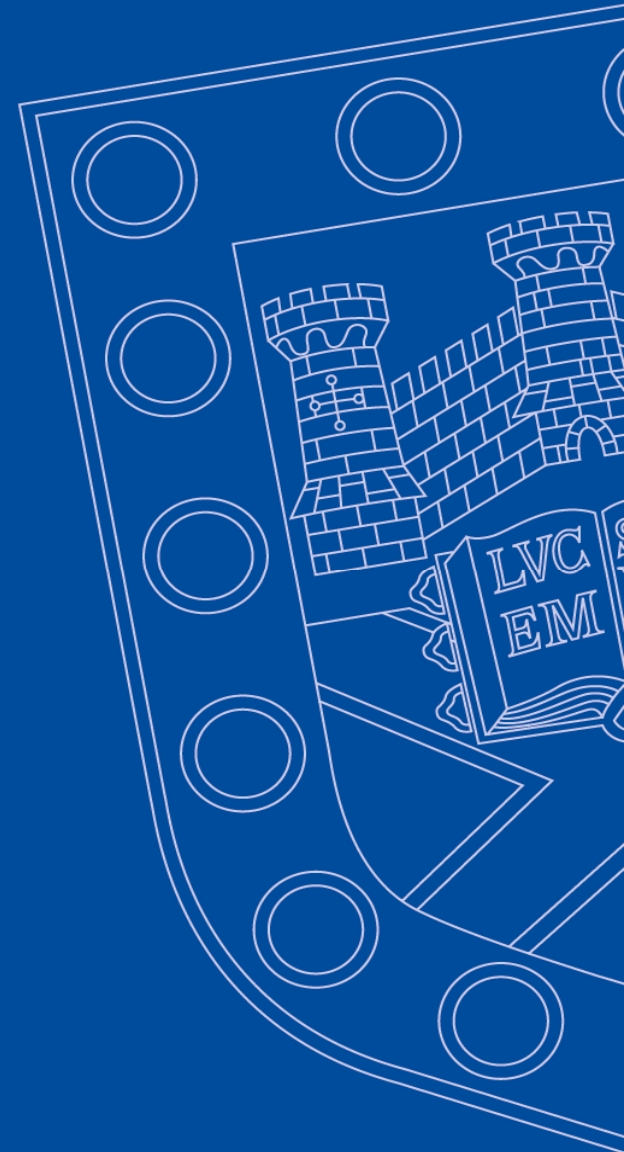




# Understanding Grenfell: Ignorance in Government and the Creation of a Hostile Environment for Safety

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# Paper's Conceptual Motivation

Vibrant literature on policy learning / unlearning / re-learning focussed on varieties or modes of learning – reflexive, epistemic, bargaining, hierarchical – and their causal mechanisms (Dunlop & Radaelli, various)

Learning as normatively neutral and prescriptively equivocal (it may, or may not, result in 'better' public policy)

Aim here: extend analysis of the darker side of policy learning

We know learning can be dysfunctional (Dunlop, 2017)

We know far less about the refusal to learn – strategic non-learning – despite the fact this is not a deviant feature of decision-making

Using ignorance literature from social science (especially STS) explore non-learning in building regulation system that enabled Grenfell Tower tragedy

# What Grenfell Revealed (again) ...

Danger of cladding system that encourages quick spread where fire can exit dwellings and travel

Uncertainty about fire brigade 'stay put' policy – advises residents to remain inside homes until assistance arrives only. BUT, only works if each dwelling is sealed off from another

Persistence of no sprinkler system (despite refurbis)

Hackitt Review (2018) – building industry and councils incentivised to cut corners: *'I don't understand the time warp this industry has been in while everyone else has been getting their act together'*

RQ: How can we explain the creation of a regulatory environment which is hostile to health and safety

Grenfell Tower, London, June  
2017



72 deaths

4<sup>th</sup> floor to top floor (24<sup>th</sup>) in thirty  
minutes

Burned for 60 hours

# Non-Learning as Ignorance

Policy learning: 'updating of beliefs based on lived or witnessed experiences, analysis or social interaction' (Dunlop and Radaelli, 2013)

Policy non-learning: ignorance – wilful or otherwise – of knowledge derived from these experiences, analyses and interactions

Again, non-learning is inevitable, normatively neutral and prescriptively equivocal; ignorance is not always a 'bad thing' and can produce functional policy outcomes

*Why* ignorance?

