



RESPONSE TO INDEPENDENT REVIEW: BUILDING REGULATIONS AND FIRE SAFETY

About the Residential Landlords Association (RLA)

1. The Residential Landlords Association represents the interests of landlords in the private rented sector (PRS) across England and Wales. With over 30,000 subscribing members, and an additional 16,000 registered guests who engage regularly with the Association, the RLA is the leading voice of private landlords. Combined, they manage almost half a million properties.
2. The RLA provides support and advice to members, and seeks to raise standards in the PRS through our code of conduct, training and accreditation and the provision of guidance and updates on legislation affecting the sector. Many of the RLA's resources are available free to non-member landlords and tenants.
3. The Association campaigns to improve the PRS for both landlords and tenants, engaging with policymakers at all levels of Government, to support our mission of 'making renting better'.

Introduction

4. In order to respond to this Review and to ensure that we are able to provide our Members with the most up to date and reliable advice, we have undertaken an extensive review of legislation and guidance applicable to residential accommodation, with particular attention to that which operates in the private rented sector (PRS). This has resulted in the production of a number of reports and notes which are itemised in the next Section. These are referred to in our replies to the questions. To some extent, we have treated the questions as an opportunity to give answers providing an overview with the detail being contained in the relevant report or note, which accompany this response.
5. We would like to thank the Review for the opportunity to contribute on what is an important topic and which in our view is long overdue for review. As set out below we have historically been involved in issues around fire safety and from the outset when both the Housing Act 2004 (the 2004 Act) and the Regulatory Reform (Fire Safety) Order 2005 ("FSO") were enacted we had serious concerns at the legislative structure surrounding fire safety in residential accommodation. Unfortunately, the horrible events at Grenfell Tower have brought this sharply into focus and we believe that the legislative flaws must have played some part as a contributory factor. After all, a sound legislative scheme is the starting point for ensuring fire safety.
6. In a nutshell, we consider that there is the need for a new Residential Fire Safety Act, that is to say primary legislation as an all embracing legislative code. With the exception of high rise blocks, however, we are firmly of the view that key guidance, the LACORS Guidance for Existing Buildings (LACORS Guidance) and the LGA Guidance for Purpose Built Blocks of Flats (LGA Guidance) both lay out adequate standards to secure fire

safety in residential accommodation. Likewise, while certain aspects require revisiting parts of Approved Document B is similarly sufficient, again, with the exception of the need to relook at issues surrounding blocks of flats, particularly how they are clad and insulated (both internally and externally) and the need to look again at a testing regime for building materials.

7. We note that Department for Communities and Local Government (CLG) in their update on interim mitigation measures requiring pending remediation of cladding (published 29th September 2017) state that the National Fire Chiefs Council (NFCC) support the LGA Guidance and consider that it remains appropriate for all purpose built blocks of flats, subject to the need to address certain aspects in relation to stay put policy. We believe the same goes for the LACORS Guidance.
8. When such an awful tragedy happens there is often the suggestion that standards actually need ratcheting up. We are strongly of the view that, again with the exception of high rise blocks of flats, cladding and insulation and material testing, this is not the case here. The standards are appropriate; instead what is needed is better implementation of them, i.e. compliance with them, and more robust enforcement. Importantly, we believe that there needs to be a single comprehensive legislative code. The current system is hideously complex and simplicity going forward is essential to ensure that both compliance and enforcement improve. We have included detailed proposals for reform with this response.

Documentation accompanying this response

9. Along with this response we have attached the following:-
 1. ***How fire safety standards are currently set, implemented and enforced in residential accommodation: The aftermath of Grenfell Tower.*** This is to be published by the RLA's Private Renting Evidence Analysis Research Lab (PEARL). As the title suggests it is a comprehensive review of the scope of legislation and guidance, giving a complete overview of legislation (including related regulations and guidance regarding domestic fire safety. In turn it looks at the legislation itself, and the guidance, after which it examines standards which are set, how they are implemented and how they are enforced.
 2. ***Who is responsible for implementing fire precautions in residential accommodation?*** This paper has largely been prepared in response to the Review's terms of reference which include the need for a survey to describe who is responsible. Here we look in turn at each legislative code to determine who is actually responsible for ensuring that they are complied with; not always an easy task.
 3. ***Fire Safety Legislation and Guidance for Residential Accommodation – A Summary of Problems with the current system.*** This is our overall critique of the current system listing out the current problems/issues which we have identified as a result of the work undertaken to prepare the previous two documents. A considerable number of] problems are identified; not least the sheer complexity of the current set up.
 4. ***The Review of the Fire Safety Order and its relevance to residential accommodation*** - This is a more detailed critique of the provisions of the FSO in the context of residential accommodation. We believe that

this order which is primarily directed at commercial property and work places is wholly unsuited to the residential context.

5. **Proposals for a new residential fire safety regime** – This document sets out in outline our proposals for a new general fire safety duty for residential accommodation and a series of other proposals.
6. **Proposed Fire Safety Compliance Code** – This proposal compliments the previous proposal and suggests the imposition (on a contractual basis) of a code governing the relationships in multi owned and multi occupied residential accommodation, as well as rented single dwelling houses. If, as we propose, one person only becomes responsible for a building it is vital that they are given the necessary tools to enforce obligations on others who are owners or occupiers of that building (which must of course be reasonable). In essence it builds on the existing HMO Management Regulations but extends these across all types of property (except for owner/occupied family homes).
7. **RLA Matrix** – Summarising measures recommended by the LACORS Guidance.

This suite of documentation provides our detailed answers, in many respects to the questions posed and also matters raised by the terms of reference for this Review.

