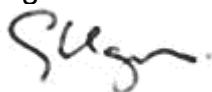


LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE: Grenfell Inquiry Phase 2 Report – Update	
REPORT OF: Director of Property Management	
FOR SUBMISSION TO: Housing & Fire Safety Advisory Panel	DATE: 29 January 2025
<p>SUMMARY OF REPORT: This report provides an update on the Council's response to the recommendations of the Grenfell Inquiry Phase 2 report.</p> <p>This report also notes the publication of the Government's plans for accelerating the remediation of dangerous cladding and new Emergency Evacuation Information Sharing regulations.</p> <p>Local Government Act 1972 – Access to information No documents that require listing were used in the preparation of this report.</p> <p>Contact Officer: Melissa Dillon, Resident Safety Engagement & Governance Lead. Tel: 0207 974 3100 melissa.dillon@camden.gov.uk</p>	
<p>RECOMMENDATIONS:</p> <p>The Panel is asked:</p> <p>To note the update on Grenfell Phase 2 Inquiry Report workstreams in sections 4 and 5 of the report.</p>	

Signed:



Director of Property Management

Date: 17 January 2025

1. INTRODUCTION

Grenfell Inquiry Phase 2 Report and Recommendations

- 1.1 On 5 September 2024 the Grenfell Inquiry published its Phase 2 report and recommendations. The report contained 58 recommendations with a view to ensuring that there should not be a repetition of this tragedy. An executive summary and the full report can be accessed online ([Publication of the Grenfell Tower Inquiry phase 2 report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/grenfell-tower-inquiry-phase-2-report)).
- 1.2 The Government committed to publishing its response to the recommendations over a period of 6 months and to accelerating the remediation of unsafe cladding on high-rise / higher-risk buildings.

2.0 REMEDIATION ACCELERATION PLAN

- 2.1 In December 2024 the Government published a Remediation Acceleration Plan with the following objectives
 - Objective 1: fix buildings faster
 - Objective 2: identify all buildings with unsafe cladding
 - Objective 3: support residents
- 2.2 The plan intends that by the end of 2029 all 18m+ (high-rise) buildings with unsafe cladding will have been remediated, and every 11m+ building with unsafe cladding will either have been remediated, have a date for completion, or the landlords will be liable for severe penalties. It is also the intention of the plan to create a legal obligation on landlords to remediate unsafe cladding so that those who should take action, but do not, will face severe penalties.
- 2.3 The Government says it will give regulators – local authorities, fire and rescue authorities, and the Building Safety Regulator new powers and funding to enforce remediation. There is also a commitment to begin accelerating the remediation of social housing, to announce a long-term strategy in Spring 2025 and to continue to identify 11m+ buildings that could need cladding remediation.
- 2.4 Details of the plan can be found on the government website via the following link – [Remediation Acceleration Plan - GOV.UK](https://www.gov.uk/government/publications/remediation-acceleration-plan).

3.0 PERSON-CENTRED FIRE RISK ASSESSMENT & PERSONAL EMERGENCY EVACUATION PLANS (PEEPS)

- 3.1 In September 2024 the Government also committed to bringing forward new rights for residents to request a person centre-fire risk assessment and new responsibilities for landlord to provide personal emergency evacuation plans. In December 2024 it published a response to the 2022 public consultation on Emergency Evacuation Information Sharing – see link - [Emergency Evacuation Information Sharing Plus \(EEIS+\) - GOV.UK](https://www.gov.uk/government/publications/emergency-evacuation-information-sharing-plus)

- 3.2 Legislation will be introduced to deliver a five-step process which require landlords to carry out a type of PEEP specifically for residential settings which will be known as a 'Residential PEEP'. The scope of Residential PEEPs will go beyond that outlined in consultation by the previous Government which assumed that EEIS would only be required temporarily where remediation works were in progress in a residential building.
- 3.3 The Council is a member of a Home Officer industry Review Group working on finalising draft residential PEEPs regulations which it is anticipated will be published in Spring 2025.

