

Appendix 1 – Grenfell Inquiry Phase 1 recommendations – update on progress made by the Council

Inquiry's Recommendations	Regulation/Law	RBKC Progress
Theme: Theme: Fire and rescue services: knowledge and understanding of materials used in high-rise buildings		Status Complete
<p>33.10.a That the owner and manager of every high-rise residential building be required by law to provide their local fire and rescue service with information about the design of its external walls together with details of the materials of which they are constructed and to inform the fire and rescue service of any material changes made to them.</p>	<p>The Fire Safety Act (FSA) clarified the scope of the Regulatory Reform (Fire Safety) Order 2005 (Fire Safety Order) as including the external walls (including cladding and balconies) and flat entrance doors for premises containing two or more sets of domestic premises. The Government commenced the Act in full on 16 May 2022. Commencement of the FSA also allowed the Government to lay The Fire Safety (England) Regulations 2022 on 18 May 2022.</p> <p>These regulations, made under Article 24 of the Regulatory Reform (Fire Safety) Order 2005, implement this recommendation and came into force on 23 January 2023.</p> <p>Under the Regulations, the responsible person of a high-rise residential building must prepare a record of the design of the external walls of the building including the materials from which the walls are constructed.</p> <p>Regulations also require the record to contain details of the level of risk which has been identified by the fire risk assessment and the mitigations have been taken in relation to that risk. The responsible person must send this record electronically to their local fire and rescue service. A template will be provided to assist the responsible person in preparing this record.</p>	<p>We completed our review of all 18m+ buildings (High-rise buildings) and reported this in line with guidance by our March 2020 target. For all 18m+ buildings we provided electronic records to the LFB of the design of external walls, including materials those walls are constructed from and a record of the level of risk which has been identified by the fire risk assessment and the mitigations taken in relation to risks.</p> <p>We electronically shared plans and FRAEWs in 2022 with LFB on all our buildings ahead of any legal requirement to do so.</p> <p>In January 2023 we completed a Fire Risk Appraisal of External Walls (FRAEWs) for all High Rise Buildings and FRAEWs were completed our low risk buildings in September 2024, in line with regulatory requirements.</p> <p>All new FRAs include this information.</p> <p>We have carried out assessments using the Gov Risk Prioritisation Tool and all remaining lower rise buildings have a low or very low risk score, with one exception, which was assessed as medium risk due to the High-Pressure Laminate (HPL) sandwich panels used as part of the curtain wall system with windows in horizontal sections along the building. These had previously been tested at the Building Research Establishment and produced a high-risk result such that the tests had to be stopped. In response to this, the building was fitted with a full communal and domestic fire alarm system and the evacuation strategy changed to simultaneous. The building has been assigned a building safety manager portfolio and is inspection every eight weeks. Information regarding the assessment has been shared with the LFB, who have carried out audits at the building. The housing management capital delivery team are planning for the required remedial works to be procured and carried out.</p>