History of RLA involvement

10. The RLA was the major representative body for landlords external to the then Office of the Deputy Prime Minister when the Housing Act 2004 was enacted. We took the lead in representing residential landlords. We were deeply concerned subsequently when the FSO was enacted, particularly around the issue of the divided responsibility for multi occupied buildings, such as blocks of flats. We were also very concerned that HHSRS system did not lay down the yardsticks to help landlords comply with the new requirements, both under HHSRS and HMO licensing. We made strong representations for change and engaged with LACORS, as a result of which the decision was made to prepare the LACORS Guidance. We contributed fully to this process, employing our own Fire Safety Consultant to give technical advice on appropriate standards for existing buildings. An excellent piece of work by Kevin Thompson and his colleagues resulted, but this Guidance was prepared on a shoestring, at a cost of approximately £18,000. There was a lot of additional assistance from the Local Government Association (LGA) and organisations such as ourselves. Unless this Guidance had been prepared; implementation of HHSRS in terms of fire safety would have failed and HMO licensing would have been far more difficult to implement. It is no good passing legislation of this kind and not filling in the detail.
11. The RLA also raised concerns around the creation of two silos, with HHSRS (supplemented where appropriate by HMO licensing) in one silo and the FSO operating in another silo dealing with the common parts of buildings such as blocks of flats and bedsits. We were told by the civil servant who took charge of the work that passing this into law through a regulatory reform order had been a logistical nightmare. The only way it had been possible to proceed, bearing in mind that the Housing Act 2004 was already on the statute book, was by a separate self contained regime. All that they could do was make provision for consultation between the local authority as the enforcement authority under the 2004 Act and fire and rescue services as enforcing authorities under the FSO. This left key elements of multi owned/occupied buildings on one side of

a sharp divide with the key living accommodation in those blocks governed by different legislation! In other words, everything got off on the wrong foot.

12. Subsequently, we have regularly pointed out that this system was inappropriate and needed reform, but it has taken the awful events of Grenfell Tower to bring this into focus.
13. The RLA was also extremely supportive of the production of the LGA Guidance, working with the LGA and other stakeholders in compiling this Guidance. We, along with many others, had long felt that the official sleeping accommodation guidance under the FSO was inappropriate and insufficient to deal with the specific issues which relate to purpose built blocks of flats, many of which were constructed a considerable time ago.
14. The Review needs to be made aware of the history of how we have arrived at this current situation.

RLA preparation of this Response

15. This Response has been led by Richard Jones LLB Solicitor now retired Policy Director of the Association, who continues to act as a consultant to the Association as a policy adviser, as well as being the RLA's Company Secretary. He has been assisted by Directors who have working knowledge as landlords themselves but particularly by Dave Princep our retained Environmental Health Consultant, who has a wealth of experience of practical enforcement of health and safety, including fire safety, in residential accommodation. We have also received contributions to our work from Neil Marsden, formerly Housing Services Manager with Leeds City Council, an experienced Environmental Health Officer, who worked for a time for the Association before he retired. Our approach has also been reviewed by an external consultant.
16. In this response, we have not ventured greatly into technical detail regarding standards, including those set out in Approved Document B. Our contribution to this review is more in relation to the need to improve the overall regulatory regime, in terms of legislation and to a certain extent guidance, but particularly to try to bring about a simplified system which it is easier for landlords to understand. Improving compliance and enforcement is our objective.

Statistics

17. Regrettably, the Grenfell Tower tragedy with very significant loss of life and other casualties has come at a time when demonstrably fire safety has improved. The headline results from the Fire and Rescue Instant Statistics: England, April 2016 to March 2017 (Statistical Bulletin 13/17 dated 10th August 2017) demonstrate that the total number of incidents (fire and non fire related) has been on a downward trend for around a decade until it became relatively flat between 2012/13 and 2014/15. Since there have been two annual increases but these are mainly driven by non fire related incidents attended.
18. In 2015/16 fire related fatalities increased for the first time in several years but this increase did not continue in 2016/17 (not counting Grenfell Tower). There were 261 fire related fatalities in 2016/17 compared with 303 in 2015/16.

19. There were 3133 non fatal casualties requiring hospital treatment in 2016/17. This is a 27% decrease compared with 5 years ago although it does now appear that the downward trend in non fatal casualties in fires has slowed in the last few years. There were 7081 non fatal casualties in fires in 2016/17 which was an 8% decrease compared with the previous year and 14% decrease compared with 10 years ago.
20. Importantly, the Fire Service attended 161,770 fires in 2016/17 which was virtually unchanged compared with the previous year but less than half compared with 10 years ago. The total number of fires attended by fire services has been broadly stable since 2012/13.
21. It has been well recognised that the position has been improving over the last 10 years with statistics moving in the right direction, although, as always, more can be done. Any incident causing loss of life or serious injury is to be regretted.
22. No publicly available statistics are kept to show the incidents of fires and associated deaths and injuries in the different tenures. Despite this there is an assumption that residents in the private rented sector are in greater danger. This may or may not be the case but without proper evidence how can this judgment be made. There is a need therefore to introduce record keeping so that relative danger can be identified across all housing sectors. Should it be the case that so much legislative attention has been directed at the PRS to the exclusion of other sectors, if the evidence does not identify extra danger. Unfortunately tragedies such as Grenfell Tower suggest otherwise. Likewise, in any case, in absolute terms the population living in the owner occupied sector is greater and therefore potentially higher numbers are at risk anyway. The Review should be conducted against this background.

Mainstream housing

23. Essentially in this response we look at what we term mainstream residential accommodation, that is to say the accommodation which is covered by the LACORS Guidance and the LGA Guidance, excluding accommodation such as refuges and hostels.

Replies to questions

24. We now turn to the individual questions. However, our response is that there is some element of overlap because different questions do in fact raise similar issues which are common to more than one question.

The overarching legal requirements

Question 1 *To what extent are the current building, housing and fire safety legislation and associated guidance clear and understood by those who need to follow them? In particular:*

- *What parts are clear and well understood by those who need to follow them? And if appropriate*
- *Where specifically do you think there are gaps and inconsistencies and/or overlaps including in different parts of the legislation and guidance? What changes would be necessary to address these and what are the benefits of doing so?*

