

**Supplementary Report
for
The Grenfell Tower Inquiry**

**re:
GRENFELL TOWER:
THE FIRE RISK ASSESSMENTS OF CARL STOKES**

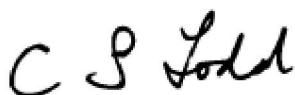


Fire Safety Consultants

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**GRENfell TOWER:
THE FIRE RISK ASSESSMENTS OF CARL STOKES
SUPPLEMENTARY REPORT**

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1. INTRODUCTION

- 1.1 I have prepared this supplementary report on the instructions of the Grenfell Tower Inquiry ("the Inquiry"). The instructions were set out in an email, dated 8 March 2021 and signed by Ms Cathy Kennedy, Deputy Solicitor to the Inquiry.
- 1.2 I previously prepared a report, dated August 2020, on the subject matter of this supplementary report, namely the fire risk assessments for Grenfell Tower, primarily carried out by Carl Stokes. In this connection, I refer the Inquiry to my original instructions from the Inquiry, which were set out at paragraphs 1.2 and 1.3 in my August 2020 report and which remain generally applicable to this supplementary report.
- 1.3 My instructions require that I review 903 witness statements and exhibits, many of which were not previously disclosed to me, and to determine whether, in the light of this additional disclosure, I wish to submit a supplementary report. The additional disclosure does not lead me to change the opinions expressed in the August 2020 report to any greatly material extent. However, for the purpose of completeness and accuracy, I now submit this supplementary report to draw further matters to the attention of the Inquiry and, where appropriate, revise my views accordingly.
- 1.4 The production of this supplementary report is consistent with the reservations set out in paragraph 1.20 of my August 2020 report, namely the right to alter my opinions and conclusions in the light of any further information of which I am, currently, unaware.
- 1.5 This supplementary report is subject to the same statement of truth as contained in my August 2020 report, and I do not believe that any potential conflicts of interest, other than those which I have previously declared to the Inquiry, are relevant to this supplementary report.
- 1.6 For ease of reference, the sections in this supplementary report coincide with certain sections in my August 2020 report. I have re-read that report, and where, in the light of any new evidence disclosed to me, my views have either altered or, to assist the Inquiry, can be supplemented with further information or opinion, I have made this clear within this supplementary report.
- 1.7 Equally, where the information and opinions set out in the relevant sections of my August 2020 report have not changed in the light of new evidence disclosed to me, it can reasonably be assumed that the information and opinions have not changed in the light of new evidence disclosed to me.

2. EXECUTIVE SUMMARY

- 2.1 Nothing within the new evidence amends my understanding of the background to the fire risk assessments (“FRAs”) carried out for Grenfell Tower or the circumstances whereby these FRAs came to be carried out by Carl Stokes.
- 2.2 However, I am now aware that an FRA was carried out on 14 June 2014 by a Leon Taylor, possibly acting on behalf of Savills. In my opinion, Mr Stokes’ FRA was considerably more thorough than that carried out by Mr Taylor.
- 2.3 In general, I remain of the opinion that Mr Stokes was competent to carry out FRAs for blocks of flats, such as Grenfell Tower. However, in my opinion, Mr Stokes was incorrect in his failure to advise, in his fire risk assessment for Adair Tower in 2014, that flat entrance doors should be self-closing; further, it is not credible that this would have been endorsed by London Fire Brigade.
- 2.4 However, Mr Stokes did record, in the 2016 fire risk assessment for Adair Tower, that, in accordance with a Notice issued by LFEPA in October 2015, all flat entrance doors were now fitted with self-closing devices. Moreover, there is ample evidence that, long before 2014, Mr Stokes understood the importance of self-closing devices on flat entrance doors.
- 2.5 Within the new evidence, I have noted an email written by the Team Leader of the LFB Fire Safety Regulation Team that was responsible for enforcement of the Fire Safety Order at Grenfell Tower. In that email, the Team Leader noted that Carl Stokes “*provides excellent fire risk assessments*”. This is consistent with the LFB audit at Grenfell Tower in 2016, which found that Mr Stokes’ FRA was “*broadly compliant*” with Article 9 of the Fire Safety Order.
- 2.6 In my August 2020 report, I referred to the matter of leaseholder flat entrance doors. In this supplementary report, I refer to further evidence regarding the lack of enforcement against leaseholders by LFB.
- 2.7 The new evidence includes a witness statement by the RBKC Senior Lift Engineer, Robin Cahalarn, who stresses that the lifts at Grenfell Tower had not previously been replaced, but had simply been refurbished. In my opinion, this is an important distinction in relation to any suggestion that, in the course of any work carried out, the lifts should have been upgraded to firefighting lifts.
- 2.8 Mr Cahalarn’s witness statement also causes me to revise an opinion, expressed in my August 2020 report, regarding what I previously believed to be a failure by Carl Stokes to ensure that the firemen’s switch on the lifts at Grenfell Tower was regularly tested and/or incorrectly to imply that testing might be carried out. Mr Cahalarn states that the lifts were checked every month by a maintenance contractor and that this included use of the standard drop key to test the firemen’s switch. If the Inquiry accept the evidence of Mr Cahalarn, this switch was, in my opinion, subject to adequate routine testing, such that the statement in Mr Stokes’ FRA was, in effect, correct.

