THE REGULATORY REFORM (FIRE SAFETY) ORDER 2005

PURPOSE BUILT COMMON PARTS FRA

Responsible person (e.g. employer) or person having control of the premises:	South Lakes Housing
Address of Premises:	1-6 Bishops Court Kendal LA9 4EZ
UPRN:	193986
Person(s) Consulted:	Unaccompanied
Assessor:	Peter McGovern
Fire Risk Assessment Completion Date:	29th October 2020
Date of Previous Fire Risk Assessment:	1st December 2017
Suggested Date for Review:	October 2022

The purpose of this report is to provide an assessment of the risk to life from fire in these premises, and, where appropriate, to make recommendations to ensure compliance with fire safety legislation. The report does not address the risk to property or business continuity from fire.

The submission of this report constitutes neither a warranty of future results by Fire Safety First nor an assurance against risk. The report represents only the best judgement of the assessor involved in its preparation, and is based, in part, on information provided by others. No liability whatsoever is accepted for the accuracy of such information.

Job No: 5091 *QA: A*

INTRODUCTION

This fire risk assessment has been carried out on your behalf, being the Employer, and/or being the person having control, to any extent, of the premises (as occupier or otherwise). It is intended to assist you in compliance with The Regulatory Reform (Fire Safety) Order 2005, which requires that a risk assessment be carried out.

It is important that you study this fire risk assessment and understand its contents. The fire risk assessment includes an Action Plan, which sets out the measures it is considered necessary for you to take to satisfy the requirements of the above legislation and to protect people from fire. It is particularly important that you study the Action Plan. If any recommendation in the Action Plan is unclear you should request further advice.

The legislation requires that you give effect to arrangements for the effective planning, organisation, control, monitoring and review of fire safety measures, identified in consequence of a risk assessment. These measures should be recorded.

This fire risk assessment is not the above record of fire safety arrangements, although much of the information contained in this fire risk assessment will coincide with the information in that record. You should, however, ensure that there is a record of the fire safety arrangements, adequate to comply with legislation, and that it is kept up to date. Consideration will have been given, in carrying out this fire risk assessment, to the records that exist in this respect.

The management of Health and Safety at Work Regulations also require that you appoint one or more competent persons to assist you in undertaking the general fire precautions. Where there is a competent person in your employment, you must, under the Regulations, appoint that person in preference to a competent person not in your employment.

This fire risk assessment has considered dangerous substances that are used or stored in your premises, only to the extent necessary to determine the adequacy of the general fire precautions (e.g. means of escape and fire warning systems) and to advise you accordingly. If dangerous substances are used or stored in your premises, you should ensure that a risk assessment of the relevant work activities has been carried out to enable you to comply with the Dangerous Substances and Explosive Atmospheres Regulations. This fire risk assessment does not consider special, technical or organisational measures that are required to be taken or observed in connection with the use or storage of any dangerous substance.

The benchmark standards applied in this fire risk assessment are those contained within the Local Government Groups guidance document – Fire safety in purpose-built blocks of flats. The content of the document received input from representative groups from the housing sector as well as the Department for Communities and Local Government and the Chief Fire Officer Association.

GENERAL INFORMATION

1. THE PREMISES

1.1	Number of floors:	4.
1.2	Brief details of construction:	Rendered structure with concrete floors and tiled roof.
1.3	Use of premises:	Common parts of a purpose-built block of flats.

2. THE OCCUPANTS

2.1	Approximate maximum number:	1
2.2	Approximate maximum number of employees at any one time in the common parts:	1 (occasionally visited by employees in the course of their work).
2.3	Maximum number of members of public at any one time in the common parts:	Limited number of residents and guests accessing and egressing the flats.

3. OCCUPANTS AT SPECIAL RISK

3.1	Sleeping occupants:	Not applicable to common parts.
3.2	Disabled occupants:	Unspecified residents or guests.
3.3	Occupants in remote areas and lone workers:	Individual employees who resort to the common parts.
3.4	Young Persons (employees):	No young persons are employed in the common parts.
3.5	Others:	None.

4. FIRE LOSS EXPERIENCE

None reported.

5. OTHER RELEVANT INFORMATION

This fire risk assessment should be reviewed by a competent person by the date indicated on page 1 or at such earlier time as there is reason to suspect that it is no longer valid, or if there has been a significant change in the matters to which it relates, or if a fire occurs. Further information on reviewing this fire risk assessment is available in the Local Government Groups guidance document – Fire safety in purpose-built blocks of flats – Section 40. **See Action 1.**

Note:- The premises are a four-story block of maisonettes. Access to the upper maisonettes is via a single stairwell leading to an open deck.

6. RELEVANT FIRE SAFETY LEGISLATION

6.1 The following fire safety legislation applies to these premises:

The Regulatory Reform (Fire Safety) Order 2005.

6.2 The above legislation is enforced by:

The Fire Authority.

6.3 Other legislation that makes significant requirements for fire precautions in these premises (other than the Building Regulations):

Housing Act 2004.