4. GRENFELL INQUIRY PHASE 2 REPORT – COUNCIL WORKSTREAMS

- 4.1 Since 2018/19 the Council has been delivering the Resident Safety Programme, developed in response to the Hackitt Review of Fire & Building Safety and the Phase 1 Grenfell Inquiry Report.
- 4.2 In September 2024 following the publication of the Phase 2 Inquiry report, the Council set up a cross-departmental group to review the implications of the report and in anticipation of further announcements by Government on regulatory change. The working group has established six workstreams to build on the on-going Resident Safety Programme and respond to the recommendations of the Grenfell Phase 2 report. The workstreams are:
- **Building control** - Consideration of the Inquiry recommendations and points to raise in Government consultations
 - **Design, technical requirements and contract management** - Review of Camden construction design guides, employer's requirements, procurement and contract management processes.
 - **Landlord services and TMOs** - Review of the Council's TMO agreements and how duties are managed across the Council and by TMOs, to include the oversight, landlord services and engagement recommendations in the Inquiry report.
 - **Fire risk assessment** - Review of current FRA arrangements with external specialists appointed to deliver the FRA programme for Council homes,
 - **Personal Emergency Evacuation Plans (PEEPs)** - Evaluation of work to date gather household information and undertake person-centred fire risk assessments (PCFRAs). The group to consider how the Council will meet revised Government proposals.
 - **Major incident plans** - Review the Inquiry findings on Emergency Response Planning and the systems Camden already has in place.

5. PROGRESS UPDATE

5.1 Building Control

5.1.1 Building Control officers are working through the Inquiry recommendations and considering the implications of the proposals to create a national Building Control Service. They will produce a report on the Council's response to public consultation when Government publishes its intended approach.

5.2 **Design, technical requirements and contract management**

5.2.1 The workstream group is focusing on procurement and contract management practice looking specifically at the following areas.

- What Camden specifies and expectations related to installation, asset information and plans provided at handover
- Updating Camden's new build and capital works client design guides and incorporating this into tendering arrangements.
- Updating Camden's employer's requirements for fire engineers and 'principal designers' for new build and capital works to ensure appointment of the right qualified and competent people
- Making sure contractors are using the right materials and contractors are robustly managed on site
- Proper interrogation of the fire and test certificates for construction products
- Ensuring technical standards and repairs product choices are consistent
- Auditing arrangements to ensure compliance with current and revised standards

5.3 **Landlord Services and Tenant Management Organisations (TMOs)**

5.3.1 There are 5 TMOs in Camden managing a total of 859 Council rented and leasehold homes. Each TMO has entered into a Modular Management Agreement (MMA) in a prescribed form setting out its rights and obligations.

5.3.2 The Council has a dedicated TMO Regulation & Performance Manager, responsible for the management of MMA contracts including performance reviews and internal audits. The MMA set out the requirements (for both the TMO and Camden) for the frequency and type of information required and provisions for governance arrangements and review periods. The key elements of the management responsibilities for the current TMOs are as follows:

- Camden TMOs do not carry out any planned or major capital works. They carry out day-to-day repairs up to the value of £2,000 and can deal with void works valued at less than £2,000 in which case they are monitored on their turnaround times.
- Safety Compliance Management: Fire, Legionella, Asbestos, Gas, Electricity & Lifts (FLAGEL) is generally carried out at TMO properties by the Council.

5.3.3 One TMO, Godwin and Crowndale, has opted to carry out the Landlords Gas Safety Check (LGSC) using the Council's contractor. Performance data is loaded on the Camden data system and monitored by the TMO Regulation and Performance Manager on a weekly basis. For Fire Safety, TMOs are responsible for managing communal areas and can carry out works to address FRA actions valued at less than £2,000.

5.3.4 The Council has reviewed the current arrangements in place for TMOs as part of the Housing Transformation Plan, with the TMO Regulation & Performance Manager post being integrated into the Housing Neighbourhoods team to ensure consistency in policy, procedures and training.

5.3.5 The next steps will be to ensure the alignment of performance measures across TMOs and the wider housing portfolio.