- 2.9 In my August 2020 report, I made extensive reference to the use of the LGA Guide by Carl Stokes, while offering no justification, in my report, for the reasons that this was appropriate. I am now aware that the status of the LGA Guide has been challenged.
- 2.10 I do not accept, as valid, any such challenge. In contrast, the Sleeping Accommodation Guide only provides recommendations for means of escape in blocks of flats of up to four storeys in height; it provides no recommendations for means of escape in high-rise blocks of flats, such as Grenfell Tower.
- 2.13 It should also be noted that a Government Minister advised the House in the immediate wake of the Grenfell Tower fire that the LGA Guide remained current and should be used. This is also the view of the Government's Expert Panel set up in the wake of the Grenfell Tower tragedy.
- 2.14 Moreover, I am able to advise the Inquiry that, if a fire risk assessor were to fail to recognize that the appropriate guidance to apply to a fire risk assessment for a block of flats was the LGA Guide, they would be rejected by the Institution of Fire Engineers for registration on the Institution's Register of persons competent to carry out fire risk assessments.

3. BACKGROUND TO FIRE RISK ASSESSMENTS AT GRENFELL TOWER

- 3.1 I have found nothing within the new evidence presented to me that materially amends my understanding of the background to the fire risk assessments (FRAs) carried out for Grenfell Tower or the circumstances whereby these FRAs came to be carried out by Carl Stokes. However, I draw attention to further information in the paragraphs that follow.
- 3.2 I refer to the witness statement of Michael Lyons, dated 10 October 2020 (TMO00880532). Mr Lyons was employed by the TMO Repairs Direct as a health and safety manager. He states that he arranged for an FRA to be carried out, on the instructions of Andrew Marshall, managing director of Repairs Direct, by a Leon Taylor at various properties across the Borough, including Grenfell Tower.
- 3.3 Mr Taylor states that this is because Andrew Marshall had some concerns with the previous fire risk assessor (unnamed in Mr Lyons' statement). Mr Lyons had previously worked with Leon Taylor, though exactly in which capacity is unclear. (There is some suggestion that Janice Wray was not aware of this at the time.)
- 3.4 The FRA was carried out by Leon Taylor on 14 June 2014 (TMO10001286). The suggested date for review was 13 June 2015. The documented FRA bore the name and logo of Savills, so it may be that Mr Taylor was an employee, or sub-contractor, of Savills. It appears to follow PAS 79, the BSI guidance on fire risk assessment, to which I referred extensively in my August 2020 report.
- 3.5 Mr Taylor's FRA recommended that arrangements be made for evacuation plans for disabled people, but notably provided no information as to what these might be. Mr Taylor stated that vulnerabilities of occupants were unknown, but that the building was designated as "general needs" and, therefore, the occupants were assumed to be typical of the general population; this is consistent with guidance in PAS 79.
- 3.6 However, in response to a question that appears to have been included within the standard template for the FRA regarding means of escape for disabled people, Mr Taylor responded that there should be a record of all those with special needs in terms of evacuation, and that arrangements be made for evacuation plans "*as per The Housing Act 2004 and if there are any "PEEPs" required*". Notably, Mr Taylor provided no information as to what these arrangements might be.
- 3.7 Mr Taylor recorded that the design of the means of escape was deemed to be satisfactory (considering current design codes) and that escape routes were adequately protected. He also recorded that most flat entrance doors had been replaced with "*modern fire doors*" but that those that had not been replaced appeared to be "*adequate notional FD20 fire doors*".

