

# PHASE 2 GRENFELL TOWER: LONDON FIRE BRIGADE AND COMPLEX BUILDING FIRES



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21<sup>st</sup> April, 2021

## 1 EXECUTIVE SUMMARY

2 This report is written in response to instructions provided to me by the Chairman and is part of a wider  
3 set of reports. This report is specific to point (b) of my instructions

4 b. The correlation between fire safety provisions (and the fire safety strategy for Grenfell Tower)  
5 and (i) the adequacy of the London Fire Brigade's ("LFB") procedures for dealing with fires in  
6 high-rise buildings, including any applicable procedures if compartmentation fails and (ii) the  
7 adequacy of training provided by LFB to its fire-fighters for dealing with fires in high-rise  
8 buildings, including any applicable procedures if compartmentation fails.

9 The tragic consequences of the Grenfell Tower fire highlight the significant shift in complexity that has  
10 occurred as a result of intricate façade systems being incorporated onto high rise buildings<sup>1</sup>.

11 Functional requirements, guidelines and simple standardized tests, if not accompanied by an  
12 appropriate level of competency of all those using them, become insufficient tools in their own right,  
13 for establishing adequate performance<sup>2</sup> of systems where performance is a function of the  
14 interactions of the building and building envelope.

15 Therefore, the safe operation of buildings can only be achieved if there is consistency between the  
16 complexity of the building and the competency of all those involved in the design, build, and operation  
17 of the building.

18 In the case of fire safety, this includes the Fire and Rescue Services. The Fire and Rescue Services will  
19 only be capable of fulfilling their duties, as defined by the Fire and Rescue Services Act (2004), if the  
20 institutional structure of the Fire and Rescue Services and the professional attributes, qualifications,  
21 education and training of its members, result in a level of competency consistent with the nature and  
22 complexity of the buildings they are required to operate in.

23 According to the Fire and Rescue Services Act (2004) the fire and rescue authority must make provision  
24 for the purpose of (a) extinguishing fires, and (b) protecting life and property in the event of fires. A  
25 fire and rescue authority must, in particular, secure the provision of the personnel, services and  
26 equipment necessary to efficiently meet all normal requirements and secure the provision of training  
27 for personnel. Most importantly, the fire and rescue authority must plan for obtaining information  
28 needed on the building for the adequate fulfilment of their functions.

29 There is a strong societal expectation of the Fire and Rescue Services, reinforced by the Fire and  
30 Rescue Services Act (2004)<sup>3</sup>, that the structure of the London Fire Brigade, and the policies that govern  
31 the organization, are conducive to the recruitment, education and training of professionals such that:

32 1. Through inspections, they are capable of gathering adequate information, identifying and  
33 enforcing rectification of issues that would result in a less than satisfactory outcome in the event  
34 of a fire in complex modern infrastructure,

<sup>1</sup> J.L. Torero, Grenfell Tower: Phase 1 Report, GFT-1710-OC-001-DR-01, May 2018.

<sup>2</sup> Performance is defined as adequately fulfilling all functions that support and enable the fire safety strategy to deliver an acceptable level of safety.

<sup>3</sup> Fire and Rescue Services Act (2004)

- 35 2. They recognise how their actions and strategies as responders intersect with the design  
36 philosophies of various types of buildings and the provisions within them to yield a satisfactory  
37 outcome in the event of a fire in complex modern infrastructure,  
38 3. Their operational command structure functions such that commanders are capable of conducting  
39 an adequate dynamic risk assessment for any fire occurring in any building, independent of its  
40 complexity.  
41 4. There is a further expectation that the commander and subordinates will communicate in a  
42 manner that enables a response that will lead to a satisfactory outcome.

43 Thus, there is an expectation that the Fire and Rescue Services can identify potential design and  
44 implementation failures that can affect the performance of a building prior to a fire event.  
45 Furthermore, in the event of a fire that progresses in a manner that is not consistent with  
46 expectations, that the London Fire Brigade can alter response procedures in a manner that enables  
47 them to fulfil their duties, as defined by the Fire and Rescue Services Act (2004),

48 An event so unusual in nature, that it is unforeseeable and capable of exceeding the response capacity  
49 of the London Fire Brigade, should have been eliminated by means of inspections and understanding  
50 of building behaviour.

51 Through Phase One of this inquiry<sup>4</sup> it has been shown that personnel from the London Fire Brigade  
52 responded in an effective manner to the initial event, a “one compartment fire.” Nevertheless, it was  
53 clearly established that the London Fire Brigade failed to attain the expectations of the Fire and Rescue  
54 Services Act (2004) once the event progressed beyond the compartment of origin. It was also  
55 established, that given the recent history of large façade fires, the evolution of the fire at Grenfell  
56 Tower was foreseeable and that there was awareness within the London Fire Brigade of these fires  
57 and their potential consequences.

58 The purpose of an inspection conducted by the fire brigade is to gather adequate information,  
59 identifying and enforcing rectification of issues that would result in a less than satisfactory outcome  
60 in the event of a fire. In regards to response, a less than satisfactory outcome is a foreseeable event  
61 that negatively affects the fire brigade capacity to fulfil their duties per the Fire and Rescue Services  
62 Act (2004).

63 It is only the fire brigade inspector, through their training, that is capable of defining what is the  
64 information that needs to be gathered, how to obtain it and how to use it in a Risk Assessment.  
65 Furthermore, it is also incumbent on the fire brigade inspector to be capable to identify issues that, if  
66 not rectified, would result in a less than satisfactory outcome.

67 Given that the evolution of the Grenfell Tower fire was a foreseeable event, that there was awareness  
68 in the London Fire Brigade of such events and that the link between these fires and specific types of  
69 products was known, a competent inspection would have identified the potential for a large external  
70 fire. Furthermore, if the inspector would have not been capable, through inspection, of extracting  
71 sufficient information on the specific systems to enable an adequate Risk Assessment, it is incumbent  
72 on the inspector to seek this knowledge (ex. test results, desktop studies, etc.).

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<sup>4</sup> Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, October 2019.

73 Therefore, in regard to Grenfell Tower, the London Fire Brigade failed to obtain the necessary  
74 information through inspections, to enable them to conduct an adequate Risk Assessment.

75 An adequate Risk Assessment would have identified the potential for the June 14<sup>th</sup>, 2017 scenario and  
76 would have determined two possible paths of action, rectification or a change in response tactics.

77 An adequate Risk Assessment would have alerted any individual possessing the appropriate  
78 professional attributes, qualifications and training to the fact that any fire occurring in Grenfell Tower  
79 had a significant potential to dismantle the existing fire safety provisions (i.e. fire safety strategy<sup>5</sup>). The  
80 structure and policies of the London Fire Brigade are currently not conducive to the recruitment,  
81 education and training of professionals with such attributes, qualifications and training.

82 Furthermore, during the events of June 14<sup>th</sup>, 2017, the London Fire Brigade failed to identify that an  
83 external fire breached one of the fundamental assumptions backing almost all aspects of the fire  
84 safety strategy of a tall residential building such as the Grenfell Tower, specifically the “stay-put”  
85 strategy. Identifying that the onset of external flame spread is not consistent with a “stay put” strategy  
86 and requires those in command to have a comprehensive knowledge of building behaviour during a  
87 fire event. None of the officers who were in command exhibited such a knowledge. Furthermore, the  
88 structure and policies of the London Fire Brigade are currently not conducive to the recruitment,  
89 education and training of professionals with such attributes, qualifications and training.

90 Finally, the Grenfell Tower Fire showed that the London Fire Brigade does not have an adequate  
91 operational command structure that allows information and orders to flow effectively, such that  
92 commanding officers may use the former to conduct a proper dynamic risk assessment, and use the  
93 latter to change strategy in accordance with this assessment. Departing from a well-established  
94 protocol, such as the “stay-put” strategy would have only been possible following a comprehensive  
95 dynamic risk assessment carried out by a suitably competent individual, and enacted via a strict  
96 command structure. It is important to add, that this is a two-way process by which an adequate  
97 command structure is also underpinned by the capacity to deliver an adequate dynamic risk  
98 assessment. The structure and policies of the London Fire Brigade are currently not conducive to the  
99 recruitment, education and training of professionals capable of conducting a comprehensive dynamic  
100 risk assessment under conditions as complex as the Grenfell Tower Fire.

101 Thus, the Grenfell Tower fire demonstrated that there is a confusion of competency and the current  
102 societal expectations of the Fire and Rescue Services are not being truly met.

103 Current building regulations rely very heavily on competent professionals to provide the necessary  
104 interpretation that will bridge the gaps and resolve the ambiguities left by functional requirements,  
105 guidelines and standardized tests. For example, a competent professional has to be capable of  
106 interpreting the requirement to “adequately resist the spread of fire over the walls ... having regard  
107 to the height, use and position of the building<sup>6</sup>” within the context of the needs of the fire safety  
108 strategy. These competent professionals include designers, builders, manufacturers but also the  
109 London Fire Brigade.

110 Currently, there is no consistency between the competency of all those involved in the interpretation  
111 of these functional requirements, guidelines and simple standardized tests, and the complexity of

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<sup>5</sup> Fire Safety Strategy, as referred here, is not a specific document but a conceptual representation of the ensemble of measures introduced to guarantee adequate fire safety.

<sup>6</sup> Section B4. (1) External Fire Spread (ADB).

112 modern construction systems. Complexity has thus far exceeded competency and therefore, there is  
113 a need to re-equilibrate competency and complexity. This applies to designers, builders,  
114 manufacturers but also to the London Fire Brigade.

