Tower Hamlets Homes’ approach to fire safety
Introduction

Whilst we acknowledge that fire safety is only one aspect of building safety, this document concentrates on Tower Hamlets Homes’ (THH) approach to managing the risk from fire.

THH have created this overview document in order to:

- enable residents to learn about and influence THH’s approach to fire safety
- inform staff of our approach to fire safety, so that they can discuss with any concerned parties; and
- encourage joint learning.

Buildings and the Fire Safety Strategy

Fire is a serious potential risk if not suitably managed and THH sets out how it achieves fire safety and resilience in the fire risk management strategy. This strategy details the framework that THH uses to manage the risk of fire and to deliver fire safety related works. Key items to note are:

1. Our strategy began in June 2016 when we reviewed our existing fire risk assessments and decided a more consistent approach was needed in assessing fire risks, and undertaking subsequent management and work actions. More in-depth type of fire risk assessments to nationally recognised good practice standards PAS 79 (PAS is an acronym for Publicly Available Specification) were undertaken along with an increased budget and resources to facilitate this. The PAS 79 assessment provides guidance and recommends methodology for conducting fire risk assessments and is recognised by the Chief Fire Officer Group as a suitable specification to use. The fire risk assessments were completed by an external accredited fire safety company. A new computer software package was purchased to better manage the actions arising from fire risk assessments and fire safety generally.

2. The primary objective of the strategy is to achieve the ‘tolerable’ rating of risk levels in our housing stock. The risk ratings, ranging from lowest to highest risk, are ‘trivial’, ‘tolerable’, ‘moderate’, ‘substantial’ and ‘intolerable’. Currently, fire risk assessments have determined that nine THH managed buildings have a ‘substantial’ risk rating and 902 buildings have a ‘moderate’ risk rating.

3. Fire safety related work is in progress - with a priority on completing fire safety works to ‘substantial’ rated blocks. The overall approach to completing fire safety works, totalling around £26m, consists of:

   a. Delivering fire safety works as part of the existing Better Neighbourhoods Five year investment plan. It is planned that work to improve fire safety to 364 blocks will be delivered within the Better
Neighbourhoods works programme already arranged, and in some cases already being undertaken. This results in quicker delivery of works, and reduces the disruption the works can cause to residents. Detailed block surveys have been completed for the first year, and block surveys have commenced for the second year.

b. For those blocks not in the Better Neighbourhoods Five Year investment plan, a separate fire safety related works programme has been created - with works being delivered to 464 blocks over 3 years. The surveys to these blocks have covered the recommendations contained in the fire risk assessments, considering any other fire safety works our surveyors deem appropriate. Blocks which require early attention, due to potentially higher risk, will be prioritised with works commencing in early 2019.

4. All fire risk assessments can be found on the interactive map on our website, along with a summary of works to be completed. Lots of fire safety information has been placed on our website along with notes on discussions held with TRA representatives and public meetings.

5. The future fire risk assessment process will be developed to include the best practice emerging from the fire safety industry incorporating the findings of Government reviews and Inquiries.

6. Developing a minimum fire standard that every home/block should meet so that residents know what to expect. This includes providing smoke and fire detection systems, fire safety signage and ensuring fire doors meet the standards.

7. Taking enforcement action should we believe the condition and or standard of a leaseholder’s front door and frame potentially puts others at risk by not being capable of suitably resisting fire.

8. Maintaining the existing internal Fire Risk Management Group to oversee the delivery of this strategy. This consists of monthly, cross-departmental meetings chaired by the Director of Asset Management – reporting to the executive team at THH, the Board, and the Council.

9. Including mechanical and electrical works and works to existing secondary means of escape when other works are delivered to blocks in the existing programme.

10. Undertaking fire safety related works where required (noting that many of these safety features already exist in blocks that require them and meet the required safety standards). Depending on the property these can include:

    a. Emergency lighting provision or upgrade
    b. Communal fire doors replacement or upgrade
    c. Flat entrance fire doors and door panels replacement or upgrade
    d. Communal fire and smoke detection alarm upgrades
    e. Domestic fire and smoke detection alarm upgrades
f. Protection of communal areas by fire safety screening  
g. Provision of sprinklers in bin areas where these are required and not in place  
h. Re-glazing upgrades  
i. Automatic opening vents to assist ventilation of common areas  
j. Compartmentalisation works to stop fires between floors and flats  
k. Upgrades to service cupboard doors  
l. Window and window panels replacement if required  

11. In addition, fire safety equipment (fire and smoke detection systems, dry risers, lifts, automatic venting systems, and emergency lighting) is serviced and repaired on a programmed basis in line with regulatory requirements. Fire safety checks also form part of the regular inspections we undertake on blocks.

