



GRENFELL TOWER INQUIRY RT

Day 215

December 7, 2021

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1 Tuesday, 7 December 2021  
2 (10.00 am)  
3 SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to  
4 today's hearing.  
5 Today we're going to hear opening statements from  
6 three further core participants, beginning with  
7 Mr Matthew Butt Queen's Counsel on behalf of the  
8 National House Building Council.  
9 Good morning, Mr Butt.  
10 MR BUTT: Good morning, sir.  
11 SIR MARTIN MOORE—BICK: You're ready to make your opening  
12 statement?  
13 MR BUTT: I am, sir, yes.  
14 SIR MARTIN MOORE—BICK: Good, thank you. Well, that's it,  
15 get yourself organised, take your time, and then when  
16 you're ready.  
17 Module 6 (Testing, Government & FRA) on behalf of the  
18 National House Building Council by MR BUTT  
19 MR BUTT: Thank you, sir.  
20 On behalf of NHBC, I would like to begin by  
21 expressing my clients' deepest condolences to all of  
22 those who lost loved ones in the Grenfell Tower fire, to  
23 the survivors of the fire, and to all of those affected  
24 by this tragedy.  
25 It is crucial that the construction industry learns

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1 from the events that took so many lives. Whilst NHBC  
2 was not involved in the refurbishment of the  
3 Grenfell Tower, as part of Module 6, this Inquiry will  
4 of course explore its role in the context of the wider  
5 house—building industry.  
6 It goes without saying the Grenfell Tower fire  
7 should never have happened. NHBC's view is that more  
8 should have been done by the house—building industry as  
9 a whole, and by both national and local government, to  
10 ensure the strictest compliance with Building  
11 Regulations and to promote fire safety.  
12 In the introduction to our written opening, NHBC  
13 acknowledges it should both have acted more swiftly and  
14 been more assertive with manufacturers such as Kingspan.  
15 It's also acknowledged, based upon what is now known,  
16 that some option 3 desktop assessments in the industry  
17 were not as rigorous as they should have been, and  
18 I will address these matters briefly in opening, and  
19 also briefly examine NHBC's internal procedures for  
20 ensuring desktop assessments it received were of the  
21 required standard.  
22 NHBC was established in 1936 with the purpose of  
23 improving construction quality in the house—building  
24 industry. NHBC today employs around 1,200 people and  
25 provides services across the UK. NHBC has no

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1 shareholders and is non—profit distributing. NHBC is  
2 independent from both government and companies within  
3 the construction industry and aims to fulfil a range of  
4 roles. These include, first of all, providing warranty  
5 cover; secondly, providing building control services;  
6 and, thirdly, providing construction quality and  
7 training services.  
8 NHBC has a working relationship with what is now the  
9 Department for Levelling Up, Housing and Communities,  
10 previously MHCLG, given that is the government body  
11 which oversees the Building Regulation process, and NHBC  
12 building control services is an approved inspector whose  
13 role is to assess individual buildings for compliance  
14 with the Building Regulations.  
15 Like any building control body, including local  
16 authority building control bodies, approved inspectors  
17 are required to take such steps as are reasonable to  
18 enable them to be satisfied within the limits of  
19 professional skill and care that the building works in  
20 question comply with the relevant part of the  
21 Building Regulations. The approved inspector issues  
22 a final certificate to the local authority when it's  
23 satisfied those works are complete. However, it remains  
24 the builder's responsibility to ensure those works do  
25 comply with the Building Regulations. A building

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1 control body cannot provide a guarantee of compliance  
2 with the regulations, and the process does not remove  
3 the obligation of the person carrying out the work to  
4 achieve compliance.  
5 Within our written opening, at paragraphs 13 to 14,  
6 we make some general introductory remarks in relation to  
7 the Building Regulations and approved documents, which  
8 all involved in this Inquiry will be well familiar with.  
9 The regulations focus on how a building should perform  
10 and set functional requirements. The approved documents  
11 go on to provide information and guidance on some of the  
12 ways to demonstrate compliance with the regulations.  
13 There is no compulsory route or routes to demonstrating  
14 compliance, so the builder can consider a range of  
15 methods. NHBC provides guidance to its own builder  
16 customers in this regard to help them comply with  
17 Building Regulations and to meet NHBC warranty standards  
18 in respect of their developments.  
19 In terms of the BCA, the BCA was founded in 2008.  
20 It is a cross—industry, non—profit group which works to  
21 address relevant industry issues within the industry  
22 with a single voice. NHBC is not and never has been  
23 a member of the BCA, but some of its staff, including  
24 Steve Evans, currently the head of technical operations,  
25 and Diane Marshall, currently the operations director,

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have close links with and played roles within the BCA during the relevant period, and you will hear from both of those witnesses during the Inquiry.

BCA Technical Guidance Note 18 was published in June 2014 and revised in June 2015. This guidance sets out approaches to achieving compliance with Approved Document B for external wall systems on buildings with a storey over 18 metres. Options 1 and 2 are the linear approaches to compliance permitted under paragraph 12.5 of ADB. As the panel will be well aware, option 1 involved using materials of limited combustibility; option 2 required testing to BS 8414 as evidence of the system's classification to BR 135.

