

Manchester City Council Report for Resolution

Report to: Neighbourhoods and Environment Scrutiny Committee - 7 November 2018
Executive – 14 November 2018

Subject: Sprinkler and fire safety works update

Report of: Strategic Director (Development)

Summary

Following the Grenfell Tower tragedy Executive received reports in June, September and December 2017. In the December 2017 report the Council committed to installing sprinklers, subject to surveys, consultation and receiving updated costs, in all Council-owned tower blocks as well as to implement fire safety works recommended by Type 4 Fire Risk Assessments.

This report provides an update and recommends additional approvals in relation to the 24 Council-owned tower blocks managed by Northwards Housing, 11 tower blocks managed by two PFI-funded contractors and Woodward Court managed by homelessness.

It does not cover in detail those blocks managed by PFI contractors in Miles Platting (7) and Brunswick (4), nor does it include privately owned blocks.

Recommendations

1. Neighbourhoods and Environment Scrutiny Committee is invited to comment on the content of this report.

2. Executive

- Is requested to **note** the progress made since December 2017.
- Is requested to **note** that the consultation undertaken demonstrated significant support for sprinklers but also that a minority of residents are strongly opposed.
- Is requested to **note** the support for sprinklers from Greater Manchester Fire and Rescue Service and National Fire Chiefs Council. The Prime Minister has also recently endorsed retrospective fitting of sprinklers to publicly-owned tower blocks.
- Is **recommended** to continue to proceed with fitting sprinklers, but give residents the ability to decline having sprinklers installed in their flat as long as they have first been given the opportunity to understand the benefits and risks as outlined in paragraph 3.8.

- Is requested to **note** that the overall budget for sprinkler installation across 35 tower blocks (Whitebeck Court extra care scheme already has a sprinkler system) remains, as estimated, £10.5m approved by Executive in December 2017 and that these systems will have a 30-year life. These costs are being met within the Housing Revenue Account (HRA) through the rephrasing of the Public Sector Capital Programme.
- Is recommended to **approve** that the initial installation of sprinklers is offered to leaseholders free of charge at an estimated cost of £240k (to include Miles Platting and Brunswick PFI leaseholders) from the Council's General Fund Housing Private Sector Capital Programme as detailed in paragraph 4.4. This is in addition to the £10.5m sprinkler budget identified above, and will require an increase of £240k to the Private Sector Housing capital budget. However, leaseholders will be required to meet the estimated £167 annual repair and maintenance costs.
- Is requested to **note** that the fire safety works recommended by the fire risk assessor, Savills, are mandatory and is asked to **recommend** to Council that the budget for these fire safety works should be increased from £4.0m to £5.2m as the budget request to Executive in February 2018 did not include the tower blocks managed by PFI contractors in Miles Platting and Brunswick and Woodward Court. This will require an increase of £1.2m to the Public Sector Capital Programme from revenue contributions from the HRA.
- Is requested to **note** that the contracts for sprinklers and fire safety works (plus the other works included in those contracts) include contingency but otherwise place cost risk on the Council, with Northwards Housing managing these contracts on the Council's behalf to mitigate against further costs. Further costs are, however, possible as the sample surveys undertaken may not have identified the full extent of works.
- Is recommended to **approve** the revenue costs associated with maintaining sprinkler systems as outlined in the revenue consequences section of this report and in paragraph 4.3. Negotiations will be held with Northwards and the PFI providers with regard to the additional revenue funding required, and any subsequent increase in the budget will be met from the Housing Revenue Account.
- Is requested, where access is denied by tenants or leaseholders to implement fire safety works, to **delegate authority** to take legal action, where required, to the City Solicitor in discussion with the City Treasurer, Director of Housing and Residential Growth, Executive Member for Housing and Regeneration and Executive Member for Finance and Human Resources.

3. Council

- is asked to **approve** a capital budget increase for these fire safety works of £1.2m (from £4.0m to £5.2m) to include the tower blocks managed by PFI contractors in Miles Platting and Brunswick and Woodward Court in the capital

programme. This will require an increase of £1.2m to the Public Sector Housing Capital Programme funded from revenue contributions from the HRA.