- 3.8 However, in apparent conflict with the above information, Mr Taylor recommended that, as a high priority, intumescent strips and cold smoke seals be fitted to doors that had not been replaced to achieve an FD30S standard. It was further stated that, if such upgrades did not achieve an FD30S standard, *"...then full door set must be fitted"*. He also recorded that these doors and all new doors were to be FD30S self-closing doors, noting that, from samples inspected, new flat entrance doors had their self-closing mechanisms disconnected and notional fire doors did not have self-closing devices.
- 3.9 Similarly, again in apparent conflict with verification that escape routes were adequately protected, Mr Taylor recommended that, as a high priority, doors to the stairway should be fitted with intumescent strips and smoke seals.
- 3.10 Mr Taylor recommended a complete overhaul of fire safety signage within the block due to lack of directional signage, escape information, fire action notices etc. This, in conjunction with premises information for attending emergency services, was allocated a high priority. Mr Taylor (correctly in my opinion) recorded that common area fire detection was not practicable as a result of the "stay put" policy, and that the fire detection should be reconfigured; it was stated that smoke detection in all lobby areas was incorporated within the fire alarm system for the premises and appeared out of date for the "stay put" strategy.
- 3.11 The template used by Mr Taylor set out various questions concerning fire safety management. For some reason, there was no response recorded by Mr Taylor in respect of these matters.
- 3.12 Within a short period of the FRA carried out by Mr Taylor, an FRA was carried out by Carl Stokes on 17 October 2014. In my opinion, Mr Stokes' FRA was considerably more thorough than that carried out by Mr Taylor and does not, for example, contain the contradiction in Mr Taylor's FRA, in which notional fire doors were deemed to be adequate but then were recommended for upgrading or replacement as a high priority.
- 3.13 With regard to the matter of self-closing devices, Mr Stokes' FRA recorded that the new flat entrance doors were self-closing and that the original doors present were, in the case of those observed, fitted with a "Perko" self-closing device. This is a proprietary name for what is more generically known as a concealed jamb self-closing device, which, by definition, is not always immediately obvious.