In the years prior to 2014, it became clear to building control bodies that the linear routes to compliance were not able to deal with the extensive number of different combinations of supporting structure, insulation and cladding finishes that were being specified. A wider range of façades was being used within the industry and it was necessary regularly to consider whether these were compliant with the Building Regulations. Therefore, the BCA developed guidance which explained what the range of industry bodies involved in the BCA considered were acceptable ways, in accordance with ADB, of providing evidence that

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could demonstrate compliance with the Building Regulations.

In June 2014, the BCA published issue 0 of the BCA Guidance Note 18. This set out a third option or approach to demonstrating compliance with the Building Regulations, known as option 3. This was a desktop assessment of the cladding system based on test data, and was based on paragraph 1 of appendix A of ADB, which we set out at paragraph 25 of our written opening. The assessment was to be carried out by a suitable, independent UKAS accredited testing body, and based on reasoned arguments or facts and not opinion. The fire engineer would then issue a report that should demonstrate equivalent performance to BR 135—compliant systems. Technical Guidance Note 18 specifically stated that it may not be of benefit if the products had not already been tested in multiple situations and that the report must specify the actual tests.

Where option 3 desktop assessments were provided by NHBC's builder customers to NHBC building control services, the internal procedure was that a fire engineer, generally John Lewis, would review each option 3 assessment. He would then escalate it to Steve Evans for a further review, who would further

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escalate it for formal internal sign-off by a senior manager, usually Diane Marshall or Ian Davis in his then role as operations director at NHBC. This was to ensure that any evidence received by NHBC, including but not limited to those option 3 reports, was appropriate and robust in accordance with its legal obligations set out in the regulations.

The desktop assessments relied upon the underlying tests being conducted properly. NHBC is now aware, based on evidence submitted to this Inquiry, of how some manufacturers approached BS 8414 tests. The Inquiry has heard, for instance, how Kingspan's 2005 test used a different version of K15 to that which was available on the market. NHBC can see with hindsight how option 3 was capable of abuse if unscrupulous manufacturers went to such lengths. Used appropriately, and with the rigour that a building control body should apply, option 3 was, however, a valid approach to compliance with the Building Regulations.

There became a concern about the capacity of UKAS accredited testing houses to deal with the volume of requests for option 3 reports. That resulted in the BCA guidance note being amended in June 2015 to reflect the guidance within ADB that option 3 desktop assessments could be undertaken by any suitably qualified fire

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engineer.

That 2015 re-issue also added option 4. This allowed a suitably qualified fire engineer to consider the building as a whole, rather than just the external wall make-ups. Option 4 reflected paragraphs 0.30 and 0.31 of the introduction to Approved Document B. The BCA expected the fire engineered solution to be at least as robust as options 1 to 3.

The production of the BCA guidance note involved input from all of the industry organisations represented through the BCA. Draft and final versions were also shared with MHCLG, given its role in overseeing the Building Regulation process and drafting the Building Regulations. The Ministry expressed no concerns about either the 2014 or 2015 BCA guidance notes.

In his statement to this Inquiry, Brian Martin says of the BCA guidance that he found no reason to disagree with its contents and was satisfied appropriate guidance was being given to the industry. Mr Martin's view was that option 4 was not a new method of compliance. It is correct that Mr Martin discussed with NHBC concerns regarding some desktop assessments being produced within the industry, but these concerns did not relate to sites for which NHBC was the building control body.

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1 Having learned of these concerns, Steve Evans  
 2 addressed them at the Façades to Tall Buildings  
 3 Conference in July 2014. Mr Martin said of this  
 4 presentation that he "hoped this would improve the  
 5 industry's understanding and provide clarity until the  
 6 issue could be addressed by way of a review of ADB".  
 7 In order to perform a building control function,  
 8 it's necessary for any building control body to  
 9 interpret the Building Regulations. The industry,  
 10 including NHBC, recognised that the approved documents  
 11 are not prescriptive, and are not updated frequently  
 12 enough to provide guidance on all new products or  
 13 methods of construction. The approved documents,  
 14 therefore, need to be interpreted and applied by  
 15 building control bodies to assess the practical methods  
 16 of construction submitted to them for consideration.  
 17 NHBC produced both internal and external guidance  
 18 for its builder customers in this respect. NHBC's  
 19 guidance B500 is an example of internal guidance. This  
 20 was issued on 27 March 2015 to inform NHBC personnel as  
 21 to the process to adopt for considering residential  
 22 projects with a floor over 18 metres in height. Unlike  
 23 the BCA guidance notes that we've looked at, NHBC's  
 24 external guidance was not for use by the industry as  
 25 a whole; rather, it was solely for NHBC's own builder

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1 customers. The purpose of that external guidance was to  
 2 set out in a transparent manner what NHBC required  
 3 before it would agree to provide warranty cover or  
 4 before it would issue a building control final  
 5 certificate when acting as approved inspector.  
 6 In terms of the warranty, if a builder met the  
 7 criteria for NHBC registration and followed NHBC's  
 8 standards, then NHBC would be willing to offer cover.  
 9 For building control services, if the builder could show  
 10 that they had followed NHBC's standards, then NHBC was  
 11 likely to accept the project, but this was never  
 12 a foregone conclusion. NHBC would always check each  
 13 project on a case-by-case basis and apply its own  
 14 internal escalation process.  
 15 NHBC was aware that other organisations at times  
 16 used or referred to its guidance as a benchmark, but it  
 17 never promoted its guidance for use in this way and  
 18 could have no idea what internal checks would be in  
 19 place if others tried to replicate NHBC procedures or  
 20 part of them.  
 21 NHBC guidance relevant to this Inquiry includes,  
 22 first of all, the March 2015 letter sent to NHBC's  
 23 builder customers, which provided guidance in relation  
 24 to the use of combustible material within the external  
 25 walls of residential buildings over 18 metres in height,

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1 which we address at paragraph 47 of our written opening,  
 2 and the 2016 NHBC guidance note entitled "Acceptability  
 3 of common wall constructions containing combustible  
 4 materials in high-rise buildings", which we address from  
 5 paragraph 48 onwards of our note.

