

READING BOROUGH COUNCIL

REPORT BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

TO:	HOUSING, NEIGHBOURHOODS AND LEISURE COMMITTEE		
DATE:	14 MARCH 2018	AGENDA ITEM:	12
TITLE:	AN UPDATE ON HOUSING FIRE SAFETY CONSIDERATIONS		
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**1. PURPOSE AND SUMMARY OF REPORT**

- 1.1 In November 2017, HNL Committee received a report which set out the Council's response following the Grenfell Tower fire in Kensington on 14<sup>th</sup> June. This included action taken in relation to the Authority's own housing stock, other corporate buildings and schools, as well as wider work in partnership with the Royal Berkshire Fire and Rescue Service in respect of privately owned high rise residential blocks within the Borough boundaries.
- 1.2 The November report advised that the Housing Service had appointed an external, qualified Fire Engineer (FireSkills) to carry out a review of fire safety practices in respect of the management and maintenance of Council housing stock. This review has now been completed and the report provides an update on findings and recommendations from FireSkills.
- 1.3 The report also includes a brief update on joint work between the Council and Royal Berkshire Fire and Rescue Service (RBFRS) in respect of cross tenure high rise residential buildings.
- 1.4 Finally, the Policy section of the report outlines the key interim findings from the independent review of building regulations and fire safety led by Dame Judith Hackett. The interim report 'Building a Safer Future' was published in December 2017.
- 1.5 Appendix 1: FireSkills report - Review of Reading Borough Council Fire Safety Management Procedures.

**2. RECOMMENDED ACTIONS**

- 2.1 That Committee note the findings and recommendations of the external review of fire safety in Council housing stock.

### 3. POLICY CONTEXT/BACKGROUND

#### Independent Review of Building Regulations and Fire Safety

3.1 In the early hours of 14 June 2017, a fire spread through Grenfell Tower, a 24 storey block of flats in Kensington causing significant loss of life. The fire appeared to be accelerated by the building's exterior cladding system, leading to a national programme of extensive testing of the cladding on other high-rise buildings. This revealed widespread use of aluminium composite materials which did not meet the limited combustibility requirements of building regulations guidance, and raised concerns for the safety of others.

3.2 Further concerns soon came to light about the adequacy of the structural design of other cladding systems and the discovery of structural safety issues in other blocks in Glasgow, Camden and Southwark. The Government asked Dame Judith Hackitt to conduct an Independent Review of Building Regulations and Fire Safety with a particular focus on their application to high-rise residential buildings. This is not intended to investigate the specific circumstances surrounding the Grenfell Tower fire. In December 2017 an interim report 'Building a Safer Future' was published -

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/668831/Independent\\_Review\\_of\\_Building\\_Regulations\\_and\\_Fire\\_Safety\\_web\\_accessible.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/668831/Independent_Review_of_Building_Regulations_and_Fire_Safety_web_accessible.pdf)

3.3 The report summarises learning to date, and sets the direction of travel for the next phase of work which is due to conclude and report in Spring this year. The work of the review to date has found that the current regulatory system for ensuring fire safety in high-rise and complex buildings is not fit for purpose and that this applies throughout the life cycle of a building, both during construction and occupation. The key reasons for this cited in the report are:

- a. Current regulations and guidance are too complex and unclear. This can lead to confusion and misinterpretation in their application to high-rise and complex buildings.
- b. Clarity of roles and responsibilities is poor.
- c. The means of assessing and ensuring the competency of key people throughout the system is inadequate with often no differentiation in competency requirements for those working on high-rise and complex buildings.
- d. Compliance, enforcement and sanctions processes are too weak. What is being designed is not what is being built and there is a lack of robust change control. The lack of meaningful sanctions does not drive the right behaviours.
- e. The route for residents to escalate concerns is unclear and inadequate.