12. Concierge services have been extended to blocks considered to be of higher risk. On one particular estate, an overnight fire warden and patrol service has been introduced until the risks identified in the fire risk assessment have been resolved.

13. Making arrangements for an enhanced waste collection regime for hot-spot fly-tipping areas at weekends along with fire safety checks being made by the caretaking teams and during estate inspections.

14. Utilising estate improvement funding to deliver fire safety related works around the outside of blocks, such as creating and relocating bin corrals, updating signage and altering parking arrangements where concerns exist over access for emergency vehicles.

Resident voice and influence

To give residents the opportunity to influence and challenge THH’s approach to fire safety, we have undertaken a number of activities and put a number of processes in place. In no particular order, THH has:

1. Attended many Tenants and Residents Association (TRA) and public meetings to discuss fire safety, shape work programmes, and answer any questions and concerns. These meetings have been attended by senior THH staff, representatives of the Mayor’s Office, the Council, the London Fire Brigade (LFB), and ward councillors. TRAs log fire safety concerns on their TRA action plans so these can be responded to and monitored for progress.

2. Attended the Tower Hamlets Federation of TRAs (a group of TRA chairs from other housing associations in the borough) to discuss fire safety. THH adopted the Federation’s Fire Safety Standard which detailed the standard approach they would like to see across the borough in all social housing stock.

3. Held meetings with TRA representatives specifically to discuss fire safety and to provide them with strategic oversight and influence on our fire safety works and communication. Again the meetings were attended by THH, LFB and the Mayor’s Office. These sessions enabled discussion and Q&A, as well
as formulating the approach to education, communication and works and happen every six months.

4. Developing a Residents Fire Safety Strategic Group to further the collaborative working and influence on our approach.

5. Organised a TRA representatives training session to enable THH and the LFB to share knowledge, so resident representatives were better informed to challenge and share information with their TRAs and other residents.

6. Made a commitment to fulfil the recommendations of the Dame Judith Hackitt report on resident voices including preparing and sharing more information.

7. Fully participated in the council’s scrutiny on fire safety during January and February 2018.

8. Arranged for all ward councillors to attend a fire safety briefing and discussion session with the THH executive team and the LFB.

As a result of resident influence, we have:

1. Prioritised the face to face contact with residents in higher rise blocks through our Fire Safety Team making visits to every resident starting with the potentially higher risk blocks first and working their way around the borough.

2. Prioritised work programmes to blocks with single internal staircases.

3. Changed consultation arrangements where major works are going to be carried out. The improved approach includes more information before works start on site, and identifies responsible contacts for both contractors and THH which are displayed on site. Additional drop-in sessions and coffee mornings have also be included to ensure residents have ample chance to raise questions and give feedback.

4. Arranged a visit for residents to see types of external wall insulation used on other THH buildings in readiness for cladding removal to their block.

5. Altered designs and timings of works including changing UVPC windows to aluminium for a specific block.

6. Identified information that residents would find most useful and published this on our website and in magazines plus the creation of block specific information for blocks above 10 storeys.

7. Investigated concerns raised by residents which includes, but is not limited to: inspecting roof spaces, inspecting fire stopping measures designed to stop fire spread between floors, identifying fire hazards in particular locations, the blocking by residents of secondary means of escape from fire, the relocation of bins at various estates, reviewing all parking areas, restricting access to
prevent bulk item dumping and inspecting and installing emergency lighting.

8. Asked residents to review draft letters on fire safety to ensure they would cover all the things residents would want to know about.

9. Set up a strategic working group on fire safety consisting of residents and the Executive Team which is part of the formal governance structure.

Communication and engagement

THH has prioritised sharing information with residents. By listening to residents and keeping them informed, residents are able to have greater influence. THH has:

1. Published information on a wide range of fire safety topics. This includes signposting to the LFB website which contains a wealth of information and translations into community languages.

2. Written a ‘what safe looks like’ webpage, in relation to fire and smoke detectors, flat front door specifications, common areas, grilles over doors, etc.

3. Explicitly published how residents can play their part in keeping themselves and neighbours safe.

4. Included fire safety discussions as part of the process when new residents collect their keys.

5. Published all fire risk assessments along with additional information, by way of a guide to fire risk assessments and how to interpret the findings and actions in them.

6. Published product specifications such as external wall insulation certification for the insulation THH has been using and fire door standards.

