

Report for: Housing, Planning and Development Scrutiny Panel

Title: Fire Safety Action Plan – Update on progress to date.

Report authorised by: Jahed Rahman – Operational Director of Housing & Building Safety

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Ward(s) affected: All

**Report for Key/
Non Key Decision:** Non Key

1. Purpose.

This report provides an update to the Housing, Planning and Development Scrutiny Panel regarding progress on Haringey’s Fire Safety action plan.

2. Cabinet Member Introduction.

Not applicable

3. Recommendations.

The Housing, Planning and Development Scrutiny Panel are asked to note the report.

4. Reasons for decision.

Not applicable

5. Alternative options considered.

Not applicable

6. Background information

6.1 This report considers activities regarding fire safety as follows:

- The Housing Improvement Plan
- Approach to Fire Risk Assessments & actions
- The Fire Safety (England) Regulations 2022
- The Building Safety Act 2022

The Housing Improvement Plan

- 6.2 Following a Compliance review by Pennington Choices Ltd. at the end of 2022, in relation to fire safety there were two key recommendations as follows:
- Ensure the fire risk assessments (FRAs) completed by internal fire risk assessors are 100 per cent quality checked to provide assurance around the quality and consistency of FRAs – **Action complete**
 - Consider allowing all properties on the FRA programme to receive a Type 3 assessment (which includes going into a sample of flats) as a best practice approach – **Action complete**
- 6.3 We currently have two in-house fire risk assessors. Each checks the other's risk assessments once completed. This is recorded on each assessment whereby a 'reviewed by' section records the reviewer's name. The review involves sense checking the content and actions and ensuring all appropriate aspects have been considered in line with the required standards.
- 6.4 There are four types of Fire Risk Assessment that can be undertaken in line with the current Publicly Available Standard (PAS) 79. These are Types 1 to 4. Type 1 is the basic and more commonly used which limits the assessment to a visual inspection of the common parts of a building. Type 3 is as per Type 1 but includes a representative sample of the inside of flats within the block. A Type 2 assessment is the same as type 1 but extends to include intrusive investigations which may include investigating behind panels or opening sealed shafts, panels or brickwork etc. A Type 4 assessment is as per Type 2 but extends further to include intrusive surveys of a representative sample of flats.
- 6.5 Having previously undertaken Type 4 risk assessments for high-rise and timber framed blocks of flats, Haringey has subsequently implemented annual Type 3 risk assessments on buildings over 11m (5-storeys) in height, of which there are 86 (44 >18m and 42 from 11m to 18m). This considers the risk associated with taller buildings and the need to undertake surveys on flat entrance fire doors, under the Fire Safety (England) Regulations 2022. Lower rise buildings will continue to undergo a Type 1 risk assessment due to the lower risk and less complex nature of these buildings unless the Type 1 assessment recommends a further and more detailed assessment such as type 3 or 4.

Fire Risk Assessments & Actions Management.

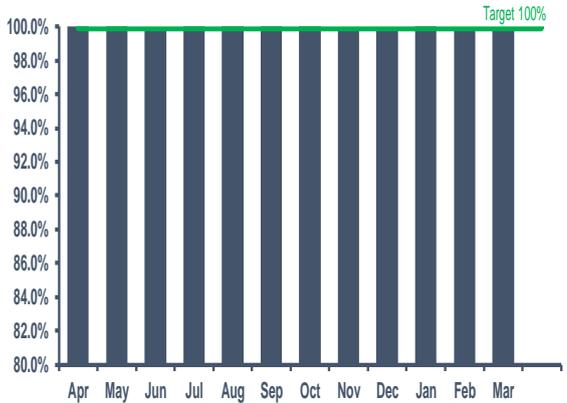
- 6.6 In addition to the work undertaken by our in-house risk assessors, whilst we recruit additional staff to the two vacant Risk Assessor roles, Haringey has engaged an external company to support the delivery of Fire Risk Assessments.
- 6.7 Our performance for Fire Risk Assessments for the financial year April 2023 to March 2024 can be seen below. (Note: The outstanding FRA at end of

March 2024, was completed on 16th April 2024, at 17 days overdue following access issues).