5.4 Fire Risk Assessment

5.4.1 Fire Risk Assessments (FRAs) to all Council residential buildings on a three-year cycle based on the building type and risk as set out in the table below:

Type of Building	FRA Frequency
Street properties and/or where determined by the overall assessment of risk.	Review or complete every three years
Purpose built blocks (below 10 stories in height) and/or where determined by the overall assessment of risk	Review or complete every two years
Purpose built blocks of flats over 10 stories in height, Sheltered Accommodation, Hostels, TRA Halls and/or where determined by the overall assessment of risk.	Review or complete every year

Current Arrangements

5.4.2 FRAs are undertaken by external accredited fire safety assessors, employed by Frankhams, whose assessors hold a Level 4 Diploma in Fire Safety, Institute of Fire Safety Management or Institution of Fire Engineers memberships. FRA reports and actions are reviewed and quality checked by the Camden in-house Fire Safety Advisor Team. FRA reports are also published on the Camden open data website.

5.4.3 Camden's in-house Fire Safety Advisors must have the following qualifications and experience at appointment:

- Minimum Level 4 diploma in fire safety
- Significant experience in handling complex fire safety issues with high-risk implications e.g. sleeping accommodation
- Experience of advising on fire safety in a large & complicated organisation
- Ability to undertake Fire Risk Assessments, conforming to the relevant guidance, be able to write appropriate reports to local teams, services & committees.
- Broad experience and expertise in conducting fire safety audit, investigations, & compiling reports.

5.4.4 The team includes those who have undergraduate and masters degrees in risk and safety management, and former members of UK fire and rescue services.

5.4.5 Fire Safety Advisors are required to maintain their accreditations and qualifications by undertaking continuous professional development. Members of the Team are all qualified in fire safety to Level 4 and above and hold qualifications from the following UK accreditation bodies:

- The Institute of Fire Safety Managers – IFSM

- The Institution of Fire Engineers – IFE
- International Association of Arson Investigators - IAAI

5.5 Personal Emergency Evacuation Plans (PEEPs)

- 5.5.1 As set out in section 3 of the report, Government will be introducing regulations to mandate Residential PEEPs for all high-rise residential buildings and for residential buildings between 11 metres and 18+ metres with simultaneous evacuation strategies in place. An evacuation strategy is the advice provided to residents to either remain in their homes (stay put) in the event a fire or smoke alarm sounds, or leave immediately (simultaneous evacuation).
- 5.5.2 Simultaneous evacuation strategies are in place in 16 LB Camden residential buildings where because of their age, construction or layout, it is safer for residents to leave their home immediately if an alarm sounds. Evacuation signs have been installed in all LB Camden residential buildings which make clear whether stay out or simultaneous evacuation strategies are in place.
- 5.5.3 In anticipation of new regulations the Council has undertaken a PEEPs pilot with residents of six high-rise buildings, Riverside, Riverfleet, Fleetway and Fleetfield on the Birkenhead Estate, and at Great Russell Mansions and Denton Tower. The pilot covers a total of 260 homes.
- 5.5.4 The results of the PEEPs pilot will be evaluated and compared with draft PEEPs regulations to identify any gaps in planned practice. The Council is developing a “Tenancy Visit” app which will enable Neighbourhood Staff, Building Safety Managers, Fire Safety Advisers and others to load relevant information on the housing management system and to make any necessary referrals for a PEEP of other care and support action.

5.6 Major incident plans

- 5.6.1 The Council’s Emergency Planning team (EP) is reviewing major incidents in Camden over the last five years which involved decants and evacuation. This will enable the team to understand trends and make sure the Council has the capacity to manage potential risks.
- 5.6.2 The EP team will also be running an incident exercise with a focus on housing, to test policies, procedures and rest centre capacity.
- 5.6.3 The review will also consider training and information for Council staff, taking into account the above work.

6. A BEST PRACTICE APPROACH

- 6.1 Whilst the Government’s response to the recommendations of the Inquiry report will emerge during 2025, the Council is not waiting to act on the recommendations and is aiming to take a best practice approach, by developing the ongoing Resident Safety Programme and continuing to ensure that all Council homes are as safe as possible.

6.2 This links to measures to make sure Camden is meeting the Regulator of Social Housing's Consumer Standards for Council homes. The Resident Safety Programme will be adapted and modified in response to any new primary or secondary legislation. The Council's Fire and Building Safety Charter commitments will also be reviewed and updated.