25. We feel that that accompanying document “How fire safety standards are currently set, implemented and enforced in residential accommodation” provides a comprehensive answer to this question which involves a number of separate matters.
26. The current system is most certainly not clearly understood, particularly by private residential landlords. To make sense of the current system, so as to make sure that we can give our members clear guidance and advice, we have identified at paragraph 1.3 (page 8) of this Report the key conclusions for private landlords as to their responsibilities. It took a very detailed and comprehensive review and a lot of time to actually arrive at these conclusions; no wonder it is hard for ordinary people to understand the current system. Even then to get a comprehensive picture there are two sets of guidance to look at (plus possible relevant local guidance) a set of regulations regarding smoke alarms and the possibility of requirements under four legislative codes (the FSO, HMO Licensing, Selective Licensing and the HMO Management Regulations) being applicable. Additionally if you are undertaking building work the building regulations must be observed and the applicable guidance documentation, particularly Approved Document B considered. There are then various obligations under supplementary but important regulations in relation to electrical safety furniture and furnishings and gas safety, alongside the landlord’s obligations under his tenancy. There may be issues where residential accommodation is situated over commercial premises as well. This potentially involves looking at one or other lengthy guidance documentation, as well as appropriate guidance around relevant regulations. No wonder anyone involved soon ends up completely baffled.
27. The private landlord, who is often a small business person, perhaps with only one property or a handful of properties, cannot be expected to understand this labyrinth especially as the PRS is the sector most affected by additional fire safety legislation. Unfortunately, however, the Grenfell Tower Tragedy has occurred in a different and less regulated sector, local authority housing, where the property affected is actually owned by a body which is charged by law with enforcing fire safety standards. Without in any way prejudging the outcome of the public inquiry clearly there has been a catastrophic break down in compliance with legislative requirements. It would appear that even a body which is charged with enforcing the law cannot understand and properly apply relevant legislation and guidance, particularly in this instance Approved Document B and the building regulations.
28. Our Report highlights the complexities and how layer upon layer of legislation is applied, as well as the key division of blocks of flats into to separate legislative codes and two separate enforcement authorities potentially.
29. But for the LACORS Guidance and the LGA Guidance there would be simply nothing meaningful to guide landlords and others as to what they need to do to provide the necessary fire precautions to make residential accommodation safe. Guidance for single dwellings was virtually non-existent before the advent of the LACORS Guidance. Local authorities would have been all over the place setting standards applicable under HMO licensing as we saw without the LACORS Guidance. Different authorities were previously making all sorts of different requirements in respect of the same types of accommodation with no standardised approach which was a nightmare particularly for landlords who owned properties in different areas of the country. The need for the LGA Guidance was highlighted by the fact that this Guidance now expressly states that the official sleeping accommodation guide for FSO purposes should be ignored in relation to purpose built blocks of flats!

30. The HHSRS should have been the principle enforcement tool used by Councils to improve fire safety but their officials do not necessarily have the expertise to use it for larger blocks of flats, nor where those flats are in their ownership, the ability to enforce against themselves. Further, HMO licensing introduced minimum fire safety standards which must be imposed in any licensed premises. It is common for Council licence condition to require this statutory standard based on LACORS Guidance but also when an assessment under HHSRS is undertaken that further sometimes contrary works are said to be necessary. It is wholly unacceptable that landlords who seek to comply with property licensing conditions are subsequently required to undertake additional disruptive and costly works at a later date. The provision of fire alarms is further complicated by the Smoke Alarm regulations which contradicts accepted guidance, places unreasonable requirements on landlords and is both unenforced and unenforceable.
31. Throughout our report we identify areas where clarity is lacking and also where there are gaps. The reality is that to start understanding the regime at all you simply have to forget the legislation and look at the guidance, as well as following applicable licence conditions where the property is licensed.
32. Legislation in isolation simply sets “a high level” of requirements where it sets any at all. None as such are set by HHSRS which is a serious deficiency, although corrected by the LACORS Guidance. The FSO does spell out a high level approach but, again, is meaningless without reference to appropriate guidance, particularly the LGA Guidance. The FSO itself is convoluted in its drafting as our analysis demonstrates. However, in principle, there is nothing wrong with this approach. One encounters various types of accommodation and different designs and layouts. We consider that it is appropriate to continue this basic approach of setting high level principles so long as they are clear and relevant and then translating them into action through guidance. Indeed, as we have already said, we do not consider that there is any need to fundamentally reappraise the guidance, with the exception of high rise blocks of flats cladding and insulation and the testing of building materials.
33. We would draw the Review’s attention to Section 4 of our Report namely “Specific Legislation/Guidance for different types of residential accommodation”. What we have done here is work through the different property types, single dwellings etc., and identify which legislation applies as well as the applicable guidance (with any omissions in coverage identified). Items marked with an asterisk indicate legislation which only applies in the private rented sector. This section runs to some 7 pages. Where work has been done to comply with modern building regulations which may only be applicable. There is no obligation at present to keep to the building regulation standards after the work has been done. We hope that in the light of this analysis the Review will accept that no further proof is needed of the complexity of the current legislative regime. Perhaps even more importantly, this section of our report addresses the question of implementation, i.e. compliance. Often in reality compliance is dependent upon what we term good practice, i.e. essentially voluntary co-operation. In the implementation section under each different property type we identify the different drivers to ensure compliance to make sure that fire precautions are in fact implemented and this shows that there are many gaps.
34. In Section 4.10 on page 32 we identify the cases where standards are compulsorily prescribed, essentially only under the Smoke Alarm Regulations for private rented properties in England, HMO licence conditions (only applicable in the private rented sector in certain properties) and Building Regulations only applicable when building work is carried out. Otherwise, standards are set by guidance.

35. In Section 5 we look in more detail at implementation and identify at paragraph 4.2 situations where there is mandatory implementation, i.e. an automatic requirement in the absence of specific enforcement action. This is limited to HMOs in the private rented sector, either through the HMO Management Regulations (which do not in any case require the provision of fire precautions, only their maintenance) HMO licensing if it applies and the FSO but this is only applicable to the common parts of multi occupied buildings. Additionally, the smoke alarm regulations provide a basic minimum provision. Building control of course again applies but only where building work is undertaken.
36. Beyond the FSO if it applies there is a huge void so far as local authorities' own stock is concerned.
37. As already indicated, one particular concern is the heavy emphasis placed on additional legislative provisions in the private rented sector which only represents some 20% of the housing stock. Beyond the fire safety order where it applies, it is a huge indictment of the current regulatory regime that in effect local authorities are exempt, because they cannot serve an enforcement notice on themselves as regards the rest of their stock. They are only subject to enforcement action in the case of the common parts in blocks of flats. There is immunity from enforcement in relation to key elements of blocks of flats, i.e. in relation to flats themselves. Elements of the flat, particularly flat front doors, as well as compartmentalisation within flats cannot be enforced because the only enforcement authority in the case of social renting of their own stock is the local authority itself.
38. In our view, it is wrong that there is such a huge focus on the private rented sector without detracting at all from the need to ensure that such properties are safe. A young child living in any tenure is potentially just as vulnerable, as tragically we saw at Grenfell Tower. This causes resentment on the part of responsible private landlords who are potentially subject to enforcement by local authorities. Landlords frequently complain that they know full well that the local authority, if it has its own housing stock, is regularly in breach of its legal obligations. This is well evidenced by the number of actions that have been taken in the past, particularly before the advent of the Decent Homes Programme, by social tenants against their landlords under the Environmental Protection Act, as well as claims under Section 11 of the Landlord & Tenant Act 1985. We look further at the issue of enforcement in respect of social landlords in Section 6.3 of our Report at page 36.
39. In our view, the current system of separate building regulations and building control imposed under the Building Act 1984 should continue, since the carrying out of building work, a material alteration, a material change of use is, in effect, a one off occurrence. On the other hand we need a robust regime for ensuring continued fire safety in existing residential accommodation of all types and tenures, including keeping them up to 1991 or later Building Regulations where these applied at the time the work was carried out.
40. So far as guidance is concerned in our Report we identify gaps, particularly around converted blocks of flats which are compliant with modern building regulations (1991 or later) and buildings of more than six storeys in height where these are outside the scope of the LGA Guidance as the LACORS Guidance does not apply. Flats in multiple occupation do not necessarily sit easily in the LACORS Guidance where they are located in purpose built blocks of flats which are covered by the LGA Guidance.