6 In terms of Kingspan, NHBC was aware that K15 was  
 7 widely used within the house-building industry and was  
 8 indeed the market-leading product. Difficult issues  
 9 with combustible insulation arose when the  
 10 BBA certificate for K15 changed. Prior to these issues  
 11 arising, NHBC's position on accepting K15 on buildings  
 12 over 18 metres was that there was a current  
 13 BBA certificate for the product, indicating that it was  
 14 acceptable for use on buildings over 18 metres in  
 15 accordance with ADB, subject to advice being sought from  
 16 the certificate holder. Therefore, providing that  
 17 Kingspan gave the appropriate confirmation, NHBC would  
 18 deem that the builder had demonstrated compliance with  
 19 the regulations, and accept the use of K15 on projects  
 20 over 18 metres, subject to NHBC being satisfied through  
 21 its other site-specific checks. Regulation 7 of the  
 22 Building Regulations permitted reliance on such  
 23 certificates, which NHBC accepted, the BBA being  
 24 a reputable independent accreditation organisation.

25 NHBC became aware in early 2014 that the requirement

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1 to seek the approval of the manufacturer had been  
 2 removed from K15's BBA certificate. This caused  
 3 concern, as the BBA certificate was based on a single  
 4 BS 8414-1 test for cladding fixed to masonry. In NHBC's  
 5 view, this limited the use of K15 on buildings with  
 6 a floor over 18 metres to those where the wall make-up  
 7 was identical to the corresponding test. However,  
 8 Kingspan, through its marketing and technical  
 9 literature, was suggesting that K15 could be used on all  
 10 buildings.

11 Initially, NHBC accepted Kingspan at its word and  
 12 sought to discuss its concerns arising from the change  
 13 to the BBA certificate with Kingspan. Far from there  
 14 being a lack of concern on the part of NHBC about  
 15 fire safety, the matter was being raised with Kingspan  
 16 in the first place because of such concern. NHBC was  
 17 aware that there were many buildings under development  
 18 where K15 was being used, and wanted to ensure that it  
 19 was in a position to provide its builder customers with  
 20 accurate information and appropriate guidance. NHBC  
 21 made considerable efforts to push Kingspan to provide  
 22 substantiating evidence or undertake further testing and  
 23 provide information to address its concerns. These  
 24 efforts are detailed in the minutes of these meetings,  
 25 which will be explored with the NHBC witnesses.

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1 What followed shows that Kingspan was not being  
2 co-operative and sought either to delay or frustrate  
3 NHBC's enquiries. NHBC began to suspect that Kingspan  
4 was being less than full and frank, and later that  
5 Kingspan was likely to be concealing test data from it.  
6 Furthermore, no adequate explanation had been provided  
7 by Kingspan or by the BBA as to why the BBA had changed  
8 the certificate for K15 and removed the requirement for  
9 approval from the manufacturer. In hindsight, NHBC  
10 recognises that it should have been more assertive with  
11 Kingspan.

12 Kingspan's refusal to comply with these requests led  
13 to NHBC's decision in February 2015 to change its  
14 approach and insist on compliance with one of the BCA  
15 guidance note options for projects submitted after  
16 1 January 2014. Kingspan's response was to instruct  
17 lawyers to threaten an injunction in relation to NHBC  
18 making statements to its builder customers about K15.  
19 This did not deter NHBC from changing its approach and,  
20 despite Kingspan's threats, NHBC's change in approach  
21 was communicated to its builder customers in the  
22 March 2015 letter.

23 NHBC's procedures in terms of dealing with products  
24 such as Kingspan K15 on its own projects were robust  
25 under NHBC's internal escalation procedure, and in

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1 circumstances where NHBC was not satisfied, it  
2 challenged the builder.

3 In July 2016, NHBC issued a guidance note. This was  
4 never intended to be industry guidance; it was written  
5 on the basis that it would be guidance for NHBC's  
6 builder customers only, and therefore issued on the  
7 basis that NHBC could control which products it would  
8 cover or issue a final certificate to, subject to its  
9 own internal checks.

10 The 2016 guidance note came about because, by then,  
11 there had been a year of option 3 desktop assessments  
12 coming in from builders. NHBC had seen its builder  
13 customers engaging fire engineers to provide almost  
14 identical reports or near identical wall make-ups. NHBC  
15 concluded that it could provide guidance that would  
16 cover certain limited wall types so that the same work  
17 did not need to be repeatedly done, provided NHBC was  
18 satisfied that the same wall type was being proposed and  
19 it had seen supporting evidence for this previously.