7. COMMENTS OF THE BOROUGH SOLICITOR

7.1 Legal Services have been consulted in the preparation of the report and have no specific comments,

8. COMMENTS OF THE EXECUTIVE DIRECTOR OF CORPORATE SERVICES

8.1 The Executive Director Corporate Services was consulted in the preparation of the report and has no further comments.

9. ENVIRONMENTAL IMPLICATIONS

9.1 There are none.

ENDS

APPENDIX: GRENFELL INQUIRY PHASE 2 REPORT - KEY RECOMMENDATIONS AND CONSIDERATIONS

Inquiry Findings	Recommendation	Government Response to Recommendation	LBC considerations
<p>Government & Regulatory Failings Arrangements under which the construction industry is regulated are too complex & fragmented.</p>	<p>Recommend government bring responsibility for functions relating to fire safety exercised by MHCLG/ Home Office & Dept Business & Trade into one department under a single Secretary of State</p>		<p>Actively monitor Government position.</p>
	<p>Recommend A Single Construction Regulator, reporting to a single Secretary of State be responsible for: Regulation of construction products Development of suitable methods for testing construction products Testing and certification of such products issue of certificates of compliance of construction products Regulation and oversight of building control Licensing of contractors to work on higher-risk buildings Monitoring operation of Building Regulations & statutory guidance & advising SoS on need for change Carrying out research on fire safety in built environment Exchanging information with fire & rescue services on matters affecting fire safety Accrediting fire risk assessors</p>		<p>Actively monitor Government position and continue to take part in MHCLG focus groups / early adopter meetings as they are convened.</p>

	<p>Maintaining publicly available library of test data & publications.</p> <p>Recommend: Appointment of a Chief Construction Adviser to SoS to provide advice on all matters affecting construction industry & monitor all aspects of the department's work relating to the Building Regulations & statutory guidance</p>		<p>Actively monitor Government position and continue to take part in MHCLG focus groups/ early adopter meetings as they are convened.</p>
<p>Building Safety Act</p> <p>Definition of a 'higher risk' building currently limited to 7+ floors/18+m height. Inappropriate given likely presence of vulnerable people, for whom evacuation in the event of a fire or other emergency would present difficulty</p>	<p>Recommend</p> <p>Review definition of a higher risk building for the purposes of the Building Safety Act.</p>		<p>Strong Building Safety team in place comprising 10 Building Safety Managers plus team leader, and fire safety measures in place in compliance with Building Safety Act requirements. BSA currently applies to 188 residential HRBs in LBC management.</p> <p>Any expansion of the definition would need to be subject to a detailed impact assessment and cost analysis by Government.</p>
<p>Building Control Functions</p> <p>Criticism of deregulation & introduction into system of commercial interests.</p> <p>Private Sector Approved Inspectors have a commercial interest in conflict with role as guardians of the public interest. Competition for work between approved</p>	<p>Recommendation</p> <p>Government to appoint an independent panel to consider whether it is in the public interest for building control functions to be performed by those who have a commercial interest in the process. Panel to consider whether all building control functions should be performed by a national authority.</p>		<p>There is considerable inter borough / agency competition for Building Control professionals and a national authority may be the logical conclusion.</p>

<p>inspectors & local authority building control departments introduced a similar conflict of interest</p>			
<p>Dishonest Behaviour of Manufacturers It is essential that those responsible for designing buildings have access to reliable information about the materials and products they wish to use.</p> <p>Arconic Architectural Products: The cladding manufacturer marketed the cladding knowing it would be used on tall buildings, despite test evidence that it might be unsafe for this purpose.</p> <p>Rydon: Building & design contractor for the tower's refurbishment knew or should have known in 2015 that the cladding was flammable</p> <p>Harley Facades: fitted the flammable cladding claims it did not know the cladding had previously failed fire safety tests.</p> <p>Celotex and Kingspan: Insulation companies accused of ignoring safety risks in selling products for</p>	<p>Recommend That a construction regulator be responsible for assessing the conformity of construction products & issuing certificates. Copies of all test results be included in certificate. Manufacturers to provide construction regulator with full testing history of product or material to which certificate relates & inform the regulator of any material circumstances that may affect its performance, Manufacturers be required by law to provide on request copies of all test results that support claims about fire performance made for their products.</p>		<p>Rydon, Harley not utilised on current projects.</p> <p>While the Government has written to those firms still trading to inform them that they will be barred from award of Government contracts, the Council will require its own procurement advice.</p> <p>The Council has however made sure competent contractors appointed and suitable materials used on its remediation projects, including a commitment to an A1 fire rated façade at the Chalcots.</p>