115 There is currently no definition of what level of competency would be required of the Fire and Rescue  
116 Services, that would render them capable of satisfactorily addressing complex modern buildings.  
117 Furthermore, there is no definition of the skill or attribute verification approaches that should be used  
118 for the different roles within the Fire and Rescue Services so as to guarantee that those involved in  
119 inspection, command, response and control can deliver their tasks to a societally acceptable level.

120 The reform of the recruitment, education and training practises of the London Fire Brigade, and indeed  
121 the entirety of the Fire and Rescue Services, is a very complex matter that requires a detailed and  
122 comprehensive assessment. The Fire and Rescue Services Act (2004) has delivered the current  
123 structure, competencies and culture of the Fire and Rescue Services, thus its principles also need to  
124 be revisited.

125 Given that the need stems from the increased complexity of buildings and building practises, it is a  
126 matter that extends far beyond response tactics. It therefore involves matters that require deep  
127 understanding of engineering practises as well as recruitment, training and professional education.

128 The current structure and culture of the Fire and Rescue Services does not allow for this review to be  
129 driven from within the service. It is therefore essential that government enacts a comprehensive  
130 external evaluation of the Fire and Rescue Services as well as the Fire and Rescue Services Act (2004).

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## 252 1 INTRODUCTION

### 253 1.1. THE INQUIRY'S TERMS OF REFERENCE

254 The Inquiry's Terms of Reference have been approved by the Prime Minister and have been published  
255 on the Inquiry's website. The Inquiry has also published on its website a detailed provisional List of  
256 Issues which identify the matters with which its investigation will be concerned. This provisional List  
257 may be revised in due course.

### 258 1.2. STRUCTURE OF THE INQUIRY

259 The Chairman has indicated that Inquiry will be conducted in two phases. The present report pertains  
260 to Phase 2. The Chairman asked me to provide a report for Phase 2 on:

- 261 a. Your final conclusions on the relative contributions of the cladding design and materials  
262 to the fire spread at Grenfell Tower, taking account of the findings made in the Phase 1  
263 report. This work will include collaboration with Professor Luke Bisby in relation to a  
264 programme of experimentation aimed at understanding and 1 quantifying the respective  
265 roles of the various materials and products that made up the cladding system at Grenfell  
266 Tower under a range of relevant fire conditions and system geometries. This work is to be  
267 undertaken By Professor Bisby with a team from the School of Engineering at the  
268 University of Edinburgh including Dr Angus Law and Dr Rory Haddon. The experimental  
269 work will be developed in on-going consultation with you and will aim to establish the  
270 manner and extent to which each component of the cladding system contributed to rate  
271 and extent of fire spread during the Grenfell Tower fire.
- 272 b. **The correlation between fire safety provisions (and the fire safety strategy for Grenfell  
273 Tower) and (i) the adequacy of the London Fire Brigade's ("LFB") procedures for dealing  
274 with fires in high-rise buildings, including any applicable procedures if  
275 compartmentation fails and (ii) the adequacy of training provided by LFB to its fire-  
276 fighters for dealing with fires in high-rise buildings, including any applicable procedures  
277 if compartmentation fails.**
- 278 c. An analysis of the adequacy of the current testing regime.
- 279 d. An overview of conclusions to be drawn about the Grenfell Tower fire, including the  
280 lessons to be learned when comparing the Grenfell Tower fire with other fires, both  
281 international and domestic.

282 The current Phase 2 Report corresponds to task (b).

### 283 1.3. STRUCTURE OF REPORT

284 The report will be structured around the facts gathered during Phase 1 of the Public Inquiry and  
285 compiled in the Chairman's Phase 1 report.<sup>7</sup> The general description of the structure of the necessary  
286 fire safety strategy for a high-rise residential building such as Grenfell Tower will be based on my Phase  
287 1 report.<sup>8</sup> Thus this report should be read in conjunction with the Chairman's Phase 1 Report and my  
288 Phase 1 Report.

### 289 1.4. FIELD OF EXPERTISE

290 1.4.1. My name is José L. Torero. I am Professor of Civil Engineering and Head of the Department of  
291 Civil, Environmental and Geomatic Engineering at University College London. I also serve as Director  
292 of TÆC. Previously, I held the John L. Bryan Chair at the Department of Fire Protection Engineering  
293 and was the Director of the Center for Disaster Resilience at the Department of Civil Engineering at  
294 the University of Maryland, USA (2017-2019). Between 2012 and 2017 I was Professor of Civil  
295 Engineering and Head of the School of Civil Engineering at the University of Queensland, Australia.  
296 Before moving to Australia, I held the Landolt & Cia Chair for Innovation for a Sustainable  
297 Future at the Ecole Polytechnique Fédéral de Lausanne, Switzerland (2012) and the BRE  
298 Trust/RAEng Chair in Fire Safety Engineering at the University of Edinburgh (2004-2011). Between  
299 2004 and 2011 I was also the Director of the BRE Centre for Fire Safety Engineering and in the 2008  
300 to 2011 period I was Head of the Institute for Infrastructure and Environment, both at the University  
301 of Edinburgh. I have held other positions at CNRS (France), University of Maryland (USA), NIST (USA)  
302 and NASA (USA).

303 1.4.2. My field of expertise is fire safety; a field in which I have worked for more than 25 years. I was  
304 trained as a Mechanical Engineer obtaining a Bachelor of Science from the Pontificia Universidad  
305 Católica del Perú in 1989. In 1991 I obtained a Master of Science and in 1992 a PhD from the University  
306 of California, Berkeley, both in Mechanical Engineering with specialty in Fire Safety. I am a Chartered  
307 Engineer by the Engineering Council Division of the Institution of Fire Engineers (UK), a Registered  
308 Professional Engineer in Queensland and a full member of the Society of Fire Protection Engineers  
309 (USA).

310 1.4.3. I am a Fellow of the Royal Academy of Engineering, the Royal Society of Edinburgh, the  
311 Australian Academy of Technological Sciences and Engineering, The Institution of Civil Engineers, The  
312 Institution of Fire Engineers, the Society of Fire Protection Engineers and the Combustion Institute. In  
313 2008 I was awarded the Arthur B. Guise Medal by the Society of Fire Protection Engineers (USA)  
314 and in 2011 the David Rasbash Medal by the Institution of Fire Engineers (UK) in recognition for  
315 eminent achievement in the education, engineering and science of fire safety. In 2016 I was  
316 awarded a Doctor of Science *Honoris Causa* from Ghent University, Belgium. I  
317 am the author of more than 500 technical documents in all aspects of fire safety of which more than  
318 200 are peer review scientific journal publications. I have been invited to deliver more than 100

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<sup>7</sup> Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, October 2019.

<sup>8</sup> J.L. Torero, Grenfell Tower: Phase 1 Report, GFT-1710-OC-001-DR-01, May 2018.



319 keynote lectures in conferences and professional fora worldwide of which more than 20 have been  
320 in the area of Fire Investigation.

321 1.4.4. I was the Editor-in-Chief of Fire Safety Journal (2010-2016), the most respected scientific  
322 publication in the field, Associate Editor of Combustion Science and Technology (1997-2008) and a  
323 member of the Editorial Board of Fire Technology, ICE Journal of Forensic Engineering, Fire Science  
324 and Technology, Case Studies in Fire Safety, Progress in Energy and Combustion Science and the  
325 Journal of the International Council for Tall Buildings. I am one of the Editors of the 4<sup>th</sup> Edition of  
326 the Fire Protection Engineering Handbook of the Society of Fire Protection Engineers (USA) and an  
327 author of several chapters. I am regularly in the Scientific Advisory Boards of most conferences in  
328 the field and a member of the Committee of many professional organizations. I chaired the Fire Safety  
329 Working Group for the International Council for Tall Buildings and Urban Habitat and was the vice-  
330 Chair of the International Association for Fire Safety Science.

331 1.4.5. I have been involved in numerous fire investigations many of which have been landmark  
332 studies. Between 2001-2010 I was involved in an independent investigation of the World Trade Center  
333 buildings 1 and 2 collapses. I was involved in the fire and structural modelling of the World Trade  
334 Center building 7 collapse in support of litigation and conducted an independent investigation of  
335 the fire growth and structural failure of the Madrid Windsor Tower Fire commissioned by the  
336 British Concrete Institute. I conducted a cause and origin investigation of the Texas City explosion and  
337 subsequent fires as well as a damage correlation analysis. I conducted dispersion fire modelling  
338 supporting the litigation of the Buncefield Explosion and of the Sego mine explosion (USA). I  
339 supported the fire service investigation of the Ycua Bolanos supermarket fire in Paraguay to establish  
340 the cause of the fire and to analyse the reasons for the fatalities. I conducted the fire investigation  
341 of La Rocha prison fire in Uruguay where 12 inmates died where we developed analytical and  
342 numerical model of fire growth in support of the investigation. I conducted the fire investigation of  
343 the San Miguel prison fire in Chile where 26 inmates died where we developed analytical and  
344 numerical models of fire growth in support of the investigation. I worked with the Scottish Fire  
345 Service on the Balmoral Bar fire investigation. I conducted the post-fire structural assessment of the  
346 Abu-Dhabi Plaza fire in Kazakhstan, probably the biggest ever fire of a building under construction.  
347 Recently, I led the fire investigation of the Ayotzinapa 43 murder case driven by the Organization of  
348 American States that encouraged the Mexican government to reopen the investigation. (*Science*, 11  
349 March 2016, vol. 351 Issue 6278, pp.1141-1143 and *Science*, 29 April 2016, vol. 352, issue 6285, p.499)  
350 and by the National Academy of Science (USA) (<http://www7.nationalacademies.org/humanrights/>).  
351 I served as advisor to the Attorney General of Mexico in the subsequent investigation. I have given  
352 expert testimony in several forensic fire investigations worldwide.

