

For General Release - updated report

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| REPORT TO: | CABINET 20 November 2017 |
| SUBJECT: | Fire safety in Croydon – update and progress |
| LEAD OFFICER: | Shifa Mustafa Executive Director of Place Stephen Tate Director of District Centres and Regeneration |
| CABINET MEMBER: | Councillor Alison Butler Deputy Leader and Cabinet Member for Homes, Regeneration & Planning |
| WARDS: | All |
| CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON Include here a brief statement on how the recommendations address one or more of the Council's Corporate Plan priorities: Corporate Plan 2015-18 Actions referred to in this report will contribute to corporate plan objectives for housing, including, specifically, improving housing estates and standards for residents, through the installation of sprinklers and other fire safety measures, and driving up standards for tenants in private rented housing, through use of the council's enforcement powers and duties. They will also contribute to objectives for liveability by helping people to be safe and feel safe. | |

FINANCIAL IMPACT

The total estimated cost of the housing fire safety works detailed in this report is about £10m. This includes £7.2m for sprinkler installation and associated measures; £1.4m for a range of different fire safety measures; £0.02m for cladding testing; and £1.4m for other associated works and contingency provision. These costs will be met through the housing revenue account (HRA) over two years (2017/18 and 2018/19). Within the general fund is a cost of £260k for the replacement of cladding at one of the council's primary schools.

FORWARD PLAN KEY DECISION REFERENCE NO: not a key decision

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below.

1. RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1 note progress on the fire safety activities and proposals reported to its meeting on 17 July 2017 and new actions instigated since. These activities relate to housing of all tenures and to council-owned schools and other buildings.

2. EXECUTIVE SUMMARY

- 2.1 This report provides an update to the report on fire safety considered by the cabinet on 17 July 2017. The proposals set out in the last report are progressing according to timescale.
- 2.2 **Cladding:** The council went ahead with the testing of cladding materials used in the 16 taller blocks (with six or more storeys) with cladding. The material used in these blocks was not the same as that used at Grenfell Tower but the decision was nevertheless made to undertake testing (this later became a government requirement). Results indicate that the materials used are in line with requirements for material of limited combustibility (further detail is given in para 4.1). Tests have also been carried out on all other cladded blocks, that is blocks with fewer than six storeys, and cladded houses, with satisfactory results.
- 2.3 **Sprinklers:** The installation of sprinklers in 26 blocks is under way with the first two blocks to be completed in December.
- 2.4 **Miscellaneous fire safety measures:** A range of fire safety measures, such as adjustments to fire doors, signage and ensuring appropriate compartmentation, agreed with the London Fire Brigade (LFB) in the blocks of flats it regards as high priority, is well under way. These blocks comprise the 16 cladded blocks and four others. 13 of the cladded blocks have been completed. Works in the remaining blocks have commenced or, where more extensive, will be referred to the general building works contractor.
- 2.5 **Private sector housing:** There have been several recent developments in relation to private sector buildings. The Communities and Local Government (CLG) department has produced two lists of high-rise and cladded buildings. Our first task is to amend and add to this list as it isn't comprehensive, and we have arrived at a total of 42 such buildings. Testing of the cladding on the initial CLG list of five buildings indicates that the aluminium composite material (ACM) panels/insulation systems fall into the categories which have failed BRE¹ tests. The CLG has advised that the cladding is removed, with local authorities using their enforcement powers should the landlords not follow advice. The council has started inspections in the first two private. There are concerns about the role of the local authority. The first is the lack of clarity over the source of powers and responsibilities, and guidance is awaited from CLG. The second is the level of staffing resources, for the inspections and administrative work, at a time when the existing workforce is already stretched. The third is the possibility that councils will be expected by the government to undertake works in default in the event that landlords do not fulfil their duties; replacing or repairing cladding will cost hundreds of thousands, if not millions, of pounds.

