the Grenfell Tower Public Inquiry Phase 1 recommendations.

FOR DISCUSSION

It is recommended that the Committee note the progress to date in relation to implementing our Housing Management fire risk management strategy and endorse our continued work to make improvements to our fire risk management system. This includes our proposed approach to addressing ongoing challenges.

FOR RECOMMENDATION

1 EXECUTIVE SUMMARY

- 1.1 At the time of our previous report, we had developed a fire risk management system document set out against the specification detailed in BS 9997:2019 *Fire risk management system. Specification.* and had developed this into a Corporate Fire Safety Policy and supporting suite of process documents which provided detail as to how we would meet the requirements of our Policy.
- 1.2 Since the previous meeting, the Council's Leadership has approved the Corporate Fire Safety Policy and, in Housing Management as well as in other areas of the Council, we have been implementing processes in order to meet the requirement of the Policy.
- 1.3 This paper provides an update on progress in Housing Management in relation to implementing our Policy. We also set out the challenges posed to fire risk management improvements by the COVID pandemic, and the approaches that we have taken to try to address and overcome these challenges.

- 1.4 Whilst we have made progress, there is still a great deal of work to do, and we set out our approach and objectives to continuing our momentum in developing a high-quality fire risk management system for the Council.

2 BACKGROUND INFORMATION

- 2.1 Since the time of the previous meeting at which progress in relation to fire safety was reported (December 2019), we have been developing and implementing our 17 key processes (Functional Requirement Processes, so named as they detail the processes by which the functional requirements of the Corporate Fire Safety Policy are met).

- 2.2 Additionally, there have been developments in the fire safety team, and some of our key updates to report since the time of the last meeting can be summarised as follows:

1. During the COVID-19 pandemic, the fire safety team have worked as close to normal as possible and have adopted technology-based solutions to delivering our work and will adopt lessons learned from this into our new ways of working.
2. The RBKC fire safety team has achieved BAFE SP205 certification (which is a third-party certification scheme for management and delivery of competent fire risk assessments), making us the first local authority to achieve this certification.
3. RBKC has corporately joined the Fire Industry Association (FIA) following achievement of our certification. The FIA is the largest trade association within the fire protection industry and enables us to stay up-to-date with developments in what is currently a dynamic and fast-changing environment.
4. Emergency plan leaflets detailing the procedures and arrangements for each block have been prepared for all residents with the assistance and engagement of residents. Fire safety information is on our website to support these plans so that residents can easily find it.
5. We have started to engage with residents and academics to explore opportunities for collaboration in research to improve resident safety. We will be expanding our community initiative following reduction in COVID restrictions.
6. We have developed a process whereby residents who require a Personal Emergency Evacuation Plan (PEEP), due to challenges that they may face in evacuating, such as having a disability, are identified and plans collaboratively prepared and shared with London Fire Brigade.
7. Additionally, we are currently installing Premises Information Boxes (PIBs), which will contain information on PEEPs as well as floor plans and other information to assist London Fire Brigade during an incident, in the remainder of our buildings over 18 metres in height. Our previous aim was to deliver this programme by December 2020 and we are on track to meet this.

8. We have continued to develop our engagement with London Fire Brigade and have implemented processes to co-operate, co-ordinate and communicate on fire safety matters.
9. We have installed wayfinding signage for fire-fighters in all of our buildings over 18 metres in height, with a plan to retrospectively install such signage in the remainder of our buildings that are over 11 metres in height.
10. We have implemented monthly testing of lifts that are provided with fire-fighting override control and agreed a process with London Fire Brigade whereby we report any issues encountered in the course of such testing, which is now fully underway.
11. MHCLG required us to advise them of all buildings over 18m that had combustible materials on the façade. Our review identified one building that had some window surround panels formed of high-pressure laminate. This is backed by non-combustible mineral wool insulation, but as a precaution we are arranging for the HPL to be removed.
12. Employer's Requirements have been implemented which go beyond minimum requirements detailed in the new Building Regulations. This includes requiring suppression systems in every new home, regardless of building height, as well as setting minimum fire safety competency standards for those designing or constructing our buildings, in line with best practice guidance.
13. A new programme of fire risk assessments has commenced, with a new portal on the Council website having been developed and launched in order that executive summaries can be shared with residents.
14. Large programmes of fire safety remedial works have been undertaken in response to fire risk assessments, which include compartmentation and fire-stopping works, fire door remedial works, fusible link cut-offs installed on bin chutes etc. These works make our buildings more robust against the potential for passage of fire and smoke between different areas.
15. In this regard, there have been some difficulties in gaining access to resident flats to undertake remedial works to fire doors, some of which relate to COVID and others which relate to residents refusing access; we continue to seek ways to overcome these challenges to ensure that we carry out our critical fire safety works.
16. Fire detection and alarm systems continue to be installed where compartmentation may not meet current standards. Again, due to COVID, there have been some challenges in installing all detectors within individual flats as necessary, and we have sought to follow a risk-based installation methodology to overcome this where possible.
17. Our flat entrance fire door replacement programme is continuing to deliver new fire doors. At the point of writing, we have fitted circa 950 flat entrance and communal doors, with a further 1,600 flat entrance doors in survey, design and manufacturing stages for installation in the coming months.
18. Dry rising fire mains are being designed for buildings that did not specifically require one, although where current guidance would recommend that a dry riser is installed.