4. COMPETENCE OF CARL STOKES

- 4.1 In general, I remain of the opinion that Mr Stokes was competent to carry out FRAs for blocks of flats, such as Grenfell Tower. Indeed, from my continuing scrutiny of FRAs for blocks of flats and those responsible for carrying them out, I would certainly regard Mr Stokes as of greater competence than many fire risk assessors who are, even today, engaged to carry out FRAs for blocks of flats, though, arguably, this is, to some extent, a reflection on standards of competence amongst fire risk assessors.
- 4.2 However, for objectivity and completeness, I draw the attention of the Inquiry to what might have been an error on the part of Mr Stokes in relation to his FRA for Adair Tower, another RBKC high-rise block of flats. In connection with this possible error, I draw the attention of the Inquiry to the following:
- In an email chain (LFB00001610) incorporating an email dated 1 November 2015 to Andy Jack, Nicholas Coombe, Nicolas Comery and Spencer Sutcliffe, Rebecca Burton of London Fire Brigade states that, in Carl Stokes' FRA for Adair Tower, Mr Stokes states that flat entrance doors were not self-closing ("*as agreed with LFB*").
 - In an email within the above chain, dated 2 November 2015, Nicholas Coombe replied to all of the above stating "*I doubt whether Andy or Nick would have accepted this*". I am familiar with the roles of both Andy Jack and Nicolas Comery, and I strongly share the doubt expressed by Mr Coombe, though, if this is considered relevant by the Inquiry, it would clearly be a matter for evidence of fact.
 - In a further email within the above chain, dated 2 November 2015, Andy Jack states that "*we certainly would not have given the green light to specific arrangements in individual premises*". (As an aside, I would note that Mr Jack refers to his recollection of some correspondence, in which the then CLG told RBKC that "we" (i.e. LFB) could enforce/prosecute RBKC for not enforcing under the HHSRS (Housing Health and Safety Rating System). I find this notion a little surprising, but draw it to the attention of the Inquiry lest it be considered relevant.)
 - In a further email chain (LFB00003463), Mr Comery, in an email, dated 4 November 2015, to the above parties advised that he had no recollection of not requiring flat front doors to be self-closing.
- 4.3 I have examined the FRA for Adair Tower carried out by Mr Stokes on 20 February 2014 (LFB00054661). The template for recording the significant findings of the FRA (a variant of that contained in PAS 79) records that dwelling entrance doors appear to be fire rated, but there is no comment as to whether or not they were self-closing. Indeed, in relation to, where appropriate, fire doors were fitted with self-closing devices that functioned correctly, this is recorded in the FRA as N/A.
- 4.4 This cannot be correct as it would be applicable for any stairway doors to be self-closing. However, the Inquiry might feel that the "N/A" is consistent with

the comment by LFB that Mr Stokes was of the impression that flat entrance doors did not need to be self-closing. Indeed, the narrative in the FRA does actually record that flat entrance doors are not fitted with self-closing devices, without further comment.

- 4.5 I find it difficult to conceive that LFB would endorse the absence of self-closing devices from flat entrance doors in a high-rise block of flats, and I have been unable to find a reference within the FRA to the effect that this was accepted by LFB. Moreover, I find it surprising that the absence of self-closing devices did not appear to be of concern to Mr Stokes. For example, there are no recommendations in the action plan of this FRA for them to be fitted (LFB00054665).
- 4.6 Nevertheless, for objectivity, I refer to the FRA that Mr Stokes carried out at Adair Tower on 20 September 2016. In the findings of this FRA, Mr Stokes refers to a Notice of Fire Safety Deficiencies issued by LFEPA on 12 October 2015. Mr Stokes records that an action to which this Notice refers is the fitting of self-closing devices to flat entrance doors. Mr Stokes further records that this matter has been actioned and that all flat entrance doors in the building were now fitted with self-closing devices.
- 4.7 Furthermore, in drawing the attention of the Inquiry to this matter, I do not, in any way, suggest that Mr Stokes did not appreciate the need for flat entrance doors at Grenfell Tower to be self-closing. In fact, the contrary is the case.
- 4.8 Moreover, within the additional disclosure, there is evidence that Mr Stokes understood the importance of self-closing devices on doors to flats generally long before 2014. For example, in an email chain that incorporates an email, dated 4 August 2011, from Carl Stokes to Abigail Acosta and Janice Wray, Mr Stokes advised that self-closing devices could not be removed from a door that a disabled person found quite heavy (TMO0073633).
- 4.9 Finally, in relation to my view, consistently expressed, regarding the competence of Carl Stokes, it is relevant to note that my view was shared by the Team Leader of LFB's Hammersmith & Fulham & Chelsea Fire Safety Regulation Team, Nick Comery. In an email from Mr Comery to Andy Jack of LFB, dated 8 May 2013, Mr Comery stated:

"....I acknowledge that the fire risk assessor Carl Stokes provides excellent fire risk assessments..."

