



NFCC
National Fire
Chiefs Council

The professional voice of the
UK Fire & Rescue Service

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Grenfell Tower Inquiry
Royal Courts of Justice
Strand
London
WC2A 2LL

3 August 2017

Dear Sir Martin,

I am writing on behalf of the National Fire Chiefs Council (NFCC) regarding the Terms of Reference of the Public Inquiry into the fire at Grenfell Tower. The NFCC represents all fire and rescue services in the United Kingdom, and is governed by a council of Chief Fire Officers, which I chair.

We understand that the independent Inquiry will examine the circumstances leading up to and surrounding the fire at Grenfell Tower on 14 June 2017, establishing the facts and making recommendations to prevent a similar tragedy happening again.

As the Inquiry's Chair, you will decide what documents should be produced and who should give evidence, within the scope of its Terms of Reference, to be approved by the Prime Minister, and it is about these that I am writing.

Question 1—What do you think the Inquiry should cover?

Issue	Further information
A review of the Building Regulations and associated guidance	<p>The review of the building regulations is part of a government review however this needs to be considered as relevant to this specific case.</p> <p>The review must also consider guidance that has been published to support Building Regulations, and the technical standards that support them especially BCA Note 18</p> <p>Regulation 38 of the Building Regulations specifies that fire safety information/details should be passed between the developer and the Responsible Person of the building at completion. The review should consider whether this regulation is suitably enforced and consideration should be given to the extent of Regulation 38 to encompass the sale of premises and the transfer of that information between two parties involved in any sale of the building.</p>
The role of Building Control and Approved Inspectors	Examine the appropriateness of the current landscape of Building Control Bodies, including the supervision and sign-off

	<p>of building work / modifications that impact fire safety in buildings.</p> <p>Examine the effect of the introduction of competition into building control through approved inspectors and into fire and rescue authorities through Primary Authority Schemes.</p> <p>Evaluation of the balance between the need to regulate the design of buildings and the desire to allow flexibility and innovation in design where it is safe to do so to ensure the correct balance is achieved.</p>
The relationship between the Housing Act 2004 and the Regulatory Reform (Fire Safety) Order 2005	<p>There is currently a recognised overlap between these two pieces of legislation.</p> <p>Review both, to provide clarity over how residential blocks and other similar premises (e.g. sheltered housing) should be regulated for fire safety in the future.</p>
Regulatory Reform (Fire Safety) Order 2005	<p>Review the application, suitability and clarity of law to housing stock, the involvement of Housing Authorities and application of the Fire Safety Order. With special consideration given to the meaning of domestic premises and what is included in areas used in common” such as front doors of flats and cladding.</p> <p>The robustness of a self-compliant law for dealing with fire-risks and the appropriate resources of the fire and rescue service to robustly audit the regulations.</p> <p>The adequacy of regulatory controls governing fire risk assessment, including the appropriateness that fire law requires the layperson to carry out an assessment of fire risk.</p>
Firefighting equipment and fixed installations in high rise premises (sprinklers)	<p>Review the current requirements for fixed fire safety installations in premises.</p> <p>This is particularly important in premises where is likely to be sleeping vulnerable people such as sheltered housing, hostels and high rise tower blocks.</p>
Competency of Fire Risk Assessors	<p>Examine the lack of any mandatory, legally enforced competency standards for anyone working in the fire industry.</p> <p>This must include those who install and maintain fire stopping to fire risk assessors, even extending to those who call themselves ‘fire engineers’.</p>
Competency the construction industry to	<p>Analysis of the adequacy of qualifications and competency.</p>

understand and apply appropriate fire safety measures when constructing or refurbishing a building	Examine and analyse the qualifications and competency required (within building trades / installers) to change or modify the fire safety measures in or on buildings, or matters that can affect the fire safety measures in or on buildings.
Suitability of tests for materials used in building construction, and in this case for high-rise buildings. This should include the appropriateness of desk-top studies to assess the compliance of building materials and solutions to the Building Regulations	<p>Review the test standards and procedures of building materials.</p> <p>Within the focus of the Inquiry, specifically review for cladding and fire-stopping processes.</p> <p>As an example, consider whether the current testing arrangements reflect factors that impact on high rise buildings such as elevated wind speeds which will affect fire growth and intensity.</p>
Stay Put evacuation strategy	<p>Consider the clarity of 'Stay Put' guidance and the understanding of 'Stay Put' for landlords and residents.</p> <p>Examine the level of fire safety protection required to provide continued support to a 'Stay Put' evacuation strategy / the application of invasive surveys so that the evacuation strategy is based on knowledge, rather than assumption. Consider the role and responsibilities of the landlord in the application of the stay-put approach.</p>
The role other Category 1 and 2 responders within the Civil Contingencies Act, in both the Response and Recovery phases of the incident.	Examine how all the responding organisations and services worked together to support the victims of the fire whilst the response phase was on-going and then as the recovery phase was implemented. This should extend to the leadership of the collective response, its timeliness, the structures that were established and the effectiveness of the overall approach.
The (Construction Design and Management) Regulations 2015	<p>Consider the role played by CDM regulations.</p> <p>Whilst there has been specific focus on the building regulations and approved inspectors, the works would be governed by the CDM Regulations from the outset and therefore the coordination of the building works from design to completion under the CDM Regulations should be considered.</p> <p>The purpose of the CDM Regulations is to ensure that all parties involved work together to deliver the project that is fit for purpose for the life of the building.</p>
Review of DCLG Fire Safety Guides including LACORS	Government issued fire safety guidance introduced for the RRO has never been reviewed. The whole suite of documents need to be examined to see if they are still fit for purpose.

Product Recall – White Goods	Evaluate the increased risk of fire of faulty white goods. Consider the potential, purpose and value for a central register to monitor recalled appliances.
How the fire service is organised to provide the 999 operational response to fires in high rise buildings	This should include matters such as operational policy and guidance, training, information, equipment including fixed firefighting equipment in the building, etc.

Question 2—Is there any type of evidence that you think is essential for the Inquiry to obtain?

The findings of previous reports into fires in high rise buildings where cladding was a significant factor (e.g. Address Downtown, Dubai; Lacrosse, Melbourne) should be taken into consideration by the Inquiry. We also believe that the following will provide important evidence:

- Findings from Prevention of Further Death reports which have involved residential tower blocks
- Results of any previous BS 8414 testing on external cladding systems
- Reports and letters from fire sector specialists on sprinkler effectiveness and calls for reviews of current building regulations.
- Any reports that relate to the issues highlighted above under question 1

Question 3—What should the Inquiry deal with in its interim report?

The Inquiry's interim report should prioritise:

- The guidance in Building Regulations Part B: Fire Safety (Approved Document B and related guidance such as BS8414, BRE 135, BCA Guidance Note 18 etc), specifically making the judgement of whether they are fit for purpose—and, if not—what immediate changes should be made?

Question 4—Would you like to be kept informed of the Inquiry's work? How would you like to be contacted?

Please direct all correspondence to my Chief of Staff Steven Adams at steven.adams@nationalfirechiefs.org.uk.

Yours sincerely,



Roy Wilsher OBE, QFSM
Chair, National Fire Chiefs Council