20 NHBC acknowledges that manufacturers only had  
21 a limited number of BS 8414 tests in relation to their  
22 products. The basis for the 2016 guidance note, though,  
23 was NHBC having considered a large number of option 3  
24 desktop assessments which were both evidence-based and  
25 from a range of experienced and qualified fire

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1 engineers. If customers submitted option 3 assessments  
2 that did not appear to be based on adequate evidence,  
3 NHBC challenged this through its escalation process.

4 The limited number of BS 8414 tests did not change  
5 the fact that NHBC had a large amount of information on  
6 which to base the 2016 guidance note. The body of  
7 evidence from a range of experienced and qualified  
8 fire engineers showed a very high level of agreement in  
9 the fire engineering community regarding what would be  
10 acceptable in closely defined circumstances. NHBC  
11 ensured the requirements in the 2016 note were robust.  
12 If the builder moved away from any of the established  
13 wall make-ups, then it would need to comply with one of  
14 the routes set out in the BCA guidance.

15 Prior to the publication of the 2016 note,  
16 Steve Evans had a meeting with Mr Martin of MHCLG on  
17 30 June 2016 where this was discussed. In his witness  
18 statement, Mr Martin explains his view on the 2016  
19 guidance, that this was a reasonable approach to  
20 satisfying the functional requirements of the  
21 regulations.

22 Prior to the Grenfell Tower fire, NHBC did not  
23 receive any negative feedback in relation to the 2016  
24 guidance note. Whilst the note was only for NHBC  
25 builder customers, the BCA technical group was aware of

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1 the guidance after it was issued and it too raised no  
2 concerns.

3 After the Grenfell Tower fire, the guidance was  
4 withdrawn, pending NHBC obtaining a fuller understanding  
5 of the cause of the fire and assessing whether any  
6 changes to guidance might be appropriate.

7 Concurrently with the issues with Kingspan, NHBC was  
8 also dealing with Celotex and its product, RS5000.  
9 NHBC's concern was that Celotex's marketing literature  
10 suggested that RS5000 was suitable on all wall make-ups  
11 over 18 metres. As with Kingspan K15, the  
12 manufacturer's statements appeared to go beyond the  
13 available tests, and Celotex did not have a BBA  
14 certificate with a condition similar to the original K15  
15 certificate, allowing its use with approval from the  
16 manufacturer. NHBC addressed these concerns by  
17 notifying customers of the change in NHBC's approach in  
18 the March 2015 letter as detailed earlier. If,  
19 therefore, a project with a storey over 18 metres was to  
20 use Celotex, then in order to be accepted by NHBC, it  
21 would have to comply with one of the approaches  
22 specified in the BCA guidance notes and meet the  
23 internal escalation process tests.

24 In relation to the BS 8414 test that Celotex  
25 obtained in May 2014, NHBC is now aware, as a result of

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evidence presented to this Inquiry, that there were magnesium oxide boards and other cladding in the test wall make-up which were not listed in the report. Whilst it might have been theoretically possible to identify the magnesium oxide board as a white panel in one of the photographs in the report, this is not a reasonable expectation of fire engineers at NHBC, when a reputable organisation such as BRE had conducted the test. In the course of this Inquiry, individuals from Celotex have admitted to dishonest conduct regarding the circumstance of the testing of their product.

It has been suggested that the BCA guidance notes create additional routes and/or less robust routes for demonstrating compliance with the Building Regulations, and NHBC would want to make the following points in response:

First of all, options 3 and 4 were allowed under ADB by virtue of paragraph 1 of appendix A and paragraphs 0.30 and 0.31 of the general introduction to ADB respectively.

Secondly, the 2014 and 2015 guidance was issued by the BCA and with the agreement of its constituent bodies, all of whom are highly experienced in the industry.

Thirdly, MHCLG was aware at all times of what was

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proposed in the BCA guidance notes. At no stage was it suggested the BCA was improperly interpreting ADB.

Fourthly, there was a general recognition that ADB required amendment and updating by government. Until this happened, the industry had to use and interpret the existing guidance as best it could, using professional skill and judgment.

Fifthly, the requirement for a desktop study was more rigorous than the procedure under the original BBA certificate for K15, which merely required the manufacturer's approval. Both options 3 and 4 ensured that an external, suitably qualified fire engineer was analysing the situation, rather than just relying on say so from the manufacturer.

Sixth, for its part, NHBC did not simply take what a fire engineer stated in a report at face value. NHBC analysed the report in question carefully, and a fire engineer from NHBC would form his or her own view. NHBC would then take a decision on whether to accept the report as demonstrating compliance with the functional requirements in ADB.

Similarly, there has been criticism of the 2016 NHBC guidance note. This guidance, which only applied to NHBC customers, was based on the principle applied to regulation 7 of the Building Regulations, under which

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past experience can be used to demonstrate that a product can perform the function for which it was intended. NHBC was not creating a separate route to compliance, but instead applying the principle of "deemed to comply" for the purposes of identifying common wall make-ups which would be deemed to comply with the option 3 requirements, which was consistent with approved guidance at the time.