3.4 Initial recommendations flow from these findings. The report highlights the need to maintain and improve the safety of existing high rise and complex buildings throughout their life cycle, as new building technology becomes available:

*'There is a responsibility to give due consideration to what it is reasonable and practicable to do to upgrade and improve the fire safety of existing facilities throughout their lifespan, not merely to ensure that they do not deteriorate beyond how they were originally designed and built.'* And *'Changes to the regulatory regime will help, but on their own will not be sufficient unless we can change the culture away from one of doing the minimum required for compliance'*.

3.5 The report calls for sufficient layers of protection to ensure that building safety does not rely heavily on compartmentation as there is a high risk residents' own actions or of maintenance work carried out breaching compartmentation. There are a range of fire protection measures that can be retrofitted to or amended in existing buildings. The report is clear that rather than prescribe one measure over others, it should be for

building owners and landlords, with the right expert advice and the involvement of residents, to demonstrate that appropriate risk mitigation measures are in place.

*(Some stakeholders) 'think that there is one 'fix' typified by the 'if we just do this one thing, it will all be better' response. Some of this is driven by vested interest, but also by a desire to 'do something' quickly. I believe we must be very wary of this type of thinking, and the evidence tells me that this is not what residents want.'*

- 3.6 The report notes that there should be a clear, quick and effective route established for residents' concerns on fire safety to be raised and addressed with an external enforcement body such as the fire service, to provide a safety net for when landlords do not have effective systems in place. The results of regular surveys of building integrity must be shared with the residents and they should be consulted about plans to modify buildings. It is also important for residents to understand the various layers of protection which are fundamental to fire safety.

### Public Inquiry: Grenfell Tower

- 3.7 In September 2017 an independent public inquiry into the Grenfell Tower fire commenced, chaired by Sir Martin Moore-Bick. It is expected to report by Easter 2018. The Inquiry's Terms of Reference have been published online here:

<https://www.grenfelltowerinquiry.org.uk/news/prime-minister-announces-inquiry-terms-reference/>

- 3.8 In summary, the inquiry will examine the circumstances surrounding the fire at Grenfell Tower and will report back to Government. The scope includes consideration of the causes of the fire and how it spread; the design and construction of the building and the decisions relating to its modification, refurbishment and management; the scope and adequacy of regulations, legislation, guidance and industry practice relating to high-rise residential buildings and compliance with these in respect of Grenfell Tower; the systems for responding to concerns raised by residents; fire safety measures in place at Grenfell Tower; the response of the Fire Brigade to the fire; and the response of central and local government in the days immediately following the fire.

### Local Authority Housing Stock - Fire Safety Review

- 3.9 As part of its housing stock, Reading Borough Council has three 15-storey blocks of flats in Coley and four 8-storey blocks in Granville Road, Southcote - none of these have panel or cladding systems similar to Grenfell Tower or to those which have been tested by the Building Research Establishment (BRE).
- 3.10 The Council has taken swift action to review its fire safety measures in relation to its own high rise housing blocks and to provide residents with a level of reassurance around fire safety measures in place as previously reported to Committee in November.
- 3.11 Despite the Council's blocks differing in design to Grenfell Tower, the Council also appointed an external qualified Fire Engineer to carry out a review of our practice in the areas of management, fire safety measures and safety advice to tenants in high rise and some other flatted blocks. This included undertaking 'Type 4' (intrusive) Fire Risk Assessments (FRAs) of sample blocks, to include communal areas and an appropriate number of flats in each block, to ascertain the general condition of the stock. Intrusive assessments involve destructive exposure or opening up parts of the construction to provide greater assurance about the degree of fire 'compartmentation'. This report sets out the findings from the review and recommendations will inform the Council's planned works programme for our housing stock.
- 3.12 Key objectives included:-

- To specifically comment on fire compartmentation including service (utility/telecoms) penetrations through communal areas and into flats.
  - To assess emergency lighting provisions and existing alarm systems and comment on their adequacy.
  - To inspect the external render systems and provide an independent view on fire risk to the structure and residents within the blocks.
  - To comment of the existing means of escape given the distance and direction of travel.
  - To comment on the existing stay put policy and whether this remains appropriate.
  - Taking into account the construction of the block and existing safety measures make recommendations on the need for sprinkler systems or other additional safety measures in both communal areas and flats.
  - To comment if smoke extraction systems should be installed in the two staircases for the 15 storey high rise blocks.
- 3.13 The review was commissioned to include high rise blocks; flat types where full height composite windows are positioned directly above each other to identify if this poses an additional risk; Wates 3 storey blocks given their interior room configuration requiring exit through a living space; and the Hexham Rd blocks which are undergoing sequential refurbishment (both 'before' and 'after').