¹ The BRE, formerly the Building Research Establishment, is a building science centre which provides research, advice, training, testing, certification and standards for the construction and built environment sectors.

- 2.6 **Fire risk assessments** (FRAs) have been undertaken in all corporate buildings and a review is under way to ensure any necessary actions are being progressed. Similarly, the FRAs for community schools have been obtained and, where relevant, are being updated. The external rain screen cladding at Chestnut Park Primary School, whilst complying with fire regulations, has been replaced as a precautionary measure because of the materials used.
- 2.7 Various developments at a national level may have implications for local government, and the council will keep abreast of emerging changes to regulations and advice. The developments include the public inquiry into the fire at Grenfell Tower, the independent review of building regulations and fire safety, and the setting up of an independent advisory panel to issue recommendations for improving public safety. It is likely that consideration will also be given to the wider social housing issues raised by the recent debate.

3 BACKGROUND

- 3.1 Following the fire at Grenfell Tower and the issues raised by this tragedy, the cabinet, at its meeting on 17 July, considered the council's policies and responses to ensure the safety and well-being of residents and visitors in Croydon. The report provided some background in terms of the nature of the council's housing stock and the history of investment, issues known to date with private and housing association homes, and the status of corporate buildings and schools.
- 3.2 The report summarised the immediate decisions and actions taken, and the programme of works and fire risk assessments being put in place. This report seeks to provide an update on those activities and to update the context in particular in relation to national developments.

4 ACTION RELATING TO THE COUNCIL'S HOUSING STOCK

Cladding

- 4.1 The council has 1,100 blocks of flats of which 25 have 10 or more storeys and 14 have six to nine storeys. 16 of these higher-rise blocks have been cladded. It was reported before that all blocks had been surveyed and this had confirmed that the method of construction prevented the spread of fire. It was also reported that the material used for cladding was not of the same type (aluminium composite material or ACM) as at Grenfell Tower but that the council was nevertheless commissioning tests. The blocks concerned have rigid aluminium panels and Rockwool insulation batt. The tests carried out indicate that the materials used are in line with requirements for the material of a limited combustibility. Specifically, the tests (bomb calorimeter tests) involve burning the material in a pure oxygen atmosphere to establish the reaction. The material used in the cladding did not burn and so achieved what is considered to be Class O (non-combustible) status.

- 4.2 The government has subsequently required testing of non-ACM materials such as used in our cladding so we are able to report the satisfactory outcomes. In addition, we have now undertaken sample testing of all cladded lower-rise blocks (which have varying types of cladding) to ensure each archetype is tested, as well as testing of cladded (or rendered) houses to check the materials used. Altogether 172 units in total have been tested. We have also inspected loft spaces for appropriate levels of fire-stopping. All of these tests have indicated appropriate materials and standards.

Fire safety works

- 4.3 Members were previously advised that the council was undertaking joint inspections with the London Fire Brigade of all blocks regarded by the LFB as high-priority blocks. All 16 cladded blocks as well as four others have now been inspected. These visits have resulted in an agreed programme of fire safety works relating, for example, to communal doors, signage, ensuring appropriate compartmentation and fire stopping, and adjustments to fire doors on flats, such as fitting intumescent strips or self-closing mechanisms. The council has commissioned Maulty Ltd to undertake the majority of these works. To date, the measures at 13 of the cladded blocks have been completed. Works are under way in three of the remaining blocks and, in the case of one block where some more extensive works are also required, we will be instructing Mulalley Ltd (our general building works contractor) to undertake the works. Of the other four priority blocks, Maulty Ltd has started works at two blocks (although one of these involves more extensive works which, again, will be referred to Mulalley Ltd) with a further two to commence shortly. One other block (College Green retirement housing scheme) had already been programmed for major refurbishment works, including cladding to address the porous brickwork, prior to the Grenfell Tower fire; advice from the LFB will be fully taken into account in the specification. This scheme is also included in the blocks receiving sprinklers.

