

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Housing and Homelessness Policy and Accountability Committee

Date: 23 April 2025

Subject: Housing Safety Compliance

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SUMMARY

Keeping residents safe in their homes is not only our legal duty but at the heart of what we do. This report sets out our performance in key health and safety areas including gas, electric, water, lifts, asbestos and fire but also Category 1 Hazards, structural walls, and playgrounds.

It provides an overview of our response to date to the Grenfell Inquiry Phase 2 report, Building Safety Act, Fire Safety Act, Fire Safety Regulations and Social Housing Regulation Act. It also provides an update on major investment to enhance safety for all.

Importantly, it sets out our journey to improve communication and engagement with residents, providing transparency of building safety information and ongoing work to ensure disabled persons can evacuate their home and building in an emergency and raising awareness of new hazards (e.g. e-bike fires).

RECOMMENDATIONS

1. For the Committee to note and comment on the report.
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Wards Affected: (All)

Our Values	Summary of how this report aligns to the H&F Corporate Plan and the H&F Values
Building shared prosperity	Good-quality homes to our residents that are safe provides a platform from which to learn, work and thrive.
Creating a compassionate and inclusive council	We are passionate about providing safe homes and buildings and developing

	personal emergency evacuation plans and additional safety systems.
Doing things with local residents, not to them	We work hand-in-hand with the fire and building safety residents group which is chaired and made up of local residents.
Being ruthlessly financially efficient	There is robust, competent contract management to ensure quality standards and value for money but always ensuring safety comes first.
Taking pride in H&F	Working to make our housing safe and a good standard that makes our residents proud to live in their homes.
Rising to the challenge of the climate and ecological emergency	Working to deliver service utilising technology to maximise operational performance and minimise our carbon footprint.

Background Papers Used in Preparing This Report

N/A

SAFETY COMPLIANCE OVERVIEW

1. Since April 2024, Housing Services is a Regulatory Service. We are the landlord to circa 17,000 homes of which around 12,000 are tenanted. In addition, we provide homes utilising temporary accommodation (approx. 1,600) that is made up of a range of types and service arrangements.
2. Our Housing Compliance Programmes and high-performance standards is our approach in keeping residents and buildings safe; sets out our accountability and responsibility, and demonstrates how we manage risks, through monthly performance reporting that complies to the law as a regulatory service. This regulatory strategy and the associated policies and procedures are reviewed at least annually.
3. We are subject to routine external independent audit to test and validate our safe systems of work with the most recent overall assessments in July 2023 and February 2024 giving us satisfactory assurance (the scale of assurance is Substantial, Satisfactory, Limited or Nil). Independent audits during the financial year 24/25 for asbestos and water give satisfactory assurance with an electrical audit due in August 2025.
4. Our Mechanical and Electrical team is third party accredited under the quality management system ISO9001, which is independently inspected. We will be rolling this out further across other safety areas including fire and asbestos.
5. We report our performance information in resident newsletters, to the residents' Housing Forum, Cabinet, the Cabinet Member for Housing and Homelessness, internal Residents and Buildings Safety Board and the Policy and Accountability Committee and annually to the Social Housing Regulator.

6. We are investing significantly in our housing in new fire doors, sprinklers and backup evacuation alarm systems, upgraded thousands of electrical installations, upgraded over 40 lifts and installed 5 new wet risers.
7. We are responding to the recommendations from the Phase 1 and Phase 2 Grenfell reports that are being implemented in new legislation. We already had Personal Emergency Evacuation Plans (PEEPs) for those living in higher risk buildings and are widening this offer to all our residents who need one that was recommended in Phase 1.

Compliance Performance

8. The Primary Compliance commonly referred to the Big 6 areas includes gas, electric, water, asbestos, fire and lifts. In addition, as part of quality improvement plans, we are now reporting Carbon Monoxide (CO) detector installs.
9. We report annually to the Social Housing Regulator as part of the Tenant Satisfaction Measures (TSMs) and publish the details on our website. Table 1 sets out our performance for the financial year, 1 April 2024 to 31 March 2025.

TABLE 1: Compliance Performance April 2024 to March 2025.

