

Grenfell Tower Fire Public Inquiry Terms of Reference consultation

IOSH response to the Public Inquiry Team's consultation



Submission

11.07.17



Introduction

The Institution of Occupational Safety and Health (IOSH), the Chartered body for health and safety professionals, is pleased to respond to this important consultation on the Terms of Reference for the Public Inquiry into the Grenfell Tower fire.

In the response that follows, we provide comments on the five question areas that the Inquiry Team has outlined and close with further information about IOSH.

IOSH summary position

IOSH believes the Public Inquiry into the Grenfell Tower fire should cover the immediate and root causes of the fire and its spread, the failure to safely evacuate all residents and the lessons to be learned.

This should include how the UK has arrived at a situation in which high-rise buildings are clad in materials that have subsequently failed Government screening tests for 'limited combustibility'; the risk levels posed; and how this should be addressed to protect human life. It should thoroughly examine any systemic weaknesses and areas for improvement in the UK's competence and management of fire risk that this tragic event has revealed.

IOSH responses to consultation questions

1. What do you think the Inquiry should cover?

IOSH recommends that the Terms of Reference should include investigating and making specific recommendations to improve the UK's fire safety risk management and protect human life, concerning, but not limited to, establishing:

Specific

- a) What were the immediate and root causes of the fire and its spread?
- b) The adequacy of fire risk assessment?
- c) Why compartmentation was not effective in Grenfell Tower?
- d) Why a decision was taken not to retro-fit sprinklers or other fire suppression system during the refurbishment?
- e) The adequacy of the overall fire safety competency requirements for those with responsibilities and governance and decision-making roles?
- f) The adequacy of the alarm system and emergency arrangements, such as for firefighting and evacuation, including for those with disabilities?
- g) How the roles, responsibilities and interactions of the various duty holders were understood, coordinated and delivered?

- h) The adequacy of communication and engagement between duty holders and residents?
- i) Why a review of [The Building Regulations 2010](#), [Approved Document B](#) (ADB) was not completed in line with the Coroner's recommendations following the [Lakanal House](#) fire and whether this contributed to the Grenfell Tower fire?

General

- j) Whether any action was taken following the 2013 [evaluation](#) report of [The Regulatory Reform \(Fire Safety\) Order 2005](#) (RR(FS)O), what more needs to be done and how to ensure such reports lead to action in future?
- k) What research the Government has commissioned into ADB, its significance and whether more is required?
- l) The adequacy and application of relevant fire safety-related standards, such as for testing cladding?
- m) Whether the UK's passive approach (compartmentation) for high-rises is sufficient and whether the active approach used in other countries should also be adopted?
- n) Why international lessons on fire safety have not been applied in the UK, such as those from the [Lacrosse Tower](#) fire and how this can be ensured in future?
- o) The adequacy of the Construction (Design and Management) Regulations 2015 ([CDM 2015](#)) cross-references to RR(FS)O, ADB and the [Equality Act 2010](#) to ensure future use of buildings will be safe?
- p) Whether there are any systemic failures in the adequacy, implementation and enforcement of relevant fire, health and safety or building regulations?
- q) How the situation has arisen in which the UK has high-rise buildings that are clad in materials that have subsequently failed Government screening tests for 'limited combustibility' and how to ensure similar failings are avoided?

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

IOSH believes it will be essential for the Public Inquiry to obtain the following types of evidence:

- a) Relevant documented information, such as fire risk assessments, communication procedures and inspection and maintenance records
- b) The fire safety competence level requirements of all those with responsibilities, including for providing advice and making decisions, and their adequacy
- c) Any progress regarding the review of ADB, including any research and urgent action still required
- d) Any progress following the 2013 review of The Regulatory Reform (Fire Safety) Order 2005 and urgent action still required
- e) How compartmentation failures can be prevented in future
- f) Relevant best practice and expertise in high-rise fire risk management
- g) The provision of resources, facilities and equipment to the Fire and Rescue Services to tackle this fire

- h) Action taken to ensure that those most at risk have been protected and any urgent action still required

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

IOSH believes that in its interim report, the Public Inquiry should make recommendations on:

- a) Any immediate findings that can improve fire safety and emergency responses in high-rise buildings
- b) How to prioritise and urgently make safe existing buildings using risk-based action plans
- c) How to ensure that current and future building and refurbishment work does not compromise fire safety
- d) How to ensure the adequacy of the alarm system and emergency arrangements, such as for firefighting and evacuation, including for those with disabilities
- e) How to ensure fire safety is effectively communicated to those with different languages and literacy levels

4. What should be left for the main report, so the interim report can be published quickly?

IOSH believes that the full report should make recommendations on improving the UK's overall approach to fire risk management, including on:

- a) The competence requirements for those directly and indirectly associated with fire safety management
- b) The application of passive and active fire risk management techniques
- c) The standards for testing / approving building materials and methods
- d) The adequacy and clarity of relevant regulation and enforcement
- e) The level of compliance with legal duties including section 3 of the Health and Safety at Work etc. Act 1974
- f) The resources that should be provided for the Fire and Rescue Services
- g) How the roles, responsibilities and interactions of the various duty holders can be better understood, coordinated and delivered
- h) How all those who can affect fire safety can work together more effectively
- i) Any other lessons learned for fire risk management more generally

5. Would you like to be kept informed of the Inquiry's work? How would you like to be contacted?

Yes, IOSH would be keen to contribute and to be kept informed of the Inquiry's work and can be contacted at richard.jones@iosh.com or 0116 257 3149.

About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with around 47,000 members in over 130 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity, and an ILO international NGO. The IOSH vision is:

“A safe and healthy world of work”

The Institution steers the profession, providing impartial, authoritative, free guidance. Regularly consulted by Government and other bodies, IOSH is a founding member to UK, European and International professional body networks. IOSH has an active [research and development](#) fund and programme, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. IOSH publishes an international peer-reviewed journal of academic papers twice a year titled *Policy and practice in health and safety*. We have also developed a unique UK resource providing free access to a health and safety research database, as well as other free on-line tools and guides, including resources for business start-ups; an occupational health toolkit; and a risk management tool for small firms.

IOSH has 41 Branches worldwide, including the Caribbean, Hong Kong, Isle of Man, Oman, Qatar, the Republic of Ireland, Singapore and UAE, 17 special interest groups covering aviation and aerospace; communications and media; construction; consultancy; education; environment; financial services; fire risk management; food and drink; hazardous industries; health and social care; offshore; public services; railways; retail and distribution; rural industries; and sports grounds and events. IOSH members work at both strategic and operational levels across all employment sectors. IOSH accredited trainers deliver health and safety awareness training to all levels of the workforce from shop floor to managers and directors, through a professional training network of more than 2,000 organisations. We issue around 180,000 certificates per year.

For more about IOSH, our members and our work, please visit www.iosh.com. Our new five-year strategy can be viewed at www.ioshwork2022.com.

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