- 4.10 This is consistent with the findings of the report of the LFB audit under the Fire Safety Order carried out at Grenfell Tower on 3 November 2016. The report recorded that the fire risk assessment for the building was broadly compliant with Article 9 of the Fire Safety Order. As an aside, I would note that the audit recorded that both of the lifts in the building were firefighting lifts, further supporting my view as to the confusion regarding types of lifts provided in existing buildings for use by the fire and rescue service (see also section 5 of this current report).

5. FIRE RISK ASSESSMENTS CARRIED OUT BY CARL STOKES

5.1 In paragraphs 3.13-3.19 of my August 2020 report, I asserted that, the external walls of a block of flats were outwith the scope of the Fire Safety Order and, hence the fire risk assessments carried out by Carl Stokes. In those paragraphs, I cited various support for my assertion.

5.2 Having studied the additional evidence presented to me, I now wish to add to the support for my assertion. This additional support takes the form of an email, dated 3 July 2013, from Louise Upton of DCLG to Cynthia Vachino, Solicitor, Legal Services, RBKC. The email states that;

"Although ultimately, only the Courts can decide, we have no evidence to suggest that Fire Safety Order (sic) was intended to apply generally to the structure of a block of flats."

5.3 The email goes on to apparently argue that the external walls of domestic premises are part of the domestic premises (and, hence, would be outwith the scope of the Fire Safety Order).

5.4 I would also cite this email as further support for my opinion on the government position in respect of the then Fire Safety Bill (now the Fire Safety Act 2021), namely that the Bill would "*clarify*" that the external walls fall within the scope of the Fire Safety Order. In paragraph 3.19 of my August 2020 report, I described the government position as disingenuous and further suggested that the amendment to the Fire safety Order in question is a reinterpretation or extension of scope of the Order. I continue to hold that opinion.

5.5 In paragraphs 8.43-8.54 of my August 2020 report, I discussed at some length the issue of leaseholder flat entrance doors and difficulties than can arise in requiring leaseholders to take action in respect of doors with inadequate fire performance. In that connection, as argued in the LGA Guide on fire safety in purpose-built blocks of flats, I discussed the potential for an enforcing authority to take action against a leaseholder, in that the latter is, arguably, a person of the character described in Article 5(3) of the Fire Safety Order.

5.6 The additional evidence with which I have been presented contains some significant correspondence in relation to the position of LFB on that matter, a position to which I referred in the paragraphs of my August 2020 report, to which I referred above. In this connection, I draw attention to the following documents:

- LFB00054623;
- LFB00054625;
- LFB00054640; and
- LFB00054648.