		Apr 24	May 24	Jun 24	July 24	Aug 24	Sept 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25
Gas Safety Checks	Actual	99.87	99.93%	99.88%	99.86%	99.89%	99.95%	99.95%	99.95%	99.99%	99.99%	100%	100%
	Target	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Fire Safety Checks	Actual	99%	99%	99%	99%	99%	99%	99.7%	99.7%	99.7%	99.9%	99.9%	100%
	Target	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Asbestos Safety Checks	Actual	100%	99.8%	100%	100%	99.9%	100%	100%	99.9%	100%	100%	100%	100%
	Target	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Water Safety Checks	Actual	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
	Target	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Lift Safety Checks	Actual	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
	Target	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Electrical Safety Checks (5 year)	Actual	96.40%	97%	97.3%	97.6%	97.6%	97*%	97%	97%	97.3%	97.4%	97.4%	97.5%
	Target	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
CO Detectors in place	Actual	New	New	New	New	New	New	New	New	New	100%	100%	100%
	Target	New	New	New	New	New	New	New	New	New	100%	100%	100%

Gas Safety

10. Each year we inspect over 11,064 gas boilers to ensure they are safe, which includes testing the carbon monoxide detector located near the appliance. Gas Safety is currently at 100%. Our communal boilers are serviced and maintained routinely against recognised standards, and many are now monitored by

automated cloud-based systems.

Electrical Safety

11. Every five years we will test the fixed wiring and the fuse box in tenants' homes, and ensure the fire detection is working, in all habitable rooms and has more than 5 years life expectancy left on the detectors. In addition, we will check the communal wiring in the building every 5 years too.
12. Electrical Safety is not 100% as the previous standard was 10-year electrical certification. As part of our service improvement, we have moved our standard to 5 years in line with industry best practice and complying with the Social Housing Act 2023.

Legionella (Water)

13. We check for legionella in communal tanks based on risk assessment and put in place controls as applicable. This measure is 100%.

Lifts

14. We have 216 lifts that undertake circa 21 million movements per year. Each lift is independently inspected every six months. We have a dedicated inhouse team of lift engineers supporting our contractors who provide 24/7 cover. All our lifts are fitted with automated alerts providing real time monitoring of performance and faults.

Asbestos

15. We remain at 100% compliance for re-inspections to non-domestic areas. The Asbestos Management Plan and Asbestos Policy have been fully reviewed and changes made to reflect current arrangements.

Fire

16. Fire risk assessments (FRA) in the communal areas of buildings is undertaken cyclically based on risk. The FRA looks at fire detection, means of escape, active and passive firefighting measures etc. Any actions from this assessment are categorised, allocated, programmed, and tracked. We have 100% of up-to-date FRAs in place.
17. There were 20 reported fires between April and January of this financial year. Sadly, there was one fatality this year following an accident in the property. All fires are investigated by our fire team to enable learning.
18. One fire this year (our second of this type) was from an e-bike being charged on a communal balcony. London Fire Brigade attended and extinguished the fire. Fires from Lithium-ion batteries (commonly used for e-bikes) are becoming increasingly frequent in the UK. There have been several fatalities (three in London in 2023). Battery failure can be triggered by overcharging, releasing a toxic and explosive gas. Batteries (which are made up of many cells) are difficult to extinguish and may reignite hours later. They need to be safely

removed, often left to burn, and disposed of.

19. We have been working with the London Fire Brigade and raising awareness through publicising both locally and nationally. We have installed signage in our lifts and on lift lobby screens prohibiting persons from taking e-bikes/e-scooters in our lifts.

Temporary Accommodation

20. H&F has a statutory duty to provide temporary accommodation to homeless households. H&F's Temporary Accommodation (TA) portfolio increased to 1,571 in January 2025 up approximately one third from April 2023.
21. The 450 private sector leased (PSL) accommodation properties are procured directly from private landlords and are managed by the in-house TA Team. As per terms of the PSL lease it is the responsibility of the landlord to maintain valid health and safety compliance certificates prior to the expiry of the current certificate. In an event that the private landlord does not act in a timely manner the TA service will commission the works and recharge the landlord.
22. The 550 private licenced accommodations (PLAs) have been procured from TA providers, such as managing agents and Housing Associations. As per terms of the licence agreement, health and safety compliance sits with the managing agents, however the Council has a duty of care in placing homeless households so collate and verify all health and safety certificates.
23. Health and Safety for hostels and Temporary On Licence properties are managed by the Council's contractors and certificates are uploaded on H&F's system.