41. There are also a number of issues which regularly occur which are not necessarily sufficiently addressed through guidance. Whilst guidance does cover inner rooms, it does not, for example, deal with staircases which discharge from the upper floors straight into living rooms (a common design feature) nor does it deal with issues such as the presence of polystyrene tiles. However, generally speaking, subject to looking at issues we have identified, guidance is sound, although often lengthy. As has happened with the National Planning Policy Framework, we believe that current guidance for existing buildings, i.e. the LACORS Guidance and the LGA Guidance could be combined into one document dealing with different property types with a clear mandate to shorten it as far as possible. This would also iron out any inconsistent approaches. This should then be supplemented by clear and simple technical guidance to advise landlords and contractors as to how they carry out specific tasks, e.g. where fire alarms should be located or issues around ensuring that proper fire doors are fitted. One only has to go onto the internet and look at forums which show that electrical contractors are asking basic questions around which type of fire alarm to fit and where and no one seems to be confident in the answer they give.
42. As already indicated, we have set out detailed proposals for change in the accompanying documentation. Fire safety, however, cannot be looked at in isolation in relation to multi owned/occupied buildings. This is why we also propose the introduction of a fire safety compliance code for residential accommodation, alongside our proposed changes. Change would need to be made by primary legislation.
43. The benefits of change are clarity and greater simplicity. After all, if there is better clarity of understanding it is more likely that fire precautions will in fact be implemented. There needs to be mass voluntary compliance, because it is beyond the available resources of enforcement authorities to police every building. Regulation can only work if it is generally accepted and implemented, in reality. We have also seen the awful consequences of Grenfell Tower in terms of what happens where there is divided responsibilities within a building and whatever the outcome of the public inquiry it is fair to assume that absence of a coherent fire safety regime must have played at least some part in what occurred. Certainly other blocks of flats, particularly the four blocks in Camden that had to be evacuated, there was clear evidence of a failure to fit fire doors to flats. We understand that Leeds City Council, for example, has had to order 3000 fire doors to upgrade its high rise blocks of flats. Grenfell Tower must be a wake up call for change to improve compliance and enforcement. However, sufficient resources need to be devoted to inspection and enforcement with enforcement authorities having the funding they need and the trained personnel required to carry out this work.

Roles and responsibilities

Question 2 Are the roles, responsibilities and accountabilities of different individuals (in relation to adhering to fire safety requirements or accessing compliance) at each key stage of the building process clear, effective and timely? In particular –

- **Where are responsibilities clear, effected and timely and well understood by those who need to adhere to them/assess them? And, if appropriate –**
- **Where specifically do you think the regime is not effective?**
- **What changes will be necessary to address these and what are the benefits of doing so?**

44. Our clear answer to the first part of the question is “no”, as evidenced by our accompanying report “Who is responsible for implementing fire precautions in residential accommodation?”
45. Additionally, in our paper “Review of the Fire Safety Order and its relevance to residential accommodation” we highlight issues around divided responsibilities and a lack of clarity as to who is exactly responsible in many respects for compliance in relation to the common parts. Under HHSRS there is no clarity, in the absence of enforcement action. We address this question in terms of HHSRS as being the person upon whom and improvement notice might be served, but even then the local authority serving the notice has a measure of discretion. At the end of the day it can therefore depend on which legislative code applies and what action (if any) is taken to enforce it.
46. Therefore we do not believe that these responsibilities are clear, effective or timely, let alone being well understood by those who need to adhere to them. With so many options this must impede the timing of compliance. There are particular problems around blocks of flats in multi ownership, of all types (not just high rise blocks) because of the divided responsibilities which can cause delay whilst these are resolved. We look at this under our critique of the individual provisions of the FSO under the definition of “domestic premises” on page 8 and also in relation to the “responsible person” on page 9. We then look further at the extension of responsibilities on page 10 “Duties under the FSO – extension of responsibilities”.
47. In our paper “Who is responsible for fire precautions in residential accommodation?” at page 8 under the section “deciding who is the responsible person” and page 9 under “extension of scope of responsibilities” further analysis appears. Importantly, in this connection, we believe that whilst the duty to undertake a fire risk assessment is to some extent well understood, the all important general fire precautions duty under the FSO is something about which there is general ignorance. After all, the risk assessment is a means to an end, i.e. fulfilling the obligations under this general fire precaution duty. The same can go for the gas safety regulations where the general ongoing obligations are not understood although people are aware of the need for an annual gas safety check. Whilst the need for a risk assessment under the FSO is understood in relation to the common parts there is a lack of realisation as to how carrying out this assessment should be linked into what happens within individual flats which are outside the scope of the FSO. If you then look at the FSO there are additional duties laid down in relation to means of escape from fire etc., all of which are identified in our paper “Reviewing the FSO”. These are most certainly generally not understood and recognised, e.g. ongoing duties regarding maintenance and the duty of co-operation as well as the need to appoint competent persons. The whole issue of co-operation with individual flat owners is a mess.
48. When it comes to HHSRS the existence of the operating guidance is virtually unknown outside involved professionals and, in any event, the guidance there is of little help. This is why the LACORS Guidance is more important as it does at least provide sufficient details to tell people what they should do.
49. Interestingly, the Association has produced its own matrix based on the LACORS Guidance. We have been able to set out all the applicable responsibilities in different types of properties on a single sheet of paper plus an accompanying explanation of the terms used. Copies are enclosed with the accompanying papers. This sits alongside the RLA’s own risk assessment form. This clearly demonstrates that it is not as difficult as one thinks to produce guidance in clear terms which can be readily understood.