Even if a builder was seeking to rely on the 2016 NHBC guidance to show compliance, that would not automatically mean that NHBC would accept that wall make-up for the purpose of warranty cover or approved inspector services. NHBC staff would still carefully analyse the information submitted in order to form its own view, and the report would be escalated by the fire engineer to Steve Evans and then up to the relevant person in senior management.

It has also been suggested that Kingspan influenced NHBC, including by the threat of the injunction, to water down the guidance. This is not an accurate reflection of the situation. NHBC took the view that engaging with Kingspan at the outset to understand what the situation was with K15 was the correct and professional response. NHBC did not work with Kingspan on the drafting of its guidance. When NHBC appreciated

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fully that Kingspan was not going to co-operate and be transparent, NHBC issued the March 2015 letter to its customers. This was done despite the threat of injunctive action by Kingspan. It is now clear that Kingspan abused its standing and position in the industry to suggest that it was genuinely seeking to demonstrate compliance when this was far from the case.

As I said at the outset, NHBC acknowledges it should have been more assertive with Kingspan and acted more quickly when dealing with this important and difficult issue.

After the fire, NHBC reviewed all of its relevant guidance following the withdrawal of the 2016 NHBC guidance note. This resulted in NHBC issuing new internal guidance in August 2017. The purpose remained the same, which was to aid consistency from NHBC's surveyors and builder customers in applying the NHBC standards and Approved Document B where NHBC was providing warranty or building control services in respect of external walls on buildings with a floor over 18 metres.

In conclusion, NHBC reiterates its commitment to assisting this Inquiry to ensure that what happened at Grenfell Tower never happens again. Improving standards in the house-building industry was and will always be

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1 part of NHBC's core purpose. NHBC is keen to learn any  
 2 lessons it can and to be part of ensuring an improved  
 3 fire safety system in the house—building industry for  
 4 the future.  
 5 Sir, those are my opening comments.  
 6 SIR MARTIN MOORE—BICK: Well, thank you very much indeed,  
 7 Mr Butt. That's very helpful, thank you.  
 8 The next opening statement is going to be made on  
 9 behalf of the Building Research Establishment by  
 10 Ms Samantha Leek Queen's Counsel, and she is going to  
 11 make that statement by video from a remote location, so  
 12 I had better just check that we're in contact with each  
 13 other.  
 14 Good morning, Ms Leek. Can you see me and hear me?  
 15 MS LEEK: I can, sir, good morning.  
 16 SIR MARTIN MOORE—BICK: Good, thank you. Well, we can see  
 17 and hear you, so as soon as you are ready, you can make  
 18 your statement, please. Thank you.  
 19 Module 6 (Testing, Government & FRA) on behalf of the  
 20 Building Research Establishment by MS LEEK  
 21 MS LEEK: Thank you, sir.  
 22 Panel members, in our written opening, we've  
 23 highlighted two matters which BRE seek to draw to your  
 24 attention at the outset of the testing and certification  
 25 and government parts of Module 6. Those two items are,

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1 first of all, an overview of BRE and its work; and,  
 2 secondly, the assistance that BRE believes it can  
 3 provide to the Inquiry on these parts of Module 6.  
 4 Before addressing these two points, as in Module 2,  
 5 I would like to repeat BRE's deeply felt sympathy to  
 6 those who lost loved ones at Grenfell Tower and to the  
 7 survivors of the tragedy and those affected.  
 8 I would also like to say on behalf of BRE that its  
 9 intention remains, as an organisation, to be reflective,  
 10 rather than to be defensive. When I say not defensive,  
 11 I mean that BRE will listen carefully to the evidence  
 12 that will be heard in this module and will acknowledge  
 13 where it considers, with hindsight, that it could or  
 14 should have done things differently. Having heard all  
 15 of the evidence, BRE will also seek to offer candid  
 16 reflection as to how governance and practices within the  
 17 testing, classification and certification regime should  
 18 and realistically could change for the better, including  
 19 the place of BRE within the whole framework for ensuring  
 20 the safety of those who live and work within the built  
 21 environment. Under new leadership since 2019, BRE is  
 22 investing in major improvements to its systems and  
 23 processes.  
 24 Sir, the evidence disclosed for the purposes of  
 25 Modules 6 and 7 of this Inquiry has given BRE further

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1 cause to reflect as to its own practices and what could  
 2 potentially have been done differently. BRE's witnesses  
 3 are still in the processes of considering carefully that  
 4 evidence and will attempt to assist you with the issues  
 5 that have been raised and the criticisms of BRE as  
 6 an organisation.  
 7 May I give you and those listening a very brief  
 8 overview of BRE and its work. I do so to set in context  
 9 the evidence that you will hear in due course about  
 10 BRE's role and relationship with government.  
 11 As you have heard, BRE was formed in 1921 to carry  
 12 out research into building materials and suitable  
 13 methods of construction to build homes. Today, it is  
 14 a multidisciplinary building science centre, with  
 15 a mission to improve buildings and infrastructure.  
 16 Knowledge generated by BRE through independent research  
 17 is used by clients, including government, to create the  
 18 products, standards and qualifications that help to  
 19 ensure that buildings, homes and communities are safe,  
 20 efficient, productive, sustainable and enjoyable places  
 21 to be.  
 22 Having started out as a government agency, BRE was  
 23 privatised in 1997, upon the formation of what is now  
 24 called the BRE Trust. BRE has since then been  
 25 a profit—for-purpose organisation. Any profit from

