Fire Safety: Risk Prioritisation in Existing Buildings

G15 response

17th February 2020
About the G15

The G15 is the group of London’s largest housing associations. Our members house one in ten Londoners and own or manage more than 600,000 homes across the country. We’re independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents. Each G15 member is different, but we’re all striving towards the same goal – to solve the capital’s housing crisis and improve the lives of Londoners.

This consultation response has produced by the G15 Asset Management Sub-Committee, chaired by Mark Everard (Executive Director of Property, Metropolitan Thames Valley Housing), which brings together Asset Directors from across G15 member organisations.

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1. **Summary**

1.1. Ensuring our homes are safe for the residents who live in them is our single greatest responsibility as building owners and landlords. That is why we fully support the government’s focus on this shared agenda and welcome the opportunity to provide insight on the crucial issue of risk prioritisation via this consultation response.

1.2. We welcome the recognition this consultation provides that advice, regulatory change, government funding and remediation work must follow a robust and detailed understanding of risk. Understandably, certain high-profile issues relating to building safety have required swift action by both landlords and government. However, to ensure the best use of both government and landlord resources over what will be an extended period of time whilst assessment and remediation works take place, as well as to give reassurance to residents, an agreed and more considered risk prioritisation approach must be developed and adopted.

1.3. A risk-based approach to prioritisation must help avoid cliff-edges and overly rigid trigger thresholds that can occur when focusing on individual building characteristics in isolation. Instead, prioritisation must better reflect the impact of the interaction of varying factors on a building’s overall risk level. Furthermore, adopting such an approach will support building owners to prioritise inspections and will contribute to the development of timescales for remediation works, giving residents greater confidence that the government, building owners, developers and construction groups are working together to an agreed and considered approach.

1.4. Developing an agreed approach and, consequently, a wider understanding of the timescales likely to be involved in completing remediation works directed by such an approach, must also recognise capacity issues in terms of the availability of suitably qualified assessors, contractors to complete works and, potentially, the need for government financial support.

1.5. This response has been produced following discussions between G15 members and represents a broad consensus on factors and approaches the government should consider when commissioning its research and producing recommendations that follow from that. It is important to note that G15 members own or manage over 600,000 homes across the country and the challenges members face concerning building safety will differ between organisations. The short timeframe made available to respond to this consultation means that this response should be seen as a first step in a dialogue between members and the government, which we would like to develop further post-consultation.
2. Factors impacting building risk

(Questions 3, 4 and 5)

2.1. As owners of a wide variety of buildings, G15 members are well placed to provide insight into the different factors that should be considered when classifying building risk.

2.2. There are clearly multiple factors that must be considered when seeking to understand the risk of fire in an existing residential building. Since the tragic fire at Grenfell Tower, certain risk factors have, understandably, required swift action to address them by both landlords and government. However, to ensure the best use of both government and building owners’ resources over what will be an extended period of time whilst assessment and remediation works takes place, as well as to give reassurance to residents, an agreed and more considered approach to understanding the full range and impact of risk factors must be developed and adopted.

2.3. Factors that should be considered when classifying building risk, aside from height, include:

- Construction type – timber-frame, steel or concrete
- Intended resident group of building – eg. general needs or care and support tenants
- Compartmentation quality
- Types of components
- External wall systems
- Escape routes – number of stairways, presence of firefighting lifts, emergency lighting
- Fire suppression measures – sprinklers, misting systems, wet or dry risers, smoke detectors
- Complexity of design and construction
- Age of a building
- Size and density of a building
- Quality of the original build
- Fire Risk Assessment (FRA) rating
- Heating-type – mains gas supply, electric only
- Fire strategy – ‘stay put’ or evacuation
- Proximity to other buildings
- Proximity to fire stations

2.4. It is important to note that whilst the list of factors at 2.3 reflect the views members had of what factors were most significant in assessing the risk level of a building, it would not be feasible to develop a risk prioritisation approach across all buildings that factored all these factors in at once. Please see section 3 below for further detail.

2.5. Whilst building height will always remain a key factor when assessing building risk, as the above list of additional factors demonstrates, it is by no means the only or most important consideration. For example, height is clearly an important factor in
determining the speed of evacuation (where that is the correct fire strategy), however, a tall building with multiple escape routes and some fire suppression measures may well be less of a risk than a smaller building with a single staircase, no fire suppression measures and where tenants are mainly residents with care and support needs.