19. We have increased the scope of our suppression system retrofit project to incorporate Trellick Tower and the Lancaster West walkway blocks (x3) in addition to our 10 sheltered and hostel schemes. COVID has caused some delays to our programme, although we are now managing to make better progress following relaxation of the lockdown measures.

20. We have drafted Building Safety Cases for our buildings of over 30m in height and started on buildings of between 18m and 30m.

2.3 We provide details of our progress in relation to implementation of processes that support our Housing Management fire risk management system to meet the requirements of the Council’s Corporate Fire Safety Policy in the following section of this report.

3 IMPLEMENTATION OF FIRE RISK MANAGEMENT STRATEGY IN HOUSING MANAGEMENT

3.1 Update on Previously Reported Projects

3.1.1 We have been continuing our work in relation to the *Functional Requirement Processes* (FRPs).

3.1.2 The below table (Table 1) provides an overview of the objectives of the FRPs and progress to date in their implementation:

Table 1: Overview Update on Progress in Implementing Housing Management FRPs		
Reference	Summary	Progress
FRP-001	Function Requirement Processes – signposts the suite of documents and processes to be enacted by HM to meet the Corporate Fire Safety Policy.	Document has been completed and forms effectively the contents page of our Housing Management Fire Risk Management System Manual. Complete.
FRP-002	Building Safety Case (BSC) Process – to outline the process and programme for preparing BSCs.	BSCs drafted for all buildings over 30m. Work commenced to prepare draft BSCs for buildings between 18m and 30m, with the aim to complete the drafts by end of December 2020 for these buildings.
FRP-003	Works Authorization Process (WAP) – to implement an additional level of fire safety internal approvals and control of project works in terms of design, construction and handover.	Work has continued in implementing our WAP. In support of this, Head of Fire Safety now meets monthly with Building Control and LFB’s fire safety team leader. An additional monthly meeting has been implemented with Capital Projects to ensure that forthcoming works are identified and captured within our WAP. Complete.

FRP-004	Planned, Preventive Maintenance (PPM) Assurance Process – to set clear standards for routine testing and maintenance of fire safety systems. This is to ensure that systems for life safety i.e. smoke vents are properly maintained.	<p>We have prepared our standard document detailing the methodology for carrying out fire safety PPM.</p> <p>Arrangements are in place for existing systems.</p> <p>New systems coming online will be subject to PPM following handover.</p> <p>Complete.</p>
FRP-005	Fire Risk Assessment (FRA) Process – to set clear standards to ensure that we meet our obligations in respect of FRAs.	<p>New FRA contract has been awarded and is being carried out by Turner & Townsend. This will provide a new up-to-date FRA for all relevant Housing Management buildings. The programme has managed to continue despite COVID challenges. We have a Fire Safety Surveyor who is dedicated to carrying out internal reviews as an additional layer of quality assurance, in addition to third-party quality checks carried out by Oakleaf under contract.</p>
FRP-006	BAFE Operations Manual and Quality Management Process – to obtain third-party certification of the RBKC fire safety team to demonstrate sector-leading competence.	<p>Third-party certification by the National Security Inspectorate has been achieved by the team, making us the first local authority to achieve this. Processes are now underway to ensure continuous quality management and improvement to ensure that we maintain this certification.</p> <p>Complete.</p>
FRP-007	London Fire Brigade Liaison Process – to document clear processes for engagement with LFB.	<p>Positive work has continued in terms of building a close collaborative relationship with LFB, which includes monthly meetings between fire safety departments, quarterly director / Borough Commander level meetings, as well as additional operational collaboration meetings. Work is being carried out to jointly address fire risk challenges including prevention work in relation to balcony fire hazards and protection work in relation to vulnerable residents. We have implemented the process and continue to work on our engagement. Complete.</p>