## 4 CURRENT POSITION

### Fire Safety Review of Council Housing

#### Methodology

- 4.1 The FireSkills review has been completed. FireSkills are a small specialist firm, incorporating fire risk assessors and ex fire fighters, who can inspect and make recommendations from both a fire fighting and fire prevention perspective. The assessor undertaking the review was a qualified fire safety engineer.
- 4.2 FireSkills approach was to undertake a sample of fire risk assessments on 8 specific blocks and compare these with previously undertaken risk assessments. From this they could identify how well previous risk assessments had been carried out, the level of any outstanding works previously identified and the current condition of the blocks. In addition they were asked to make any recommendations they felt appropriate.
- 4.3 An assessment of fire safety management and procedures involved a review of fire risk assessments for the blocks inspected as above; a review of policy documentation and interviews with a number of managers and staff in relevant roles.

#### General Findings:

- 4.4 FireSkills found that the risk categories allocated to each building were suitable and inspection frequencies were in line with LGA recommendations; FRAs for all blocks are now up to date. The Council needs to ensure that planned maintenance programmes clearly identify where the need for a new FRAs might be triggered. The format of the FRA reports produced were appropriate and the format used represents current best practice - they have noted that there is no specific domestic dwelling template and have suggested we may wish to develop one.
- 4.5 FireSkills noted that RBC's fire risk assessors were adequately trained and noted that 'it was obvious that assessors have a very good knowledge of the buildings and the fire precautions present'. FireSkills have suggested that periodic training and professional development be maintained specifically on residential property assessment. Assessors

need to ensure that FRAs take into account any changing regulation and best practice guidance as this evolves which might necessitate or suggest a change to the fire safety strategy for a block.

- 4.6 FireSkills noted that the FRA's undertaken by RBC had been undertaken to a good standard with a high degree of detail and that 'fire precautions present demonstrated an ongoing drive to improve the level of safety in the blocks'. A comprehensive defect reporting system ensures that safety issues found or reported by residents are dealt with in a timely way.
- 4.7 FireSkills have stated that RBC have a comprehensive policy and guidance document which they felt could be developed further to encompass the whole fire risk assessment and fire safety management function - this could then be used for in-house training and development.
- 4.8 Routine sample auditing of the quality of FRAs by a fire safety specialist is recommended - by an in-house role if possible or externally if sufficient expertise is not available internally. The FireSkills review has sampled and provided assurance in respect of FRAs across high rise and other selected flatted blocks as a baseline.
- 4.9 FireSkills found that "*RBC have implemented a detailed and effective management policy for the provision of fire safety to its social housing stock.*" Staff are adequately trained, have a good understanding of their responsibilities and have good written documentation. None of the recommendations are considered to be urgent.