7. Issued general update letters to residents - this totals around 70,000 letters/magazines issued.

8. Advised on seasonal risks of the dry weather and issued follow-up letter to blocks that have experienced an incident.

9. Discussed with leaseholders the proposed arrangements for the opportunity to buy into a flat front door replacement programme with the intention to save them time and money, and with the reassurance that the door will be fitted correctly.

10. Created a Fire Safety special edition of our resident magazine Open Door which was delivered to all residents. Subsequent editions of Open Door have included fire safety topics and articles closely associated with the LFB. We have recently introduced an electronic version of Open Door which is sent out
between hard copy issues and have included fire safety material.

11. Produced three professionally made fire safety videos on our website: ‘safety at home’, ‘what to do if there’s a fire in your home’ and ‘what to do if there’s a fire in you block’. All videos are available in English, Somali and Bangla.

12. Trained staff in fire safety so that the discussions are ongoing at each TRA meeting and actions arising are recorded, actioned and monitored through a TRA action plan. Training to staff has also included technical aspects of fire safety (e.g. smoke detector standards and safety features of blocks) as well as the Fire Safety Strategy.

13. Visited blocks of 10 storeys and above in the months following the Grenfell tragedy and discussed concerns over THH’s approach to fire safety with residents (see Fire Safety Team section).

14. Introduced as much information as possible onto the website on common concerns through FAQs and providing scripts for front line staff to respond to queries, and produced a guide for TRAs so they can locate this information easily.

15. Utilised data from the London Fire Brigade and the government to influence education, communications and works packages. An example of the analysed data from gov.uk helped THH produce this map, showing census data areas with the highest incidents of dwelling fires occurring over the previous seven years in the London Borough of Tower Hamlets (LBTH).

16. Developing block specific information to be hand delivered to residents, providing them with information to support their understanding of the layers of protection in place to keep them safe and their obligations.
17. Set up a specialist Fire Safety Team who have commenced a programme to visit every resident in a THH managed block. They discuss fire safety concerns, check smoke detectors, educate residents on fire safety, and look to support residents on areas which may compromise fire safety such as hoarding. See below:

**Neighbourhood Services Fire Safety Team**

A specialist neighbourhoods Fire Safety Team was created in January 2018 and deals directly with the tenants and leaseholders, initially concentrating on blocks six storeys and above. The team of four visit and gain entry to flats and look at communal areas during work hours, evenings and at weekends. The approach is endorsed by the LFB who welcome the education aspects of the programme. Other housing associations also view this initiative as good practice and have been to learn about it and the outcomes. As at January 2019, the team have:

- Completed 3,748 visits across 95 blocks.
- Gained to 3,587 homes - the majority of residents have welcomed the visits and complied with the requests to remove obstructions.
- Cleared communal areas in 67 blocks.
- Identified 429 vulnerable residents; and 33 residents with hoarding tendencies.
- Identified 19 suspected sublet properties now under investigation.
- Recovered three properties following interviews under caution by the fraud team.
- Identified 33 Airbnb rentals.
- Identified 379 private balconies storing combustible items.
- Referred 331 leaseholders to the LFB to fit smoke detectors.
- Raised 300 repair works orders for faulty or missing smoke alarms to be fitted in tenanted properties.
- Referred 255 Houses in Multiple Occupation to the council to check if licences are in place.
- Provided support to residents during fire safety works.
- Visited blocks following fires – to discuss the incident, provide answers and assurance and complete flat checks. Blocks with similar designs are also visited.
- Provided support to vulnerable people.

**Responding to enquiries**

THH diverted resources to manage the huge influx of queries following the Grenfell tragedy. The Housing Services Centre (HSC) was furnished with scripts to respond to the questions being asked by residents, which was updated every few days. A system of recording queries was created, along with an identified staff member to co-ordinate and provide responses. Information was replicated on the website. Once the initial surge of queries had been responded to, the existing processes were employed again along with some changes to ensure monitoring and intelligence could be gathered to further inform communications. The existing arrangements include:
1. Widely publicising that THH encourages residents to get in contact to share their fire safety concerns.

2. Concentrating on personal dialogue as the vast numbers of queries are addressed in this way. We have completed training sessions with frontline staff and provided routine updates on fire safety so that staff can respond to fire related questions.

3. Neighbourhood team members are briefed so that they can attend TRA meetings and cover fire related questions. Specific staff complement the attendance where requested.

4. The HSC deals with fire related concerns on a daily basis as the first point of contact for residents phoning or emailing in.

5. Complaints are dealt with through the existing complaints system; however, they are recorded under a health and safety code for easy identification. Further improvements to this include an automatic email being generated to the health and safety team when the health and safety code has been used.