Sprinkler systems

- 4.4 It was previously reported to members that the council had committed to fit fire sprinklers within 25 blocks of flats with 10 or more storeys and one eight-storey block used as retirement housing 'It should be noted that this measure [sprinkler systems] was considered to be essential by the Council and the London Fire Brigade and it will provide additional safeguarding in the event of a fire.'. Work has been progressing on this in terms of commissioning and resident engagement. A specification was then issued to Mulalley Ltd, the general building works contractor, which is drawing up specific proposals for the design and installation in each block of flats.
- 4.5 The council has engaged in a variety of ways with residents about the proposed works. Fire safety (including sprinkler installation) has been a standing item on all resident representative service improvement groups and Tenant and Leaseholder Panel meetings held since June 2017. Residents' questions and concerns have been captured through these meetings and responses prepared

which address the appearance and the effect on the flats, the amount of disruption, what would happen in the event of the system being triggered, and the cost (an issue for leaseholders). The council's *Get Involved* website was used to engage with around a third of affected households, to ensure that the questions and answers produced are comprehensive and easy to understand. The installation programme has been developed in ways which address or mitigate concerns raised through this process. Resident meetings will be held for all affected blocks before works start on site.

- 4.6 A vacant property has been fully fitted with a non-operational sprinkler system to be used as a "demonstration flat" to help residents visualise how the sprinklers will look within their homes. A video and before & after photos have been produced to use for people who haven't viewed the flat and for use after the vacant property is re-let. These are available, with a set of frequently answered questions, on the council's website at www.croydon.gov.uk/housing/firesafety. There may be the possibility of providing a similar demonstration approach in other blocks in order to extend the opportunity for viewing for local residents. This will depend on the availability of vacant flats. Feedback indicates a positive level of satisfaction with the proposals. The average amount of time estimated for the work is three days per flat, and the contractor will help people where furniture or belongings have to be moved away from walls. Advice is being provided in the event of sprinklers being set off depending on whether just one room or a whole flat is affected. In retirement housing schemes, the sprinkler will be linked to a centralised call-out system to enable emergency services notification in the event of an activation. The first two blocks will be completed in December 2017, with the full programme of works under way by the spring 2018.
- 4.7 Consideration has been given to whether leaseholders (of whom there are 46) should be charged for installation. There is no statutory right of entry under current health and safety or fire safety legislation. Under the terms of the leases, any argument we make for right of entry and recovery of costs under the improvement clause could be contested by the leaseholder which could result in a delay to the programme of over 12 months. As we are keen to fit sprinklers in as many flats as possible and our residents' safety is paramount, it has been decided that we will not charge in this instance in order to guarantee maximum coverage for the sake of the safety of the whole block. All leaseholders will be expected to sign an acceptance for future communal charges (which is in the terms of the lease) and maintenance. This decision will not set a precedent for other fire-related charges, due to the unique nature of the works.
- 4.8 A letter has been sent to leaseholders to this effect, and encouraging them to allow access to their flats for the works. The letter makes clear that this is a short-term offer so if someone refuses now, they would be charged should they change their minds and ask for installation at a future date. To date, the only

London borough to decide to charge leaseholders is Wandsworth with other councils preferring, like Croydon, to encourage maximum take-up.

4.9 Procurement and value for money

The contracts and commissioning board, at its meeting on 02 August 2017, agreed a procurement strategy in relation to a range of technical services and fire safety works, including sprinklers, fire risk assessments and the measures arising from these, and checks and inspections. To ensure swift action could be taken, some initial contractual matters were resolved in consultation with the Council's commissioning and improvement division and were implemented in accordance with Regulation 18c of the Tenders and Contracts Regulations (Disasters and Emergencies) or under Director's delegated authority (as appropriate). The sourcing approach involved various ways of ensuring value for money including through the benchmarking of prices against existing frameworks or schedules of rates, and previous quotes, or through cost management scrutiny and verification.