50. We consider that there are particular issues around the risk assessment process and this needs a radical re-appraisal with changes proposed. Essentially, in our view, it is an overwhelming process because it appears that you have to design your own fire precautions, effectively starting with a blank sheet of paper. We are aware of one case where in a six storey block of flats there have had to be three different risk assessments to deal with the issue of whether there should be a communal alarm system. LABC have had to become involved to try to sort matters out. Instead, as we set out in our proposals paper, the current system should be replaced by a compliance check using relevant guidance as the benchmark but retaining an element of risk assessment to see if there are unusual factors applicable which require a different approach. Obviously, in some instances, particularly high rise blocks of flats, a much more wide ranging risk assessment would be needed. However, for single dwellings and small HMOs there should be a general assumption that these pose a “normal risk” so that the need for extra measures would be exceptional. Again the benefits of change would mean much greater clarity and therefore it becomes much more likely that fire precautions will be provided in the first place.
51. Instead of the current system we propose that for every building there should be one single identifiable person who should be the responsible person. However, that person must be supported by the introduction of measures such as our proposed fire safety compliance code to make sure others involved with the building, such as occupiers, carry out their obligations which need to be imposed to ensure that they all bring about to a building which holistically is safe so far as the risk from fire is concerned. Further details are set out in our proposals paper for a Residential Fire Safety Compliance Code.
52. When it comes to building regulations it is in fact difficult to establish from looking at the wording of the Building Act 1984 or the regulations themselves exactly who is responsible, although Government literature such as that published on the Planning Portal indicates that it is the “owner”. In fact it is the person carrying out the work but there is always a question, where a contractor is involved, as to the extent of the responsibilities of the contractor carrying out the work. In practical terms, in the past this does not seem to have caused too much difficulty, especially as usually professionals are engaged as part of the process to carry out relevant duties under building regulations such as depositing plans or giving a building notice. This is of course important where various contractors are involved or there is a hierarchy of contractor and sub contractor carrying out the work. As with the Construction Design and Management Regulations (CDM Regulations) we consider that ultimately the responsibility should fall on the owner of the building. Grenfell Tower suggests however that there are serious gaps potentially in the present system and this may well turn out to be an important issue in terms of the Grenfell Tower Inquiry.

Question 3 Does the current system place clear overarching responsibility on named parties for fire safety requirements for high rise multi occupancy buildings? Where could this be made clearer? What are the benefits of doing so?

53. No – for the reasons already set out in the reply to the previous question. We have explained in that reply in detail how the FSO operates and the defects we have identified. As already indicated we propose a single person with the necessary “back up powers” should be appointed. You cannot break a building such as a high rise block of flats down into individual components and expect different people to be responsible for different elements let alone different people being responsible for the same part. Someone has to be in overall control although they must of course act fairly and reasonably.

Competencies of key players

Question 4 What evidence is there that those with responsibility for –

- **Demonstrating compliance (with building regulations, housing and fire safety requirements) at various stages of the lifecycle of a building.**
- **Assessing compliance with those requirements.**
- **Are appropriately trained and are adequately resourced to perform their role effectively (including whether there are enough qualified professionals in each key area)? If gaps occur how can they be addressed and what are the benefits of doing so?**

54. The RLA regularly receives enquiries about who can carry out a fire risk assessment under the FSO. It is of course necessary to carry out some element of risk assessment to properly comply with the LACORS Guidance, even though this is not a statutory requirement. The advice that we have decided to give is that a private landlord should only carry out any risk assessment if they are competent to do so but subject to this then it could be appropriate for a private landlord to carry out his/her own risk assessment in the case of single occupancy dwelling. Otherwise, we advise the use of professionals. The problem then is ascertaining who is a competent professional. We consider, as set out in our accompanying proposals paper, that there needs to be a proper system of training/accreditation for fire risk assessors via accredited bodies similar to that which occurs in the case of energy assessors.
55. Importantly, we consider that it is vital that there is a general improvement in training in this whole area, including officers employed either by the local authority or the fire and rescue service to carry out inspections of residential accommodation and who enforce fire safety.
56. We frequently receive complaints about inconsistencies and different requirements/recommendations made by different officers and different authorities. We feel that this needs to be addressed by the creation of an oversight body with primary authority status and a mandatory requirement then for accredited training for such officers.
57. Oddly under the FSO at the moment there is a requirement to appoint a competent person to implement fire safety precautions, but not to actually carry out the risk assessment.
58. We feel that the Review needs to look at the issue of different grades of training for different people who are involved in the process. The fire risk assessment for a high rise block of flats, such as Grenfell Tower, needs to carry a higher level of competence than where someone carries out a risk assessment for a small block of four flats. Training needs to be accompanied by testing and the need for continuing professional development (CPD).
59. In terms of building regulations we believe that generally speaking there is a large corpus of professionals available to deal with most circumstances. However, in the case of high rise blocks of flats compared to other more complicated residential accommodation there is a need to ensure that architects and other professionals involved in the design process are fully conversant with fire safety engineering requirements. Had this have been the case already we venture to suggest that the tragedy at Grenfell Tower might have been avoided.

60. The question also arises as to whether compliance checks carried out by building inspectors, including approved building inspectors, are sufficiently rigorous in terms of checking compliance with fire safety requirements. It would seem from the tragedy at Grenfell Tower that this is not necessarily the case. Since fees are payable for the inspection process there is a need to ensure that the checking system is sufficiently rigorous.

Enforcement and sanctions

Question 5 Is the current checking and inspection regime adequately backed up through enforcement and sanctions? In particular –

- **Where does the regime already adequately drive compliance to ensure that remedial action is always taken in a timely manner where needed?**
- **Where does the system fail to do so? Are changes required to address this and what will be the benefits of doing so?**

61. In our report on setting implementing and enforcing standards we have already raised our serious concerns about ensuring that those who are responsible in the social sector, whether local authorities and housing associations and the like, operate to a sufficiently high standard since for practical purposes they seem to be outside detailed regulatory control. We have already addressed this in answer to Question 1. Lots of provisions for enforcement are put into the hands of local authority but they seldom if ever take enforcement in the case of owner/occupiers, concentrating instead on the private rented sector and failing to police themselves at the same time. Grenfell Tower and other fires in social sector blocks have been the result.