#### Fire Safety Measures

- 4.10 FireSkills were also asked for a professional view on whether additional fire precautions were advised in any of the building types surveyed, to improve the fire safety standard in the context of recent incidents nationally and the learning from those. Overall FireSkills noted that the Council's Housing Service has a 'forward facing and proactive fire safety strategy' and whilst the Council is fully compliant with current legislation, FireSkills have recommended that the Council consider implementing a number of additional measures. These include range of measures but principally:
  - a. The installation of new fire suppression sprinkler system to the 15 storey blocks in Coley. This will be procured imminently as part of the project to replace the existing water storage facility, water supply mains and distribution pipework at the Coley High Rise Flats.
  - b. Additional smoke and/or heat detectors for some block types, for example where access/exit is via a lounge and in properties with 'stacked windows'.
  - c. In blocks where the flat front doors open directly onto the enclosed escape staircase, installation of communal smoke detector systems is advised at each landing level.
  - d. Further to work already underway for Coley high rise blocks, the inspection of flat front doors to check smoke seals and fire resistance is advised for some blocks.
  - e. In terms of the Council's sheltered accommodation, whilst outside of scope and not inspected, FireSkills would recommend ensuring that a smoke detector or heat detector is allowed in all habitable rooms as well as the main exit corridor of the flat. In addition where residents are immobile and unable to self-evacuate, consideration should be given to installing a single unit misting system.
- 4.11 The Council will need to monitor and take on board any future recommendations regarding external cladding. However, the cladding to the 15 storey Coley blocks is already reaching the end of its design life. There is no current requirement to remove such cladding. However, in terms of proactively maintaining stock, minimising future repair liabilities and optimising safety, it would be beneficial if over the next few years this could be stripped and replaced with an alternative cladding system that does not

utilise a polystyrene based insulation board as this is classed as 'fire retardant' rather than 'fire resistant'. Given the costs of scaffolding buildings of this height it would be most cost-effective to complete works at the same time as window replacement scheduled for 3 years' time. This work cannot be completed simultaneously with the water mains works and sprinkler installation and would follow-on.

- 4.12 FireSkills have not recommended retro-fitting sprinklers in the 8-storey Granville Rd blocks - most flats have external balconies and a smaller number open onto a corridor which is open to the elements. FireSkills Fire Safety Engineer did not consider that fitting sprinklers would improve fire safety in these blocks having reviewed all measures in place.
- 4.13 FireSkills have not indicated that the stay put policy is of concern and therefore there is no proposal to move to an exit policy for any of our blocks.

### Cross Tenure Residential Buildings

- 4.14 Since the November HNL Committee meeting it has been confirmed that there are three privately owned blocks within the Reading Borough Council administrative area which have Aluminium Composite Material cladding that does not meet the relevant requirements of the Building Regulations Guidance. In all three cases, Reading Borough Council is working in partnership with Royal Berkshire Fire and Rescue Service to ensure that the owners of these buildings have implemented interim mitigating safety measures to ensure the safety of residents until remedial works are completed. All three buildings identified to date as having ACM have been visited and assessed by the fire and rescue service. The timescales for the removal of the cladding are being discussed with the buildings' owners.
- St Lawrence House, Abbey Square, RG1 3AG - The property is owned by Southern Housing Group. Officers have been in liaison with the owners who have put a number of initial measures in place to safeguard residents, in line with DCLG advice. RBFRS are fully engaged.
  - Queens Court, Queens Walk RG1 7PT The property was formerly an office building which has been recently converted and extended to provide student accommodation. The building has a current Fire Risk Assessment which was completed in July 2017. The building is fitted with a high level of fire detection meaning that any fire starting within the building would be detected at an early stage. They currently operate a phased evacuation with those closest to the fire being evacuated first followed by the remainder of the building.
  - Hanover House, 202 Kings Road, RG1 4NN - In order to safeguard residents a number of initial actions have been taken following a meeting with RBFRS and RBC Housing officers. These measures are in line with DCLG advice and include the closure of the undercroft car park.
- 4.15 The Council has agreed a memorandum of understanding with RBFRS to, in partnership, re-inspect all high rise residential properties in the Borough in order to ensure appropriate standards of fire safety and other safety provisions are provided and maintained. Additional resources have been added to the Council's private sector housing team to support this work which will also be supported by building control expertise.

## 5 PROPOSAL

- 5.1 The Housing Service have already implemented a number of system improvements in respect of fire safety as previously reported. The recommendations and advice from this external review will now be incorporated into a live service action plan and have informed the programme of planned maintenance to the Council's housing stock. Work is underway to cost, schedule and plan procurement of works to further improve fire safety in the Council's housing flatted blocks.