Fire risk assessments and compliance team

- 4.10 Given the great focus on fire safety work, it has been agreed to establish a housing compliance team bringing together staff with the skills, knowledge and resources to ensure that the council is meeting its obligations and developing the best approach to fire safety. There are a number of advantages to a dedicated team:
- fire safety will consistently have a high priority and be adequately resourced
 - the team will operate across both responsive and planned maintenance areas of activity ensuring a consistent and joined-up approach in terms of policy and practice
 - there will be a clear allocation of responsibility, enforcement of policies and regulatory requirements within the housing service, and a single point of enquiry and advice for other staff
 - one team will ensure that all records are kept together in a systematic way.
- 4.11 The team will bring together a number of existing duties and functions. There will continue to be other levels of responsibility in particular at contract manager levels. Next steps will be a compliance register to hold all information in one place, a reporting tool to provide up-to-date status on compliance issues, an overarching compliance policy and a training and awareness programme for all staff. Discussions with the asset management database supplier have commenced to take forward the ICT elements.
- 4.12 One area of operation for the team will be the oversight of fire risk assessments (FRAs) undertaken in all eligible blocks of flats (more than 700 in total). These are currently undertaken by Frankham Consultancy Group. The approach by the consultant has been to undertake what is known as Level 1 FRAs. The recent inspections by the LFB have effectively been Level 4 assessments. These far more intrusive assessments have not flagged up any significant concerns but rather a number of minor measures; these results indicate that the

previous degree of scrutiny was largely appropriate. The compliance team will be responsible for developing an approach to FRAs which will determine the appropriate level for each block. Whilst Level 1 FRAs might generally be sufficient, Level 3 or 4 assessments will be preferred in some instances, for example following a major refurbishment programme. The team will also include staff themselves qualified to undertake FRAs for the purpose of contract management, spot checks and policy development.

Resident responsibilities

4.13 The council has been promoting a zero tolerance approach to behaviour which puts others at risk of fire or obstructs routes of escape. Caretaker managers and inspectors have been identifying flats which have items stored outside and have been writing to the residents concerned. Our processes, for example escalating levels of written requests and warnings to residents who don't comply, aim to inform people about risks and responsibilities first and foremost with enforcement action only where this doesn't work and possession action only in the very last resort. In the event that warnings are disregarded, the council is itself removing items posing a risk and placing them in storage. Overall, the response from residents to this strict approach has been positive although, in some cases, residents have resented the approach even to the extent of threatening violence to council staff. Members have been made aware of this new approach as their promotion of safe behaviour and support for the efforts of officers to ensure their safety is key.

4.14 Fire safety leaflets are being sent to all residents in council blocks and included in sign-up packs for new tenants. The council's behaviour change team has supported the development of communications, for example, signage for communal areas using visual images rather than text to get the message across in a user-friendly way to all residents. Direct messages from frontline staff remain important; all caretakers and tenancy officers have attended LFB awareness training and caretakers have heightened their regular fire checks.

4.15 Enquiries and communications

The council has continued to deal with all enquiries from the press, public and MPs, including freedom of information requests (many of which have been very complex or required the full 18 hour maximum of officer time), comprehensively and promptly. It should be noted that these enquiries have themselves created a significant body of work for the same officers dealing with the overall fire safety response with implications for other areas of work.

5 PRIVATE SECTOR AND REGISTERED PROVIDER HOUSING

5.1 At the time of the last report, there was limited information about private sector and housing association stock. The Communities and Local Government (CLG) Department has been collating details of high-rise residential blocks across the country. The LFB is responsible, under the Regulatory Reform Order (Fire

Safety) 2005, for the external areas (including cladding) and internal communal areas, The council is responsible, under the Housing Act 2004, for individual privately-rented homes (the landlord of which can be the owner of the block or the leaseholders of individual flats). Freeholders, or others who have responsibility for common areas, are responsible for undertaking fire risk assessments and taking mitigating action where risks are identified. The LFB's role is to check whether FRAs have been undertaken and whether they are adequate, and to confirm that risk-reduction measures have been actioned. One of the issues we, in conjunction with the LFB, will be checking is whether the existence of cladding has been identified and taken into account in the FRA.