- 5.7 It is clear from this and other correspondence that, while Matt Ramsey of LFB had prepared a Notice of Deficiencies to serve on RBKC in relation to flat entrance doors at one of their blocks of flats, he was instructed not to do so, pending resolution of the correct route to follow. It is also clear that LFB were not fully confident that leaseholders are “Article 5(3) persons”, as believed by RBKC, who appeared to consider use of the Housing Act for enforcement in relation to flat entrance doors burdensome (given that the Housing Health and Safety Rating System required consideration of 29 different hazards, only one of which was fire, in application of the system to flats).
- 5.8 It is also clear that LFB took a policy view to enforce against the Council rather than the leaseholders, on the basis of what, in an email from Mr Jack of LFB, dated 16 August 2013, was stated by Mr Jack to be the knowledge that the Council had legal routes open to them to achieve compliance; this appears to refer primarily to an understanding by LFB that the Council had relevant powers under the lease. (As discussed in my August 2020 report, my own personal experience of advice from property law experts is that freeholders do not normally have such powers.)
- 5.9 In paragraphs 8.56-8.73 of my August 2020 report, I discussed at length the subject of the lifts at Grenfell Tower and the mis-description of the lifts as firefighting lifts by Carl Stokes. In this connection, I have now read the witness statement of Robin Cahalarn, the Senior Lift Engineer at RBKC, dated 7 January 2020 (TMO00866023).
- 5.10 I draw attention to Mr Cahalarn’s distinction between the refurbishment of these lifts that was carried out, as opposed to replacement of the lifts (as occurred in the case of the hydraulic lift). In my opinion, this is a very important distinction, particularly in relation to any suggestion that the lifts should, at the time in question, have been upgraded to firefighting lifts.
- 5.11 In paragraphs 8.80-8.87 of my August 2020 report, I expressed some doubt regarding the view of Mr Stokes that the lifts would be checked by lift engineers every month and that this would have involved testing the operation of the firemen’s switch on the lift. In this connection, I refer, in particular, to paragraph 8.85 of my report.
- 5.12 If the Public Inquiry accepts the evidence in Mr Cahalarn’s witness statement, I may have done Mr Stokes a disservice, to which I now draw attention. In this connection, Mr Cahalarn states that the RBKC maintenance contractor, ILS, (and not, presumably, specialist lift engineers) checked all RBKC lifts every month and that this check did, indeed, as expected by Mr Stokes, include use of the standard drop key.
- 5.13 On the other hand, I also draw attention to Mr Stokes’ expectation that ESAs would test the lift switch. In this connection, I have now read the witness statement of the ESA, Paul Steadman, dated 12 May 2020 (TMO 00870944). Mr Steadman states that the drop key he checked routinely was that for the main entrance doors to the Tower and not the drop key for the lifts.

- 5.14 Notwithstanding the above, in my opinion, monthly testing of a firemen's switch on a lift is adequate (and is, indeed, the frequency in proposals put out to public consultation by the Home Office for new legislation to implement the findings of Phase 1 of the Public Inquiry). Under the circumstances, when Carl Stokes recorded in his fire risk assessment for Grenfell Tower that the firemen's switch was inspected monthly, in the light of Mr Cahalarn's evidence (and contrary to my original opinion), implicit in this inspection was the testing of the switch.

6. USE OF THE LGA GUIDE BY CARL STOKES

- 6.1 In my August 2020 report, I made extensive reference to use of the Local Government Association Guide "*Fire safety in purpose-built blocks of flats*" ("the LGA Guide") by Carl Stokes. At that time, I did not endeavour to justify the use of this guidance, as, in my experience, it was universally accepted by those competent in the practice of fire safety in purpose-built blocks of flats, and in fire risk assessments for these premises, that this was the appropriate guidance for Carl Stokes to use.
- 6.2 Subsequent to my August 2020 report, I have become aware that doubts have been expressed regarding the fitness for purpose of the LGA Guide to advise on fire safety within Grenfell Tower and/or a suggestion that the "Sleeping Accommodation Guide", produced by the CLG in 2006, should have been used for this purpose. In this connection, I am aware that the Sleeping Accommodation Guide was reprinted in 2015.
- 6.3 I wish to make it clear to the Public Inquiry that I regard any suggestion that the LGA Guide was not the most appropriate Guide on which to base fire safety at Grenfell Tower as wrong. In that connection, I would note that my understanding is that the 2015 reprint of the "Sleeping Accommodation" Guide arose, quite simply, because the publishers had run out of copies. My further understanding is that the Guide was not subject to any review before reprinting to continue to make it available in hard copy. Accordingly, its reprinting did not somehow change its status in relation to purpose-built blocks of flats, which formed only a small part of the scope of the Guide, which was more concerned with premises, such as hotels, hostels, etc.
- 6.4 I do not accept the suggestion that the LGA Guide was not a primary reference source on fire safety in purpose-built blocks of flats. Such is the overwhelming weight of evidence available to support my assertion to the contrary, I do not wish to burden the Public Inquiry with such weight of evidence.
- 6.5 However, I do draw attention to a small number of key factors, which, alone, support my view. In this connection:
- As managing director of the consulting practice contracted to draft the LGA Guide, I can assure the Public Inquiry, categorically, that the need for the LGA Guide, and the urgency with which it was required, arose from the view of the Government department responsible for the Sleeping Accommodation Guide that, in the wake of the Lakanal House fire, the Sleeping Accommodation Guide was not fit for the purpose of advising on fire safety in purpose-built blocks of flats.
 - As is generally known by competent practitioners in fire safety, the recommendations in the Sleeping Accommodation Guide are only relevant for blocks of flats up to four storeys in height. Accordingly, this Guide could not be used (or certainly used in full) for high-rise blocks of flats, such as Grenfell Tower; only the LGA Guide provides guidance on means of escape and compartmentation in buildings such as Grenfell Tower.

