

Notes on Regulatory Reform (Fire Safety) Order Consultation Exercise

The Government breached their own consultation principles on the previous consultation exercise by not including all interested groups – organisations representing disabled people:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/893173/The_Regulatory_Reform_Fire_Safety_Order_2005_-_summary_of_responses.pdf:

1. Annex A lists all the organisation responders – not one charity representing disabled people in spite of Section 4.24 specifically asking about PEEPs which suggests that they were unaware of the consultation exercise.
2. The Governments Consultation Principles state (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691383/Consultation_Principles_1.pdf) :

F. Consultations should be targeted

Consider the full range of people, business and voluntary bodies affected by the policy, and whether representative groups exist. Consider targeting specific groups if appropriate. Ensure they are aware of the consultation and can access it. Consider how to tailor consultation to the needs and preferences of particular groups, such as older people, younger people or people with disabilities that may not respond to traditional consultation methods.

G. Consultations should take account of the groups being consulted

Consult stakeholders in a way that suits them. Charities may need more time to respond than businesses, for example. When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action, such as prior discussion with key interested parties or extension of the consultation deadline beyond the holiday period.

So the question is, did the charities not respond because they were not interested or because they were not informed that the consultation?

No response from the EHRC is particularly surprising as is the lack of any response from any of the Grenfell Tower campaigning charities (who I would have expected to be extremely interested in both this area of consultation and the new consultation) suggests that it is the latter case.

Essential reading: EHRC Submission to the Grenfell Tower

Inquiry: <https://www.equalityhumanrights.com/sites/default/files/grenfell-inquiry-phase-1-submissions-january-2019.pdf> this pretty much encapsulates everything!!!!

The Grenfell Tower charities, I've identified so far are:

The Grenfell Foundation: <https://grenfellfoundation.org.uk>

Grenfell United: <https://www.grenfellunited.org.uk>

Justice4Grenfell: <https://justice4grenfell.org>

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