Playgrounds

24. H&F has 62 play sites across housing land. These are a mixture of Playgrounds, Ball Courts, and Multi Use Games Areas. H&F are required to ensure the health and safety of playground users, so far as is reasonably practicable. As of January 2025, there was one closed site owing to vandalism. Quotes to remedy have been sourced to reopen the site as soon as possible.

Other Hazards

25. Under the Housing and Health Safety Rating System (HHSRS) there are 29 types of hazard defined from falls to damp and mould. Where a hazard is identified it is categorized as either a Category 1 (urgent and must be resolved straightaway) or Category 2 (dependent on scale it defines works are needed but not in the immediate future).
26. H&F commissioned a stock condition survey of its properties, which concluded in July 2024. Access to over 11,000 properties was gained. Where hazards were identified they were logged and if a Category 1 it was referred to the same day for resolution. Between June 2023 and July 2024 103 Category 1 hazards

were identified and remedied.

27. As part of the stock condition survey, we monitored the condition of structural and freestanding walls and balconies. We have commissioned further surveys by a structural engineer with 110 completed to date. No urgent risks have been identified.

Major Investment in Safety

28. H&F is investing circa £1.4 million per week in its current housing stock which includes health and safety measures. We have:

- a) Upgraded over 6,000 front entrance fire doors sets to date and are programming another 2,800.
- b) Rolled out a programme of installing sprinklers in our higher risk buildings with 5 tower blocks completed (600 homes) and a further 5 blocks in progress (380 homes).
- c) We have introduced evacuation alert systems to 9 blocks with another 5 planned. The alert system allows the London Fire Brigade to change the evacuation strategy from stay put to a phased evacuation in an emergency.
- d) We have installed 5 new wet risers (firefighting systems) in 5 tower blocks and renewed it in 3 other tower blocks.

Grenfell Inquiry Phase 2 report

29. The Grenfell Phase 2 report (published 4 September 2024) concluded that every one of the 72 tragic deaths were avoidable. Of the 72 who died, 18 were children and 15 disabled people and the majority were from ethnic minorities.
30. The Grenfell Phase 2 report, circa 1,700 pages makes significant recommendations. On 26 February 2025 the Government confirmed in a report that it accepted 49 of the 58 recommendations and sets out at a high level how they will be addressed. The remaining 9 relate to the Government itself, which it accepts in principle and sets out in the report how it will implement these.
31. Further detail on the Grenfell Phase 2 report and H&F's response to the recommendations can be found below.

Vulnerable Residents

- a. The phase 2 report concludes by looking back to Phase 1. In the Phase 1 report the chairman recommended that the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to evacuate the building without assistance may be compromised (such as persons with reduced mobility or impaired cognition) and to include current information about them and their associated PEEPs in a premises information box.
- b. In the days running up to the release of the Phase 2 report the new Government committed to the introduction of this recommendation. The Government will implement secondary legislation later in 2025 setting out the requirements.

- c. In H&F, we have for several years provided a Safety-First service that has proactively reached out to residents in higher risk buildings (HRBs) to offer PEEPs and Person Centred Fire Risk Assessments. We have extended this offer to all residents but continue to prioritise those in HRBs and Sheltered homes.

Higher Risk Buildings

- d. The report recommends extending the definition of Higher Risk Building (HRB) as defined in the Building Safety Act 2022 to have regard for the occupiers rather than just the height of buildings. The Government will set out in summer 2025 how it will review this.
- e. Any building defined as a HRB is subject to the requirements of the Building Safety Act 2022 including registration and certification with the Building Safety Regulator (BSR) and provision of safety case reports and safety case files, mandatory reporting and a resident engagement strategy. Also, approvals for planning and building control would be directed through the BSR. The BSR is currently operating with a significant delay, any increase in its role will need to be factored into any plans.
- f. In advance of the review of the definition by Government we have started collating the relevant documents and analysis for sheltered homes, which we suspect are likely to be classified as HRBs, and if not, this information is still invaluable.