Ref	Month	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Target	Tolerance	YTD
1.	FRAs Required (12-month rolling)	1,620	1,619	1,619	1,619	1,617	1,617	1,619	1,619	1,618	1,617	1,617	1,618	100%	99.0%	1,618
	FRAs Completed (12-month rolling)	1,620	1,619	1,618	1,619	1,617	1,617	1,619	1,617	1,615	1,617	1,616	1,617			1,617
	% FRAs Compliant	100.00%	100.00%	99.94%	100.00%	100.00%	100.00%	100.00%	100.00%	99.88%	99.81%	100.00%	99.94%			99.94%
	Programmed (monthly)	127	135	126	129	149	137	136	136	126	137	151	131	1620		
	Completed (monthly)	127	135	125	129	149	137	136	134	124	137	152	130	1615	99.7%	
	Target	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%		

Fire

Fire Risk Assessments
 All FRAs complete except for one no access, due on 28/03/24 (currently 8 days overdue). Our RLO will contact the resident to arrange an appointment date. The annual programme figures increased by one from February 2024 due to Whitby Court being split into two assessments (1-8 & 9-25).



YTD TREND

6.8 Our management and delivery of fire risk actions are reported through our internal Board structure, where delivery of actions are tracked, as well as regularly reviewing progress on our Voluntary Undertaking directly with the Regulator for Social Housing.

6.9 The following table shows progress against the programme for reducing high risk overdue actions against which we self-reported to the Regulator in January 2023:

Self-Reported Overdue Actions			
Priority	January 2023	28th June 2024	Improvement
High	4120	1497	-2623
Medium	2529	939	-1590
Low	1588	75	-1513
Total	8237	2511	-5726

6.10 The following activities are also being progressed to manage actions effectively:

	Activity	Status
1	Implement the new compliance system that will improve and speed up action allocation and completions and provide	In progress - The Fire Risk Assessment and Electrical Inspection modules are fully configured and awaiting upload of remaining reports estimated by end of July. Asbestos and Gas modules being

	live status reporting on compliance.	configured and estimated completion end of September. Water and Lifts not started but will be shorter timescale using knowledge from previous modules. All due to be in full use for compliance reporting by end of December 2024.
2	Procure specialist contractors to support our in-house repairs team where required.	In progress – 6 out of seven contractors in place and delivering programmes. One contractor awaiting final approval of award report, due to be in place in July 2024.
4	Procure specialist contractors to deliver future major works actions.	In progress – Have initiated the project with Strategic Procurement to agree a project timescale. We have confirmed budget requirements, and are developing the tender pack, including pricing documents and rates, and quantities to ensure accurate pricing by contractors.
6	Increase building safety inspections of high-rise buildings through our in-house Building Safety Managers (BSMs)	In progress – BSMs are undertaking monthly site inspections of all communal areas of all high-rise blocks, representing the Council as the Principal Accountable Person (PAP), ensuring a visible presence and key point of contact for residents regarding all aspects of building safety. They are also coordinating any actions and activities with all other teams and stakeholders as required to ensure that works are completed with minimal disruption to residents. Examples of improvements made so far include increased security regarding roof access, management of empty properties, auditing secure information boxes.
7	Undertake analysis of actions to identify potential prevention measures.	Complete – A report was submitted to the internal governance board in May 2024 that confirmed the average number of actions per FRA and the underlying workstreams that we can now use to further identify root causes over the coming months.

6.11 Several teams across Housing Services & Building Safety are responsible for completing actions including Tenancy Management, in dealing with resident activities, such as keeping communal areas clear or removing security grilles, Housing Repairs Services (HRS) for repairing damaged doors or signage etc., as well as Fire Safety and Asset Management for fire-door replacement programmes and major refurbishment etc.