Inquiry's Recommendations	Regulation/Law	RBKC Progress
Theme: Plans		Status Complete
<p>33.12.a That the owner and manager of every high-rise residential building be required by law to provide their local fire and rescue services with up-to-date plans in both paper and electronic form of every floor of the building identifying the location of key fire safety systems.</p>	<p>On 18 May 2022 the Government laid regulations under Article 24 of the Regulatory Reform (Fire Safety) Order 2005 to implement this recommendation. The Fire Safety (England) Regulations 2022 came into force on 23 January 2023. Under the Regulations, the responsible person for a high-rise residential building must prepare a plan for each floor of the building. This plan should show, alongside the layout of the relevant floor, the location of all lifts and main fire-fighting equipment for the building. Where the layout for two or more floors are identical, the responsible person can produce a single plan (as long as they clearly indicate the floors to which that plan relates). The responsible person must send these plans electronically to their local fire and rescue service. In addition to this plan, the responsible person for a high-rise residential building must, under the Regulations, prepare an additional hard copy single page building plan to show the environs of the building, as well as the location of fire-fighting facilities and information useful to the fire and rescue service.</p>	<p>The Council currently owns 35 high rise buildings, following the handover of Kelso Cochrane House earlier this year. Additionally, in the next year the Acklam Road and Barlby Road developments will include high rise buildings that will be handed over.</p> <p>Secure Information Boxes (SIB) are installed in all 18m+ buildings as required by the legislation. We have also installed SIBs at all buildings 11m+. The SIBs contain the information required by the Fire Safety England Regulations and by the NFCC/FIA code of practise. A physical inspection of each SIB is carried out every 6 months to ensure all information is present and up to date, including the Vulnerable Persons List, the FRA is up to date and that any keys are still are present and available. The results of the inspection are loaded onto Keystone and checked by the Building Safety Managers. Any change in floor plans is updated on the LFB portal.</p>
<p>33.12.b That the owner and manager of every high-rise residential building be required by law to ensure that the building contains a premises information box (now SIB), the contents of which must include a copy of the up-to-date floor plans and information about the nature of any lift intended for use by the fire and rescue services.</p>	<p>Also, under the Regulations, the responsible person for a high-rise residential building must install a secure information box in or on the premises. This secure information box should contain hard copies of the building floor plans, the single page building plan and the UK contact details of the responsible person and any other individual the responsible person considers appropriate.</p> <p>In addition to this, the Department for Levelling Up, Housing and Communities (DLUHC) consulted on the proposal to recommend secure information boxes in new blocks of flats through an update to Building Regulation guidance document Approved Document B (ADB). DLUHC announced on 1 June 2022 that it had amended ADB so that secure information boxes would now have to be installed in all new residential buildings over 11 metres.</p>	<p>The SIBs for the 11m+ building are currently c. 96.64 per cent compliant against the criteria, though this is still not a legal requirement. All 11m+ buildings have contact details, RP name and address and vulnerable persons information where relevant.</p> <p>For the 18m+ building SIBs, the floorplans are complete. For the 11m+ buildings there are some outstanding floorplans and in a number of cases we will not be installing floorplans due to the simple layout of the building. They were assessed as not being needed or able to assist the LFB in their attendance at any fire or incident.</p> <p>Whilst not a requirement of the Fire Safety England Regulations the Council carries out PCFRAs and PEEPs which are recorded on the Vulnerable Persons List in a GDPR compliant format in each SIB, for use by the LFB. The list is updated as needed, either when a new person has been identified as vulnerable or when someone wants to be removed from the list.</p>

Inquiry's Recommendations	Regulation/Law	RBKC Progress
Theme: Lifts		Status Complete
<p>33.13.a That the owner and manager of every high-rise residential building be required by law to carry out regular inspections of any lifts that are designed to be used by firefighters in an emergency and to report the results of such inspections to their local fire and rescue service at monthly intervals.</p>	<p>On 18 May 2022 the Government laid regulations under Article 24 of the Regulatory Reform (Fire Safety) Order 2005 to implement this recommendation. The Fire Safety (England) Regulations 2022 came into force on 23 January 2023.</p> <p>Under the Regulations, the responsible person for a high-rise residential building must undertake monthly checks of lifts for use by fire-fighters, evacuation lifts and other essential fire-fighting equipment. Where a fault is identified which will take longer than 24 hours to fix, the responsible person must report this via electronic means to their local fire and rescue service.</p>	<p>We implemented this in November 2019, having increased our testing frequency from quarterly to monthly. We have since increased the testing of fire service lift controls from monthly to weekly.</p> <p>Lift switches are tested weekly by our caretakers and then serviced monthly by our lift engineers. All defects not repairable within a 24 hour period are reported to the LFB via a high-risk premises portal.</p>
<p>33.13.b That the owner and manager of every high-rise residential building be required by law to carry out regular tests of the mechanism which allows firefighters to take control of the lifts and to inform their local fire and rescue service at monthly intervals that they have done so.</p>		
Theme: Lifts		Status Complete
<p>33.2.d That all high-rise residential buildings (both those already in existence and those built in the future) be equipped with facilities for use by the fire and rescue services enabling them to send an evacuation signal to the whole or a selected part of the building by means of sounders or similar devices.</p>	<p>A further update to ADB, announced by DLUHC on 1 June 2022, has been introduced so that new residential developments over 18 metres in height will have to incorporate evacuation alert systems. The Home Office is currently developing an evidence base of existing evacuation alert systems in high-rise residential buildings. This will inform the next step of work, addressing evacuation alert systems in existing high-rise residential buildings.</p>	<p>We will be delivering fire evacuation alert systems as part of our capital refurbishment programme, with the four towers at Silchester Estate, and some of the blocks at Lancaster West Estate, being the first to have these systems added. Our aspiration is to install these systems in all our high rise buildings as the opportunities appear.</p> <p>The project at Silchester Estate Towers is due to be completed by November 2025. It has been chosen as it is undergoing a major refurbishment, and if being built today a new build scheme would have this system in place.</p> <p>All new build High Rise Residential buildings will be or have been installed with a BS8629 Evacuation and Alert System. The recently completed Kelso Cochrane House has two such systems installed.</p>