## **6 COMMUNITY ENGAGEMENT AND INFORMATION**

- 6.1 Tenant involvement is a priority for the service. Findings of the review will be presented to tenant representatives. Tenants and leaseholders will be consulted and advised of works planned as required at a local block level.
- 6.2 A tenant Scrutiny Panel are carrying out their own review of fire safety. The scope of the review is:
- a. To investigate RBC's approach to fire prevention in high risk blocks of flats and the actions that RBC would take in the event of fire
  - b. To investigate the quality of information provided to tenants and whether tenants feel able to communicate concerns to RBC and confident that their concerns will be listened to and acted upon.
- 6.3 The tenant scrutiny exercise will include a desk-top review, tenant call for evidence, interviews with staff, shadowing staff on block inspections, a frontline staff focus group, mystery shopping and inspections of communal areas/blocks/flats. The findings will be disseminated on the website, through Housing News and the Annual Report to Tenants. The review is expected to conclude in early April.

## **7 CONTRIBUTION TO STRATEGIC AIMS**

- 7.1 This report supports the following objectives in the corporate plan:
- Safeguarding and protecting most vulnerable
  - Providing homes for those in most need
  - Keeping the town clean, safe, green and active

## **8 EQUALITY IMPACT ASSESSMENT**

- 8.1 Not applicable to this report.

## **9 LEGAL IMPLICATIONS**

- 9.1 There are several important pieces of legislation which impact on fire safety within dwellings, principally:
- Building Regulations 2010 Part B.
  - Housing Act 2004.
  - The Regulatory Reform (Fire Safety) Order 2005.
- 9.2 Further, the LGA published guidance in 2012 'Fire safety in purpose builds blocks of flats' which is referred to above in the report. A more detailed exposition of legislation was provided in the November 2017 report to HNL Committee.

## 10 FINANCIAL IMPLICATIONS

- 10.1 There are a number of potential financial liabilities arising in respect of Local authority housing following the Grenfell Tower fire which are being factored into financial planning.
- 10.2 Costs have been estimated for works to Council housing stock which are advised as a result of the external review. Provision of circa £5.52m has been made in the capital programme and in the HRA Business Plan. This is profiled as follows (£,000's):

2018/19	2019/20	2020/21	2021/22	2022/23
£900k	£800k	£700k	£1.56m	£1.56m

- 10.3 The impact of works which might be mandated through changing regulation to the Council's own housing/other residential stock cannot be anticipated. However, the expert review in respect of Council homes and the additional measures proposed should go some considerable way to meeting current best practice, taking a proportionate but proactive approach to safety. The requirement for future works to improve fire safety will be further informed by the recommendations arising from the national review/public inquiry and emerging industry advice.

## 11. BACKGROUND PAPERS

- 11.1 HNL Committee 15<sup>th</sup> November 2017 - An Update on Fire Safety Considerations Post Grenfell Tower.



Reference: TF1004 Date: 19 October 2017 Version: 1.2

**Technical Note: Review of Reading Borough Council Fire Safety Management Procedures**

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**Version and review history table**

Version	Date	Action
1.0	19/10/2017	Document issued
1.2	26/02/2018	Minor amendments to text following review of version 1.0

**NOTE:**

This report should not be manipulated, changed or presented without the consent of FireSkills Ltd



## 1 Introduction

This technical note has been produced in response to a request for an assessment of the fire safety management and procedures in place in respect of the management of fire safety in the Reading Borough Council (RBC) social housing stock.

The following questions were addressed as part of this review:

- Is the guidance used by RBC suitable and fit for purpose?
- Is the current prioritisation system suitable?
- Are inspection frequencies suitable?
- Is the current system and content of training for nominated employees suitable?
- Is the current system of Senior Manager audit of quality suitable?
- Do the fire risk assessments produced by the systems and procedures appear to be suitable and sufficient?

## 2 Process

The review of fire safety management has involved a number of activities, the first of which was an assessment of the current fire precautions in the 8 properties identified as representing the highest potential risk to life should a fire break out.

A selection of the existing fire risk assessments for these buildings was then scrutinised to identify the scope and level of detail attained by the current processes.