Unclear knowledge, institutional ambiguity, new knowledge (that is clear) unsettles existing power configurations

Grenfell exposes the dark side of wilful ignorance – through not seeing and not learning societies render citizens more vulnerable and at risk

# Locating Ignorance in Grenfell – Focus on Hierarchy

Figure 1: Mapping the Four Genera of the Policy Learning Literature

		PROBLEM TRACTABILITY	
		LOW	HIGH
CERTIFICATION OF ACTORS	LOW	Reflexive Learning	Learning through Bargaining
	HIGH	Epistemic Learning	Learning in the Shadow of Hierarchy

Hierarchical learning –  
set institutional actors (govt, courts, IOs) & accepted ways of dealing with problems

Pathology of hierarchical learning – expert defeatism and blocked learning

How?

(Dunlop and Radaelli, 2013)

Learning as ...	Epistemic	Reflexive	Bargaining	Hierarchical
Knowledge use as ...	instrumental	conceptual	political / symbolic	imposed
Causal mechanism Knowledge use mediated by ...	expert teaching	deliberation	resource competition	institutional rules
Interaction of policy actors as ...	cooperative asymmetric	cooperative symmetric	competitive symmetric	competitive asymmetric
Benefits as ...	clinching what works	depth of debate and breadth of knowledge types	wide range of evidence scanned	locks-in evidence
Decision-makers' attention as ...	directed	diffuse / divided	selective	routinized
Mode underpinned by a logic of ...	rationality	appropriateness	consequence	habit
Pathologies as ...	groupthink	uneven capacity leads to spurious consensus	unstable outcomes and expert discrediting or withdrawal	blocked learning and expert defeatism

# Empirics: Five UK Cladding-Related Fires

Inquiry recommendations (coroner, expert, public and parliamentary) and government responses to five external cladding fires:

Summerland, 1973 – recommendations & responses 1975, 1985

Knowsley Heights, 1991 – recommendations & response 1992

Garnock Court, 1999 – recommendations & response 2000

Harrow Court, 2005 – recommendations & response 2006

Lakanal House, 2009 – recommendations & responses 2013, 2014

Our hierarchical actors are exposed to consistent and unequivocal messaging in all cases on cladding standards, stay-put policy and sprinklers AND are being reminded on various occasions by the Parliamentary All-Party Group on Fire Safety

Yet, government acquired the habit of ignorance thereby cultivating a hostile environment for safety through non-learning

## Summerland, Isle of Man, 1973



UK's first exterior cladding fire

Summerland Indoor Holiday Park

50 deaths

1973/74 Inquiry recommends sprinkler fitting and banning flammable cladding

1975 'Summerland Amendments' UK Building Regulations

- external walls must be fire resistant for at least 30 minutes

## 1980s Regulatory and Housing Landscape Shifts

- Regulation as burden
- Principled approach to risk in H&S – risk is owned by those who create it
- Functional requirements – not prescriptions
- Extreme pressure from 'elf and safety gone mad' myth
  
- Post-war social housing stock run down
- Increased funds for refurbishments – over-cladding to address insulation and cosmetic problems

Result:

1985 Building Regulation Part B simplification  
'Summerland Amendments' are deleted

Guidance in 'Approved Document B' – cladding does not need to be fire proof

## Knowsley Heights, Liverpool, April 1991



No deaths

Building Research Establishment:

- cladding and other exterior materials (e.g. PVC windows) should be full scale tested together

## Garnock Court, Irvine, June 1999



1 death

Parliamentary Inquiry (10 major recommendations):

- cladding should be either non-combustible or 'proven through full scale testing not to pose unacceptable risk of fire spread' with new British Standard to be imposed
- review of existing social housing stock to be instructed

## Harrow Court, Stevenage, February 2005



3 deaths

Fire Brigade Union Inquiry and Coroner recommends:

- review of 'stay put'
- compulsory installation of sprinklers in residential blocks

## Lakanal House, London, July 2009



6 deaths

Coroner's Rule 43 Letter recommends:

- review of 'stay put'
- Gvt should 'encourage' housing providers to 'consider' retro-fitting sprinklers
- Approved Document B, a 'most difficult document to use', needs a comprehensive review