The Fire Safety (England) Regulations 2022

6.12 These regulations followed the introduction of the Fire Safety Act 2021 which:

- Gives clarification regarding the premises to which the Regulatory Reform (Fire Safety) Order applies and extends the Order regarding what parts of a building are included.
- Details the powers granted to the Secretary of State to alter which premises it applies to.
- Gives risk-based guidance about the discharge of duties under the Fire Safety Order.

6.13 The resulting changes to the Regulatory Reform (Fire Safety) Order 2005 began to come into force on 23rd January 2023, imposing additional requirements to improve existing housing stock, put new reporting processes and arrangements in place and to implement new inspections of fire safety systems as follows:

Area	Requirement	Status
In high-rise residential buildings, responsible persons are required to:		
Building plans	Provide the local Fire and Rescue Service with up-to-date electronic building floor plans and to place a hard copy of these plans, alongside a single page building plan which identifies key firefighting equipment, in a secure information box on site.	Existing plans are in place, and being updated
External wall systems	Provide to their local Fire and Rescue Service information about the design and materials of a high-rise building's external wall system and to inform the Fire and Rescue Service of any material changes to these walls. Also, they will be required to provide information in relation to the level of risk that the design and materials of the external wall structure gives rise to and any mitigating steps taken.	Specialist contractors are being procured, with bids being evaluated. There is no Grenfell type rain-screen cladding on our buildings and all; have been suitably risk assessed.
Lifts and other key firefighting equipment	Undertake monthly checks on the operation of lifts intended for use by firefighters, and evacuation lifts in their building and check the functionality of other key pieces of firefighting equipment. They will also be required to report any defective lifts or equipment to their local Fire and Rescue Service as soon as possible after detection if the fault cannot be fixed within 24 hours, and to record the outcome of checks and make them available to residents.	All teams have access to LFB Portal and update accordingly.
Information boxes	Install and maintain a secure information box in their building. This box must	All required buildings have one in place

	contain the name and contact details of the Responsible Person and hard copies of the building floor plans.	
Wayfinding signage	Install signage visible in low light or smoky conditions that identifies flat and floor numbers in the stairwells of relevant buildings.	An upgrade programme was completed in 2023
In residential buildings with storeys over 11 metres in height, responsible persons are required to:		
Fire doors	Undertake annual checks of flat entrance doors and quarterly checks of all fire doors in the common parts.	This is being completed on a rolling programme by in-house and external risk assessors.
In all multi-occupied residential buildings with 2 or more sets of domestic premises responsible persons are required to:		
Fire safety instructions	Provide relevant fire safety instructions to their residents, which will include instructions on how to report a fire and any other instruction which sets out what a resident must do once a fire has occurred, based on the evacuation strategy for the building.	All buildings have 'Fire Action' notices in communal areas. We also issue fire safety information through our resident new letters. Additional communication methods are being developed.
Fire door information	Provide residents with information relating to the importance of fire doors in fire safety.	Specific letters are being issued to all residents regarding fire safety and fire doors. Further options are being evaluated through various media as part of our fire safety communications plan.

6.14 Haringey Council meets on a two monthly basis with the London Fire Brigade (LFB) at senior level, chaired by the Director of Placemaking & Housing and attended by Assistant Directors and Heads of Service, and the LFB's Borough Commander and his team. There are also operational communications between Haringey's Building Safety Team and the LFB's Borough Commander and Tottenham Station Manager as well as their Enforcement Team. Through on-going dialogue, we work closely with the LFB to ensure they are aware of any issues and works we are doing and how we can both best inform and raise awareness with our residents, regarding fire safety.

The Building Safety Act 2022

6.15 The Building Safety Act (2022) is focussed on improving fire and structural safety of high-rise, higher risk buildings. It takes forward the government's commitment to the fundamental reform of building safety. The Act puts into effect the policies set out in the 'Building a Safer Future' consultation response, published in April 2020. This detailed how the government intended to deliver the principles and recommendations of Dame Judith

Hackitt's Independent Review of Building Regulations and Fire Safety, published in May 2018.

