

Appendix ii

Briefing: Fire Safety Exception Report

Date: 16th August 2024 for reporting period to 31st July 2024

Executive Summary

Due to current issues of non-compliance, this exceptions report aims to provide additional information on the management of fire safety in the HRA housing stock.

Whilst we remain compliant with the requirement to have in date fire risk assessments (FRAs) on all blocks, we are non-compliant due to there being fire safety actions overdue for completion with 216 actions overdue against their assigned priority timescales, of which 32 are high priority.

An action plan is in place to progress these actions to completion with the timescales varying, depending on the complexity of the task, procurement, statutory permissions etc. In the meantime, we have undertaken certain mitigations to reduce risk and are undertaking a review of further mitigations and communications with residents that may be necessary.

Detail

Background

Since the Grenfell tragedy in June 2017 there has, quite rightly, been a focus on fire safety within social housing. This has resulted in a number of legislative and regulatory changes to improve fire safety within homes, most notably:

- Fire Safety Act 2021
- Building Safety Act 2022
- Fire Safety (England) Regulations 2022
- Smoke and Carbon Dioxide Alarm (Amendment) Regulations 2022
- Safety and Quality Consumer Standards 2024

The new requirements arising from these statutory/regulatory instruments include:

- Extension of the requirement to undertake Fire Risk Assessments (FRAs) to all properties containing two or more homes, this requirement has expanded the duty to encompass premises where there is no internal communal area, such as maisonettes, this has resulted in an additional 79 properties requiring FRAs from January 2023
- Extension in the scope of FRAs to include external components, such as wall cladding and balconies
- To undertake annual checks on flat entrance fire doors and quarterly checks on fire doors in communal areas in blocks over 11m in height
- Provide fire safety instructions to residents and information on the importance of fire doors
- Requirement to provide smoke and carbon dioxide alarms became mandatory
- Requirement to ensure all required actions arising from FRAs are carried out within appropriate timescales

The new regulations have additional measures that are required for High-Risk blocks, the definition of which is buildings 18m or more in height or over six storeys – there are no such buildings within the managed stock.

Whilst this report focuses specifically on the requirement to undertake fire risk assessments (FRAs) and the delivery of actions arising from FRAs, new Estate Compliance Officers (ECO) to support good fire safety in blocks, their duties include:

- Undertaking fire door checks for all fire doors on an annual basis, not just those in blocks over 11m
- On site checking that FRA actions have been suitably actioned
- Checking fire safety signage is in place and replacing as necessary
- Providing fire safety advice to residents at the time of fire door checks
- Undertake additional testing of smoke alarms at time of inspections
- Carry out adjustments to door closers to ensure 1st time fix at point of inspection

We manage 446 blocks that require FRAs, these have been categorised as:

- 71 Greater risk blocks – sheltered schemes, conversions and medium rise block (5 storey)
- 375 lower risk blocks – all other blocks

For Greater risk blocks the FRA is renewed every three years, with interim annual reviews, whilst for Lower risk blocks the FRAs are renewed every four years with a biennial review.

There are five priorities identified for actions that may be recommended through the FRAs:

- High – 2 months
- Medium – 4 months
- Low – 6 months
- Planned – 12 months
- Advisory – no timescale

All actions recommended by the FRAs are considered to determine the appropriate course of action. The actions are logged centrally and allocated to officers depending on their nature, they could require minor repair or improvement works, major works, further surveys or management action such as evidencing certification or servicing records, communicating with residents or action where a resident is not complying with fire safety requirements.

In some instances, the priority of the action may subsequently be lowered, where mitigation measures have been undertaken.

We have moved from Type 1 FRAs (visual inspection of communal areas only) to Type 3 (visual inspection of communal areas and sample flats) as well as some Type 4 (inspection of communal areas and flats, including the intrusive opening up of concealed areas). Undertaking more robust FRAs has resulted in a significant increase in the number of actions arising from the FRAs.

Historically FRAs have been programmed to be undertaken as a bulk instruction over a short period of time, the result being that it has been impossible to undertake all actions arising within the target timescales as there have been many thousands of actions of varying priority and scale. We are now rescheduling the programme of FRAs to ensure that the workload arising from these is more manageable. The new programme of 20 FRAs per month will commence in November and run for a period of 16 months.

Performance

Monthly performance reporting includes the status of both FRAs (% in date for both Greater risk and Lower risk blocks) and actions outstanding by priority against both Greater and Lower risk blocks.

Since the last round of FRAs were undertaken in late 2021 a total of 5,053 actions have been recorded and of these 4,835 have been completed.