353 1.4.6. I have developed novel methodologies for forensic fire investigation that have affected the  
354 manner in which fire investigation is conducted and its legal ramifications (V. Brannigan and J. L.  
355 Torero, "The Expert's New Clothes: Arson "Science" After Kumho Tire," *Fire Chief Magazine*, 60-65,  
356 July 1999.). For these studies I have received the William M. Carey Award for the Best Paper  
357 Presented at the Fire Suppression and Detection Research Application Symposium (C. Worrell, G.  
358 Gaines, R. Roby, L. Streit and J.L. Torero, "Enhanced Deposition, Acoustic Agglomeration and Chladni  
359 Figures in Smoke Detectors," *Fire Technology*, Fourth Quarter, 37, Number 4, pages 343-363,  
360 2001), the Harry C. Bigglestone Award for the Best Paper Published in *Fire Technology* (T. Ma, S.M.  
361 Olenick, M.S. Klassen, R.J. Roby and J.L. Torero, "Burning Rate of Liquid Fuel on Carpet (Porous  
362 Media)" *Fire Technology*, 40,3, 227-246, 2004) and the Telford Premium Best Paper Award by the

363 Institution of Civil Engineers (J.L. Torero, "Forensic Analysis of Fire Induced Structural Failure: The  
 364 World Trade Centre, New York" ICE Journal of Forensic Engineering, 164, 2, 69-77, 2011.). I was  
 365 awarded the FM Global Best Paper Award for a paper on the precision of fire models and the required  
 366 skills for fire modelling (G. Rein, J. L. Torero, W. Jahn, J. Stern-Gottfried, N. L. Ryder, S. Desanghere,  
 367 M Lazaro, F. Mowrer, A. Coles, D. Joyeux, D. Alvear, J. A. Capote, A. Jowsey, C. Abecassis-Empis,  
 368 P. Reszka, Round-robin study of a priori modelling predictions of the Dalmarnock Fire Test One, Fire  
 369 Safety Journal, 44, 590-602, 2009.).

370 1.4.7. For more than 20 years I have been involved in the education and training of fire engineers,  
 371 fire investigators and the fire service. I have developed training programmes on fire investigation for  
 372 the Bureau of Alcohol Tobacco and Fire Arms (USA), fire investigators and fire brigades in the UK  
 373 (University of Edinburgh short course in Fire Science and Fire Investigation, 2001-20012), the RAIB  
 374 (UK) and the Police Scientifique of Lyon (France) among others. I have taught courses at Fire Service  
 375 College Gullane, for the Queensland Fire and Emergency Services and for the fire services in  
 376 numerous other countries (Costa Rica, Chile, Peru, Argentina, Singapore, Malaysia, etc.). I have  
 377 developed curriculum and taught the Fire Protection Engineering programme at the University of  
 378 Maryland, the Structural and Fire Safety Engineering course at the University of Edinburgh, the Civil  
 379 and Fire Safety Engineering course at the University of Queensland and the International Masters  
 380 in Fire Safety Engineering (Ghent, Lund and Edinburgh Universities). I was external examiner to the  
 381 Fire Safety programme of Glasgow Caledonian University (UK) and I am on the Advisory Board of  
 382 Worcester Polytechnic Institute (USA) Fire Protection Engineering programme. I am a Distinguished  
 383 Visiting Chair Prof. in Fire Safety Engineering at the Hong Kong Polytechnic University.

384 1.4.8. In the period 2007 to 2010 I lead the development of the FireGrid project funded by the  
 385 Department of Trade and Industry and in partnership with the London, Manchester, Strathclyde and  
 386 Lothian and Borders Fire Brigades where a detailed study of the role of information on fire brigade  
 387 emergency response was analysed. This project was featured in the 2007 BBC Horizon Documentary  
 388 "Skyscrapers Fire Fighters" that has been shown in more than 30 countries. In 2010 I was awarded a  
 389 GBP 2M grant by the Engineering and Physical Sciences Research Council UK to study the Real Fires  
 390 for the Safe Design of Tall Buildings.

391 1.4.9. I have been involved in numerous advisory roles for industry and government many of them  
 392 including the fire service. I was involved in the Nuclear Regulatory Commission (USA), PRiT  
 393 Committee on Fire Modelling, a member of the Expert panel of the Fire and Resilience Directorate  
 394 (Communities and Local Government, UK) and of the Forum of Chief Fire Officers of Scotland (SDAF).  
 395 I was advisor to the Department of Transportation and Main Roads (Queensland, Australia), special  
 396 advisor to the vice- President of Peru on the Utopia Club and Mesa Redonda fire investigations and  
 397 a member of the CFOA Training Needs Analysis Gateway Review Group. I am currently special advisor  
 398 to the Minister of Housing (Queensland) on issues of façade fires. I am a regular participant in  
 399 standards development committees worldwide.

400 1.4.10 A full and up to date CV (current at the time of Torero's initial instruction as Expert Witness)  
 401 has previously been provided to the Inquiry's Core Participants.

## 402 1.5. STATEMENTS

403 *I confirm that I have made clear which facts and matters referred to in this report are within my own*  
404 *knowledge and which are not. Those that are within my own knowledge I confirm to be true. The*  
405 *opinions I have expressed represent my true and complete professional opinions on the matters to*  
406 *which they refer.*

407 *I was assisted in the production of this report Dr Adam Cowlard - Director and senior engineer at*  
408 *Torero, Abecassis Empis and Cowlard Ltd. Dr Cowlard holds a PhD in Fire Safety Engineering and an*  
409 *MEng in Civil Engineering from the University of Edinburgh. He has undertaken a wide range of*  
410 *consultancy and research work encompassing development of fire safety strategies for a wide range*  
411 *of complex infrastructure, development of design fires and heat transfer modelling, and fire and*  
412 *evacuation modelling. Dr Cowlard supported my work primarily on modelling, data analysis, reporting*  
413 *and reviewing.*

414 *I confirm that I understand my duty to assist the Inquiry on matters within my expertise, and that I*  
415 *have complied with that duty. I also confirm that I am aware of the requirements of Part 35 and the*  
416 *supporting Practice Direction and the Guidance for the Instruction of Experts in Civil Claims 2014.*

417 *I confirm that I have no conflict of interest of any kind, other than any which I have already set out in*  
418 *this report. I do not consider that any interest which I have disclosed affects my suitability to give*  
419 *expert evidence to the Inquiry on any issue on which I have given evidence and I will advise the Inquiry*  
420 *if, between the date of this report and the Inquiry hearings, there is any change in circumstances which*  
421 *affects this statement.*



422 Signed:

Dated: 18<sup>th</sup> February, 2021

## 423 2 GENERAL CONTEXT

424 Issues of wellbeing such as safety, security and health necessitate regulation that is defined by public policy  
425 and is affected by public perception. If the general consensus is that existing regulation guarantees wellbeing,  
426 then there is typically no appetite for regulatory change. Regulatory change in terms of safety, security and  
427 health is therefore only made as a result of publicly perceived failure or disaster. This is the case for fire safety.

428 Disasters demonstrate that failure modes have arisen unnoticed. When they manifest themselves through a  
429 disaster, public awareness is raised and changes in public policy follow. The Grenfell Tower fire is a disaster  
430 that has exposed many weaknesses in the way public wellbeing is managed in the built environment. In  
431 particular, it has exposed inadequacies in the education and certification processes for engineers involved in  
432 matters that affect fire safety, weaknesses of the regulatory process, and the way the Fire and Rescue Services  
433 operate<sup>9</sup>. This document focuses specifically on the Fire and Rescue Service.

434 To fully establish the need for the Fire and Rescue Service to evolve, it is first essential to discuss the  
435 relationship between firefighting and the provision of building performance in the design process and beyond.

436 Currently, building and infrastructure development in the broad sense is conducted through design principles  
437 that are based on a series of fundamental assumptions and are executed via a range of design tools. The design  
438 can either be regulated by compliance with codes/standards or by explicit demonstration of adequate  
439 performance via professional/technical analysis (engineering). The design is then implemented and the  
440 building is assumed to provide adequate performance, including delivering societally acceptable levels of fire  
441 safety.

442 The Regulatory Reform (Fire Safety) Order 2005<sup>10</sup> requires for the responsible person to make an ongoing,  
443 suitable and sufficient assessment of the risks to which relevant persons are exposed. Regular monitoring  
444 provides the feedback loop that enables the assessment of performance during the life of the building. Hence,  
445 adequate performance assessment allows to determine if any specific action is required. Nevertheless, regular  
446 monitoring is only useful if the diagnostic tools are adequate and the professionals managing data are capable  
447 of converting it into useful information. Many good examples of good practise exist in high hazards industries  
448 where sensor networks provide extensive data, well-trained personnel constantly monitor and properly  
449 interpret the data to identify safety issues and maintain safe operations<sup>11</sup>.

450 The definition of regular monitoring varies between systems and disciplines. In some areas it is a continuous,  
451 direct and quantitative measure of performance. A good example is energy production from solar panels.  
452 Sensors can measure how much energy is produced and the data enables the competent professional to define  
453 the true performance of the panels at any time. Water supply systems for hydrants and sprinklers can be  
454 monitored in a similar manner by sensors or by testing protocols that can deliver the state of a water supply  
455 network.<sup>12</sup> In both cases a true measure of performance is obtained. In the case of the measurements by  
456 sensors, the performance assessment is continuous while in the case of testing it will happen as part of the

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<sup>9</sup> The Warren Centre, University of Sydney, Fire Safety Engineering, Education Report, 2019.