A meeting was held with Mr Matt Finch, the nominated competent person responsible for the documentation of the fire arrangements and procedures. At this meeting, the corporate code of practice: *CORP 012*, procedure document: *Fire Safety Review Inspections* were viewed and discussed, along with details of review prioritisation, staff training, document storage, defect reporting and management and quality assurance.

Finally, a number of meetings were held with the Council's fire risk assessors, the housing management team and the senior management team to discuss the processes, funding availability and proposed course of action.

## 3 Findings

### 3.1 Guidance

The primary guidance document used for assessing fire risks is the *LGA: Fire safety in purpose-built blocks of flats*.

This document has been specifically written to inform the management of fire precautions in blocks of flats built to previous standards, and to identify situations where it may be necessary to upgrade what



was previously accepted, in order to achieve a suitable level of safety from fire. The guidance is extremely thorough, identifying not only issues arising from changes to regulation and assessment of safe conditions which have occurred over the years, but also identifying a comprehensive range of potential issues arising from poorly controlled alterations and the hazards these might lead to. As such, within the boundaries of the situations covered by the guidance, it is suitable for the task.

However, although the document raises the issue of external thermal cladding systems and the potential for external fire spread as a result of the use of flammable materials in their construction, the guidance on actions to be taken to assess this risk, and to mitigate the risk if identified, is limited to the seeking of advice from an expert. The risks posed by cladding systems incorporating combustible materials in their construction, and the actions to be taken if they are found to be present, are rapidly evolving due to recent high-profile fire incidents in high rise buildings and further investigation and remedial actions are likely to be required as a result of new guidance from Central Government, or changes to current legislation. This situation should be closely monitored to ensure that any new guidance can be rapidly identified and implemented.

### 3.2 Prioritisation and inspection frequency

General guidance is given within the LGA document on routine review periods for fire risk assessments, however terms such as 'high risk' or 'low risk modern low rise' are given. Assessment of which category an individual building falls into is the responsibility of the managing organisation.

Table 1 of the RBC Procedure document: 'Fire Safety Review Inspections' clearly specifies which buildings are considered to fall within each category of risk, and the review periods for each building type. The allocation of risk categories appears to be suitable, with a clear rationale for assigning higher risk to a number of buildings which might otherwise be categorised at a lower risk.

The identified inspection frequencies for each risk category are in line with the LGA guidance for FRA review and for full re-evaluation of the fire risks present.

In addition to the regular reviews and re-evaluations of the fire risk assessment, the RBC policy is for dedicated Block Maintenance Officers (BMO) to carry out regular Fire Safety Reviews. The RBC policy document provides a comprehensive description of the procedures for the BMO to follow, along with proforma schedules to work through and for reporting and recording of issues.

Fire Safety Block Inspections are carried out monthly, 3monthly or 6 monthly, dependant on the risk category of the building and complements the fire risk assessment and review process, ensuring that fire safety issues will be identified within a reasonable timeframe.



### 3.3 Training

In-house fire risk assessors have received accredited training in fire risk assessment. The past training was provided by Vulcan Fire Training Ltd, however I understand that the training provider is to be changed for future courses.

This training is aimed specifically at developing competence at fire risk assessment, and as initial training is suitable, however, for assessors to develop and maintain competence, it is necessary to both exercise the knowledge and to maintain currency by undertaking follow on training and CPD events.

As the majority of premises requiring fire risk assessment are multiple dwelling residential buildings, it would be appropriate for fire risk assessors to receive ongoing training in subjects pertinent specifically to this building type.

A very comprehensive policy and guidance document has been produced, aimed at the Building Maintenance Officers and their duties to carry out regular fire safety reviews. Ideally, this policy and guidance should be extended to encompass the whole fire risk assessment and fire safety management function, to the same level of detail. This would then form the basis of in-house training and development for all those involved in the fire safety management process, and ensure a consistent approach.