As at end July 2024 there are a total of 218 actions open, with 216 of these past the target date for completion. It is a priority to ensure all actions are undertaken within target times, however for some actions there are significant complexities that make this very challenging.

Broadly the categories that outstanding actions fall into are:

- **Doors**

89 outstanding actions (19 high priority)

A contract for the supply and installation of timber fire doors is in procurement with sign off expected by end August. Subject to contract the high priority actions are expected to be completed by end December with the remainder by end March 25.

- **Compartmentation**

66 outstanding actions (9 high priority)

We are currently in the process of awarding of a term contract through an appropriate framework to deliver these actions. Subject to contract the high priority actions are expected to be completed by end November and the remainder by end March 25.

Three actions relate to undertaking further survey on external wall insulation. A contract has been procured with a specialist consultant and arrangements are being made to facilitate these surveys which are expected to be undertaken in September.

- **Admin (Inc Signage)**

27 outstanding actions (0 high priority) currently under review as most relate to recommendations for upgrade to current standards that are not retrospective and therefore, they are not matters of non-compliance. Figures to be adjusted in August report.

- **Fire Detection – Alarms**

26 outstanding actions (0 high priority) currently under review as these relate to recommendations for upgrade to current standards that are not retrospective and therefore, they are not matters of non-compliance. Figures to be adjusted in August report.

- **Escape Route (Inc Refuse/Bins)**

10 outstanding actions (4 high priority), plans in place, high priority actions to be completed by end September and the remainder by December.

We have undertaken a number of mitigation measures to reduce risk and are currently reviewing what other mitigation measures may be required to reduce risk until actions can be completed. We will communicate with residents to explain the situation and impact on them.

There are a number of actions included within the above, that relate to improvements to meet current standards, where these standards are not retrospective and represent best practice, these are not situations of non-compliance. These have been reviewed and will be removed from the August KPI report. It is intended that these improvements will be undertaken in delivery of other planned improvements to properties and they will be managed through these programmes.

An action from some FRAs has been to undertake compartmentation surveys, these have been completed and recommended repairs and improvements received. These will be delivered as an ongoing programme through the passive fire protection contract currently being procured; progress on these will be reported separately to the compliance KPIs.

We regularly communicate with residents on fire safety measures and advice and all residents in flats are spoken to about fire safety at the time of the annual fire door checks and are provided with an information sheet.

We are currently reviewing how we use our systems to facilitate management of fire actions and how these can be improved to provide a higher level of assurance.