<p>residential tower blocks. Insist their products could be used safely with the right designs</p> <p>Exova: Fire safety consultants advised refurbishment would have no adverse effect on safety.</p>			
<p>Failure of oversight & scrutiny by Kensington & Chelsea Council (RBKC)</p>	<p>Inquiry Panel content not to make further recommendations for action & to leave to implementation of the Social Housing (Regulation) Act 2023 & oversight of Regulator of Social Housing.</p>		<p>Current governance includes:</p> <p><u>Officer Oversight</u></p> <p>Landlord Compliance Group chaired by Director Property Management - monthly</p> <p>Housing & Safety Regulatory Board chaired by Executive Director Supporting Communities - monthly</p> <p>CMT Safety Board chaired by Chief Executive – quarterly</p> <p><u>Public Reporting</u></p> <p>Housing & Fire Safety Advisory Panel – quarterly compliance reporting and policy matters</p> <p>Housing Scrutiny Committee and Cabinet reports as and when required, for example the resident safety charter.</p> <p>Fire Risk Assessments (FRAs) and FRA actions monthly reporting to Panel & Scrutiny Committee members, publication on Council website</p>
<p>RBKC Response to Fire</p> <p>Residents were let down by RBKC as category 1 responders. RBKC failed to put in place suitable arrangements to discharge responsibilities under the Civil Contingencies Act or to train staff.</p>	<p>Civil Contingency Act/London Local Authority Gold Arrangements: Recommendation</p> <p>Guidance on the operation of Civil Contingency /Local Authority Gold arrangements be revised</p> <p>Existing and newly appointed chief executives & other staff be</p>		<p>The Council will consider recommendations linked to the Civil Contingencies Act/first responders (and any Council response) at its “Corporate Resilience Assurance Group”, this as part of a review that is already in progress.</p>

	given regular training to ensure they are familiar with its principles.		
Landlord Failings & Poor Management by TMO Criticism of TMO for treatment of residents & poor landlord performance	Inquiry Panel content not to make further recommendations for action & to leave to implementation of the Social Housing (Regulation) Act 2023 & oversight of Regulator of Social Housing.		<p>The Council will review its Tenant Management Organisations' adherence to statutory compliance and the management agreements in place.</p> <p>It is noted the TMOs in Camden have a much more limited remit than that of the Kensington and Chelsea TMO (KCTMO) which was more akin to an Arms-Length Management Organisation with full housing and property management responsibility. The Council will review the findings in relation to the KCTMO and consider it against its own practice.</p>
Failure to keep records of vulnerable residents	<p>Recommend: Owner/manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for residents whose ability to evacuate the building without assistance may be compromised & include info in a premises information box for access by fire & rescue services</p> <p>Recommend that the advice contained in paragraph 79.11 of the Local Government Association Guide on PEEPS be reconsidered.</p>	EEIS Consultation Response Published December 2024	<p>Residents have been asked to self-identify to the Council if they or a member of their household may need help to evacuate.</p> <p>Neighbourhood Housing Teams also undertake Tenancy checks and make referrals of vulnerable residents to Fire Safety Advisers for person centred fire risk assessments and/or to OT team for aids and adaptations. The new 100% internal stock condition survey also includes a question to identify potential vulnerabilities / evacuation requirements.</p> <p>For information storage on site, the Premises Information Box installation programme has completed. The housing transformation programme is evaluating the systems required to electronically store, produce and maintain this data.</p>