# Ignorance as Denial and Contrary Behaviour

- 1985 deletion of Summerland Amendments
- 2006 (seven years since Garnock Court and only a year after Harrow Court) Approved Document B is updated – cladding need only be data tested where effects of fire simulated on computer
- 2013 Government review of fire safety in building regulations delayed (has just begun post-Grenfell): *'I have neither seen nor heard anything that would suggest that consideration of these specific potential changes [on sprinklers and cladding] is urgent and I am not willing to disrupt the work of this department by asking that these matters are brought forward'*
- 2014 explicit rejection of retro-fitting sprinklers: *'In our commitment to be the first government to reduce regulation, we have introduced the one in, two out rule for regulation [...] Under that rule, when the Government introduce a regulation, we will identify two existing ones to be removed'*

Result: de-coupling from safety – Government uses formal processes to give power to myth of regulatory burden that misdirects attention from basic issues of safety

# Ignorance as Delegation of Learning

- 2000 DETR Response to Garnock Court inquiry: *'I am asking my officials to write to the local authority associations and to the Housing Corporation to draw their attention to the Committee's recommendation ... so that the requisite messages can be conveyed to local authorities and Registered Social Landlords'*
- 2013 Secretary of State DCLG response to Lakanal House Coroner: *'We provided the Local Government Association with grant funding to develop, in partnership with the housing sector and the enforcing authorities, detailed national guidance on the risk assessment process and the range of issues to be considered if the risk of fire to residents of purpose built blocks of flats, including high rise, is to be assessed and managed adequately ... It addresses in some detail the rationale for the stay-put principle and provides detailed advice on the fire safety information that should be made available to residents in the light of the findings of a risk assessment'*
- 2013 Secretary of State DCLG response to Lakanal House Coroner: *'Finally, in relation to Building Regulations, I have noted your concerns about the difficulties that some of those involved in the Inquests had with the interpretation of Approved Document B. I can assure you that my Department is committed to a programme of simplification. However, the design of fire protection in buildings is a complex subject and should remain, to some extent, in the realm of professionals'*

Outcome: de-coupling from accountability – Government renders itself invisible by abdicating responsibility for learning – this is a matter for building industry, experts, local government and housing managers

# Ignorance as Bureaucratic Hubris

- 2000 DETR Response to Garnock Court inquiry: *'Analysis of 1995 UK fire statistics shows that although the risk of death from fire in flats (purpose-built and converted) was double that in houses, none of these deaths had been attributed to external cladding. Internal factors such as internal layout and lack of fire barriers in floors and ceilings were a major contributing factor. Accordingly, any assessment of a dwelling-based fire risk must address both external and internal factors. A new DETR Health and Safety Rating (which will replace the existing fitness standard) will be an important tool for this purpose because it assesses a range of measures linked to fire risks'*
- 2013 Secretary of State DCLG response to Lakanal House Coroner: *The housing sector's feedback on the impact of this guidance has been very positive, and I consider that it addresses sufficiently those issues which have been highlighted in your Rule 43 reports. However, we are not complacent*
- 2017 in aftermath of Grenfell, DCLG statement: *'Fire safety requirements are complex issues and our priority has been that we have high standards. A great deal of work has been completed, including commissioning and undertaking research to support the planned consultation. Clearly, in light of this tragic event, we need to reflect on whether this consultation is the correct next step to take. We will confirm our approach shortly.'*

Outcome: de-coupling from humans – Government justifications based on unevaluated measures that signal complacency and bureaucratic hubris

# Conclusions and Prospects for Change

- Grenfell preceded and enabled by wilful ignorance – government amorality rather than any ostrich-mentality
- Other sites of ignorance existed – e.g. inquiries not link up with previous findings; building industry and local housing authorities' risky practices realised the race to the bottom potential of the regulatory system
- BUT, the system of ignorance developed through hierarchical non-learning by successive governments since 1985 – fomented and entrenched regulatory environment where practices hostile to safety could flourish and where accidents were normalised
- Three results of non-learning:
  - *de-coupling of regulation from safety*
  - *de-coupling of regulation from accountability*
  - *de-coupling of regulation from humans*
- Prospects for change?
  - *system is currently defined by what government ignores*
  - *still waiting for review of building materials to happen (18 months on from Grenfell)*
  - *pre-dominant learning modes do change (a lot), learning and non-learning is dynamic*
  - *reflexive learning (through tenants action group and now the Grenfell Inquiry) and epistemic learning are two functional arenas YET hierarchical ignorance is a major barrier where it has set the habit for the policy system*