- 5.2 An initial list, based on information volunteered by owners, indicated five such blocks in Croydon, of which three were owned by housing associations and two by private landlords, which have ACM panel/insulation systems falling into the categories which have failed recent BRE tests. The results of the tests together with advice notes have been sent to the landlords and CLG is in discussion with them about any immediate steps they might need to take to protect the safety of residents (including, for example, employing on-site overnight wardens), about how they will work with the council to prepare plans for communicating with residents, and about their remediation plans for the building in light of the test result. CLG advice is that the cladding is removed although landlords will first want to see full guidance on suitable systems. The role of local authorities is to support landlords and to use any enforcement powers under the housing health and safety rating system should landlords fail to follow advice concerning the cladding.
- 5.3 The enforcement team has commenced inspections of the rented flats within one of these private blocks focussing, initially, on licensed flats but identifying non-licensed flats for the next stage. Inspections are due to start at the second block. One of the challenges is the clarification of the rental nature and name of the landlord, although this work is enabling us to bring all relevant properties into our existing landlord licensing scheme. No action will be taken in relation to the housing association blocks unless it becomes clear that the landlord is not following advice and regulatory requirements.
- 5.4 The CLG has subsequently sent a longer list of relevant blocks, including 30 properties. The council is aware that this list is incorrect and the first step is to review and add to the list. So far, a total of 42 properties has been identified. The next step will be joint visits with the LFB of all blocks. Where cladding is identified, we will contact the landlords to request that the panels are sent for testing. Again, collating this information and acquiring contact and other details is placing a considerable administrative burden on the council.
- 5.5 There is insufficient clarity over the source of powers and responsibilities for enforcement by local authorities, and guidance is awaited from CLG. Of significant concern is what we are expected to do if a freeholder does not co-operate regarding the removal of the cladding. CLG appears to suggest that

local authorities should use their enforcement powers under the Housing Act 2004, including carrying out the works in default if necessary; this will cost hundreds of thousands, if not millions of pounds. This is a lengthy and potentially complicated process which is already significantly affecting the resources we have available to deal with other issues in the private rented sector, including the proactive inspection of properties under our selective licensing scheme, and we have not yet started any enforcement action should this become necessary.

6 COUNCIL NON-HOUSING BUILDINGS

- 6.1 The council owns a number of non-residential buildings for which the same fire safety obligations apply. These buildings include depots, crematoria, children's homes, pupil referral units, youth, leisure and community centres, and other premises for public use or in public areas, as well as office buildings. Fire risk assessments have been undertaken for 49 corporate buildings (excluding schools) that fall under the terms of the Regulatory Reform (Fire Safety) Order 2005. A detailed review has been carried out of these assessments to ensure all actions are being progressed and ensure outstanding items are addressed. All high priority items have been actioned and Facilities Management have held face-to-face meetings with all the identified 'local responsible persons' identified as part of the FRA reviews. This also involved local training around the FRA purpose and responsibilities. Although full training has also been undertaken for all youth community groups and organisations, working with the youth service, to help raise fire safety awareness, roles and responsibilities, the health & safety team continues to provide support to the groups and this will be ongoing until all parties are confident in completing their responsibilities. Following the full review of the entire corporate estate, including all leasehold properties, the identified 51 sites for which an FRA is required are under way. An FRA specification is being developed to ensure the format enables the council to monitor progress and compliance, and this will follow a compliant procurement exercise. As part of the council's monitoring role as the landlord, all letters have been sent out to establishments with shared responsibility and where the council are the commissioning body (i.e. libraries, leisure centres etc). Letters to all FRA leaseholders and long leaseholders are being sent out and this exercise will be completed by the end of October. All responses are being reviewed and monitored to ensure compliance.
- 6.2 Members were previously advised that officers were undertaking a desktop study of cladding used on the community schools for which the council is directly responsible. FRAs have been obtained for all (45) community primary schools to be used to in this analysis which will then be followed by site visits.
- 6.3 As a result of the desk top analysis, the decision has been made to replace external cladding at Chestnut Park Primary School. The external rain screen cladding complied with fire regulations but it has been removed as a precaution