<p>TMO failure to maintain access to gas pipeline isolation valves Pipeline isolation valves are a critical part of the gas distribution network because they are intended to enable the supply of gas to be shut off quickly in an emergency</p>	<p>Recommend Every gas transporter be required by law to check accessibility such valves at least once every 3 years & report the results of that inspection to the HSE as part of its gas safety case review</p>		<p>LBC mechanical & electrical engineers carry out annual surveys on each of the gas transportation networks on Camden estates. Engineers ensure PIVs are clean & easily accessible in case of emergency</p> <p>All LBC gas networks have up to date line drawings /map with marked pipeline isolation valve locations marked on them. The line drawings have also been shared with Cadent and copies are also located within the meter rooms on estates.</p>
<p>Design & Technical & Contractual Practice for Refurbishment & Cladding Works Rydon Criticised for failings in its organisation of Grenfell Tower refurbishment. Including failure to make it clear which contractor was responsible for particular aspects of the design & a failure to take an active interest in fire safety.</p>	<p>Recommend: A licensing scheme operated by the (proposed) construction regulator be introduced for principal contractors wishing to undertake the construction or refurbishment of higher-risk buildings Recommend: It to be a legal requirement that any application for building control approval for the construction or refurbishment of a higher-risk building (Gateway 2) be supported by a personal undertaking from a director or senior manager of the principal contractor to take all reasonable care to ensure that on completion and handover the building is as safe as is required by the Building Regulations</p>		<p>Design team appointments & procurement processes to be reviewed.</p> <p>Will require amendment to new build design guides, employer’s requirements and scopes of service to make sure aligned.</p> <p>Will need amendments to the evaluation criteria and processes for contract award (for example the personal undertaking).</p>
<p>Criticism of lead architects with no experience of</p>	<p>Architects and Principal Designers: Recommend</p>		<p>Design team appointments & procurement processes to be reviewed.</p>

<p>cladding/tower refurbishment or understanding of fire safety. Widespread failure of architects to investigate properly or understand the nature of the materials being chosen for cladding/fire safety purposes.</p>	<p>That Architects Registration Board & Royal Institute of British Architects review the changes already in training & education of architects to ensure they are sufficient in the light of report findings.</p> <p>Recommend: A statutory requirement that an application for building control approval in relation to the construction or refurbishment of a higher-risk building (Gateway 2) be supported by a statement from a senior manager of the principal designer under the Building Safety Act 2022 that all reasonable steps have been taken to ensure that on completion the building as designed will be as safe as required by Building Regulations.</p>		
<p>Fire Strategy</p>	<p>Fire engineers 113.24 Designing buildings that are safe in the event of a fire requires particular skill. It is a skill that can be acquired only by specialised education and experience worthy of formal recognition. The term “fire engineer” does not denote any formal qualification & it is possible for a person to practise as such without any formal qualification.</p>		<p>LBC Fire Risk Assessments are carried out by Frankham Risk Management Services and are delivered by competent persons providing suitable and sufficient risk assessments in accordance with the Regulatory Reform (Fire Safety) Order 2005.</p> <p>FRAs produced by Frankhams are reviewed and quality checked by LBC’s in-house Fire Safety Adviser team and published on the Council’s website.</p> <p>Design team appointments & procurement processes to be reviewed. In particular, amendments to scope of</p>

	<p>Recommend that the profession of fire engineer be recognised/protected by law</p> <p>That an independent body be established to regulate the profession, define the standards required for membership, maintain a register of members & regulate their conduct.</p>		<p>services required to reflect any changes to definition of Fire Engineer.</p>
<p>Fire Safety Strategies and Building Control Gateways.</p>	<p>Recommend that it be made a statutory requirement that a fire safety strategy produced by a registered fire engineer to be submitted with building control applications (at Gateway 2) for the construction or refurbishment of any higher-risk building and for it to be reviewed and re-submitted at the stage of completion (Gateway 3). Such a strategy must take into account the needs of vulnerable people, including the additional time they may require to leave the building or reach a place of safety within it and any additional facilities necessary to ensure their safety.</p>		<p>Design team appointments & procurement processes to be reviewed, including amendments to new build design guide, employer's requirements and scopes of service.</p>