6. Where complaints and enquires are made by elected members on behalf of residents or Freedom of Information requests received, we consider them to be a valuable source of feedback. Along with feedback from teams and informal enquiries, they help us plan proactive communications. They are given a high profile to ensure that responses are of a good quality, provided in a timely manner and that learning is captured and actioned. All responses to complaints and Members Enquiries are quality checked by a Director or Head of Service and regular monitoring and reporting regimes are well established. Quarterly monitoring reports summarising performance and the cause of complaint/ reason for enquiry and a learning from complaints action plan are provided for the Senior Management Team and Residents Panel. Additionally, a Customer Experience Task Force (which includes THH Board Members) and a Complaints Learning Panel meet to oversee the progress of improvements identified as a result of learning.

**Governance**

Fire safety has justifiably become more prominent since Grenfell. However, fire safety has always been important at THH and has been developed over time using good practice – shaped by events as they occur and the resulting guidance. THH does not consider it to be appropriate to wait for government directives – it chooses to take action that strengthens residents’ safety. Measures at THH which ensure appropriate control and oversight of fire safety include:

1. The Executive Management Team receives reports on fire safety issues and progress, regularly reporting on a broader range of compliance performance indicators. To ensure impartiality, the main fire safety report is authored by a staff member attached to the Chief Executive rather than any one department.
2. The Fire Risk Management Group, chaired by the Director of Asset Management, meets monthly to consider all aspects of fire safety. The standing items include compliance testing, stakeholder recommendations, reviews on the LFB approach to smoke alarms, and Dame Judith Hackitt’s recommendations. THH will be an early adopter of the recommendations on resident voices, with increased information and advice for blocks above 10 storeys, internal arrangements for recording health and safety incidents, and the recording and use of building information to reduce risk.

3. The council has put scrutiny measures in place, and an action plan has been created with high-level ownership between council departments and THH.

4. The THH board receives fire safety reports, a board brief, and a report on queries and responses from residents.

Our Resident Engagement approach has many strands with the key ones regarding building safety being:

- Tenants and Residents Associations (TRAs) give a voice to residents who want to be involved in how their homes and neighbourhoods are run and building safety concerns are recorded and monitored through a TRA specific action plan. The TRAs are invited to an ‘All TRA Meeting’ which specifically discuss fire safety.

- The Residents’ Panel - The Panel’s role is to ensure that the resident voice – in terms of needs, concerns and aspirations – is listened to, heard, and acted upon by THH. Members of the Panel will scrutinise the performance of THH and make recommendations for service improvements. Membership of the Panel is open to 11 local residents, who serve a maximum of three year terms and meet every two months. The Panel is usually made up of five tenants, four leaseholds and two private tenants of leaseholders. The Panel has recently completed a review of how THH manages its health and safety obligations during Major Works in light of the Grenfell tragedy. It has made a series of recommendations aimed at increasing transparency and improving the quality of communication provided to residents in line with the principals set out in the Social Housing Green Paper.

- The Joint Working Group on Fire safety – the Group strategically shapes the approach to fire safety and is designed to continue to improve the safety of THH residents. This group is made up of entirely of THH residents from the THH Board, Residents Panel, Service Development Group and the Federation of Tower Hamlets Tenants and Residents Associations along with Directors of THH.

Stakeholder and partnership working
THH has been fully supported by the LBTH, LFB and partnership organisations. The Council have made swift and effective decisions and financially supported works programmes and the resourcing to deliver this. At many meetings, THH, LBTH and the LFB have jointly presented at the highest levels – namely the Mayor, Deputy Mayor, and borough commander. Some key areas of partnership working include:

1. The senior THH team meet every six weeks or so with the borough commander of the LFB. This provides a good opportunity to validate initiatives in developing the approach, as well as discussing emerging issues. The support and guidance provided by the LFB has been invaluable.

2. Using the Council’s influence with regards Houses in Multiple Occupation licensing criteria, tackling short term lets (e.g. Airbnb) and concerns over commercial properties.

3. Working together to issue a joint THH/LFB letter specifically for leaseholders, educating and encourage leaseholders to have a fire safe front door.

4. Developing a multi-agency hoarding protocol based on the LFB and Hackney Council’s work in this area.

5. Sharing information with other councils on approaches to issues and management – such as leaseholder front doors, sprinklers, and fire risk assessments.

6. THH and LFB delivering fire safety training to TRA members and to Councillors.

7. Sharing information with the LFB on known vulnerabilities within blocks, dry riser configurations and other building safety measures.

8. Reviewing emergency planning, out of hours arrangements, and data management. We also work closer with the Council’s civil response teams, and THH plays a wider role in strategic and operational borough resilience.