Social housing providers

- g. The report reminds landlords responsible for the management of social housing that they should take appropriate action accordingly to ensure they have effective systems in place. The Act makes safety a priority and imposes a duty on landlords to investigate and remedy within a specified time of being reported defects that may adversely affect health (Awaab's law).
- h. In H&F, we report monthly to the Cabinet Member for Housing and Homelessness and the internal Residents and Buildings Safety Board on the outcome of effective fire safety management and subject our processes to regular scrutiny. We submitted the first tenant satisfaction measurement data to the Social Housing Regulator and published it on our website in June 2024, which showed 99.9% to 100% compliance for fire, gas, electric, water and lift safety.

Legislation

- i. The Inquiry concluded though that the statutory guidance in Approved Document B on fire safety was unsatisfactory and most importantly that it does not provide the information needed to design buildings that are safe in a fire.

- j. The Inquiry recommends that the revision of the guidance is done at pace and that it contains a clear warning that compliance with the guidance will not necessarily result in compliance with the regulations.
- k. The Inquiry also recommends that the government draw together under a single regulator all the functions relating to the construction industry.
- l. In H&F, we keep track of the regulatory and associated guidance changes, (Approved Document B is targeted at new developments or new works) to ensure we apply the latest thinking to keep residents safe.

Clients

- m. The Inquiry's conclusion of the construction industry is that those who commission building work are not always fully aware of their responsibility for compliance with the provisions of the Building Regulations, particularly if an application for building control approval was made by a consultant on their behalf.
- n. The Inquiry welcomed the new requirement for a Building Regulations compliance statement, made or approved by the Client to be provided at the time of an application for building control approval (Gateway 2).
- o. H&F is the Client for many construction projects. The changes to the Building Regulations place duties on the Client for any notable alteration or refurbishment or new development. The emphasis is on the competence of the Client as well as the need to appoint a competent Principal Designer and Principal Contractor.
- p. In H&F we are ensuring that projects are competently managed and supervised through ensuring that competent officers are employed and that appointed consultants and contractors are competent through contractual arrangements.

Contractors

- q. The Inquiry recommends the introduction of a licensing scheme for principal contractors wishing to undertake the construction or refurbishment of higher-risk buildings and that it be supported by a personal undertaking from a director or senior manager that the building is as safe.
- r. In H&F, roles and responsibilities are set out for works to our higher risk buildings within contractual arrangements. The introduction of a licensing scheme and personal commitment from the contractor is welcomed. It is noted that this may, at least initially, reduce the market's competitiveness both for contractors and insurance companies that will potentially impact on costs and delivery timelines.

Principal Designer

- s. The Building Safety Act 2022 amended the Building Regulations to require the Client to appoint a Principal Designer for relevant works, prior to design and

construction. This differs from the Principal Designer, also required, under the Construction Design Management Regulations.

- t. This new role is a fundamental step in ensuring that the design is fit for purpose and that there is legal ownership and responsibility for ensuring it is safe.
- u. The Inquiry recommends going a step further to make it a statutory requirement that before getting approval to build or refurbish a high-risk building (Gateway 2), a senior manager from the main design team must sign a statement saying they've done everything reasonably possible to make sure the finished building will be safe.
- v. In H&F, we have thorough procurement and contractual processes ensuring that Principal Designers are appointed. The market is adapting and evolving to this new requirement, which requires ownership of the design and evidence of competence, for example in term of fire and structural engineering. There is an inevitable increase in resource and planning to be factored into projects as the market responds.

Fire Safety Strategy

- w. A fire safety strategy should describe a building's structure and the various fire protection systems it contains and set out how they work together to ensure the safety of the occupants and firefighters in the event of a fire.
- x. The Inquiry recommends a fire safety strategy should be produced as a condition of obtaining building control approval for the construction or refurbishment of any higher-risk building and for it to be reviewed and approved on completion. The Inquiry also requires that the strategy is produced by a registered Fire Engineer.
- y. The Inquiry recommends that the Fire strategy should also consider the needs of vulnerable people, including the additional time they may require to leave the building or reach a place of safety within it and any additional facilities necessary to ensure their safety.
- z. In H&F, all our higher risk buildings have a fire strategy and also this includes the work being done with PEEPs to protect those who need help to evacuate if needed.