### 3.4 FRA quality and scope

The fire risk assessments sampled have been completed using a PAS 79 based template. This is the nationally recommended standard, however it is designed for application to workplaces where occupants are predominantly employees and under the direct control of the responsible person. There are a number of situation in purely residential buildings which do not fit well into the PAS 79 template and a significant number of headings which are not applicable in the majority of buildings. As such, it may be worth considering developing or acquiring a template more suited to the building stock type. However, in the absence of a more suitable template being available, the PAS 79 version represents current best practice.

The sampled fire risk assessments were completed to a high level of detail and to a good standard, with the overall fire strategies for the buildings appearing to be suitable and sufficient. The notes on issues found, or on fire precautions present were sufficient to indicate where work was required, and the fire precautions present demonstrated an ongoing drive to improve the level of safety present in the blocks.

A comprehensive defect reporting and maintenance service is in place to ensure that any fire safety issues found by BMOs or reported by residents are recorded and dealt with. Expected time scales for the remedying of identified risks are given in the guidance provided.

It was obvious from the fire risk assessments sampled that the assessors responsible have a very good knowledge of the buildings and the fire precautions present. The only possible improvement would be to record the current accepted fire strategy for each building, as a description of the various fire precautions



and escape routes, to inform the observations and judgements of either new or external fire risk assessors.

Discussions with Mr Matt Finch indicated that the number of trained fire risk assessors has recently increased. This has the potential to lead to several improvements. There will be greater resilience within the team; discussion of observed conditions and issues will assist in development and competence throughout the team; having more assessors will allow for rotation of assessors through the building stock and help to prevent complacency.

### **3.5 FRA audit and quality assurance**

The method of quality assurance of the fire risk assessments appears to be the examination of a sample of those completed by senior Housing Property Service managers.

While this will encourage the meeting of targets for the maintenance and review of assessments, unless there is a considerable level of fire safety competence held by members of the senior management team, there will be no assessment of the quality or suitability of fire precautions provided.

To demonstrate supervision of the technical standards, sample auditing of the quality and standard of fire risk assessment should be undertaken, in line with the full re-evaluation program, by a fire safety specialist. This review has sampled and provided assurance in respect of fire risk assessments across high rise and other selected flatted blocks. The specialist should ideally be taken from in-house staff if possible, however an external contractor should be used if no suitably qualified and experienced employee is available.

Ideally, the assessment should involve viewing the building directly and comparing it to the recorded fire precautions, and be matched to the full re-assessment program, thus ensuring that the standard to be maintained over a period of several years by the review and Fire Safety Review Inspection processes, is likely to be compliant from the beginning of that period.

## **4 Conclusion**

Reading Borough Council has implemented a detailed and effective management policy for the provision of fire safety to its social housing stock.

Those responsible for the specification, management and maintenance of the fire precautions receive adequate training and have a good knowledge of their responsibilities, backed up by some good written policies. Provision of a wider range of policy and guidance could lead to increased consistency and resilience, however the existing measures are being thoroughly and conscientiously applied to a good standard.



While a number of recommendations are made below, none of these are considered to be urgent, and none of the situations commented on constitute a failure to meet the requirements of the Regulatory Reform (Fire Safety) Order 2005.

## 5 Recommendations

- Further investigation and remedial actions may be required as a result of new guidance from Central Government, or changes to current legislation concerning external thermal cladding systems. This situation should be closely monitored to ensure that any new guidance can be rapidly identified and implemented.
- Reading Borough Council fire risk assessors should receive ongoing training and CPD specifically aimed at developing their knowledge of the issues surrounding fire risk assessment in residential buildings.
- The policy and guidance already produced covering fire safety review inspections, should be extended to encompass the whole fire risk assessment and fire safety management function, to the same level of detail.
- Consider the use of a fire risk assessment template specific to residential buildings as opposed to the industry standard that covers both residential and commercial.
- Consider producing a fire strategy description for each building, to document the accepted fire precautions on the premises.
- Sample auditing of the quality and standard of fire risk assessment should be undertaken, in line with the full re-evaluation program, by a fire safety specialist. Ideally this should be taken from in-house staff if possible, however an external contractor should be used if no suitably qualified and experienced employee is available.