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<p>33.22.e That the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition).</p>	<p>The previous Government consulted on its proposals to address this recommendation in its Fire Safety consultation (carried out in 2020) and again in the Emergency Evacuation Information Sharing Plus (EEIS+) consultation in 2022.</p> <p>A statement to parliament on 4 September 2024, confirmed that the Home Office will bring forward proposals in the Autumn to improve the fire safety and evacuation of disabled/vulnerable residents in high-rise and higher-risk residential buildings in England in response to the Grenfell Tower Inquiry's Phase 1 recommendations that relate to Personal Emergency Evacuation Plans, or PEEPs. These proposals will be called 'Residential PEEPs'."</p>	<p>Whilst the sector and government consult on the most appropriate way in which to carry out PEEPs and whilst there is no legislation or guidance to support the original intention of the Inquiry, we have an agreed process with LFB, where we engage with residents to seek information on those that require assistance. We then carry out a person-centred fire risk assessment and document a PEEP, which is then recorded on the Vulnerable Persons List in the SIB. All previously completed PEEPs are updated as part of the PCFRA update process. This includes when someone self identifies as needing an updated PCFRA due to a change in circumstance, either in reply to our annual letter or through the team directly. We provided details to all residents of how to self-identify to the Council in our fire safety leaflets.</p> <p>Since 2021, we have written annually to all general needs residents in 11m+ buildings regardless of evacuation strategy to encourage self-identification, so that we can assist with planning for our vulnerable residents. Since 2022, we have done this for all residents in Council housing. Each January we send all residents an information booklet informing tenants of the service offered by the Council. Previously the LFB would have carried out an additional Home Fire Safety Visit to vulnerable people we identified. This service is now much reduced by the LFB due to capacity, and we work closely with them to help support our most vulnerable residents.</p>
<p>33.22.f That the owner and manager of every high-rise residential building be required by law to include up-to-date information about persons with reduced mobility and their associated personal emergency evacuation plans (PEEPs) in the premises information box.</p>		<p>As of 15/11/2024, we had completed a total of 810 PCFRAs and 403 PEEPs. In terms of Home Fire Safety Visit (HFSV) referrals to the LFB, we made 67 HFSV referrals as part of the 2023/2024 PCFRA programme.</p> <p>We accept that the current model for working with vulnerable residents, which mostly relies on self-identification for PCFRAs, has limitations. We should make better use of opportunities to identify vulnerabilities, and we need to improve how we share information between departments.</p>

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<p>33.27 That in all high-rise buildings floor numbers be clearly marked on each landing within the stairways and in a prominent place in all lobbies in such a way as to be visible both in normal conditions and in low lighting or smoky conditions.</p>	<p>On 18 May 2022 the Government laid regulations under Article 24 of the Regulatory Reform (Fire Safety) Order 2005 to implement this recommendation. The Fire Safety (England) Regulations 2022 came into force on 23 January 2023.</p> <p>Under the Regulations, the responsible person for a high-rise residential building must install wayfinding signage in line with the recommendations for new buildings as set out in Building Regulation guidance (Fire Safety: Approved Document B), on each landing within the stairways and in the lift lobbies of the floor level marked in such a way as to be visible both in low level lighting conditions or when illuminated with a torch.</p> <p>On 26 November 2020, the amendments to Building Regulation guidance (Fire Safety: Approved Document B) was published and sets provisions for consistent wayfinding signage in new block of flats or new mixed-use buildings containing flats with a top floor more than 11 metres above ground level.</p>	<p>We had already provided wayfinding signage in all buildings over 18m in advance of any guidance on what that signage would look like. We reviewed the formal guidance and requirements and added updated signage to all 18m+ and 11m+ buildings (the latter are only required on refurbishment).</p> <p>All wayfinding signage was installed ahead of the deadline of 23 January 2023. Wayfinding signs are checked by caretakers, as part of their documented checks, and also by the building safety managers for our in-scope buildings.</p> <p>For all new buildings the requirement for the installation of Wayfinding Signage falls under the Building Regulations 2010 as amended in the 26 Nov 2020 version and is audited by building control and the SIP team.</p>