Fire Engineers

- aa. The Inquiry states: 'Designing buildings that are safe in the event of a fire requires particular skill. It is a skill that can be acquired only by specialised education and experience worthy of formal recognition. Unfortunately, the term "fire engineer" does not at present denote any formal qualification and as a result it is possible for a person to practise as a fire engineer without any formal qualification.
- bb. Given the importance of fire engineering the Inquiry recommends that the profession of fire engineer be recognised and protected by law and that an

independent body be established to regulate the profession, define the standards required for membership, maintain a register of members, and regulate their conduct.

- cc. In H&F, on higher risk buildings and other complex developments we ensure that industry recognised fire engineering companies with Chartered Fire Engineers are engaged. As with other areas, there is a scarcity of such practitioners, and this must be factored into timelines and cost forecasts for projects.

Fire risk assessors

- dd. The Inquiry recommends that the government establish a system of mandatory accreditation to certify the competence of fire risk assessors.
- ee. There is a scarcity of fire risk assessors and the range of skills required for differing building archetypes is complex. In H&F, we have an experienced team that solely specialise in residential stock. We only engage external fire risk assessors who operate under a recognised quality management system. Our expert team review each fire risk assessment as an additional check.

Fire Safety Competence

- ff. Competence at all levels is a key feature of the Inquiry's findings that was missing in the Grenfell refurbishment and more generally across the construction industry.
- gg. The Building Regulations have introduced requirements for competence of Principal Designers and Principal Contractors and guidance has been introduced but this is still evolving.
- hh. The Inquiry recognises that competence and understanding of fire safety must be at all levels and recommends that the government, working in collaboration with industry and professional bodies, encourage the development of courses in the principles of fire engineering for construction professionals and as part of their continuing professional development.
- ii. In H&F, we are supporting staff in their training and continuing professional development. We benefit from specialist teams with experience in the sector and recognise the need to continue to keep pace with new regulations and guidance.

Fire control switches in lifts

- jj. All modern lifts are fitted with fire control switches designed to be operated by drop keys to enable the fire and rescue services to take control of them in the event of a fire.
- kk. In H&F housing all our 216 lifts are fitted with drop keys that are compatible and agreed with the London Fire Brigade.

New Legislation

- 32. Significant changes have already been made since the Grenfell tragedy with the introduction of the Building Safety Act, Fire Safety Act, Fire Safety Regulations, Social Housing Regulation Act and the revision of core guidance documents.
- 33. A requirement of the new Building Safety Act is the registration of existing Higher Risk Buildings (HRBs) with the new Building Safety Regulator. In H&F we currently have 49 HRBs, which are all registered with the Regulator. We have been invited to certify 26 of those HRBs and we have submitted the legal documents within the 28-day requirement.
- 34. The Social Housing Regulation Act has health and safety and accountability at its core. It introduces the requirement for a designated health and safety lead, the requirement to submit and publish annual health and safety performance data (Tenant Satisfaction Measures) and Awaab's law (which places prescribed timeframes to address damp and mould).

Resident Engagement and Communication

- 35. The Grenfell tragedy significantly and disproportionately affected residents who were disabled and/or of ethnic minority background and/or children. We need to ensure that safety awareness reaches all and that everyone can evacuate safely if they need to.
- 36. We therefore have written to all residents (and will repeat annually) setting out their evacuation strategy for all properties and providing core advice on fire safety and how to contact us if they would need help evacuating in a fire. The letter provides details on translations and access via QR Codes.
- 37. Our safety-first team proactively works with residents to create a personal emergency evacuation plan (PEEP) in the event of a fire if they are unable to escape of their own accord. To date our primary focus is on higher risk buildings and sheltered but anyone can ask for a PEEP. This information is logged with the London Fire Brigade.
- 38. We work closely with the London Fire Brigade, Borough and station Commanders and have developed in collaboration an online training package called Make Every Contact Count. It is available to frontline officers and our contractors. Through this partnership we are demonstrating how we are working with the fire service, residents to monitor our compliance, review safety practices and improve resident engagement.

Conclusion

- 39. Overall, our performance is very good and we routinely subject ourselves and processes to independent scrutiny.
- 40. We do have a Good safety standard that shows accountability, responsibility and operational grip of competent officers and contractors, and we continue to invest

in training and development.

41. There is much new legislation, which we are adapting to and working to embed. The journey of safety compliance is continuous in its cycle, and we continue to strive to improve data validation and monitoring of systems and safe systems of work.