62. Where the Fire and Rescue Service is the regulator, the question must also be posed as to whether they deal with social landlords with sufficient rigour. The situation at Camden where four blocks were evacuated is an example. Those blocks could have been cleared by the use of the prohibition order process under Article 31 of the FSO, but manifestly the fire and rescue service were reluctant to use these powers. Why? If the situation was that serious then this action would have been justified. On the other hand, had this been a small bedsit house, we have repeatedly seen in the private rented sector that the fire service would not have hesitated to use those powers, ordering the residents out instantly. We appreciate that it is a lot easier to re-house perhaps half a dozen private tenants than the occupants of four blocks of flats but, after all, the danger in those four blocks of flats with the consequent risk of a large scale loss of life was that much greater comparatively.

63. We are putting these matters in strong terms but regret to say that there have to be serious questions asked around enforcement, particularly where it occurs outside the private rented sector.

64. The primary objective, however, must be to get people to comply without the need for enforcement action. The benefit of this is obvious and this can be helped by much greater clarity around what needs to be done to comply and knowledge that someone is policing it. Our suggestion is therefore for a compliance checking process, although owner/occupiers would be exempt from this (whilst still subject to our proposed general fire safety duty). Means of enforcement and sanctions are there but we have long argued that in the private rented sector they are not used against criminal or rogue landlords, who ignore their responsibilities. Our requests under the Freedom of Information Act for information about enforcement action (across all hazards including

fire safety) regularly show that many authorities have taken little or no formal enforcement action. We do support informal action which often works with compliant landlords but experience shows that environmental health officers do not take sufficient rigorous action against the non compliant private landlord. This must be true of fire safety issues as other hazards. If enforcement in the PRS is poor the situation is even worse in the other housing sectors.

65. As the question suggests it is important to drive compliance and we believe that our proposals are a way of achieving this without the need to resort to enforcement action/sanctions.
66. At the same time, there needs to be a regulatory system in which those responsible for compliance know that they are deemed to have complied; that they have done enough. The current system lacks this although it is present to some extent under building regulations where compliance with Approved Document B would tend to show compliance with building regulations, if there is a criminal prosecution or a civil claim. We believe that it is important that we look at some system of deemed compliance to give that assurance, particularly to encourage the landlord who is generally compliant to undertake their obligations in relation to fire precautions.

Tenant's and residents voice in the current system

Question 6 Is there an effective means for tenants and other residents to raise concerns about the fire safety of their buildings and to receive feedback? Where might changes be required to ensure tenant/residents voices on fire safety can be heard in the future?

67. Responsible private landlords will interact with their tenants and address their concerns. This is clearly an issue which has come to the fore as a result of Grenfell Tower and obviously we must await the findings of the public inquiry. There is, of course, the ability to raise issues with the enforcement authority and in the PRS tenants do make complaints to the local authority involving issues about fire safety.
68. We believe that our proposal regarding fire compliance checking would go some way to providing a structured way of reassuring tenants that proper fire precautions are in place.
69. At the same time it has to be noted that this is not entirely an issue for landlords. As we highlight in our accompanying papers tenants and residents also have a role. After all they are the ones living in the building and they must play their part overall in securing and promoting fire safety in their homes.

Quality Assurance and Testing of Materials

Question 7 Does the way building components are safety checked, certified and marketed in building regulation requirements, need to change? In particular –

- **Where is it sufficiently robust and liable in maximising fire safety and if appropriate –**
- **Where specifically do you think there are weaknesses/gaps? What changes will be necessary to address these and what would be the benefits of doing so?**

70. This question raises a particular worry in relation to insulating buildings in order to promote energy efficiency and to address carbon emissions. This is a key element, in our view, based on reports which we have seen, in the context of Grenfell Tower.
71. Building regulations now require a much higher standard of insulation than in the past which is applicable when new buildings are erected and existing buildings are converted, particularly internal insulation. Insulation takes up space. Rock wool is safe in terms of combustibility but the space taken up is four times greater than that used by equivalent foam products such as Kingspan. Rock wool has the potential also to give off fibres but equally foam can give off poisonous vapours as was suggested at Grenfell Tower. There is a serious question to be examined by the Review as part of its work, in our view. How far is insulation material which has been introduced into homes up and down the land safe? Are we in effect filling our houses with the equivalent of petrol that can go up in flames in the event of fire. This is about the inside of properties and could be just as important as the issues which arise with regard to external cladding and insulation.
72. In a cold winter we have at least 20,000 excess winter deaths in England and Wales sometimes rising to 40,000. This is vastly greater than the number of people that are killed annually normally as a result of fire. When it comes to falls more people are killed than in fires. Important as fire safety is and as dreadful as are the deaths and serious injuries which result from it, we also have to look at risk in terms of human life, whether death or other serious injury, in the overall context of health and safety in residential accommodation. One death, of course, is one too many.
73. We believe that it is important that this inter relationship with home insulation is looked at carefully by the Review to see if change is required.
74. Generally speaking, if insulation is properly encased within plasterboard or brickwork or block work etc., then it should be safe. Nevertheless, in our view, there needs to be a technical review, with proper testing of building materials to ensure that installing foam insulation on the inside of homes (as well as on the exterior) does not pose a fire risk.
75. Clearly, the tests carried out under the auspices of CLG after Grenfell Tower indicate that certain materials are highly combustible and dangerous but prior to this they went untested. Even if they have been tested the test conditions have not been considered and followed when materials are actually installed. If one looks at the manufactures products specification for Celotex which was used as insulating material at Grenfell Tower whilst it is passed FR135, the test was in fact carried out when the insulation material was sandwiched between two sets of plasterboard, as well as other materials. This is entirely different from placing it on the exterior of Grenfell Tower and then cladding it with non fire resistant ACM.
76. We do consider that there needs to be a rigorous review of building regulations testing procedures. The problem seems to be that no systematic testing was carried out prior to the disaster at Grenfell Tower, only afterwards has it come to light. Clearly building techniques have changed greatly over the last twenty years or so and building regulations have not necessarily kept up to date with these changes. Materials should not be approved for use where they are combustible, unless following testing we are sure that provided they are stored in a certain way the risk of them causing danger from fire is minimized.

Differentiation within the current regulatory system

Question 8 What would be the advantages and disadvantages of creating a greater degree of differentiation regulatory system between high rise multi occupancy residential buildings and other less complex types of residential/non-residential buildings?