Inquiry's Recommendations	Regulation/Law	RBKC Progress
Theme: Information to Residents		Status Complete
<p>33.28 That the owner and manager of every residential building containing separate dwellings (whether or not it is a high-rise building) be required by law to provide fire safety instructions (including instructions for evacuation) in a form that the occupants of the building can reasonably be expected to understand, taking into account the nature of the building and their knowledge of the occupants.</p>	<p>On 18 May 2022 the Government laid regulations under Article 24 of the Regulatory Reform (Fire Safety) Order 2005 to implement this recommendation in part. The Fire Safety (England) Regulations 2022 came into force on 23 January 2023. Under the Regulations, the responsible person for all multi-occupied residential buildings must, regardless of height, provide their residents on an annual basis with relevant fire safety instructions. These instructions must be comprehensible to all residents and give residents instructions on how to report a fire, instructions related to the building's evacuation strategy and any other instruction that tells residents what they must do when a fire has occurred.</p> <p>Furthermore, whilst this recommendation has been partially addressed in the Fire Safety (England) Regulations 2022, provision has also been made in Section 156 of the Building Safety Act 2022 for a new requirement to be added to the Regulatory Reform (Fire Safety) Order 2005 requiring that responsible persons in buildings that contain two or more sets of domestic premises must provide residents with relevant and comprehensible fire safety information. Commencement regulations for this provision were laid in March 2023 and came into force on 1 October 2023.</p>	<p>In May 2024 we issued a printed booklet to all residents which has been developed using best practice, guidance and fire prevention advice from the industry and LFB, legislation such as the Building Safety Act and Fire Safety England Regulations. The booklet is written in plain English, and is available in 10 other languages. For residents who are visually impaired or otherwise cannot read, the Building Safety Manager who knows residents' requirements through the PCRFAs/PEEPs can arrange for the material to be provided in an alternative format</p> <p>The booklet includes information on:</p> <ul style="list-style-type: none"> • Instructions on the building's evacuation strategy (which is at the beginning of the booklet) • How to report a fire • Contact details for the fire safety team given early in the booklet and residents are welcomed to contact the team with any questions.