- 6.16 The Act establishes a new building safety regime in England with the introduction of the Building Safety Regulator and sets out a new legislative framework for the design and construction of new buildings and those undergoing significant refurbishment. It also introduces the role of the Accountable Person (AP)/ Principal Accountable Person (PAP)¹, which in relation to Haringey Council housing stock is Haringey Council.
- 6.17 In 2021 Homes For Haringey commenced a 5-point plan (five workstreams) in anticipation of the requirements of the new legislation based on the White Paper issued ahead of the introduction of the Act itself, as follows:
1. Improving property data.
 2. A new compliance management system.
 3. A Building Safety Strategy.
 4. A Resident Engagement Strategy.
 5. A Pilot Safety Case.
- 6.18 Workstream 1: Improving Property Data also supports the Housing Service's work in response to the latter requirements for the Golden Thread of information. More information on those requirements can be found at: [Keeping information about a higher-risk building: the golden thread - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/keeping-information-about-a-higher-risk-building-the-golden-thread)
- 6.19 These workstreams have ensured that the Housing Service has been able to move forward all five workstreams. Having completed workstreams 4 & 5, Workstream 3 will see a new Building Safety Strategy put to Cabinet for adoption in July 2024. Our new compliance system is nearing completion for initial launch at end of May 2024, and we have appointed and are mobilising a consultant to assess our data infrastructure and identify areas for improvement.
- 6.20 The implementation of the compliance system by the end of December 2024, will provide a live and transparent view of our compliance position. It will remove the need for manual data entry and allow for automatic reconciliation of property data between the compliance programmes and the property data in our Housing Management system (Northgate NEC).
- 6.21 The eradication of manual data entry and use of spreadsheets that it will replace will provide greater assurance around the quality of our data and its integrity. This will address previous internal audit and assurance recommendations to move away from spreadsheets, due to the risks regarding data corruption and human error.

¹ AP where there is only one AP. PAP where there is more than one AP - [Safety in high-rise residential buildings: accountable persons - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/safety-in-high-rise-residential-buildings-accountable-persons)

- 6.22 We have put in place an annual assurance statement to cabinet each year which sets out our performance on all compliance responsibilities including FRAs and Actions so there will continue to be transparency on this through independent assessment of the quality of our compliance reporting. The use of a compliance management system will allow remote and direct access to auditors and thereby, faster and better auditing and analysis of data in future years.
- 6.23 Haringey completed the registration of its 44 high-rise higher risk buildings by 1st October 2023 as required. Haringey also provided the required key building information, at the same time.
- 6.24 We are continually updating and developing our Building Safety Cases so that we can respond accordingly to the Regulator, as and when invited to submit applications for a Building Assessment Certificate.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes’?

- 7.1 This project will help to deliver theme 5 of the Corporate Delivery Plan: A borough where everyone has a safe, sustainable, stable, and affordable home.

8. Carbon and Climate Change

- 8.1 The Climate Change Action Plan sets out how the borough will become net zero carbon by 2041. Our proposed Building Safety Strategy supports that objective, through commitments to improve building and fire safety of our 44 high-rise and higher risk blocks. There are potential synergies between our retrofit projects both being about the climate outcomes but also enhancing resident safety, for example through the move to air-source heat pumps and other electric driven technologies, that will help to remove gas supplies and combustion appliances from buildings.
- 8.2 By doing so we will improve the sustainability, suitability and continued use of those buildings as safe and sustainable homes for residents. This in turn reduces the carbon emissions produced by them, and/or the need for re-development of them, and the carbon emissions that produces.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

N/A

Procurement

N/A

Head of Legal & Governance [Name and title of Officer completing these comments]

N/A

Equality

N/A

10. Use of Appendices

N/A.

11. Background papers

1. Draft Building Safety Strategy & Cover Report May 2024
2. Placemaking & Housing Report on Fire Risk Action Analysis May 2024
3. Scrutiny Committee Report Building Safety Cases March 2023.