Wards Affected:

Ardwick, Baguley, Charlestown, Cheetham, Crumpsall, Gorton North and South, Harpurhey, Higher Blackley, Hulme, Miles Platting & Newton Heath, Northenden, Rusholme, Sharston and Woodhouse Park

Manchester Strategy outcomes	Summary of the contribution to the strategy
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	The Council has continued to work with partners to drive forward major development schemes that provide safe accommodation, stimulate economic growth and job creation.
A highly skilled city: world class and home grown talent sustaining the city's economic success	The City aims to provide safe accommodation which encourages people worldwide to visit, keeping those with the skills the City needs, keeping our home grown professionals.
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	Everyone will have the same opportunities and life chances no matter where they're born or live in safe accommodation. Voluntary and community groups will find new ways to reach those as yet untouched by Manchester's success to create resilient and vibrant communities.
A liveable and low carbon city: a destination of choice to live, visit, work	The right mix of quality safe accommodation is needed to support growth and ensure that our growing population can live and work in the city and enjoy a good quality of life.
A connected city: world class infrastructure and connectivity to drive growth	The City's transport system has an enormous influence on the lives and prospects of Manchester's residents. To enable people to access jobs we are creating efficient transport systems that link residential communities to employment centres.

Full details are in the body of the report, along with any implications for

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue

The initial installation of sprinkler systems is capital expenditure. However, the systems will require annual inspection and parts will need periodic renewal. It is estimated by Northwards Housing that it will cost in the region of £167 per annum per flat to maintain the systems during their 30-year life. This is made up of £35 annual maintenance and £132 on average per annum to cover periodic lifecycle replacement

costs. There are 2328 properties and the additional annual cost will be £389k, of which £9k relates to leasehold properties and will be recharged. These revenue costs will be met from existing budgets.

The Council and its contractors (Northwards Housing and two PFI-funded contractors) Northwards Housing will include the annual inspection in their servicing programme and cover any one-off maintenance costs within their overall repairs and maintenance budget. Subject to agreement at today's meeting, the Council will charge leaseholders for the actual repair and maintenance cost.

The Council's insurers have indicated that if the Council installs sprinklers in every flat in a block they would be prepared to remove the excess charge in the event of a fire. They have, however, indicated that there would be very little difference in the annual premium.

Financial Consequences – Capital

Executive agreed a budget of £10.5m in December 2017 for sprinkler works to 35 Council-owned blocks (including those in PFI projects), based on high level estimates at that time. This was estimated as £7.2m for the 23 blocks managed by Northwards Housing, plus Woodward Court, and £3.3m for the blocks managed by the PFI contractors. Since then Northwards Housing have undertaken 3 tender exercises (covering 13 of the 24 blocks which are the subject of this report) and at current prices the overall capital budget required is in line with the original approval of £10.5m, including contingency. This assumes the tower blocks managed by PFI contractors will incur similar costs, which will be reviewed at a later stage.

Alongside the sprinkler installation the contractors will be undertaking other fire safety works legally required as a result of Type 4 Fire Risk Assessments. The value of these works, following a number of sample surveys, has been estimated by Northwards Housing's fire risk assessor at £4m for the tower blocks (£3.6m) and retirement homes (£0.4m). The budget approval in February 2018 only included the properties managed by Northwards Housing. Assuming these costs are similar in the other 12 the overall cost of Type 4 Fire Risk Assessment (FRA) works is likely to be c.£5.2m. However, the full scope and cost will be determined once detailed inspections are carried out in each flat under the building contracts.

The sprinkler installation and Type 4 FRA works will be funded from capital via the Housing Revenue Account (HRA).

The 30-year life of the sprinkler system means that in 30 years time the Council would need to budget for its renewal. As the HRA model is a 30-year rolling model this does not currently feature in the model but will be added in a year's time.

Contact Officers:

Name: Jon Sawyer
Position: Director of Housing & Residential Growth
Telephone: 0161 234 4811
E-mail: jon.sawyer@manchester.gov.uk

Name: Julie Roscoe
Position: Head of Planning, Building Control & Licensing
Telephone: 0161 234 4552
E-mail: j.roscoe@manchester.gov.uk

Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

Report to Executive 28 June 2017
Report to Executive 13 September 2017
Report to Executive 13 December 2017

1.0 Introduction

1.1 The following recommendations were approved by Executive at its meeting in December 2017:

- ***Executive is requested to note the work undertaken to date***
- ***Executive is recommended to approve the installation of sprinklers within Council-owned tower blocks following consultation with residents at an estimated cost of £10.5 million for a full installation in each flat.***