- I have previously disclosed to the Public Inquiry correspondence from DCLG, the Fire Sector Federation and the representative of the then Chief Fire Officers' Association on the Project Board for preparation of the LGA Guide that supports the view I have expressed above in relation to the lack of suitability of the Sleeping Accommodation Guide as the basis for fire safety in purpose-built blocks of flats.
- Moreover, within that correspondence, the Chairman of the Fire Sector Federation Technical Guidance Steering Group, Mr D. Sibert, refers to the LGA Guide as superseding the Sleeping Accommodation Guide. (At the time, Mr Sibert's full time job was Fire Safety Advisor for the Fire Brigades Union.)
- In the immediate wake of the Grenfell Tower tragedy, the relevant Government Minister advised the House regarding the LGA Guide in the following terms¹:

"As the hon. Member for Poplar and Limehouse said, there was also a discussion about the coroner's recommendations following the fire at Lakanal House in 2009. The Government took action in a number of areas following that fire. In particular, DCLG provided funding to enable the Local Government Association, in partnership with the housing sector and enforcement authorities, to publish new fire safety guidance for purpose-built flat blocks in 2011. That guidance is still current, and hon. Members may well have seen the letter my Department sent to housing associations and local authorities on 18 June, which clearly referenced that guidance. Of course, I urge all housing providers to ensure that they are following that guidance."

- The position, as set out by the Minister, has not changed since that time. For example, in the Consolidated Advice Note, dated January 2020, produced by the MHCLG Expert Panel set up by Government in the wake of the Grenfell Tower tragedy, it continues to be recommended that fire risk assessments for blocks of flats should take into account the principles set out in the LGA Guide. Indeed, the Consolidated Advice Note goes further and states that any such risk assessment should take into account the likely performance of the external wall, as set out in section 72 of the LGA guidance.

That section, ever since publication of the LGA Guide in 2011, has drawn attention to the fire hazard of rainscreen cladding, a matter to which the Sleeping Accommodation guide makes no reference.

6.6 As the Public Inquiry is aware, I am Chairman (though, currently, stepping down to become Vice Chairman) of the Institution of Fire Engineers ("IFE") Panel responsible for registration of fire risk assessors as competent to carry out fire risk assessments. As such, I am able to inform the Public Inquiry that any applicant for registration by the IFE as a competent fire risk assessor would be rejected for registration by the Institution if they failed to recognize the LGA Guide as the appropriate guidance to apply in carrying out a fire risk assessment for a purpose-built block of flats, or if they considered that the appropriate guidance to apply was the Sleeping Accommodation Guide.

¹ Hansard, 26 June 2017. Volume 626. Column 435.

- 6.7 For avoidance of doubt, the above assertion is not hypothetical. In consultation with the current Vice Chairman of the Panel, he and I carry out routine audits of completed applications for registration as part of the Institution's quality assurance process. I am aware of a small number of circumstances, in which an applicant for registration failed to recognize the LGA Guide as the appropriate guidance and was, accordingly, rejected for registration on the basis that they were not competent to carry out a fire risk assessment for a purpose-built block of flats. In these quality assurance audits, neither I nor the Vice Chairman even considered challenging the decision of the various interviewers in this respect.