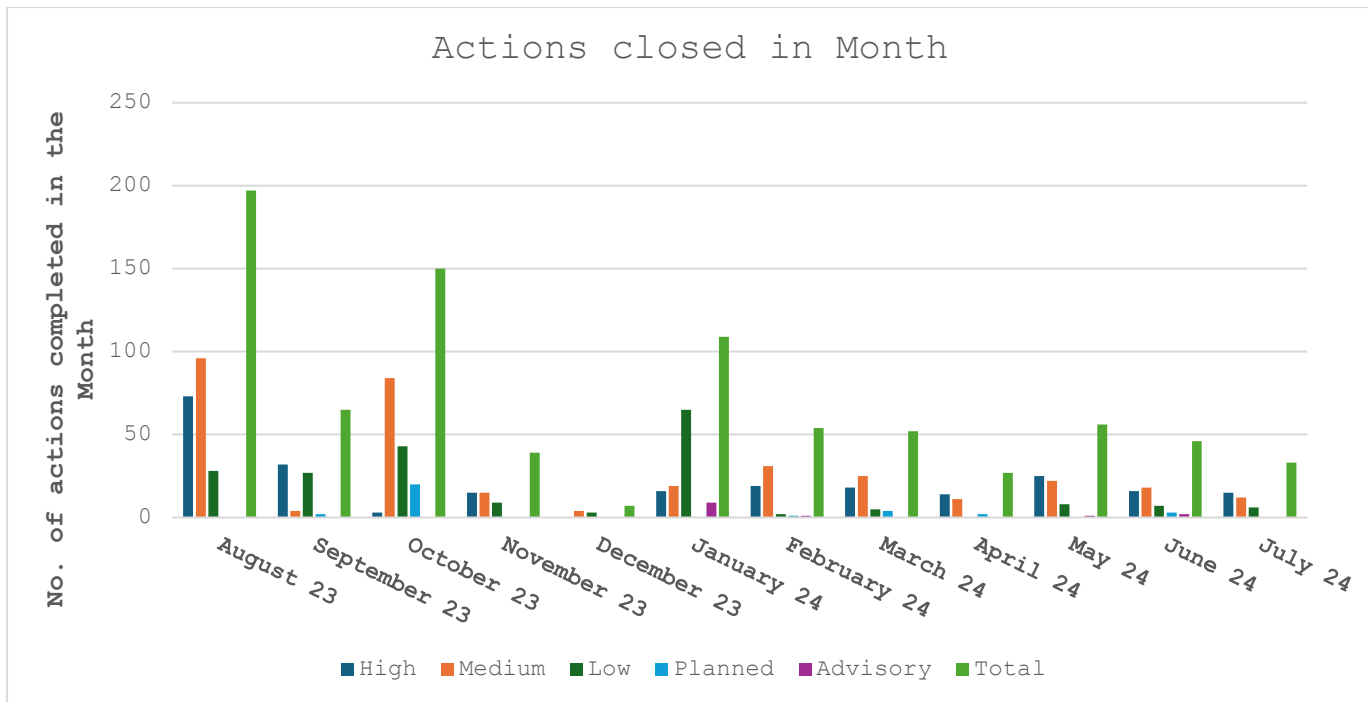


Chart 1

Chart 1 shows progress made in completing actions over the last 12 months, with a breakdown by priority. It should be appreciated that some actions require significantly more resource and/or time to complete and the responsibility may sit with different teams; hence the variation month on month both in total numbers completed and priority and the apparent slow down in completions reflecting the more complex nature of the outstanding actions.

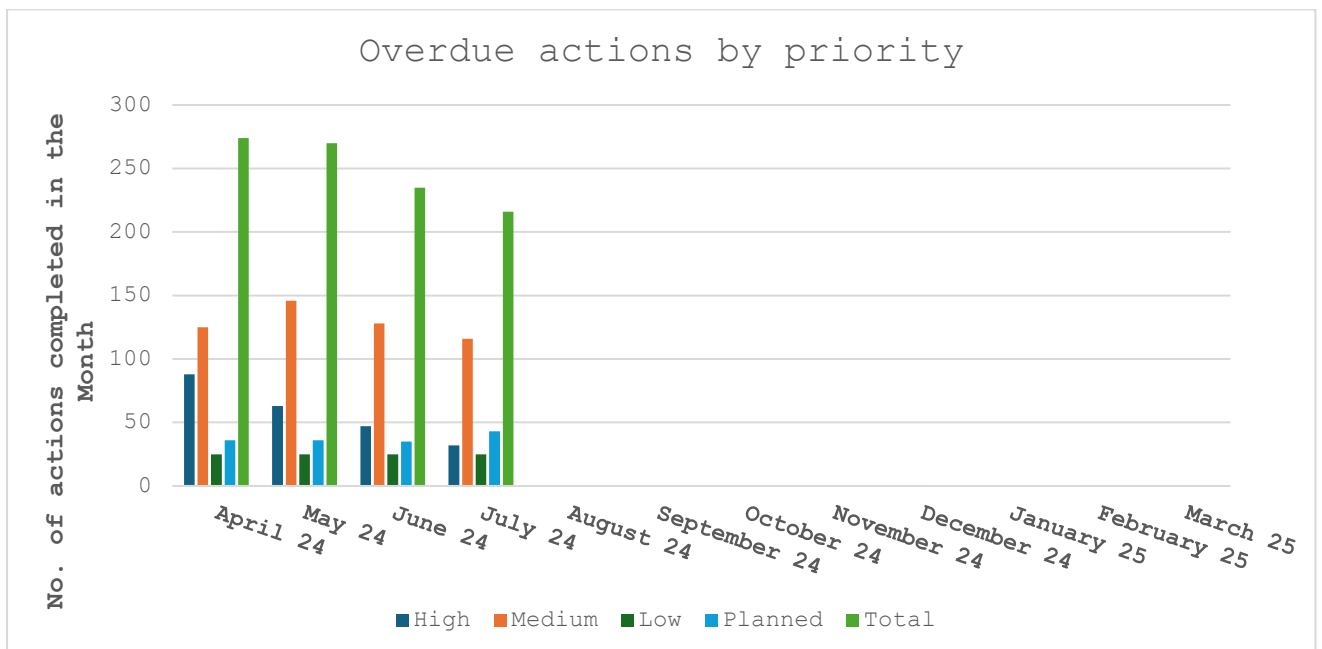


Chart 2

Chart 2 shows the monthly breakdown of overdue actions by priority, together with the total number of overdue actions.