1.2 On 13 December 2017 Executive received and approved the report 'Grenfell Tower - Update on the Implications for Manchester' in which the following was reported:

- The Council believed that sprinklers ought to be fitted to each of the high rise blocks it owns (in both common areas and individual flats).
- That once Type 4 Fire Risk Assessments (FRAs) had been prepared and consultation had taken place with tenants and leaseholders through the High Rise Forum the Council would be able to make a final decision whether to install sprinklers.
- Subject to consultation, there was a recommendation to locate sprinklers where recommended by residents and Greater Manchester Fire and Rescue Service (GMFRS).
- The estimated cost for retrofitting sprinklers to Northwards Housing's flats was £7.5m (£10.5m including PFI blocks) but any future capital costs would be reported to Executive for approval.

2.0 Current position

2.1 Budget approval

2.1.1 Following the December 2017 Executive report an instruction was given to Northwards Housing in line with the Council's Capital Approval Process and Governance rules. Northwards Housing then commissioned a specialist to undertake selective Type 4 Fire Risk Assessments in a range of flat types across the properties they manage. Once they had received the detailed reports they began the procurement of the works. An initial Business Case was submitted to the Capital Strategy Board for approval, and was signed off by the City Treasurer and the Executive Member for Finance & Human Resources.

2.2 Procurement

2.2.1 To ensure value for money and minimise resident disruption the Council and Northwards Housing agreed to procure:

- Sprinkler and other fire protection works recommended by the Type 4 FRAs (such as compartmentation) together.
- These fire safety works alongside other improvement works already in the capital programme (e.g. new window frames).
- These collective works in clusters of tower blocks.

2.2.2 Northwards Housing have procured a preferred contractor to undertake these works, with appropriately skilled subcontractors for the sprinkler and fire safety works elements. An EU compliant framework has been used.

2.2.3 Having selected the contractor team earlier in the year Northwards Housing have benefited from their expertise in finalising the design of the sprinkler works, combined with the expertise of fire risk assessor Savills in specifying the fire safety works.

2.3 Technical Approvals

2.3.1 The contractor is working closely with the Council's Building Control team to secure appropriate approvals. An initial demonstration flat was set up by Northwards Housing and observed by one of the Building Control team, with further demonstration flats having since been set up in blocks across the Northwards Housing area to enable residents to view the proposed sprinkler system. 210 residents have visited the demonstration flats to date.

2.4 Type 4 Fire Risk Assessments

2.4.1 Type 4 FRAs give more detailed assessments of a building's potential performance in the event of a fire and detail what work is required to meet the current fire performance standards in relation to means of escape and evacuation, occupants' safety, the ability of the building to resist the spread of fire and the means of detecting and fighting fires within the building. In part these involve intrusive investigation behind walls, ductwork and other hidden spaces where fire could circumvent the designed fire breaks if the breaks are not installed correctly or have been breached by previous maintenance works.

2.4.2 Northwards Housing engaged Savills to undertake Type 4 FRAs in a representative sample of properties in each tower block that they manage (and also in Woodward Court which is managed by the Council's homelessness service). The sample represented different types of flats on different elevations across the property portfolio. 115 Type 4 FRAs were carried out across the 1615 flats in the 24 tower blocks.

3.0 **Consultation**

3.1 In the report to Executive in December 2017 the following consultation arrangements were proposed:

"Once sufficient Type 4 FRAs have been carried out, and an assessment of the quality of compartmentation has been made by fire risk assessors, the Council will be able to undertake consultation with tenants and leaseholders in tower blocks about retrofitting sprinklers. Consultation will be carried out with members of the High Rise Forum (covering properties in north Manchester managed by Northwards Housing) ...

One of the key decisions to be addressed will be whether or not, on completion of all Type 4 FRA works, the Council then commits to installing sprinklers in each individual flat ... Fundamentally, type 4 FRAs will offer a high level of assurance that the compartmentation of the flats is secure and that in the event of a fire, it will be contained as designed, allowing the Fire Service to deal with the fire within the flat.

Once the consultation has been completed, Executive is recommended to approve the installation of sprinklers in the locations recommended by residents and GMFRS. Funding provision for the installation of sprinklers will have to be provided for within the HRA capital programme although this will have an impact on other programmed capital works, unless central Government is prepared to assist".