FRP-008	Housing Fire Safety Training Process – to scope, prepare and deliver suitable training for staff across Housing Management.	Modular training has been developed in-house by the fire safety team. Training has been provided to staff performing certain roles (i.e. Visiting Officers) to enable them to identify and report any fire safety issues in order that these are dealt with. Further bespoke courses will be delivered to staff (per role) across Housing Management from September 2020, with use of technology to assist in overcoming COVID challenges where necessary. Ongoing.
FRP-009	Resident Engagement Process	We have documented a process for engaging with resident. We have continued to progress resident engagement, which we consider to be absolutely critical to the fire safety work that we are undertaking, adopting, where appropriate, control measures or different ways of engaging, to ensure that we continue with this important work despite COVID challenges. This has included socially-distanced site meetings (with use of PPE), as well as online engagement via MS Teams and Zoom. Adopting these approaches has enabled us to continue to engage on fire safety work, which has included site work, as well as preparation of the emergency plan leaflets. Ongoing.
FRP-010	Community Initiative Process – to further promote fire safety careers in the community and provide opportunities within the Council and partner organisations.	COVID has slightly slowed progress with implementing FRP-010, although we have managed to carry out some engagement between residents, the Council and external parties. This work will continue following lifting of COVID restrictions, although it is currently estimated that this may take until next year to complete. Ongoing.
FRP-011	Housing Fire Safety Complaints Process – to ensure a consistent approach to recording, investigating and resolving fire safety complaints.	Complaints (and customer satisfaction) are now recorded internally under the BAFE SP205-certificated Operations Manual, which also considers the complaints process that applies to the rest of the Council. At the time of writing, we have received two complaints and one recorded customer satisfaction report and we continue to monitor this on an ongoing basis. Complete.

FRP-012	Competency Specification – to ensure that we identify key competencies required for Housing Management staff to assist them in implementing our fire risk management system.	This was originally drafted in late 2019 and is now being reviewed to make improvements to the original competency specification, in order that our improved fire safety training process mirrors the required competencies. Complete.
FRP-013	Employer Requirements (ERs) – to ensure high-quality and consistent procurement of goods and services across the Council.	Our ERs are now being implemented in the course of projects, which includes the new homes projects, where all of our new homes are being provided with suppression systems regardless of size. Additionally, we have banned use of combustible materials on external walls of all buildings, again regardless of height, and required that only registered competent fire engineers are engaged in design or construction work on our projects. Complete.
FRP-014	Due Diligence Process – to ensure that we check that third-parties with whom we engage have appropriate fire risk management systems in place.	Significant work has been undertaken in collating fire safety information from third-parties (such as commercial tenants based on Housing Management buildings), with reviews undertaken of tenant fire risk assessments, etc. Work is ongoing in respect of checking FRAs and compliance of buildings in which the Council is not the freeholder, but in which Council tenants are housed, to ensure that they are safe. Where landlords have failed to co-operate, we have sought assistance from the Council's Legal Services department. Ongoing.
FRP-015	Incident Planning, Control, Investigation and Recording Process – to implement a process whereby the fire safety team record and investigate fire incidents and near misses and respond with improvement measures where necessary.	The fire safety team now has a process in place to record and investigate fires across Housing Management premises. We then cross-check all of our recorded fires against information collected by LFB to ensure that we are recording and investigating all relevant incidents. The process has now bedded in and has allowed us to capture more data on fires in our buildings than is being collected by LFB, which is a measure of some success. Complete.

FRP-016	Grenfell Tower Public Inquiry Response Process – to record and respond to recommendations made by the Public Inquiry relevant to Housing Management.	We have worked towards implementing the relevant recommendations made in the Phase 1 report and provide details of how we have approached each relevant recommendation in Table 2 of this report. Ongoing.
FRP-017	Fire Precautions Upgrade Process – to provide a strategy for upgrading fire precautions, adopting a risk-based approach.	We have adopted a risk-based approach to strategically upgrading fire protection measures. An example of this is that we are currently procuring retrospective suppression system in our 10 sheltered and hostel schemes, with further suppression systems for the three Lancaster West walkways and Trellick Tower (our tallest building). Strategy is complete.