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1 BRE's work goes to the BRE Trust, which invests in  
 2 research and education programmes for the public  
 3 benefit, carried out by BRE, other research partners and  
 4 universities across the UK. The BRE trust is the  
 5 largest independent charity in the UK dedicated to  
 6 improving the built environment for the benefit of those  
 7 who use it.  
 8 Since 2007, BRE Global Limited has been the testing,  
 9 classification and certification body within BRE. BRE  
 10 Global Limited works in a broad range of areas, with the  
 11 largest being fire and security. In this area, BRE  
 12 Global Limited carries out UKAS accredited testing,  
 13 classification and certification of construction  
 14 products for manufacturers. BRE Global Limited also  
 15 carries out research, including for government  
 16 departments.  
 17 Profits from BRE's business activities are  
 18 gift-aided to the BRE Trust, which, in the last  
 19 24 years, has funded over £20 million of research for  
 20 the public benefit, produced or updated over 300  
 21 publications, and supported more than 300 postgraduate  
 22 students through its university partnerships. Its  
 23 enduring purpose is to contribute to the improvement of  
 24 the built environment.  
 25 Health and safety, referred to with emphasis

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yesterday by Mr Mansfield, are, in essence, at the very core of what BRE does. To some extent, they are its very *raison d'être*. Where this module shows that there are matters which could have been done better, BRE will acknowledge them, accept them and learn from them.

Turning to BRE's assistance to the Inquiry in Module 6.

First of all, testing and certification.

BRE hopes to be able to assist you and the panel to build upon what you have learned from Module 2 about the regime for the fire safety testing and classification of cladding systems. As was made clear in Module 2, BRE did not test or classify the cladding systems that were installed on Grenfell Tower. It was not engaged to do so. In this module, however, BRE hopes to be able to work with the Inquiry to deepen its understanding of the development, operation and oversight of the fire safety testing and classification process for cladding systems. You will recall that we gave an overview of this in part B of BRE's written opening for Module 2.

Mr Millett said in opening yesterday that some core participants appeared to hope that the Inquiry would miss things. That is not, nor has it ever been, BRE's approach to this Inquiry. BRE's sincere hope is that light will be shone into all areas of the building

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industry, and that the evidence heard in Module 6 will form the basis of recommendations to drive forward necessary changes and improvements to the testing, classification and certification regime. Echoing the sentiment of a number of core participants yesterday, it is equally, if not more important that your recommendations are implemented, and implemented quickly.

With regard to the government side of things, BRE and its witnesses believe that they will also be able to assist with the government part of Module 6. As we set out in our written opening, BRE's input and expertise are commissioned by way of research projects for use by third parties, including government departments. For example, BRE's research underpinned the development of BR 135, which was first published in 1988, and originated as a report of research work by BRE in conjunction with the Loss Prevention Board, carried out for the Department of the Environment. BRE also published in 1999 Fire Note 9, entitled "Assessing the fire performance of external cladding systems: a test method". This resulted from a Department of the Environment and industry collaborative research project, and was the first large-scale fire test methodology for external cladding systems. Fire Note 9 set out the

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methodology initially used as the basis for the development of BS 8414-1, which was first published by the British Standards Institution in 2002 following public consultation.

Secondly, BRE has also been commissioned by government to undertake investigations of fires under the government's Investigation of Real Fires programme, which has been running for several decades. As part of this programme, reports are provided to government on fires in the built environment to inform government of fire safety issues observed from real incidents, so that government can take account of issues in the development of the Building Regulations, Approved Document B and any other relevant guidance.

BRE's expertise has, over time, also assisted other public authorities, coroners' courts and public inquiries to understand why fires occurred in the built environment and what lessons can be learned.

BRE emphasises that although it was, until 1997, a government agency, and although its work is commissioned by government, among others, BRE's role has never been to determine policy or make regulations, nor has BRE ever been a regulator. BRE was established to undertake building research, including fire research, which may be used — or not, as the case may be — by

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third parties to fulfil their functions and objectives.

Sir, finally, improvements to the regulatory regime.

BRE understands that Module 6 will explore how the regulatory regime can be improved and how regulatory oversight can be strengthened. I repeat the closing remarks from BRE's oral closings for Module 2: unsafe cladding systems should never have been installed on Grenfell Tower. Those systems did not comply with the applicable Building Regulations, yet were installed by contractors and signed off by building control. The bereaved, survivors and residents and the wider public must be assured that the regulatory regime will be reformed and oversight improved to avoid a repetition of the tragedy at Grenfell Tower.

BRE is committed, both within this Inquiry and outside it, to assisting in the formulation of improvements to the regulatory regime, and BRE looks forward to contributing to Module 6.

Thank you, sir.

SIR MARTIN MOORE-BICK: Well, thank you very much, Ms Leek.

Finally this morning we're going to hear an opening statement on behalf of the Department for Levelling Up, Housing and Communities, made by Mr Jason Beer Queen's Counsel.

Good morning, Mr Beer.

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1 Module 6 (Testing, Government & FRA) on behalf of the  
2 Department for Levelling Up, Housing and Communities  
3 by MR BEER

4 MR BEER: Good morning, sir.

5 As you said, this opening statement is made on  
6 behalf of the Department for Levelling Up, Housing and  
7 Communities, which I shall refer to as "the department".