- 3.2 Northwards Housing have met with the High Rise Forum on 4 occasions - December 2017, March 2018, June 2018 and August 2018 - and have discussed the installation of sprinklers on each occasion. GMFRS have also attended at least 2 of these meetings to provide advice to the Forum.
- 3.3 As explained above Northwards Housing have also prepared demonstration flats and over 200 residents have so far visited these and the majority were either supportive of the Council's proposal to install sprinklers or made no comment, with a small minority expressing concerns. However, in Collyhurst a large number of residents visiting the demonstration flat strongly expressed their disapproval about the proposals and stated that they did not want sprinklers and would not allow access for the works. Some concern was also expressed by a small number of Newton Heath residents.
- 3.4 Whilst the December report stated that the Council would review the decision to install sprinklers once the Type 4 Fire Risk Assessments and/or works were undertaken the consultation has focused more on how the work will be carried out rather than whether it was necessary. This approach has been taken because officers believe that installing sprinklers will create a further layer of protection for individual residents (and for the block overall) even after the Type 4 FRA works improve the compartmentation.
- 3.5 The Council needs to carefully weigh up the pros and cons arising from this consultation and other relevant information.
- 3.6 The retrospective fitting of sprinklers is recommended by the GMFRS and the National Fire Chiefs Council (see Appendix 1 and 2). The retrofitting of sprinklers in publicly-owned tower blocks has also been supported by the Prime Minister in a recent article in the Housing trade magazine Inside Housing. Building regulations also now require sprinklers for all new build tower blocks that has a floor at or above 30m high (approx. 10 storeys). Since 1 January 2016 it has been mandatory to install sprinklers in every new residential building in Wales.
- 3.7 However, at the same time the recent Social Housing Green Paper stresses the importance of attaching weight to tenants' wishes.

- 3.8 On balance, the recommendation made in this report is to allow residents to make their own choice, but having first been given every opportunity to understand the benefits and risks of sprinklers. The sprinkler system can be designed to allow this flexibility.
- 3.9 Further information dealing with some of the concerns raised by residents about sprinklers and the substance of the Council's responses can be found in Appendix 3 of this report and a report on the effectiveness of sprinklers is included at Appendix 4.
- 3.10 Once Type 4 FRA works have been completed to improve the compartmentation it is essential that the Council educates its contractors and residents so that they do not undertake any work to the property which might undermine the integrity of the fire safety works. We will work with our managing agents (Northwards Housing, Avro Hollows Tenant Management Organisation, Renaissance Miles Platting Ltd and Solutions for Brunswick, along with staff managing Woodward Court) to give them practical advice to enable them to make informed decisions about the risk mitigation they must take to avoid breaching the compartmentation. Resident newsletters and other media will be used to inform residents of their responsibility to not undertake any works which might result in fire safety works being compromised.

4.0 Budget

4.1 Sprinklers – capital

- 4.1.1 In December 2017 we estimated, based on knowledge at that time, that the cost of installing sprinklers in the 35 tower blocks would be around £300,000 per block. The apportioned cost for the number of blocks managed by Northwards Housing (plus Woodward Court) was approximately £7.2m, with a further £3.3m for the 11 PFI tower blocks.
- 4.1.2 Northwards Housing undertook some initial design work and estimated that the overall cost would be nearer to £6m for the blocks they manage and Woodward Court and sought capital budget approval for this amount.
- 4.1.3 Following the selection of a sprinkler installation contractor further work has been identified and following the 3 tenders undertaken to date (covering 13 tower blocks) the overall cost of the work to all 24 tower blocks has increased by around £1.4m. This can still be contained within the overall budget agreed.
- 4.1.4 The estimated cost of installing the sprinkler system increased due to a change in the scope of works required. In particular, the following work is recommended:
- Additional sprinkler pump (standby should the duty pump fail).
 - Uninterrupted power supply (battery back-up system to provide power in the event of the power to the blocks failing).
 - Additional costs associated with boxing in.
 - Lockable cabinets on each floor.

- Sounders (alarm bells) in each flat.
- Extension of the sprinkler system into the enclosed balcony (in Collyhurst).

4.1.5 The first two additional items were not originally included but are recommended measures, according to the British Standard guidance, to be considered where there is a higher than average risk profile. The FRA consultant, Savills, recommended that the Council include these for all of the tower blocks.