Inquiry's Recommendations	Regulation/Law	RBKC Progress
Theme: Fire Doors	Status	In progress
<p>33.29.a That the owner and manager of every residential building containing separate dwellings (whether or not they are high rise buildings) carry out an urgent inspection of all fire doors to ensure that they comply with applicable legislative standards.</p> <p>33.29.b That the owner and manager of every residential building containing separate dwellings (whether or not they are high rise buildings) be required by law to carry out checks at not less than three-monthly intervals to ensure that all fire doors are fitted with effective self-closing devices in working order.</p> <p>33.30 That all those who have responsibility in whatever capacity for the condition of the entrance doors to individual flats in high-rise residential buildings, whose external walls incorporate unsafe cladding, be required by law to ensure that such doors comply with current standards.</p>	<p>The Fire Safety Act (FSA) achieved Royal Assent on 29 April 2021, which clarified the scope of the Regulatory Reform (Fire Safety) Order 2005 (Fire Safety Order) as including the external walls (including cladding and balconies) and flat entrance doors for buildings containing two or more sets of domestic premises. The Government commenced the Fire Safety Act on 16 May 2022. This means we have published new guidance in support of the Fire Safety Act and launched the Fire Risk Assessment Prioritisation Tool (FRAPT). This will now remove legal ambiguity and require responsible persons to update Fire Risk Assessments to take account of external walls and flat entrance doors. The FRAPT will help responsible persons identify which buildings should have their Fire Risk Assessments updated first. Furthermore, on 18 May 2022 the Government laid regulations under Article 24 of the Regulatory Reform (Fire Safety) Order 2005 to implement the fire door checks element of this recommendation. The Fire Safety (England) Regulations 2022 came into force on 23 January 2023. Under the Regulations, the responsible person for all multi-occupied residential buildings over 11 metres and above must undertake quarterly checks on fire doors in common parts and annual checks, on a best endeavour basis, on all flat entrance doors. Responsible persons must make a record of their attempts to check flat entrance doors. In its consultation, the Government sought views on proposals for a reasonable and practicable level of checks proportionate to the risk. In line with the Inquiry's additional recommendation on fire doors, (recommendation 33.30), where unsafe cladding is incorporated into external walls. Under the Fire Safety Order, responsible persons have a duty to take general fire precautions, which include ensuring that fire doors in their building are in good order. Following commencement of the Fire Safety Act it is clear that this duty extends to flat entrance doors.</p>	<p>Fire risk assessments The clarification made by the Fire Safety Act 2022 requires that Fire Risk Assessments take account of flat entrance doors, therefore a review of all RBKC housing stock was carried out utilising the current FRAs and the FRAPT. Through this we were able to prioritise the highest risk buildings and ensure that the front entrance doors and cladding are now considered fully as part of the FRA. Those buildings with ratings of 3 (medium) have now had an updated FRA and FRAEW carried out and the full information has been shared with the LFB. Those with a rating of 4 (low) and 5 (very low) have also been completed</p> <p>Flat fire door inspections Flat entrance door inspections are now carried out via a contract with a third-party contractor called Joint Security Services (JSS). They use qualified inspectors under the Fire Door Inspection Scheme (FDIS) to carry out annual checks on all flat entrance doors of properties above 11m. Each property receives a specific door inspection report. Repairs to tenant doors are carried out by internal repairs staff. All leaseholders are sent the report for them to action. This is followed up on the next annual audit.</p> <p>Communal doors Quarterly checks on all communal doors of properties above 11m are carried out and recorded by our caretaking staff under the guidance and support of the fire safety team. The first year of inspections was completed in January 2024 and 99.6 per cent of all communal doors passed the assessments. Any defects are sent to our repairs team to action immediately.</p> <p>Fire door replacements To meet the requirements under the Fire Safety Order, the Council implemented a large-scale door replacement programme with Gerda Security Products Ltd. This project was split into three phases with the highest risk buildings completed first. This programme covers front entry doors of tenanted homes where we are the landlord. The front entry doors of leaseholder homes are a joint responsibility for leaseholders and housing management. The fire safety team are responsible for ensuring leaseholder doors are up to standard.</p>

Inquiry's Recommendations	Regulation/Law	RBKC Progress
		<p>Pre-Programme A total of 487 doors were manufactured and installed before the below phased programme commenced. They were installed by LFS, before the Gerda contract was formalised.</p> <p>The phased programme ensured that the doors of higher risk buildings were replaced as a priority and was structured as follows:</p> <ul style="list-style-type: none"> • Phase 1 targeted buildings over 10 storeys and any building of any height equipped with Manse Masterdoor front entrance doors addressing the highest risk first. • Phase 2 (& Phase 2+) included buildings between 9 and 5 storeys tall, encompassing a broader range of mid-risk structures. • Major Works Inclusion Phase: World's End Estate which comprises of 4 tower blocks housing 403 units, including 287 rental and 116 leasehold homes. • Phase 3: Focused on the remaining lower-rise buildings, generally those 4 storeys and lower. <p>Phases 1 & 2 and 2 extension A total of 3,451 doors were identified for replacement in this phase. Currently a total of 3,407 have been installed leaving a balance of 44 tenant doors requiring replacement, 98.7 per cent complete. The shortfall is made up of hard-to-reach residents. These include those with mental health and physical access needs and those refusing the new doors. For the former we are working closely with Aids & Adaptations to find mutually compatible solutions and the latter with our legal team.</p>