<sup>10</sup> The Regulatory Reform (Fire Safety) Order 2005.

<sup>11</sup> J. Hackitt, Building a Safer Future – Independent Review of Building Regulations and Fire Safety: Final Report, Crown Copyright, May 2018.

<sup>12</sup> I. Stoianov, Grenfell Tower Inquiry, Phase 2 Report, the provision and use of water for fighting the fire at Grenfell Tower on 14 June 2017.

457 ongoing assessment required by the Regulatory Reform (Fire Safety) Order 2005.<sup>13</sup> In the case of sprinklers, a  
458 similar assessment of the water supply can be conducted leading to a direct assessment of performance of the  
459 sprinkler in what pertains the supply of water to the sprinkler. In what pertains the performance of a sprinkler  
460 as a means to control the fire, the performance assessment methodology that satisfies what is required by the  
461 Regulatory Reform (Fire Safety) Order 2005<sup>14</sup> is of a different nature. A physical inspection of the sprinkler  
462 system will establish that their state is as per the design and an inspection of the building will show that the  
463 fire load is as per the design. If the case were both remain consistent with the design, then the inspector  
464 assumes that performance is as per the design and therefore adequate. While this is not a direct measure of  
465 performance, it still satisfies the Regulatory Reform (Fire Safety) Order 2005.<sup>15</sup>

466 In respect to most fire safety provisions, ongoing performance assessment is indirect and therefore not truly  
467 quantified beyond the design process. It is assumed that if a provision introduced through the design process  
468 remain unaltered, then performance should be as dictated by the design. In a similar manner, an adequate  
469 relationship between building performance and firefighter intervention is introduced through the design  
470 process. So, if all building provisions pertaining fire fighter operations are verified through inspection to remain  
471 as per design, then it can be inferred that firefighting operations will be enabled by the building design.

472 It is in the design process where provisions are made to support firefighting activities and these are based on  
473 preconceived modes of operation or known policy. Thus, the design process will deliver a building where the  
474 fires that can occur (“design fires”<sup>16</sup>) are only those that can be fought using existing protocols (“operational  
475 protocol”). And, by definition, firefighting protocols are designed to be effective when responding to those  
476 “design fires.” The link between the “design fire” and the “operational protocol” is therefore a two-way link.  
477 It is expected that the fire and rescue services will verify that this two-way link is consistent with their  
478 operation protocols.<sup>17</sup>

479 In what concerns fire safety, the inspection is perceived as the relevant approach to monitoring. The inspection  
480 guarantees that all fire safety provisions defined during design remain and therefore it can be inferred that  
481 the expected performance, as conceived at the moment of design, is maintained. There is, therefore, an  
482 expectation that those conducting the inspection have the necessary knowledge and competencies in respect  
483 to building design, to enable them to perform such a diagnostic effectively.

484 It is not possible to offer infallible guarantees that all fires will be as anticipated, therefore Fire and Rescue  
485 Services have to possess a means to provide an adequate response to events that differ from the “design fire.”  
486 The dynamic risk assessment is the most common means to achieve this.

487 As explained above, the implementation of an appropriate feedback loop is of particular importance in fire  
488 safety because design decisions are intended to limit the range of outcomes of a fire. This limited range of  
489 outcomes enables Fire and Rescue Services to define a specific range of response protocols which responders  
490 can be trained to carry out efficiently and safely. The feedback loop is therefore important information that is  
491 intimately linked to the capability of the Fire and Rescue Services to respond adequately in the event of a fire.  
492 It is for this reason that the Fire and Rescue Services Act (2004) requires the fire and rescue authority to plan

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<sup>13</sup> The Regulatory Reform (Fire Safety) Order 2005.

<sup>14</sup> The Regulatory Reform (Fire Safety) Order 2005.

<sup>15</sup> The Regulatory Reform (Fire Safety) Order 2005.

<sup>16</sup> The term “design fire” is commonly used by fire safety engineers and not by fire and rescue services when referring to operations. Nevertheless, the meaning (i.e. a fire event of sufficiently high probability) applies both to the design of a fire safety strategy or operational protocols for firefighter response that are an integral part of such a strategy.

<sup>17</sup> Fire and Rescue Services Act (2004)

493 by obtaining necessary information regarding a building, and then ensure they have the necessary equipment  
494 and competency to enable the adequate fulfilment of their functions in the event of a fire in this building. This  
495 information must inevitably include the performance of all relevant building systems. It is important to note  
496 that as the complexity of the building and its fire protection systems increases, the degree of competency  
497 required of those gathering the information inevitably increases.

498 When designing for wind or earthquakes a probabilistic distribution of loads can be established and embedded  
499 within a regulatory framework. As society changes its tolerance to risk, or as the urban sprawl evolves,  
500 different criteria can be used to describe the loads that need to be considered to continually ensure  
501 performance. Nevertheless, the probabilistic distribution of these loads will not change as earthquakes and  
502 wind are independent of the infrastructure they interact with. This is not the case with fires where changes in  
503 design practises can radically transform the nature of a fire event, and by extension therefore, the nature of  
504 the environment and challenges that Fire and Rescue Services are required to face.

505 Fire safety is therefore one of the areas where building regulations are generally only modified either because  
506 of external pressure (i.e. economic, architecture, functionality, etc.) or because of lessons learned from a  
507 disaster. This is particularly important for high-rise buildings where the underpinning assumptions of  
508 regulation are stretched to their limits and therefore the impact of performance failure will likely be more  
509 profound.

510 The Grenfell Tower was designed on the basis of regulations relevant to the period when it was built. As was  
511 the case with many other very similar buildings, it was assessed as being compliant after it was refurbished  
512 between 2012 and 2016. When a building is assessed as being compliant, there is an implicit expectation by  
513 occupants, owners and management that adequate levels of fire safety exist. The building was constructed in  
514 1972-74 using conventional construction means and then it was refurbished between 2012 and 2016 by the  
515 Kensington and Chelsea Tenant Management Organization. The refurbishment added to the building a new  
516 façade, that consequently reduced the building's energy consumption and improved its aesthetic. The building  
517 was also reconfigured in certain areas so that the occupants could experience higher living standards. In  
518 principle, the refurbishment of the building satisfied all the sought-after drivers and constraints.

519 On June 14<sup>th</sup> 2017 a small fire started in the kitchen of one of the flats<sup>18</sup>. The fire was not out of the ordinary  
520 and could be assumed to be a very high probability event for a building of that nature. The expected  
521 performance (i.e. the "design fire") was that such a fire would remain within the unit of origin and therefore  
522 flames and smoke would not compromise other units.

523 The compartmentalization, recommended by government issued guidance, aims to contain the fire within the  
524 unit of origin and thus allows implementation of what is called a "stay-put" strategy. This implies that with the  
525 exception of the occupants in the unit of origin, all other occupants can remain in their units and wait safely  
526 until either the fire brigades control the fire or the fire burns out. A "stay-put" strategy leads to certain  
527 advantageous attributes such as the limited means of egress as suggested by government issued guidance  
528 (one stair) and inclusiveness policies that enable ageing populations and populations with disabilities to remain  
529 in their units safely and thus live securely in upper levels.

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<sup>18</sup> Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, October 2019.

530 Statistics show that of more than 8,000 fires in high-rises in the UK in the last 20 years, only two cases justified  
531 generalized evacuation<sup>19</sup>. Thus, a strong perception that building regulations support the operational  
532 protocols of the Fire and Rescue Services is backed by statistical confidence.

533 There is an expectation that through inspections, the Fire and Rescue Services could identify if a specific design  
534 could allow a fire to exit the unit of origin. Furthermore, those in command of firefighting operations should  
535 be capable of determining the implications of a fire progressing beyond the compartment of origin and how  
536 this pertains to firefighting protocols. If such performance was to be accepted, then adequate firefighting and  
537 rescue strategies need to be implemented as an alternative to “stay-put.”

538 As clearly articulated in my Phase One report<sup>20</sup>, there was sufficient evidence from fires worldwide, that  
539 indicated that certain façade systems represented a significant risk to external fire spread and therefore the  
540 safe implementation of a “stay-put” strategy. Therefore, according to the Fire and Rescue Services Act (2004),  
541 it was essential to identify through inspection any façade systems that allowed for external fire spread, to  
542 quantify the nature of this external fire spread, and to establish any implications to firefighting and rescue  
543 operations. According to the requirements of the Fire and Rescue Services Act (2004), in the case of  
544 foreseeable events, firefighting and rescue protocols should have been implemented to guarantee an  
545 acceptable outcome.

546 It is clear that the attributes and competencies of those conducting the inspection and establishing alternative  
547 firefighting and rescue protocols would be very different for the original Grenfell Tower design than for the  
548 refurbished building. The latter would have required a much deeper understanding of Fire Safety Engineering  
549 principles as well as construction methods and practises.

### 550 3 PRESUMPTION OF COMPETENCY AND OUTCOME

551 There is a strong public perception that the firefighter is a competent authority in all matters pertaining to  
552 fires. Independent of legal regimes, this perception extends to the building approval process and building  
553 inspections. This perception is also very strong within the fire service itself, where there is a clear sense of  
554 ownership of everything related to fires. Buildings on fire are after all, the workplace of the fire service.  
555 Therefore, the fire service is an unavoidable stakeholder in the design, construction, operation and  
556 maintenance of a building.