8 The department is deeply sorry for its past failures  
9 in relation to the oversight of the system that  
10 regulated safety in the construction and refurbishment  
11 of high-rise buildings. It also deeply regrets past  
12 failures in relation to the superintendents of the  
13 building control bodies, which themselves had a key role  
14 in ensuring the safe construction and refurbishment of  
15 such buildings. It apologises to the bereaved,  
16 residents and survivors of the fire for such failures.  
17 This can, of course, neither change what happened, nor  
18 compensate for the immeasurable loss and grief suffered,  
19 but the department believes that it must examine its own  
20 conduct and candidly accept mistakes, errors and  
21 omissions when the Inquiry identifies them.

22 You have seen from the extensive and detailed  
23 written opening statement that the department has sought  
24 itself to identify mistakes made and made efforts to put  
25 them right. The department believes that critical

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1 self-reflection has been necessary throughout, alongside  
2 the commissioning of external and independent reviews of  
3 the building regulatory system. The department,  
4 of course, also set up this Inquiry in order  
5 independently to establish the facts, to identify fault,  
6 and to make recommendations.

7 The department is fully supportive of the work of  
8 the Inquiry and its aims, and will do everything it can  
9 to assist it in its vital work. That is why the  
10 department has disclosed tens of thousands of pages of  
11 documents to the Inquiry and provided dozens of witness  
12 statements from junior civil servants to former  
13 Secretaries of State, thereby opening itself fully to  
14 the scrutiny of this Inquiry and the benefits that that  
15 brings.

16 The public, residents and indeed government trusted  
17 that those constructing and approving high-rise blocks  
18 and supplying the products used in them were following  
19 the law and doing the right thing. This trust was both  
20 misplaced and abused. The department greatly regrets  
21 that it took the Grenfell Tower tragedy to lay bare this  
22 misplaced and abused trust.

23 Reflecting on its role in the issues to be examined  
24 in this part of the Inquiry, the department has asked  
25 itself where its actions contributed to an overarching

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1 building safety system that has subsequently been shown  
2 to be unfit for purpose with catastrophic consequences.  
3 Its work over the past few years has found that the  
4 department did not have a good understanding of how the  
5 regulatory system was working on the ground, nor of how  
6 well it was being enforced by local building control  
7 bodies.

8 Departmental officials fulfilled their  
9 responsibilities in accordance with the legislative  
10 scheme. Their role did not include offering a view  
11 whether individual buildings were compliant. This was  
12 the role of local building control bodies, and the  
13 department did not expect its officials to act as  
14 stewards of the system. The mistaken assumption  
15 underlying the department's approach was that compliance  
16 was being monitored by qualified experts at the local  
17 level, and that non-compliance with the regulations  
18 would be identified by building control inspectors. The  
19 department did not identify any need for it to  
20 superintend the inspectors.

21 This system of local enforcement failed to ensure  
22 that building safety standards were always met,  
23 especially in more complex residential buildings, such  
24 as high-rise blocks of flats, which demand greater  
25 technical competence and more intensive oversight

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1 corresponding to the level of risk.

2 The department accepts that it failed to recognise  
3 the risk that those responsible for complying with and  
4 enforcing the Building Regulations would not diligently  
5 fulfil their respective responsibilities and the  
6 potential consequences should that risk eventuate. The  
7 department further accepts that, having failed to  
8 recognise that risk, it then failed to add a further  
9 layer of assurance to the system. Had there been  
10 a functional enforcement system, with efficient  
11 assurance built in, non-compliance to the extent that  
12 gave rise to the Grenfell Tower tragedy may not have  
13 been possible.

14 The department has asked itself whether it should  
15 have identified the failure in the design of the  
16 regulatory system, most particularly the enforcement  
17 system, and taken steps to remedy it before the tragedy  
18 of Grenfell Tower. The department accepts that, as the  
19 government department which sponsors the building safety  
20 system, it should have had a clear process in place to  
21 collate and aggregate the information that it did  
22 receive, and that obtained individually by local  
23 authorities, to develop its understanding of systemic  
24 compliance and enforcement risks. Had that risk been  
25 identified and properly quantified, it would have been

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the role of the department to propose appropriate legislative change before Parliament, whether, for example, in the form of increased penalties for non-compliance, or in a system of centralised oversight of the compliance and enforcement system. Building safety is too important to leave its enforcement to local authorities without that central oversight, given the risk and consequences of a systemic failure, which increased with the introduction and expansion of competition in the building control market.

However, had the Building Regulations, British Standards and statutory guidance been followed and enforced with reasonable diligence, a large-scale cladding fire could not have happened. In particular, the department's view is that the meaning of the regulations and of ADB read together with the regulations was sufficiently clear at the time of the refurbishment of the tower that no competent professional, acting in good faith, should have misunderstood or misapplied the statutory requirements. A competent professional would have taken appropriate advice in case of uncertainty, not least where the issue involved fire safety.

The department should have done more to take on board the learnings and recommendations triggered by

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other fires, including, in particular, its response to the Lakanal House fire and the coroner's recommendations following it. Similarly, correspondence from the APPG should have been addressed in a timelier manner and with more done to probe the issues raised by it.