Inquiry's Recommendations	Regulation/Law	RBKC Progress
		<p>Major works inclusion phase 7 towers, with 403 dwellings of which 116 are Leaseholders. The reasoning behind moving the Flat Entrance Door (FED) replacement to the major works at World's End Estate, is due to the high-level amount of 'builder's work' (structural framework and wood) involved when replacing these doors. The risk in the towers is mitigated by the installation of new GERDA communal doors on all floors, approx. 3-4 years ago. In addition, the distance of travel between the flat front entrance doors is short being less than 4.5m and the balcony/lobbies have open windows allowing sufficient ventilation of these areas. Finally, there was a separate project where the FST installed self-closers to the current notional front entrance doors. This project is due to be on site under Major Works package Lot 2, by September 2025.</p> <p>Phase 3 This phase covers lower risk buildings, which are typically street properties or low-rise blocks The phase 3 programme will largely complete within the financial year 2024-25, except for FEDs in blocks requiring listed building consent, which we anticipate completing in the first quarter of the financial year 2025/2026.</p> <p>At the commencement of Phase 3, 2,300 FEDs were initially procured. A subsequent risk-based survey assessed the "passing risk" of these doors, reducing the number down to 1,400 needing to be replaced, with a target of 1,500 doorsets being used to allow for contingency. To date 1,358 doors have been identified as "passing risk", with 56 additional contingent doors identified as needing to be replaced, bringing the total to 1,414. With 1,256 ordered and 1,058 of these installed (just over 84 per cent) as of 14 November 2024. FEDs that did not pose a passing risk were scheduled for future major works.</p>

Inquiry's Recommendations	Regulation/Law	RBKC Progress
Theme: Co-operation between emergency services		Status In progress
<p>33.34 Many people had difficulty in establishing the whereabouts of friends and relatives who had been taken to hospital after escaping from the building. It is important that in the aftermath of a disaster people are able to ascertain as quickly as possible where their loved ones are and are able to make contact with them. I therefore recommend that the LFB, the MPS, the LAS and the London local authorities all investigate ways of improving the collection of information about survivors and making it available more rapidly to those wishing to make contact with them.</p>	<p>The Blue Lights panel has worked with the Humanitarian Assistance Working Group to address this recommendation and it is now reported as complete with the revised manual presented to the London Resilience Forum in October 2021 and published in November 2021.</p>	<p>All survivors As a local authority we would only be aware of survivors if they attend the rest centres, at which point their personal information would be captured.</p> <p>Emergency Centre Registration Information Sharing Process outlines our process of collecting and sharing information from the Emergency Centre with the Borough Emergency Control Centre and other relevant services. In the first instance the electronic emergency centre registration form should be completed rather than the paper copy to speed up the process of sharing the information gathered. The form can be accessed from the emergency centre section of the RBKC BECC SharePoint.</p> <p>If the internet is limited or unavailable, paper forms will allow the registration process to continue without significant impact. There are 200 forms in the emergency centre box, and more can be provided by the Borough Emergency Control Centre if needed.</p> <p>The Council's resilience advisor (Major Incidents) is collaborating with the North West London Integrated Care Board (NWL ICB) to collect details about residents transported to hospitals after the incident. The ICB will inform us about which hospitals they have been taken to, so we can update friends and family. Additionally, the ICB will share local authority information with hospitalised residents who are being discharged, such as rest centre locations, return status to their residence, and any established information points.</p> <p>Residents with vulnerabilities The Identification of Vulnerable People During Emergencies Plan, allows data sharing between Council teams and the emergency services. With a pan-London framework that supports this.</p> <p>This information has been shared with Gold and Silver officers through the Contingency Planning Assurance Group (CPAG) and EMT. In an emergency, the On-call Resilience Advisor will also notify the relevant emergency response team at the early stages of an incident. It is also integrated in the Major Incidents Response Plan.</p>

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		<p>The Humanitarian Assistance Lead and Welfare Response Coordinator would lead on identifying and collating data on vulnerable persons in an emergency. There is a procedure in place in the Identification of Vulnerable Persons.</p> <p>Departmental officers will join Gold/Strategic and Silver/Tactical recovery meetings as needed, based on the incident type. For instance, customer delivery would attend if a designated line is set up. They could then use gathered information to identify if residents have called about the location of friends and family.</p>