557  
558 Traditionally, buildings were designed and built in a manner that buildings compliant with regulations  
559 delivered consistent and robust fire performance. Buildings had robust attributes, such as simple solutions for  
560 compartmentalization, that limited fire growth within very predictable bounds. While variations have always  
561 been possible, statistics show that these variations were rare and the departure from standard behaviour was  
562 limited. The Fire and Rescue Services had very well-defined targets for which response protocols could be  
563 structured and performance expectations defined.

564  
565 In a system where the range of behaviour of a fire can be assumed to be a function of regulatory compliance  
566 and thus largely predictable; predefined strategies, such as “stay-put” can be implemented, and firefighters  
567 can be trained in delivering a standardised but broadly applicable response (plan execution). Training does not  
568 have to be extensive and does not need to involve a comprehensive understanding of complex building  
569 behaviour.

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<sup>19</sup> C. Todd, Phase One Expert Report, Grenfell Public Inquiry, March 2018.

<sup>20</sup> J.L. Torero, Grenfell Tower: Phase 1 Report, GFT-1710-OC-001-DR-01, May 2018, pp. 56-61.

570

571 Within a building typology, such as residential buildings, the expectation is that a fire will be contained and  
572 therefore firefighting will be limited to a single unit. The “design fire” that firefighters are tasked to control  
573 will be the single unit fire and will be no different at ground level or any higher floor.

574

575 Any variation from the norm then becomes a matter for a dynamic risk assessment (plan formulation) defined  
576 by those preparing to interact with the fire. For a dynamic risk assessment to be effective, the fire event must  
577 be understood by those conducting the assessment. Thus, a dynamic risk assessment is only expected to  
578 extend firefighting protocols to variants that are reasonably close to a more typical fire event (the “design  
579 fire”).

580

581 Firefighters that directly interact with the fire will have the greatest capacity to acquire information and  
582 therefore the natural tendency is for those individuals to conduct the dynamic risk assessment and  
583 consequently make all subsequent decisions. Fires evolve rapidly in time, so time is at a premium, and  
584 firefighters will generally privilege a rapid decision to the transfer of information to a command unit.

585

586 While hierarchies exist in the Fire and Rescue Services, they are generally not enforced effectively during an  
587 event. Direct decision making by those interacting with the fire appears as the primary operational mode.

588

589 Conducting a dynamic risk assessment is therefore not necessarily the prerogative of the officer in command  
590 but there is a presumption that all responders are equally responsible and qualified to deliver these  
591 assessments. The role of the command unit is therefore naturally diminished and the necessary competency  
592 to conduct an adequate dynamic risk assessment is presumed to be shared by all responders.

593

594 The level of competency required to successfully conduct a dynamic risk assessment is directly linked to the  
595 extent that a building’s characteristics have to enable a fire to depart from the standard characteristics (i.e.  
596 the “design fire”). The more complex the building, the more the potential for a significant departure and the  
597 more difficult it therefore becomes to identify the course that will be followed by the fire. Consequently, the  
598 competency required from those performing a dynamic risk assessment is intimately linked to building  
599 complexity. Furthermore, research has shown that the situational awareness necessary for an effective  
600 dynamic risk assessment is intimately related to the nature of the training and education of the responder<sup>21</sup>.

601

602 Building regulations together with protocols of approval and inspection aim to provide assurances that a  
603 building will behave as expected. There is therefore a high expectation that standard firefighting protocols can  
604 be applied more or less universally (plan execution) but there is also a presumption that departures from the  
605 expected behaviour will be sufficiently minor that firefighters at any level will be capable of conducting an  
606 effective dynamic risk assessment. Therefore, current training and education within the Fire and Rescue  
607 Services strongly favours straightforward plan execution<sup>22</sup> and any wider role in the design process is deemed  
608 of lesser importance.

609

610 Many other stakeholders have criticized the involvement of the Fire and Rescue Services in building approvals  
611 and inspections (in the UK and abroad). As a result, their role has, in some cases, diminished nevertheless it  
612 is still required for them to be consulted as part of the Building Control approval process. Criticism resulted

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<sup>21</sup> Cohen-Hatton, S.R. and Honey, R.C., Goal-Oriented Training Affects Decision-Making Processes in Virtual and Simulated Fire and Rescue Environments, *Journal of Experimental Psychology*: 2015, Vol. 21, No. 4, 395–406.

<sup>22</sup> Cohen-Hatton, S.R. Butler, P.C. and Honey, R.C., An Investigation of Operational Decision Making in Situ: Incident Command in the U.K. Fire and Rescue Service, *Human Factors*, Vol. 57, No. 5, August 2015, pp. 793–804.



613 from a strong feeling, within the construction sector, that firefighters were not delivering an adequate service.  
614 The construction industry has consistently questioned the timeliness of response as well as the quality of the  
615 assessments and inspections. The result has been a push for exclusion of the Fire and Rescue Services from  
616 the design process. This is a phenomenon that has happened worldwide but the root of the perceived  
617 inadequacy has never been clearly explored<sup>23</sup>.

618  
619 The fire service has continually objected to losing control, nevertheless public policies have followed market  
620 demands, pushing for a more streamlined process of approvals and inspections that has a reduced  
621 involvement of the Fire and Rescue Services. This has resulted in confusion and tension because the Fire and  
622 Rescue Services cannot, for reasons stated above, be entirely excluded from these processes.

623  
624 Total exclusion would take away responsibility from the Fire and Rescue Service because they would no longer  
625 be involved in the delivery of fire safety in buildings, which therefore places the onus on others (e.g. engineers,  
626 builders, TMO's, etc.) to guarantee the delivery of a building with characteristics that result in a fire that  
627 firefighters can fight using standard protocols (i.e. the "design fire"), or else is consistent with their capacity  
628 to conduct a dynamic risk assessment.

629  
630 Given that the relationship between "design fires" and "operational protocols" is a two-way relationship and  
631 therefore full exclusion of the Fire and Rescue Services is not possible, it is essential to have a clear definition  
632 of the necessary competency of all those participating in approvals and inspections. This definition of  
633 competency has been elusive<sup>24</sup> and once again has resulted in confusion. Instead of necessary synergistic  
634 cooperation between knowledge in building behaviour and response, what has resulted is a competition of  
635 what knowledge is more or less relevant. This competition has, ultimately, resulted in diminishing the  
636 importance of those within the Fire and Rescue Services itself with a degree of competency in regard to  
637 building behaviour in favour of those with greater experience in response.

638  
639 Therefore, the relationships between building behaviour, expectations of building performance, capability to  
640 conduct an adequate dynamic risk assessment, firefighting and rescue tactics and the necessary competency  
641 and training of the Fire and Rescue Services is currently unclear.

642  
643 The Fire and Rescue Service will have a comprehensive training process for the task of fighting fires that are  
644 consistent with the traditional expectation of fire behaviour. Only in rare exceptions will this not include at  
645 least a component of understanding building performance. The education and training structure of the Fire  
646 and Rescue Services is consistent with a professional practice<sup>25</sup>, nevertheless, the view that dominates among  
647 the Fire and Rescue Services is that their education and training should primarily contribute to developing  
648 practical professional skills in the form of familiarity with equipment, and methods and techniques to enable  
649 them to operationally handle various kinds of accidents in a confident and safe manner<sup>26</sup>. Furthermore, the  
650 internal image of the competent firefighter has arguably, until very recently, been largely tied to practical  
651 experience, a well-trained body<sup>27</sup> and to someone of concrete use to society through damage-limiting  
652 initiatives<sup>28</sup>.

653

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<sup>23</sup> The Warren Centre, University of Sydney, Fire Safety Engineering, 2019.

<sup>24</sup> The Warren Centre, University of Sydney, Fire Safety Engineering, Education Report, 2019.

<sup>25</sup> R. Holmgren, Nordic Journal of Vocational Education and Training Vol. 4 2014.

<sup>26</sup> R. Holmgren, Nordic Journal of Vocational Education and Training Vol. 4 2014.

<sup>27</sup> R. Holmgren, Nordic Journal of Vocational Education and Training Vol. 4 2014.

<sup>28</sup> Baigent, D. One More Last Working Class Hero. A Cultural Audit of the UK Fire Service. Fitting-in Ltd & The Fire Service Research and Training Unit, Anglia Polytechnic University, 2001.

654 When it comes to the capability of fire fighters to assess building performance, the focus on operational  
655 orientation and prescriptive approaches is not considered sufficient to meet contemporary safety and  
656 preparedness requirements in societies undergoing rapid change<sup>29,30</sup>. Of course, this traditional view does not  
657 reflect the evolving role of the fire brigade in many jurisdictions. For example, in Australia the fire brigade  
658 serves two roles – the traditional role of intervention and response which elicits the above image, and one of  
659 a referral body which is invited (although not mandated) to weigh in on complex fire safety issues as part of  
660 the regulatory framework.

661  
662 Given that it is not possible to circumvent the fire services' role in in building design, construction, operation  
663 and maintenance practices, it is of fundamental importance to review education, training and accreditation  
664 practices within the fire service. It is clear that the current presumption of competency is not consistent with  
665 the complexity of modern building solutions.

666  
667 Firefighter training is clearly insufficient to understand the intricacies of modern buildings and in particular all  
668 potential forms of behaviour in the event of a fire. The profile of those recruited to the service is aligned with  
669 the activities of a first responder and therefore individuals entering the service generally are more focused on,  
670 and afford more value to, direct interaction with the fire. The acquisition of leadership qualities from  
671 recruitment, and development through training and education have been recognized, nevertheless, there is  
672 no similar recognition for the need for technical competency in regard to the intricacies of building  
673 performance (for example the building fabric<sup>31</sup>). Therefore, it cannot be expected that fire fighters will develop  
674 general knowledge and understanding in this regard in isolation. The lack of technical knowledge on building  
675 performance is further reinforced by years of training and tradition that also favours direct interaction with  
676 the fire.