4.2 Fire safety works - capital

4.2.1 Whilst the Government has made available funding for replacing unsafe cladding on social rented tower blocks this does not extend to the fire safety works included in this paper. In the February 2018 budget report to Executive, an estimated budget of £4m was approved to undertake other fire safety works which have been identified as a result of the Type 4 FRAs in tower blocks and retirement homes managed by Northwards Housing. Increased approval of £1.2m is sought from Executive in this report to increase the budget from £4m to £5.2m in total for the FRA works to cover the estimated cost of works to tower blocks managed by the PFI contractors and Woodward Court.

4.3 Sprinklers – revenue

4.3.1 The estimated cost of maintenance of the sprinkler system is £35 per annum per flat. The system will be inspected each year and this will be included within Northwards Housing's annual servicing programme.

4.3.2 During the 30 years there are certain parts which will periodically need replacing such as the pumps, the back-up batteries, alarms and sounders, and the control panel. The estimated cost is £132 per flat per annum at today's prices and funding will be allocated within the Northwards Housing management fee in the relevant years.

4.3.3 Detailed costings will be negotiated with the PFI contractors in due course taking into account the experience with Northwards Housing.

4.4 Leaseholders

4.4.1 The Council believes that all residents in tower blocks ought to have the opportunity to have sprinklers installed. It acknowledges, however, that these are unexpected costs and at an estimated cost of £4,540 per flat would be likely to cause financial hardship for most leaseholders. It is, therefore, recommended that Executive agree that the initial installation will be provided to leaseholders, who want sprinklers installed, free of charge. However, those that opt to have the sprinklers will be required to meet the annual repair and maintenance cost and the cost of future replacement parts and system renewal through their service charge which will be on average £167 per annum at today's prices. As these costs vary from year-to-year (from £35 per annum to £945 per annum depending on the work required) leaseholders will

be offered the opportunity to pay into an interest-bearing sinking fund to spread these costs.

- 4.4.2 There are currently 29 leaseholders in tower blocks managed by Northwards Housing and the estimated cost to the Council of supplying sprinklers free of charge will be c.£130k if all leaseholders opted to have them installed.
- 4.4.3 Executive should also be aware that there are at present 25 leaseholders in the Brunswick and Miles Platting PFI contract areas and, therefore, free installation will cost the Council approximately £240,000 in total. As the work is to leasehold, not tenanted, properties this funding should be provided from the Council's General Fund Housing Private Sector Capital Programme.

4.5 Potential savings

- 4.5.1 The capital and revenue costs described above assume that 100% of tenants and leaseholders take up the option of sprinklers. If they do not, there may be scope for savings. Likewise a level of contingency is assumed in the capital costs for sprinklers and fire safety works, which may not be needed in full. However, as explained, the Council is taking cost risk on these contracts and the costs could, therefore, increase, including possible legal costs if tenants/leaseholders prevent access for fire safety works. Therefore no specific savings assumed but if they arrive they will be returned to the HRA capital programme.

5.0 Risk

- 5.1 Subject to the decisions being made in this report, the Council would be entering into a series of contracts at the same (or similar) time for all 24 tower blocks referred to above. This approach is being taken because of the need to complete fire safety works within the timetable recommended by the fire risk assessor.
- 5.2 The contracts place cost risk with the Council for sprinkler installation, fire safety works and other works (window replacement etc). It is not unusual for the Council to take cost risk for items within the capital programme. However, risk is increased somewhat by the fact that the Type 4 FRA works cost estimates are based on sample surveys. The actual costs will be clarified within the scope of the contract, with contingency in place to mitigate this risk. Northwards Housing has explored the scope for cost risk transfer or cost risk share with the preferred contractor on the fire risk works but they are unable to confidently price such risk sharing. A higher level of contingency is included on the fire safety works as a result.
- 5.3 Delays in decision-making about the contents of this report could lead to the specialist sprinkler subcontractor being unavailable and the Council needing to deliver the fire safety works under a separate contract to ensure they are delivered within the timetable recommended by the fire risk assessor. If the sprinkler works were then progressed later this could be at additional cost as the economies of scale of the larger contract would no longer be available.