because the materials include an aluminium composite material (ACM) and a sealed polyethylene core. The remedial works were completed before children returned to school in September at a cost of £260,000 met from within the existing schools capital budget.

7. GOVERNANCE

7.1 The July report to members indicated that a fire safety board had been established by the council in conjunction with the LFB to take a council-wide view of fire safety arrangements. Terms of reference have been agreed although the board does not have decision-making powers (which, rather, rest with the chair, the executive director of place). The board is formally linked to the corporate health and safety board but allows for detailed examination of fire safety issues as well as consideration of non-corporate matters for example relating to private sector housing. The board is now also attended by the Deputy Leader and Cabinet Member for Homes, Regeneration & Planning. A new officer-level working group, including LFB representatives, holds detailed discussions about council and private sector buildings and refers matters to the board.

8. PUBLIC INQUIRY AND GOVERNMENT REVIEWS

8.1 This programme of review, activities and policy change is occurring within a changing national picture. The government now has in place a building safety programme. This involves: the testing and checking of buildings as mentioned above, and advice to landlords; an independent expert advisory panel to develop recommendations for improving public safety and identifying the buildings of concern, to be followed by advice on other buildings (ie those with materials other than ACM, or where cladding has been removed or new construction halted because it was planned to install ACM); and an independent review of building regulations and fire safety with a particular focus on high rise residential buildings. These mostly concern matters directly related to the Grenfell Tower fire but there will no doubt be findings of general relevance including the scope and adequacy of regulations, legislation, guidance and industry practice relating to the design, construction, equipping and management of high-rise residential buildings. And, of course, the public inquiry has started. Additionally, the prime minister has promised that the Government will also consider the broader questions raised by the public including the wider social housing issues.

8.2 The council will be examining all findings and provisions as they emerge to ensure that our own buildings, measures, procedures and enforcement policies are updated accordingly.

9. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 The total estimated cost of the housing fire safety works detailed in this report is about £10m. This includes about £7.2m for sprinkler installation and associated works, surveys, drawings, electrical support for the notification system and infrastructure; £1.4m for the range of fire safety measures; £0.02m for cladding testing; and £1.4m for other associated works and contingency provision. Following the completion of all measures, the final costs can be reported to cabinet. The works will be undertaken within 2017/18 and 2018/19. The fire safety measures will be undertaken over two years, with the spend in 2017/18 likely to be about £400,000 on works completed or undertaken by Maulyte and the remainder through the capital programme in 2018/19. The costs of preparatory works in relation to the sprinkler programme have already been incurred but the majority of costs will be incurred from December, with the completion of the first two blocks, through to the programme completion in 2018/19.
- 9.2 The HRA capital budget is funded primarily through HRA revenue income, to be supplemented when necessary by using HRA reserves and, once the reserves have reached the minimum level of £3m, by borrowing up to the cap set by central government. As LBC has no control over the level of rent collected to fund the works, the impact of carrying out the fire safety works is to be addressed through making efficiency savings in both the capital and revenue programmes year on year, beginning with 5% savings in the HRA revenue budget in 2018/19. The impact will be modelled within the 30-year business plan to work towards a long-term sustainable HRA.
- 9.3 General fund expenditure relates to the removal of cladding from one of the council's primary schools, amounting to £260k which can be met from the schools capital budget.
- 9.4 The council has written to the Secretary of State for Communities and Local Government on two occasions (21 June and 2 August 2017) endorsing his assessment of the need for additional fire safety measures and notifying him that, as a result, we are installing sprinklers in taller blocks and working closely with LFB. We explained the significant cost to the council which, given the financial pressures on the housing revenue account caused by annual rent reductions among other things, would mean other council programmes of work would suffer unless there were to be a contribution to these costs from central government. No offer of assistance has been forthcoming and it is understood that local authorities are expected to fund these works themselves. The housing minister Alok Sharma has stated that the installation of sprinklers does not meet the criterion of "essential fire safety works required to make a building safe". Dany Cotton, the commissioner of the London Fire Brigade, has stated that "this (sprinklers) can't be optional... this is something that must happen". The council has made it clear that we do not have the financial resources within the HRA to fund the sprinkler programme without significant impact on other