3.1.3 The below table (Table 2) provides a record of action taken in response to the recommendations from Grenfell Tower Public Inquiry Phase 1 report:

Table 2: FRP-016 Detailed Update			
Rec (FRP-016-)	Nature	Progress	Previously Reported Target
001	BS 8629 evacuation systems for buildings over 18m.	This recommendation was made whereby systems may be provided for use by the fire and rescue service. We engaged early with London Fire Brigade on their recommendations for such systems, who advised us that they were awaiting further detailed guidance. We have now agreed to pilot an evacuation system for use by LFB in the Lancaster West walkways, as well as potentially Trellick Tower, which will be incorporated into the projects to deliver suppression systems in those blocks.	Being formulated and will be brought in once guidance is published – this is dependent on London Fire Brigade at present
002	Reporting of combustible facades. Information will be required by LFB	Carried out in conjunction with Building Control as part of the Borough-wide (public and private sector) review. This was completed to deadline.	Mar 2020 – we completed this to target

003	Provision of floor plans and Premises Information Boxes.	We previously had plans in place for buildings over 30m in PIBs. We are currently delivering PIBs for buildings over 18m and we are on track to complete this project early, by end of September 2020.	Dec 2020 – anticipated to complete early by end of Sep 2020 at present
004	Monthly testing of fire lifts (controls) and reporting to LFB.	We implemented this in November 2019, having increased our testing frequency from quarterly to monthly.	Complete at time of previous report
005	Personal emergency evacuation plans (PEEPs). Inquiry recommends paper and electronic copies of PEEPs are shared with LFB.	We have now agreed a process with LFB, whereby we engage with residents to seek information on those that require assistance. We then carry out a person-centred risk assessment and document a PEEP, which we provide as hard copy in the PIB.	Process agreed and implementation ongoing – we aim to complete all high-rise buildings by end of December 2020.
006	Internal signage indicating floor levels in buildings over 18m.	We have now provided wayfinding signage in all buildings over 18m. We are planning to go further, by retrospectively applying the guidance published in the new (May 2020) version of Approved Document B, which recommends such signage in all newly constructed buildings over 11m. We are in the process of planning to design, produce and install this signage for the remainder of our buildings between 11m and 18m as a standalone project.	Mar 2020 – completed to target. Plans to go further currently being prepared, which is quite a substantial job, and due to quantity of buildings in scope we anticipate completion by June 2021.
007	Fire doors – fire-resistance checks and quarterly self-closer checks.	Our strategy to carry out self-closer checks has involved changing our specification for new fire doors to locate the closing device on the external face of the door (which enables a check of the closer without requiring access to flats). This will enable us to carry out quarterly checks of the flat entrance door closers, in addition to our existing monthly checks of communal fire doors.	Dec 2020 – we envisage meeting (or beating) this target at present

3.2 The Impact of COVID-19

- 3.2.1 Lockdown measures in response to the COVID-19 pandemic in late March 2020 presented Housing Management with numerous challenges, which included fire safety challenges.
- 3.2.2 The fire safety team undertook specific COVID-19 fire risk and compliance assessments, identifying challenges and potential control measures to reduce risk.
- 3.2.3 Our assessments identified that lockdown measures would be anticipated to increase the likelihood of fires occurring. There have been 11 fires in Council housing since lockdown. However, the good news is that no one was injured in any of these fires and relatively little damage.
- 3.2.4 This is above the average number of fires anticipated by the Council.
- 3.2.5 COVID-19 has caused other fire safety challenges. Clearly, we have been unable to enter homes where residents are shielding or self-isolating, and some residents have understandably been concerned about granting access to their homes for installation of alarms or repairs to their flat entrance fire doors.
- 3.2.6 That said, we have continued with our fire door replacement programme where possible to do so safely and have continued our work of carrying out fire-stopping and compartmentation works in communal areas. We have also installed fusible link cut-offs to bin chutes to greatly improve the fire safety of the chutes, which has been a programme started, delivered and finished during the COVID pandemic, which is positive.
- 3.2.7 We have also taken a phased, risk-based approach to continuing with our work installing common fire detection and alarm systems where these have been identified as required by our fire risk assessments, whereby we install the system components in the communal areas, allowing us to relocate devices into the flats once the COVID risk decreases.
- 3.2.8 We have managed to continue with our new fire risk assessment programme by making minor amendments to the methodology adopted by our external assessors, Turner and Townsend, whereby they omit the sample check of resident flats, carrying out a visual check of the external face of the door only. The assessors have been granted parking so that they do not need to use public transport and wear personal protective equipment (PPE) whilst on site. This has allowed us to continue with our fire risk assessment programme.
- 3.2.9 Overall, the fire safety team has continued with 'business-as-usual' as closely as possible, with continued socially-distant site visits and site work using PPE, with some distanced site meetings with residents and other resident engagement remotely via online platforms where necessary. This has allowed us to continue making fire safety improvements despite the challenges posed by COVID-19.