677  
678 As noted above, this situation is evolving and, in some jurisdictions (ex. LFB), fire brigades do now employ or  
679 qualify staff as fire engineers specifically to fulfil roles as reviewing or inspection bodies, however it must be  
680 noted that this is definitely the exception to the rule. Further, performing this role as reviewer/inspector  
681 requires these employees to possess an adequate skillset which enables them to fulfil this role. Importantly,  
682 this in turn requires the Fire and Rescue Service to define the necessary knowledge base and skillset of an  
683 individual that can technically challenge the competent fire engineer in matters of building fabric, in order to  
684 recruit appropriately.

685  
686 An attempt to introduce building related technical competency in the Fire and Rescue Services was made  
687 through the introduction of higher education programs at Glasgow Caledonian University (GCU) and the  
688 University of Central Lancashire (UCLan). These programs are directed towards the Fire and Rescue Services  
689 and they introduced design, regulatory, and engineering principles to enhance the technical competency of a  
690 small number of firefighters. In principle, the graduates of these programmes should be able to direct activities  
691 such as design review or building inspection however the establishment of these programs does not seem to  
692 have had the desired outcome, and no detailed review of the impact of these programs has been conducted  
693 so far to demonstrate otherwise.

694

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<sup>29</sup> Baigent, D., Hill, R., Ling, T., Skinner, D., Rolph, C. & Watson, A. Training Firefighters today as tomorrow's emergency workers. Cambridge: Fire Service Research and Training Unit at APU, 2003.

<sup>30</sup> Childs, M. Beyond training: new firefighters and critical reflection. Disaster Prevention and Management, 14 (4), 558-566, 2005.

<sup>31</sup> Carr, B., National Fire Academy, Managing Officer Program, Examination of the Promotional Process within the Fire Service, March 20, 2017.

695 The new regulatory framework set by Dame Judith Hackitt<sup>32</sup> is structured around three fundamental concepts;  
696 leadership, competence and a new Joint Competent Authority (JCA). The latter is stated as, “comprising Local  
697 Authority Building Standards,<sup>33</sup> fire and rescue authorities and the Health and Safety Executive to oversee  
698 better management of safety risks in these buildings (through safety cases) across their entire life cycle.” From  
699 the onset, the Hackitt report presumes that adequate levels of competency exist within all three groups, and  
700 in particular the fire and rescue authority. Furthermore, it assumes that the fire and rescue authority is the de  
701 facto “competent authority” in all matters pertaining fire safety.

702  
703 “The FRAs (fire and rescue authorities) will bring fire safety expertise to the JCA ensuring fire safety measures  
704 are properly considered, in place and maintained (for example, by ensuring awareness of measures to reduce  
705 the risk of fire and the means to escape from fire). The expectation would be that they would, on behalf of the  
706 JCA, continue to provide specific technical fire safety input during the design, construction and refurbishment  
707 stages. But the FRAs could predominate, on behalf of the JCA, during the occupation and maintenance phase,  
708 particularly in the delivery of the ongoing safety case review process.”

709  
710 This is consistent with the analysis presented above where it was recognized that society perceives the Fire  
711 and Rescue Service as the “competent authority.” On this basis, it is clear that guaranteeing competency within  
712 the Fire and Rescue Services on all matters pertaining to relevant building technologies is fundamental if this  
713 new framework is to be implemented. Furthermore, a clear definition of competency and the means of  
714 attaining it, unavoidably become a requirement in Dame Hackitt’s new regulatory framework.

## 715 4 CONFUSION OF COMPETENCY

716 The increased complexity of buildings has resulted in a clear need for Fire and Rescue Service personnel to  
717 develop and apply a set of skills and attributes, necessary to understand building performance in the event of  
718 a fire, and enable adequate response during one. These skills and attributes are consistent with a professional  
719 engineering framework.<sup>34</sup>

720  
721 Currently, such a framework does not exist so the Fire and Rescue Services are called upon, by the Fire and  
722 Rescue Services Act (2004), to fulfil a role that should be reserved for a competent professional. The strong  
723 internal and external presumption of their competency reinforces the involvement of the Fire and Rescue  
724 Services in providing such assessments and advice, which in actual fact is way beyond what is required by the  
725 by the Fire and Rescue Services Act (2004).

726  
727 It is clear that this involvement is not backed by the necessary education and training. In a similar manner,  
728 other stakeholders, are called upon to deliver design, execution, inspection and maintenance of complex  
729 buildings also without any accreditation requirements. The result is a profound confusion over who should be  
730 performing engineering roles, and ultimately, a lack of competency of those who currently undertake them.

731  
732 This confusion of competency is evident in the Hackitt review where Dame Hackitt identifies six key professions  
733 whose work is essential to fire safety.

734

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<sup>32</sup> J. Hackitt, Building a Safer Future – Independent Review of Building Regulations and Fire Safety: Final Report, Crown Copyright, May 2018.

<sup>33</sup> J. Hackitt, Building a Safer Future – Independent Review of Building Regulations and Fire Safety: Final Report, Crown Copyright, May 2018.

<sup>34</sup> The Warren Centre, University of Sydney, Fire Safety Engineering, Education Report, 2019.

735 “5.14. The interim report identified a minimum of six key professions whose work is essential to the fire safety  
736 of HRRBs:

- 737 • engineers;
- 738 • those installing and maintaining fire safety systems and other safety-critical systems;
- 739 • fire engineers;
- 740 • fire risk assessors;
- 741 • fire safety enforcing officers; and
- 742 • building control inspectors.”

743

744 This list presented should have only included one profession, “engineers.” Those installing and maintaining  
745 fire safety systems and other safety-critical systems should either be engineers or should be supervised by  
746 engineers. These systems are integral parts of a holistic fire safety strategy and therefore cannot be seen as  
747 the independent, isolated responsibility of those installing the systems. “Fire Engineers” are engineers, and  
748 fire risk assessors, fire safety enforcing officers and building control inspectors should be engineers or be  
749 supervised by engineers.

750

751 The Fire and Rescue Services as a body are also an integral part of the fire safety of High-Rise Residential  
752 Buildings (HRRBs), therefore the same professional skills have to be expected from those representing their  
753 interests. If a subdivision/segregation of individual skills/disciplines is encouraged, as described by section 5.14  
754 of the Hackitt report, then fire safety will never be implemented in a rational and holistic manner. None of the  
755 stakeholders (including the Fire and Rescue Services) will ever understand how their role contributes to the  
756 strategy as a whole, and none will achieve the objective of guaranteeing that finished buildings deliver safety  
757 adequately. In the case of Fire and Rescue Services, this means never guaranteeing the capability of effectively  
758 responding to a fire.

759

760 Finally, the Hackitt report establishes that “The government should create a new structure to validate and  
761 assure guidance, oversee the performance of the built environment sector and provide expert advice.” The  
762 Hackitt report discusses efforts being conducted by the Local Authority Building Standards<sup>35</sup> to improve the  
763 levels of competency. While these efforts are clearly important, the most pressing issue is to clarify roles and  
764 responsibilities between the Local Authority Building Standards<sup>36</sup> and the fire and rescue authorities in the JLC.  
765 In the absence of a clear definition of roles and responsibilities, and a detailed framework to certify  
766 competency, the JLC will not foster leadership or quality, which will only add to the enormous confusion of  
767 competency that currently characterizes fire safety.

## 768 5 THE EVIDENCE

769 Section 7 of the Fire and Rescue Services Act 2004<sup>37</sup> indicates that:

- 770 1. A fire and rescue authority must make provision for the purpose of—
- 771 a. extinguishing fires in its area, and
- 772 b. protecting life and property in the event of fires in its area.

<sup>35</sup> J. Hackitt, Building a Safer Future – Independent Review of Building Regulations and Fire Safety: Final Report, Crown Copyright, May 2018.

<sup>36</sup> J. Hackitt, Building a Safer Future – Independent Review of Building Regulations and Fire Safety: Final Report, Crown Copyright, May 2018.

<sup>37</sup> Fire and Rescue Services Act 2004

- 773 2. In making provision under subsection (1) a fire and rescue authority must in particular—
- 774 a. secure the provision of the personnel, services and equipment necessary efficiently to
- 775 meet all normal requirements;
- 776 b. secure the provision of training for personnel;
- 777 c. make arrangements for dealing with calls for help and for summoning personnel;
- 778 d. make arrangements for obtaining information needed for the purpose mentioned in
- 779 subsection (1);
- 780 e. make arrangements for ensuring that reasonable steps are taken to prevent or limit
- 781 damage to property resulting from action taken for the purpose mentioned in subsection
- 782 (1).

783 In the context of the Grenfell Tower fire, points 1(a), 1(b), 2(b) and 2(d) are of particular importance<sup>38</sup>. Only if

784 these points are fulfilled it is possible to establish adequate provisions of personnel, services and equipment

785 (2(a)), make arrangements for dealing with calls for help (2(c)) and make arrangements for ensuring that

786 reasonable steps are taken to prevent or limit damage to property resulting from action taken during response

787 (2(e)).