- 5.4 There is always a potential risk of procurement challenge, such as from competitors. However, Northwards Housing have used a EU-compliant procurement method (which they have to be given the value of the works) and have already taken, and will continue to take, relevant legal advice prior to signing any contracts.
- 5.5 Whilst, subject to approval today, Executive agrees that tenants and leaseholders can decide whether they want sprinklers installed or not, the Council must undertake the works identified in the Type 4 FRAs. Therefore, within the contracts, the Council will require the contractor to gain access to each flat to inspect the compartmentation and carry out any works identified in the FRAs. Failure by the tenant or leaseholder to allow access could, ultimately, require the Council to take legal action which would both potentially increase the cost and cause delays to the programme of works.
- 5.6 If Executive decided not to proceed with the installation of sprinklers in flats in tower blocks there is a risk of significant negative publicity as it had previously agreed to the installation.
- 5.7 There is a potential risk that the Government may in the future decide to offer local authorities funding to cover some or all of the cost of fire safety works, including sprinkler installation. In carrying out the works before any announcement, the Council could miss the opportunity to claim financial support in the future. However, whilst the Prime Minister is supportive of the retrospective fitting of sprinklers, no announcement was made at the Conservative Party Conference in October 2018 and we are not aware that the Government are working on any funding proposals.
- 5.8 There is a risk that following the Grenfell Inquiry, and other ongoing technical work, the Government prescribes a different fire safety solution or a different type of sprinkler system than the one the Council is procuring. However, the chosen solution has been developed in discussion with GMFRS and the fire risk assessor, Savills.
- 5.9 There is a general fire safety risk until all of the work identified in the Type 4 FRAs is completed, although the fire risk assessor Savills has suggested completion dates for each item of work and Northwards Housing is programming its work accordingly.

6.0 Conclusion

- 6.1 Following December's report to Executive Northwards Housing have undertaken consultation with representatives of the High Rise Forum and have held a number of Open Days in show flats across the properties they manage.
- 6.2 The majority of residents welcome the Council's proposal to install sprinklers in their flat to improve their personal safety. However, there has been a significant number of residents in the Collyhurst blocks, and a few in Newton Heath, who have stated strongly that they do not want sprinklers.

- 6.3 Local and national fire service organisations, and our Building Control manager support the retrofitting of sprinklers in tower blocks and this has been further endorsed by the Prime Minister.
- 6.4 However, if residents are adamant that they do not want sprinklers and have been given the opportunity to understand the benefits of them and risks of not having them installed then Executive is recommended to agree that they can make this choice.
- 6.5 The overall scope of the sprinkler installation works to be carried out in each block has increased since Northwards Housing undertook initial design work but currently remains within budget. However, further budget approval is required to cover Type 4 FRA fire safety works in tower blocks in Miles Platting, Brunswick and Woodward Court as this was not requested in February 2018.
- 6.6 Budget approval is also required to cover the cost of free sprinkler installation in leasehold properties, with leaseholders covering the annual maintenance costs, and to cover the annual maintenance of the sprinkler systems in Council tower blocks.
- 6.7 Executive is asked to approve all of the recommendations identified in this report

7.0 Contributing to the Manchester Strategy

- (a) A thriving and sustainable city
- 7.1 The delivery of providing safe accommodation could provide the opportunity for an increase in employment across the various schemes.
- (b) A highly skilled city
- 7.2 The provision of safe accommodation will encourage young people and graduates, to be attracted to apprenticeships and work placements
- (c) A progressive and equitable city
- 7.3 The planning process of the schemes will encourage residents to get involved and influence decision making for providing safe accommodation.
- (d) A liveable and low carbon city
- 7.4 The right mix of quality safe accommodation is needed to support growth and ensure that our growing population can live and work in the city and enjoy a good quality of life.
- (e) A connected city

7.5 Implementation of safe accommodation across the City. The work will reinforce the City's role as the centre of providing safe accommodation.

8.0 Key Policies and Considerations

(a) Equal Opportunities

8.1 The recommendations in this report allow residents who might experience above average difficulty evacuating a block from staying in situ should a fire arise.

(b) Risk Management

8.2 A detailed section on specific risks has been included in this report. The City Council's Short Term Financial Strategy includes an assessment of budget risk for implementing fire safety measures.

(c) Legal Considerations

8.3 As this work develops we may need to work with legal colleagues to ensure the contractor can gain access to undertake any necessary inspections and fire safety works that may be required.