3.3 Specific Ongoing Challenges and Proposed Solutions

- 3.3.1 The fire safety team has experienced specific challenges in relation to accessing flats for the purposes of remediating fire doors outside of the first phase of the door replacement programme. Part of this has been caused by COVID, although some refusal of access is understood to be non-COVID-related. Housing Management are in the process of adopting procedures used elsewhere for gaining access to address these issues.
- 3.3.2 Another challenge has been in addressing leaseholder flat entrance doors, where the door has either been changed to a non-fire-rated door, or the self-closer is missing. Again, Housing Management is working on a process to address these doors outside of the flat entrance door replacement programme, whereby leaseholders are given the option of replacing the door ahead of the programme, or, as an interim measure, they can remediate the door by installing a closer, etc. Again, enforcement of these measures may, in some cases, be necessary, and we recommend that the Committee supports such action where necessary in principle.
- 3.3.3 We have also experienced challenges with residents having barbeques on balconies resulting in fires (or indeed emergency calls made to London Fire Brigade with good intent). Whilst this is perhaps linked to the lockdown imposed to tackle COVID, it does represent a risk to our residents, on the basis that balcony barbeques can result in secondary fires. Our approach to addressing this challenge is multi-faceted communications, with again potential need for enforcement action in the case of repeat offenders. Again, we recommend that the Committee supports this action in principle, where we need to adopt this approach.

4 CONSULTATION

- 4.1 We continue to routinely consult with stakeholders on the implementation of our fire risk management system, as we have done since the outset of preparing the system. This includes work with the Resident Safety Panel.
- 4.2 Key to this has been our continued work to engage with our residents and respond to their queries, requests and concerns. This consultation has resulted in positive output, perhaps most notably our emergency plan leaflets, which have received positive and constructive input from our residents.
- 4.3 We have also continued to engage with residents on specific fire safety challenges and projects at individual estates. This has enabled us to continue to implement fire safety improvements, overcoming some of the challenges posed by COVID-19.
- 4.4 We also have improved processes for consulting with London Fire Brigade and the Council's Building Control department. This has enabled us to identify fire safety challenges and implement solutions and has again been extremely positive and of great assistance in debating and agreeing on an approach that works to improve the safety of our residents.

- 4.5 Internally, the fire safety team has engaged with stakeholders from across the Council, from other teams within Housing Management, through to Building Control, Environmental Health and Corporate Health and Safety.
- 4.6 In many respects, consultation is ongoing, and will continue to be so, as part of our continuous improvement model.

5 FINANCIAL IMPLICATIONS

- 5.1 As we noted at the time of the previous Select Committee meeting, the HRA revenue budget includes some specific budget provisions for fire related activities. This includes annual provision of £200,000 to allow for additional responsibilities arising from the Hackitt Review. In addition, some fire-related works of a revenue nature would need to be met from the overall repairs budgets.
- 5.2 In March 2019, a seven-year capital programme of £267m was set for works needed to the Council's housing stock. This included approximately £12m for fire doors and fire-related expenditure.
- 5.3 The capital programme will deliver some of the works associated with the fire strategy, most notably those works that are carried out to deliver the 14 retrofit suppression systems (10x sheltered and hostel blocks, 3x Lancaster West Walkways and 1x Trellick Tower), as well as the wet risers for World's End and Silchester, the dry risers for buildings over 18m not currently fitted with a riser, and retrofitted alarms.
- 5.4 Fundamentally, there may be some additional cost elements, for example where PEEPs identify the need for a local suppression or extinguishing system, and these will be considered and allocated on a case-by-case basis, as necessary.

6 NEXT STEPS

- 6.1 It is recommended that the Committee note the progress to date and provide any feedback in respect of our developing work programme and any other matters arising from this report.

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Background papers used in the preparation of this report: None

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