Individually, these areas of missed opportunities from the department and across industry may not have caused the fire at Grenfell Tower, but, cumulatively, they created an environment in which such a tragedy was possible.

The department has accordingly listened carefully to the evidence heard so far by the Inquiry and has accepted the criticisms made and the recommendations of the Hackitt Review. The building safety regulatory system was not fit for purpose, and within the construction industry there was a race to the bottom, with profits being prioritised over safety. The department did not interrogate the underlying performance of the system, nor take active steps to assure itself whether the regulatory regime was working as intended. This most definitely is not just a question of the specification of cladding systems, but of an industry that has not reflected and learned for itself.

In the immediate aftermath of the fire, the

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department established the building safety programme directorate, an integrated team of policy, strategy and technical experts working together to ensure that wider priorities are correctly identified and escalated. Since that time, the department has taken a wide range of measures to make the public safe, the most important of which are as follows.

First, it has legislated. The Building Safety Bill was published on 20 July 2020, and the Fire Safety Act 2021 will bring about the biggest improvements in building safety for a generation, including the creation of a new building safety regulator, led by the new chief inspector of buildings, as part of the Health and Safety Executive, to oversee the safe design, construction and occupation of high-rise buildings, and a system of oversight over and regulation of building control bodies and professionals.

The role of the new regulator will be to ensure that residential buildings over 18 metres are safe in terms of both design and construction and occupancy. The building safety regulator will have powers to set rules about what operational standards must be met, and about practices and procedures to be adopted. Local authorities and registered building control approvers will have to adhere to these rules and comply with the

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requirements in the exercise of their duties and functions. The building safety regulator will be able to revise these rules to reflect best practice requirements as the industry changes. The building safety regulator will be responsible to ministers and ultimately to Parliament for its performance, as is typical for national regulators.

The Bill provides for an additional safeguard going beyond this usual practice. As recommended by Dame Judith Hackitt, the Bill requires a regular independent review of the whole system and, specifically, the effectiveness of the building safety regulator. This will provide another source of public oversight over and transparency in relation to how the building safety regulator performs its functions.

Second, the introduction of powers that will extend regulations to all construction products, creating a requirement for products to be safe in line with existing expectations for consumer products, and the creation of a safety-critical list of construction products, where their failure could cause death or serious injury. Manufacturers of these products will be required to declare their performance and put in place measures to ensure that this performance is consistently met.

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Third, the establishment of a new national regulator for construction products within the Office of Product Safety and Standards, so that people can be confident that construction products, including those used to construct homes, are safe and will perform as they should. The regulator will be given powers to carry out market surveillance, to share information with other regulators, including the building safety regulator and local trading standards, to remove any product from the market that present a significant safety risk, and prosecute and fine any company that breaks the rules and compromises public safety.

Fourth, it developed, through the British Standards Institute, a suite of national competence standards for individuals working on higher risk buildings to support the work of the industry—led competence steering group and take forward some of the recommendations in its final report, "Setting the Bar", published in October 2020.

Fifth, it imposed a ban on combustible materials in external walls of new high-rise homes and funding to remove dangerous cladding from existing high-rise residential buildings.

Sixth, it introduced a new code of practice through the BSI for assessors when examining external walls and

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claddings. The code of practice is intended to help professionals provide consistent, risk-based and proportionate advice on whether remediation of the external walls is necessary, and give building owners clarity on the fire risk of the construction of external walls. The draft was issued for public consultation by BSI in April and is expected to be published in due course.

Seventh, it undertook an independent review to identify systemic issues with how construction products are tested and certified, and made recommendations about how the system can be strengthened to inspire confidence that construction products are safe and perform as labelled and marketed.

Eighth, it introduced a programme to encourage the industry to lead and deliver culture change, including through the industry safety steering group, chaired by Dame Judith Hackitt herself, and to challenge the industry to make improvements ahead of the new building safety legislation. This programme is supporting the work of the industry—led competence steering group to develop recommendations for a new system of competence across the industry and, in addition, supporting industry initiatives, such as the Building a Safer Future Charter and the Code for Construction Product

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Information.

In conclusion, through these measures, the department has sought to remedy the wrongs of the past. It has been committed to preventing a similar tragedy from happening again, will continue to ensure that the necessary changes to the regulatory system are made to protect the safety of those living in tower blocks and of the public more generally, and will continue to engage with this Inquiry proactively, openly and fully throughout this module and beyond it.

Sir, those are the opening submissions of the department.

SIR MARTIN MOORE—BICK: Thank you very much indeed, Mr Beer.

Well, we had originally allowed quite a lot more time for opening statements on behalf of core participants, but, as you will know if you have been following the proceedings for the last day or so, not everyone wishes to make an opening statement, and we have now reached the end of the statements that people have asked to make orally, although we've received other opening statements in writing.

Tomorrow we shall start hearing evidence from the first of the witnesses. It will be a witness from the Local Authority Building Control. But the witness has been asked to attend tomorrow and therefore is not here

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to give evidence today.

So at that point, I'm afraid, we shall close the proceedings for today, and we shall resume tomorrow morning at 10 o'clock, when, as I say, we look forward to hearing the first of the witnesses in this part of Module 6.

Thank you all very much. 10 o'clock tomorrow, please.

(11.00 am)

(The hearing adjourned until 10 am on Wednesday, 8 December 2021)

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