788 It is important to note that the obligations described in the Fire and Rescue Services Act 2004 are not only

789 limited to events where pre-planned tactics and protocols apply, but also include those events where the

790 building does not behave in the manner expected. The Fire and Rescue Services are required to have

791 contingency plans for these types of events, as well as to provide training for those who might be called to

792 command such events.<sup>39</sup>

793 At the core of the problem is the fact that the refurbishment of Grenfell Tower was executed using specific

794 building technologies and practises that enable a small and perfectly foreseeable kitchen fire<sup>40</sup> to initiate

795 external fire propagation of a magnitude that thwarted the LFB in fulfilling its obligation as per the Fire and

796 Rescue Services Act 2004.

797 Throughout Phase 1, evidence was gathered that the LFB did not manage, through inspection or other means,

798 to obtain adequate information and subsequently identify the nature of the hazards introduced by the

799 refurbishment of the Grenfell Tower.<sup>41,42</sup> It is apparent that, even if all information would have been made

800 available, there was no capacity within LFB to correctly interpret this information<sup>43</sup>. Furthermore, LFB could

801 not extract the requisite information from the many past high-rise building fires involving external spread, that

<sup>38</sup> Section 7.2 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 1, October 2019.

<sup>39</sup> Section 27.3 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>40</sup> J.L. Torero, Grenfell Tower: Phase 1 Report, GFT-1710-OC-001-DR-01, May 2018.

<sup>41</sup> Section 27.21 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>42</sup> Section 27.24 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>43</sup> Section 27.25 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

802 could have enabled them to conduct an adequate dynamic risk assessment. In particular, they were not  
 803 capable of distilling lessons from the Lakanal House fire<sup>44</sup> that could have allowed the LFB to be better  
 804 prepared to fulfil their obligations per Part 1, Section 7 of the Fire and Rescue Services Act 2004.

805 Evidence shows that the LFB effectively implemented their response protocols to tackle a one-unit fire. The  
 806 testimonies make evident that the initiating event was effectively controlled<sup>45</sup>.

807 Once the event was no longer a one-unit fire, the response should have been driven by a dynamic risk  
 808 assessment<sup>46</sup>. The dynamic risk assessment should include contingency plans “which should cover the spread  
 809 of fire beyond the compartment of origin, the possible need for multiple rescues and the need for an  
 810 operational evacuation plan in case “stay put” became untenable.”<sup>47</sup>, up to and including total evacuation of  
 811 the building.<sup>48</sup>

812 LFB personnel, including those in command, were not capable of conducting an adequate dynamic risk  
 813 assessment once it became obvious that the fire was propagating externally<sup>49,50,51</sup>. As a result, many decisions  
 814 that were made or not made, misjudged the nature of the event<sup>52,53</sup>. This resulted in ineffective actions<sup>54</sup> and  
 815 inadequate information being transmitted between members of the LFB<sup>55</sup>, and between them and the  
 816 occupants inside the building who were seeking help.<sup>56,57,58</sup>

<sup>44</sup> Section 28.97 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>45</sup> Section 28.11 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>46</sup> Section 7.46 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 1, October 2019.

<sup>47</sup> Section 27.1 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>48</sup> Section 27.2 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>49</sup> Section 28.14 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>50</sup> Section 28.17 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>51</sup> Section 28.8 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>52</sup> Section 28.14 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>53</sup> Section 28.5 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>54</sup> Section 28.16 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>55</sup> Section 28.17 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>56</sup> Section 28.14 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>57</sup> Section 28.97 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>58</sup> Section 29.71 to 29.78 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

817 Actions taken were not consistent with a proper command structure<sup>59,60</sup>. In particular, the management of  
 818 information and communications<sup>61,62,63</sup> were representative of individuals in charge of their own actions and  
 819 not of a response which is characterized by an effective, coordinated command structure.<sup>64,65,66</sup> This applies  
 820 to both personnel attending the fire and those in the control rooms.<sup>67,68</sup>

821 In general, evidence shows that the LFB did not exhibit the type of command structure required to handle an  
 822 event of the complexity of the Grenfell Tower Fire.

823 At the core of these failures is a profound misunderstanding of risk<sup>69</sup> within modern buildings created by  
 824 inadequate education and training<sup>70</sup>. From the evidence gathered, it can be established that the training  
 825 provided to members of the LFB was not adequate to understand the complexities of modern buildings, in  
 826 particular high-rise buildings. Furthermore, it became apparent that there is a strong disregard for training  
 827 and education pertaining to building behaviour.<sup>71,72</sup>

828 It is clear that the inadequacy of training and education crosses through all ranks of the LFB<sup>73,74</sup>. The  
 829 misunderstanding of risk at the highest level of command is such that statements made during testimony not

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<sup>59</sup> Section 28.105 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>60</sup> Section 28.76 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>61</sup> Section 28.108 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>62</sup> Section 28.88 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>63</sup> Section 28.99 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>64</sup> Section 28.17 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>65</sup> Section 4 - Section 29.44 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>66</sup> Section 29.29 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>67</sup> Section 28.97 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>68</sup> Section 28.103 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>69</sup> Section 27.9 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>70</sup> Section 27.1 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>71</sup> Section 27.24 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>72</sup> Section 27.16 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>73</sup> Section 28.47 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>74</sup> Section 28.20 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

830 only show an absolute lack of knowledge of past fire events<sup>75</sup>, but also a complete misunderstanding of the  
831 behaviour of modern high-rise buildings<sup>76</sup>.

832 The fundamental misunderstanding that the primary role of the Fire and Rescue Services is to fight the fire is  
833 apparent at all command ranks<sup>77</sup>. There is clear evidence that the LFB considers that if the fire cannot be fought  
834 there is no alternative path of action or role.<sup>78</sup> The perception that the fire has to be fought, subordinating all  
835 other actions, is shared by all ranks of the LFB command. This perception was at the heart of the inadequate  
836 dynamic risk assessment conducted during the Grenfell Tower fire<sup>79</sup> and is a key weakness of the training and  
837 structure of the LFB.

838 Repeated actions while responding to the Grenfell Tower fire showed that the LFB has a culture where  
839 adequate command structures are not robust. Furthermore, testimonies provided no evidence that technical  
840 knowledge associated to building behaviour is valued. Such a culture disables the capacity of the Fire and  
841 Rescue Services to operate effectively under conditions where a dynamic risk assessment becomes necessary.  
842 Current trends in building technologies and processes will inevitably result in the LFB having to operate under  
843 these conditions more frequently. Dynamic risk assessments will only become more complex and command  
844 decisions more challenging.

845 Most importantly, this culture manifests itself as an enormous level of unawareness of the key technical issues  
846 to be considered<sup>80</sup>, a complete disregard of the need to enhance the technical competency of the fire service,  
847 and an absolute insensitivity to the mistakes made.<sup>81</sup>

848 The inconsistency between the required technical knowledge and the entitlement of those in command makes  
849 it very difficult to imagine the Fire and Rescue Services conducting a profound enough self-examination such  
850 as that required to deliver the necessary reforms. This is clear from some of the subsequent documents  
851 produced by the LFB describing changes being implemented in response to the Grenfell Tower Fire.<sup>82</sup> In that  
852 sense I am compelled to echo the statements of the Phase 1 report: “only serves to demonstrate that the LFB  
853 is an institution at risk of not learning the lessons of the Grenfell Tower fire.”<sup>83</sup>

<sup>75</sup> Section 27.14 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>76</sup> Section 27.10 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>77</sup> Section 28.17 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>78</sup> Section 27.18 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>79</sup> Section 28.114 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>80</sup> Section 27.17 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>81</sup> Section 28.55 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.

<sup>82</sup> Grenfell Tower Progress Report: Update from London Fire Commissioner, Fire, Resilience and Emergency Planning Committee, Executive Director of Secretariat, 16 October 2019. Grenfell Tower Improvement Progress, Assistant Commissioner – GTIRT, Official, 10 October 2019. (JTO00000001)

<sup>83</sup> Section 28.55 - Grenfell Tower Inquiry: Phase 1 Report, Report of the Public Inquiry into the Fire at Grenfell Tower on 14 June 2017, Chairman: The Rt Hon Sir Martin Moore-Bick, Volume 4, October 2019.



## 854 6 A REQUIRED NEW APPROACH

855 The Grenfell Tower fire has provided clear evidence that the Fire and Rescue Services are required to  
856 incorporate sufficient understanding of building behaviour in their activities. The knowledge associated to  
857 building behaviour will only be effective if it is introduced within a context where this knowledge is respected  
858 and valued. Respect and value are critical because they demonstrate the recognition that this information is  
859 important for making response effective.

860 Currently, the prevailing culture of the Fire and Rescue Services only assigns value to plan execution<sup>84</sup> and the  
861 tools and training associated to following predefined protocols. This culture confines the nature of inspections  
862 and the current command structure. Interventions in fires that incorporate modern building technologies  
863 require plan formulation<sup>85</sup>. Plan formulation is only enabled by relevant information fed into a dynamic risk  
864 assessment. Well interpreted information is a necessary prerequisite to the development of a dynamic risk  
865 assessment. Given the short time-scales of fire growth, the execution of an alternative plan, issued from a  
866 dynamic risk assessment, requires a rigorously adhered to command structure, accompanied by adequate  
867 communications.

868 The acquisition of information prior to any event is essential, because if an inspection cannot identify and  
869 interpret serious mistakes in the design, implementation and maintenance of a building, and ensure that they  
870 are corrected, the nature of the potential fire might still exceed the capacity of the Fire and Rescue Services.  
871 It is clear that a building like Grenfell Tower would respond so poorly to a fire, that not even the best possible  
872 response would have resulted in an acceptable outcome. Purely from the perspective of response capabilities,  
873 a building such as Grenfell Tower should have never been approved and no inspection should have allowed  
874 the building to continue its operation.

875 The Grenfell Tower fire has demonstrated that the culture of the LFB is profoundly associated to a traditional  
876 firefighting culture<sup>86</sup> that cannot generate the quality of plan formulation required by the modern built  
877 environment. This culture prevails across all ranks of the LFB and stifles every possibility for the organic growth  
878 of the technically driven culture that values and respects the skills necessary to form a dynamic risk assessment  
879 driven plan.