77. There must be differentiation between different types of buildings because their nature, layout and design clearly poses different risks. Common sense dictates that if you are on the sixth floor it may be more difficult to exit in the event of fire than if you are on the ground floor in a bungalow. In our view, high rise blocks, i.e. over 18 metres, do obviously pose additional risks, simply because of their height. There are the consequential difficulties found by the fire and rescue services, not being able to use ladders and hoses. Measures have been traditionally installed such as wet risers and dry risers to cope with these problems. This needs to continue, but further measures may be needed. The cost of installing these is however a real concern. We have heard of estimates of costs in excess of £50,000 per flat.
78. Subject to this we do however, question why so much emphasis has been put on fire safety in HMO accommodation which is normally low rise, as against the obvious dangers posed by high rise blocks of flats. It is important, in our view, to ensure that adequate fire standards apply across all types of property, relative to their nature. We do, however, question the need for a separate system of licensing in terms of fire safety for HMO accommodation, especially smaller HMO accommodation such as small shared houses which are usually occupied on a very similar fashion to a family home anyway. We believe that instead a general fire safety duty should apply across the board with the appropriate precautions being benchmarked in applicable guidance which the landlord should then follow in order to discharge the general fire safety duty which is proposed.
79. One area that needs addressing is stay put policies in blocks of flats, particularly high rise blocks. Our view is that they should continue so long as greater attention is given to the soundness of compartmentalisation. This view is clearly shared by the Fire Chiefs Council. As awful as each incident such as that at Grenfell Tower has been, there have been many fires in blocks of flats which have not extended beyond the flat itself where the fire has broken out. It is vital that there is effective compartmentalisation. However, there could be greater danger from evacuations, particularly simultaneous evacuations, where the danger results from panic or the alternative worry of indifference caused by repeated evacuations because of false alarms or because of where fire breaks out it does not spread beyond the flat of origin.
80. However, to meet the need to ensure compliance in high rise and more complex buildings, including larger HMOs, we have proposed in our proposals paper a system of fire certification. We believe that the repeal of the Fire Precautions Act 1971 led to too violent a swing in the opposite direction away from involvement of the fire and rescue service in assessing fire safety in these larger and more complex buildings. There were, of course, problems around that system because of its static nature and there does need to be a more dynamic approach as envisaged by the FSO. However, checks via the appropriate regulatory authority would give assurance of compliance in this kind of accommodation, particularly high rise buildings.

81. Overall, in our view, we need to simplify the system with one across the board duty without the current add ons which only apply anyway in the private rented sector and not in the social sector in which the Grenfell Tower Tragedy occurred.

International comparison with other sectors

Question 9 What examples exist from outside England of good practice and regulatory systems that aim to ensure fire safety in the buildings? What aspects should be specifically considered and why?

82. This is not an issue which we have investigated and therefore we cannot comment on it.

Question 10 What examples of good practice from regulatory regimes in other industries/sectors that depend on high quality safety environments are there that we could learn from? What key lessons are there for enhancing fire safety?

83. The tendency in this country is to impose legal requirements but frequently they are not effectively enforced. Instead, in effect, it is left to good practice or the general inclination of law abiding citizens to obey the law. The problem with this approach is that the less effective active enforcement agencies are seen to be, then even the most law abiding persons thinks "why should I bother?". This situation also has not been assisted by the financial cuts which Government has been compelled to impose to redress the public finances since the financial crisis of 2008. This situation has not been helped by the natural reaction of legislators to resort to any perceived problem by ratcheting up standards without giving any thought as to why the pre-existing standards were not enforced; let alone thinking about enforcement of the new standards that they seek to impose. It is fair to say that often Government likes to be seen to be doing something even though they do not then carry matters through by making sure that sufficient resources are then devoted to enforcement. There is even a reluctance to spend money on publicising changes so often those effected are ignorant of what is required of them. All of this is made worse by lack of clarity about the requirements which are being imposed because of complex drafting.

84. In the context of fire safety, as already pointed out, pleasingly there has been a downward trend in fire related incidents, deaths and serious injuries which is hugely welcome. The Grenfell Tower tragedy has been a wakeup call that one cannot be complacent. Whilst cranking up standards in itself is not the answer (with the exception of a review of high rise blocks of flats insulation and cladding, and testing the materials) better enforcement is needed.

85. Certainly the Health and Safety Executive has been proactive in enforcement in certain areas, e.g. construction sites, but as always this needs resources devoting to it. There has been a noticeable decline in the number of deaths and injuries on larger construction sites with no deaths at all being recorded when the Olympic complex was constructed. When observing work on large building sites it is clear that a huge effort is devoted to health and safety.

86. Another example is the rail industry where after awful experiences, there have been no deaths of passengers travelling on the railway now for a number of years. This is, however, again required to devote a larger

element of resources together with careful planning and monitoring, by Network Rail, train operating companies and the Railway Inspectorate.

87. It can be done but it needs a consistent approach, careful planning and strict implementation, all underpinned by the required amount of spend both in terms of money and personnel, who must be well trained.

Additional matters

88. We welcome the invitation of the Review to comment more widely and there are a number of additional matters that do not really seem to be covered by the questions posed.

Issues around fire safety affecting private landlords

89. Although we have addressed a number of these issues elsewhere here we would like to pull together concerns regarding raised with us by members –
90. *Need for direct action against those responsible* – At the moment if the tenant interferes with the fire alarm and an enforcement officer becomes involved they will still go to the landlord and even if they could do so will not take any action against the tenant, e.g. under the HMO regulations. Landlords frequently encounter issues where fire precautions are tampered with, e.g. plastic bags taped over detectors, batteries removed from battery operated detectors, fire doors disabled by removing self closers, etc. Our proposals for a fire safety compliance code is an answer to these problems.
91. *Clear direction as to who is qualified to carry out what types of risk assessments and guidance for responsible persons on how to procure the right person* – This is an important area which we have highlighted above and there does not appear to be a sufficient number of competent assessors available at the present time.
92. *Prescribed direction on compliance with a risk assessment around areas which are difficult to comply with or are not standard and what might change the level of assessment of risk so that additional requirements are needed* – Whilst guidance does go some way currently there is a need for more explicit guidance on these areas which we have already mentioned above. This is an area where relevant guidance needs to be revised in consultation with stakeholders.
93. *Consistency across local authorities and fire authorities in terms of both requirements and enforcement* – landlords frequently complain that different fire officers and different local authority officers come up with different requirements. Much better resourcing and much better training are needed. We propose an oversight body as a primary authority to give guidance to deal with questions that arise where there is uncertainty or there are different views.
94. *Complaints that fire officers and local authority environmental health officers pass cases from one party to the other and hardly does anything about it* – There does seem to be a fuzzy line as to responsibilities between the different enforcement authorities. Our Members' experiences are that often there are delays as reports are passed between one authority and another.