2.6. We agree that a case-by-case risk-based approach is broadly the correct one for existing buildings, but this should be based on a useable risk matrix to assist with prioritisation. Reviewing individual buildings’ risk profiles is preferable to the overly simplistic method of selecting one or two trigger thresholds to drive prioritisation for inspection and remediation if required. However, it should be noted that as the scope of government advice and legislation broadens to encompass more buildings, reviewing this wider pool of buildings on a case-by-case basis will lengthen the time it takes to deliver remediation and will require significant levels of financial resource to be invested.

2.7. Initial estimates by the G15 have suggested that remediation costs across member organisations will be significant and further discussions will be required with government to understand the scale of these costs, the timeframe required to address them and the potential costs leaseholders may face.
3. Developing a risk matrix

(Question 8)

3.1. We welcome the government’s intention, as set out in this consultation document, to commission research to develop an evidence base on fire safety risk in buildings to assist building owners in the prioritisation of risk. A systematic and robust evidential foundation for any future risk matrix is extremely important.

3.2. We believe that the development of an agreed risk matrix should follow the conclusion of the government’s research and evidence gathering process, and after reflecting on responses to this consultation. Therefore, we are not proposing a finalised risk matrix within this consultation response. However, members do have a number of concepts that could assist government when investigating the development of a risk matrix further.

3.3. Members supported the proposal for a matrix that reflects the impact and interaction of key characteristics of a building and its environment to develop a more sophisticated understanding of risk. The inputs (ie. different factors) to the matrix should be given a weighting or score, which can then be used to help plot or rank a building’s risk in comparison with other buildings. It was felt that height should be a key input, but that it must not be uncritically assumed to be the most significant factor.

3.4. The Hackitt Review identified the concept of layers of protection and members felt this could be helpfully applied to understanding the build-up of risk within a building, whilst also factoring in mitigation measures that are in place to reduce risk levels. The main risk categories can be described as:

- The risk of a fire starting
- The risk of a fire spreading
- The risk to the prevention of a swift evacuation (where that is the fire strategy)

3.5. The risk a building poses across these categories and taking into account the individual factors contained within them, could then be reassessed against what mitigation measures are in place in order to arrive at a holistic understanding of a building’s risk level.

3.6. The approach outlined at 3.4 and 3.5 adopts a ‘systems approach’ methodology, as does the layers of protection approach referred to in the Hackitt Review. The benefit of such an approach in this context is to allow the interaction of various risks or mitigations to be better understood, and to allow for complexity and change to be incorporated into the understanding of how the building as a system is operating and the risk this presents.

3.7. Members also saw value in a more hierarchical ranking of risk approach. Such an approach would rank primary influencing factors (height, external wall system, construction) and then incorporate secondary influencing factors (tenure, proximity to other buildings, escape routes) to help order individual buildings within a risk-based prioritisation system. In the interim period whilst a risk prioritisation approach
is being fully researched and developed, an initial prioritisation approach based on these factors could be helpful to building owners. This approach could help to create timeframes for when buildings falling within different levels of risk should have remediation works completed by. Members identified the need for government support in developing timeframes by building capacity among sectors that building owners will need to work with to conduct remediation.

3.8. The Housing Health and Safety Rating System (HHSRS) was identified by members as an example of a risk-based evaluation approach that works well. Introduced under the Housing Act 2004, the HHSRS is a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.
4. Areas for further research

(Questions 6 and 7)

4.1. The G15 is committed to sharing best practice and understanding in relation to building safety with government and all those involved in the construction, maintenance and management of buildings.

4.2. We feel that in its work to investigate risk, the government should seek to draw on the combined understanding and experience of those involved in the building safety environment. For example, the Fire and Rescue Services and insurance companies will have a wealth of knowledge about fire risk, including what mitigation measures are most effective and what assessment tools provide the best predictive insight to inform prioritisation for action.

4.3. Members identified a number of areas concerning potential fire risk that the government should conduct further research into. These include:

- The contribution of electrical faults to building fires, including consideration of putting electrical testing on the same statutory footing as gas inspections and compliance.
- The role of building occupants in supporting fire prevention and best practice for building managers to follow to support occupants in this regard.
- Residents’ perception and understanding of building safety and what impact the adoption of a risk prioritisation approach would have on this.
- Strengthening access rights to carry out inspections and remedial action when necessary, and the issues failure to gain access to properties is having on progressing assessments and remediation works.
- Analysing results of BS 8414 tests that have identified some external wall systems that have passed tests whilst known defects remained.
- The potential for the publication of building safety test results (eg. BRE tests), possibly on an anonymised basis, to help building owners become aware quicker of new issues or solutions.
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