880 The creation of a culture that rebalances priorities is necessary to promote acquisition of the skills and  
881 attributes essential for the Fire and Rescue Services to operate in the modern built environment. The new  
882 culture requires a profound reformulation of hierarchy within the LFB that enables those with the appropriate  
883 skills and attributes to conduct plan formulation, to progress in the command structure. Currently, this culture  
884 does not exist and the LFB command shows a strong bias towards those individuals who have demonstrable  
885 skills and attributes when it comes to consistent repetition of pre-defined protocol.

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<sup>84</sup> Cohen-Hatton, S.R. Butler, P.C. and Honey, R.C., An Investigation of Operational Decision Making in Situ: Incident Command in the U.K. Fire and Rescue Service, Human Factors, Vol. 57, No. 5, August 2015, pp. 793–804.

<sup>85</sup> Cohen-Hatton, S.R. Butler, P.C. and Honey, R.C., An Investigation of Operational Decision Making in Situ: Incident Command in the U.K. Fire and Rescue Service, Human Factors, Vol. 57, No. 5, August 2015, pp. 793–804.

<sup>86</sup> Baigent, D. One More Last Working Class Hero. A Cultural Audit of the UK Fire Service. Fitting-in Ltd & The Fire Service Research and Training Unit, Anglia Polytechnic University, 2001.

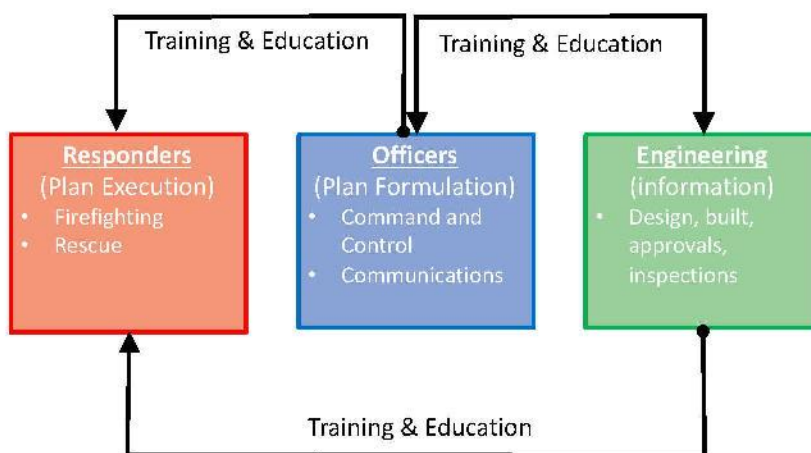
886 This new culture will enable the Fire and Rescue Services to gather and interpret information adequately and  
 887 to use this information for the effective management of a fire scene where on-the-spot plan formulation and  
 888 strict command practices are necessary.

889 Figure 1 presents a conceptual map of skills and attributes that are necessary for a Fire and Rescue Service to  
 890 operate in an effective manner within the modern built environment. The three branches have distinctive and  
 891 essential skills and attributes. The three branches must continuously interact through training and education  
 892 to guarantee that all necessary skills and attributes are present in each branch, but also to reinforce the value  
 893 of each specific role. For a structure of this nature to thrive it is necessary that a culture of value and respect  
 894 for all the different skills and attributes is developed.

895 The Engineering Branch must include professional Fire Safety Engineers as well as professionals of other  
 896 disciplines where strong interactions are necessary to guarantee fire safety (e.g. architects, structural  
 897 engineers, etc.). This branch is responsible for information gathering and for providing training and education  
 898 in relevant matters to responders and officers. Only through the introduction of the skills and attributes of the  
 899 Engineering Branch can the Fire and Rescue Services have the capability to play a direct and effective role in  
 900 the approvals process. Its responsible members will be accredited by their relevant engineering professional  
 901 organizations thus eliminating the confusion of competence, as the skills and attributes of these new  
 902 personnel in Fire and Rescue Services will be aligned with all other professionals (engineers, architects, etc.)  
 903 responsible in delivering fire safety to the public. It will provide a single competency standard for approvals  
 904 authorities, design/construction engineers and all other professional stakeholders.

905 The role of the officer is associated to all the skills and attributes relevant to plan formulation and includes  
 906 only individuals with a profile and attributes appropriate for strategizing, leadership and logistical skills. The  
 907 Officers Branch is characterized by a deep relationship between these aforementioned skills and all relevant  
 908 professional skills.

909 The skill requirements of the Responders Branch will inevitably be defined by the other two branches to meet  
 910 the evolving needs.



911  
 912 Figure 1 - Conceptual skills and attributes diagram for the Fire and Rescue Service

913 An element of fundamental importance to enable a system of this nature to be effective is a coherent structure  
 914 for training and education. Currently, firefighter training is conducted by the Fire Service Colleges and external  
 915 contractors and is coordinated by officers. Firefighting training can remain under this structure, nevertheless,  
 916 the coordination of training and education activities for the Responders Branch should be jointly shared by

917 the Officers and the Engineering Branches. The Engineering branch will comply with training and educational  
918 practises defined by the relevant professional institutions. This will guarantee a balanced delivery of all  
919 relevant aspects. The pedagogy that results in an adequate acquisition of knowledge will have to be carefully  
920 studied. The Engineering Branch will be responsible for coordinating training and education for the Officers on  
921 matters related to building technology while the Officers Branch will provide training for Engineers in all  
922 matters pertaining to operational requirements.

923 This suggested new approach towards the Fire and Rescue Services is purely conceptual. Currently, there are  
924 many unresolved questions related to the training and education of all three branches. Professional  
925 institutions have not adequately defined the skills and attributes of a modern fire safety engineer<sup>87</sup> and  
926 pedagogies that are capable of delivering these skills and attributes are still in their infancy.<sup>88,89</sup> Furthermore,  
927 it is clear that such a drastic change of culture within the Fire and Rescue Services will face many complex  
928 barriers. Therefore, this simple representation should only be regarded as a recognition that a broader set of  
929 distinct skills and attributes are necessary for a modern Fire and Rescue Service to deliver the type of response  
930 necessitated by the modern built environment.

931 It is essential to recognize the complexity of this proposed transformation because only then can the necessary  
932 resources be deployed to study the problem and provide implementation paths that will truly deliver what is  
933 necessary. The formulation of a transformation path can only be achieved by a multi-disciplinary group that,  
934 while potentially incorporating members of the Fire and Rescue Service, must not be led by them. This group  
935 needs to have external leadership because the current culture of the Fire and Rescue Services does not allow  
936 for the required level of self-criticism and introspection.

937 It is important to state, given that this inquiry stems from the events at Grenfell Tower, that the issues raised  
938 in this report should not be assumed as unique to the LFB. It is my strong opinion that these issues are in fact  
939 endemic to all Fire and Rescue Services, nationally and globally. Thus, while I insist that the Fire and Rescue  
940 Services should not lead this review, the justification for this position is equally applicable to any national or  
941 international Fire and Rescue Service. It is also important to reiterate that this will be a multi-year effort that  
942 needs to challenge the nature of the Fire and Rescue Services as well as the fire safety engineering profession.

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<sup>87</sup> J.L. Torero, "Fire Safety Engineering: profession, occupation or trade?" International Fire Professional Magazine Vol. 1 No. 1 July 2012, Institution of Fire Engineers, UK.

<sup>88</sup> The Warren Centre, University of Sydney, Fire Safety Engineering, Education Report, 2019.

<sup>89</sup> M. Woodrow, L. Bisby, J.L. Torero; A nascent educational framework for fire safety engineering; Fire safety Journal, vol. 58, pp. 180-194, 2013.

944 **7 SUMMARY**

945 The characteristics of the London Fire Brigade are very similar to many other Fire and Rescue Services globally.  
946 While this report has focused on the London Fire Brigade, most of these statements will apply to Fire and  
947 Rescue Services across the United Kingdom and internationally.

948 The Grenfell Tower fire demonstrated that the London Fire Brigade, in its current structure is not capable of  
949 delivering the role that society expects from this institution.

950 The nature of the modern built environment and current construction practises requires a Fire and Rescue  
951 Service that is capable of conducting Plan Formulation when faced with complex modern infrastructure. This  
952 must include all components of the Plan Formulation process; from information gathering, its interpretation,  
953 its use in a dynamic risk assessment, the handling of communications and an effective command structure to  
954 deliver an appropriate response.

955 The London Fire Brigade still operates in a Plan Execution mode which is no longer sufficient. For the London  
956 Fire Brigade to deliver the level of service expected by society when operating in respect to complex modern  
957 infrastructure, it requires a deep transformation that involves not only improvement of skills and professional  
958 attributes but also requires a drastic change of culture.

959 At the core of this change of culture is transforming the value structure of the organization to introduce respect  
960 and value for technical knowledge. Currently, the culture of the London Fire Brigade exhibits, at all levels, a  
961 total disregard for technical competency and the understanding of building performance.

962 The necessary transformation requires a deep, extensive and fundamental review of the structure of the  
963 London Fire Brigade as well as a redefinition of skills and attributes of those employed by the London Fire  
964 Brigade. This report does not provide such a review but a simple conceptual structure that could serve as a  
965 starting point.

966 The review of the London Fire Brigade, and in general any Fire and Rescue Services, must be a long term,  
967 extensive and multi-disciplinary effort. The current culture prevailing in the London Fire Brigade, and Fire and  
968 Rescue Services globally, prevents them from leading such a review.