95. *Clear definition of the leased areas in blocks of flats* – we have already highlighted this in our comments under the Fire Safety Order. This is a very real problems and the answers would seem to be do away with the divided responsibilities so that there is a single responsibility. At the end of the day, however, there will be, inevitably, issues about recharge and cost of the works. These are unavoidable.

Appliances

96. It is clear that the fire at Grenfell Tower was started by a defective fridge/freezer and this must therefore raise questions about safety of electrical appliances generally. Currently a large number of appliances manufactured by the Whirlpool Group are subject to recall and the recall seems to be proceeding rather slowly. There are particular problems with their tumble dryers where fluff can accumulate and catch light. Questions have also been raised about refrigerators and their safety. In these cases these are not necessarily due to electrical faults as/or the fault of users. Rather they are manufacturing issues.

97. There may be a suggestion that in the private rented sector PAT testing is the answer. Leaving aside the fact that if PAT testing is introduced in one sector it ought to be introduced across all tenures, there is the very real question of whether PAT testing would make any difference. We do not believe it would because the problems currently being encountered seem to stem more from poor manufacturing and the need for better design, e.g. the need for incorporation of a metal backing to refrigerators. There was also a clear need to review and improve the recall process. Why for example do not all suppliers have to record the address to which they deliver white goods; rather than relying on the buyer to fill in a card/go onto the internet to register details. Obviously the goods will be moved subsequently but the bulk will remain where they are. It would then be possible to issue out recalls in the same ways as happens with many car manufacturers.

98. It is also important that when a recall is undertaken that clear guidance is given in the interim as to what should be done; something that has not happened with Whirlpool.

99. In any case, in the private rented sector there is the additional problem that tenants would introduce their own electrical appliances and it would not be appropriate or practical for landlords to test these anyway. These are just as likely to be the source of fire if one were to break out.

100. We consider that this is an issue which the Review ought to consider because the statistics do indicate a rising level in the number of fires caused by electrical appliances, particularly white goods.

Cost

101. In all of this, it is important to avoid the subject of money. Regrettably there can never be absolute safety; nor are there unlimited resources. There has to be a proportionate approach when it comes to spending money. There are already loud complaints for example in the private rented sector around rent levels, due to an overall shortage of housing and the rising population. We consider that so long as the existing regimes are enforced that normally the standards required are achievable. Particular thought would, however, have to be given to the cost effectiveness of significant retro fitting measures in high rise blocks of flats as well as any work which may be required in non high rise blocks which have non compliant cladding or external insulation. Worries have been expressed to us by our members who own flats in affected blocks as to the bills which they face. It 19

seems to us to be unfair that this cost will fall on individuals although it appears that there has been a systemic breakdown in building control in this area. Solutions have been applied without adequate testing of the relevant materials, as is now clear from the tests which have subsequently been carried out. Building regulations have not been kept up to date. It is not going to help any one as flat owners simply cannot afford very significant bills of the kind now envisaged to put matters right.

102. Related to the issue of costs is the need to ensure that residential accommodation which is potentially compromised when it comes to fire safety, e.g. because of the presence of inner rooms or other recognised problems, remains in use. With the current housing crisis it is unimaginable that this stock is taken out of use. Fortunately we believe that solutions have been devised which minimize the risk. For example in the case of back to back houses a solution was achieved by agreement with the West Yorkshire Fire and Rescue Service, which was then translated, with modification, into a national standard relating to some 25,000 back to back properties across the country.

Conclusion

103. In terms of fire safety, residential accommodation raises particular issues because of its use as sleeping accommodation. It can be occupied around the clock and for a considerable part of the time the residents can be asleep, ignorant of danger. Even when roused people can be disorientated. Although equally relevant to hotels etc., this is not otherwise the case from the vast bulk of commercial premises, which in themselves pose a very different potential problem because of the wide range of activities involved. On the other hand, residential accommodation tends to be of a standardised nature and use, often with very similar layouts and designs found amongst the different types of accommodation. Therefore there is the potential to “normalise” the risk level which, when coupled with the risks for sleeping purposes, means that it is easier in many respects to create guidance which benchmarks the precautions which are needed.

104. On this footing, in our view, there is absolutely no reason why there should not be a single legislative code for all mainstream residential accommodation. We believe that we amply demonstrated that the current legislative framework is not fit for purpose. It is too complex. Complexity in itself makes compliance less likely. Legislation is far from the being the be all and end all but it sets the tone and influences behaviour.

105. Clearly the awful tragedy at Grenfell Tower necessitates a thorough review of high rise blocks. There seems to have been a breakdown in building control when alterations have been carried out. Likewise, there is ample evidence of a need to ensure better compliance with standards, including the need to ensure “good housekeeping” i.e. making sure that standards are kept up, precautions are properly maintained, and also flats are fire safety compliant and the like. Divided responsibilities of whatever kind do not help.

106. On the other hand, we do not consider that there is a need for a complete rewrite of legislation; rather this can be done by piecing together the best parts of the present system which has the advantage of familiarity. Regrettably, as we foretold at the time, the divided responsibilities for residential accommodation resulting from both the 2004 Act and the Fire Safety Order have resulted in the current system which is not coherent. We would be very surprised if this was not at least a factor in the events surrounding Grenfell Tower and its immediate aftermath. Fire safety is a technical subject but it can be simplified. Fortunately, we do have good guidance in place in and our view based on first hand involvement, is that without this guidance the situation

would be far worse. We need to build on this, look at what changes are needed in relation to high rise blocks of flats, and bring about a new residential accommodation orientated fire safety regime, largely without the need to change the existing approach to safety standards embodied in current guidance. Changes are necessary in relation to high rise blocks of flats cladding and insulation and the testing of materials as part of this exercise. Approved Document B needs revisiting to bring it into line with modern building techniques which have developed over the last 20 years or so. In reality, it is all about ensuring effective implementation and compliance, as well as enforcement to keep up the drive to continue the current trend for declining incidents, deaths and serious injuries, prior to Grenfell Tower; as well as reducing the likelihood of a further similar tragedy.

Residential Landlords Association Limited
1 Roebuck Lane
Sale
Manchester
M33 7SY
Tel: 0845 666 5000
Fax: 0845 665 1845
Email: info@rla.org.uk
Website: www.rla.org.uk

For enquiries please contact
R.O.Jones
Tel: 0113 2444 227
Fax: 0113 2465 965
Email: richard.jones@rla.org.uk