programmes of work. Attached, for information, are the letter of 02 August from the cabinet member for homes, regeneration and planning to the secretary of state for communities and local government, and the letter of 27 September from the minister of state for housing and planning. The council will continue to press ministers for their support, especially given the LFB's position on the importance of sprinklers in taller council blocks.

1. The effect of the decision

The decision to undertake these necessary safety improvements, is made assuming that there will be no financial contribution from the Government. Given the nature of these works it is considered that these are essential to safety and therefore must be undertaken, resulting in an increased financial pressure on the HRA.

2. Risks

- The funding of these additional works to housing being from the HRA will result in a financial pressure to the HRA if funding from the Government is not made available. These additional costs will impact on the HRA business plan becoming unsustainable within a shorter period of time than currently predicted.
- That commitment to maintain all homes to the decent home standard over time may be compromised in the short to medium term as monies will need to be diverted to these essential works and not be available for other works

2 Options

There is no other option but to undertake these essential safety works. There will be a continuation of lobbying to government to fund these.

3 Future savings/efficiencies

Not applicable

Approved by: Lisa Taylor, Director of Finance, Investment and Risk, and Deputy S151 Officer

10. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

- 10.1 The Solicitor to the Council advises that there are no additional legal considerations arising from the recommendations within this report.
- 10.2 Approved for and on behalf of Jacqueline Harris Baker, Director of Law, Council Solicitor and Monitoring Officer.

11. HUMAN RESOURCES IMPACT

- 11.1 There are no human resources impacts in respect of Croydon staff.

11.2 Approved by: Sue Moorman, Director of Human Resources

12. EQUALITY IMPACT

12.1 Many residents affected by fire safety issues will have specific needs and requirements. Fire risk assessments need to take into account the users of buildings and identify risks and mitigation accordingly. The works programmes being developed and the way in which they are being carried out, and the communications setting out information and advice, have fully acknowledged the need for an understanding of such needs and for flexibility in terms of works programmes and sensitivity and tailoring in terms of communications. Tenancy officers are currently checking records to identify vulnerable people in taller blocks, not just retirement housing schemes, to ensure the development of personal emergency evacuation plans in the event of a fire.

13. ENVIRONMENTAL IMPACT

13.1 The sprinkler installation and other fire safety improvements recommended contribute to ensuring the safety of tenants and leaseholders and will serve to reduce the risk of the environmental and human loss and suffering that fires cause.

14. CRIME AND DISORDER REDUCTION IMPACT

14.1 Installation of sprinkler systems will reduce the risk of disorder arising from a major incident.

14.2 There is increased risk of disruption from anti-social behaviour associated with setting off sprinkler systems.

15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

15.1 Not applicable.

16. OPTIONS CONSIDERED AND REJECTED

Not applicable.

CONTACT OFFICER: Stephen Tate, Director of District Centres and Regeneration
extension 47446

APPENDICES TO THIS REPORT:

Appendix A: Letter, dated 02 August, from the cabinet member for homes, regeneration and planning to the secretary of state for communities and local government

Appendix B: Letter, dated 27 September, from the minister of state for housing and planning to the deputy leader of the council

BACKGROUND PAPERS: None.