Note:- Building Regulations are not reviewed within a fire risk assessment. Building Regulations are a statutory requirement which are enforced by the Building Control Authority at the design and construction stage of a building project. Building Control are also required to consult with the local fire authority. The fire safety strategy will have been agreed with all relevant parties including active and passive measures, engineered solutions and variations. The approved provision will have been subjected to a programme of inspection throughout construction and certified on completion. Any proposed material alterations should be submitted to Building Control for approval prior to the commencement of any work. Should the responsible person, or an enforcing authority, have concerns with regards building regulation matters, these will require further investigation outside of the fire risk assessment.

6.4 The legislation to which 6.3 makes reference is enforced by:

Local Authority.

6.5 Comments:

None.

FIRE HAZARDS AND THEIR ELIMINATION OR CONTROL

7. ELECTRICAL SOURCES OF IGNITION

7.1	Reasonable measures taken to prevent fires of electrical origin in the common parts?			Yes	√	No
7.2	More specifically:					
	Fixed installation periodically inspected and tested?			Yes	√	No
	Portable appliance testing (where appropriate) carried out?	N/A	√	Yes		No
	Suitable policy regarding the use of personal electrical appliances?	N/A	√	Yes		No
	Suitable limitation of trailing leads and adapters?	N/A	√	Yes		No

7.3 Comments and hazards observed:

These matters comply with the recommendations contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 46.7.

8. SMOKING

8.1	Reasonable measures taken to prevent fires as a result of smoking in the common parts?			Yes	√	No
8.2	More specifically:					
	Smoking prohibited in the common parts?			Yes	√	No
	'No smoking' signs provided?			Yes	√	No
	This policy appeared to be observed at time of inspection?			Yes	√	No

8.3 Comments and hazards observed:

None.

9. ARSON

9.1	Does basic security against arson by outsiders appear reasonable[1]?			Yes √	No
9.2	Is there an absence of unnecessary fire load in close proximity to the premises or available for ignition by outsiders?			Yes √	No
9.3	Comments and hazards observed:				
	These matters comply with the guidance contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 43.				

10. PORTABLE HEATERS AND HEATING INSTALLATIONS

10.1	Is the use of portable heaters avoided as far as practicable in the common parts?			Yes √	No
10.2	If portable heaters are used:				
	Is the use of the more hazardous type (e.g. radiant bar fires or LPG appliances) avoided?	N/A √		Yes	No
	Are suitable measures taken to minimize the hazard of ignition of combustible materials?	N/A √		Yes	No
10.3	Are fixed heating installations subject to regular maintenance?	N/A √		Yes	No
10.4	Comments and hazards observed:				
	Portable heaters are not provided in the common parts of the premises.				

[1] Reasonable only in the context of this fire risk assessment. If specific advice on security (including security against arson) is required, the advice of a security specialist should be obtained.

11. COOKING

11.1 Are reasonable measures taken to prevent fires as a result of cooking? N/A [√] Yes [ ] No [ ]

11.2 More specifically:

Filters changed and ductwork cleaned regularly? N/A [√] Yes [ ] No [ ]

Suitable extinguishing appliances available? N/A [√] Yes [ ] No [ ]

11.3 Comments and hazards observed:

No cooking facilities are provided in the common parts of the premises.

12. LIGHTNING

12.1 Do the premises have a lightning protection system? Yes [ ] No [√]

12.2 Comments and deficiencies observed:

The original building design did not require lightning protection in these premises.

13. HOUSEKEEPING

13.1 Is the standard of housekeeping in the common parts adequate? Yes [√] No [ ]

13.2 More specifically:

Are stairwells and corridors free from the storage of combustible materials including items such as electric mobility scooters, upholstered furniture, etc? Yes [√] No [ ]

Are plant rooms and electrical switch rooms free from storage? Yes [√] No [ ]

Where homely items such as pot plants, pictures, small tables, etc are provided are they acceptable under a “Managed Use” policy? N/A [√] Yes [ ] No [ ]

13.3 Comments and hazards observed:

These matters comply with the guidance contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 44.

14. HAZARDS INTRODUCED BY OUTSIDE CONTRACTORS AND BUILDING WORKS FOR THE COMMON PARTS

14.1	Are fire safety conditions imposed on outside contractors?			Yes	√	No
14.2	Is there satisfactory control over works carried out on the premises by outside contractors (including "hot work permits")?			Yes	√	No
14.3	If there are in-house maintenance personnel, are suitable precautions taken during "hot work", including use of hot work permits?	N/A	√	Yes		No

14.4 Comments:

Further advice on controlling hazards introduced by outside contractors and building works is contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 80.

15. DANGEROUS SUBSTANCES

15.1	Are the general fire precautions adequate to address the hazards associated with dangerous substances used or stored within the premises?	N/A	√	Yes		No
15.2	If 15.1 applies, has a specific risk assessment been carried out, as required by the Dangerous Substances and Explosive Atmospheres Regulations 2002?	N/A	√	Yes		No

15.3 Comments:

None.

16. OTHER SIGNIFICANT FIRE HAZARDS THAT WARRANT CONSIDERATION INCLUDING PROCESS HAZARDS THAT IMPACT ON GENERAL FIRE PRECAUTIONS IN THE COMMON PARTS

16.1 Hazards:

None.

16.2 Comments and deficiencies observed:

None.

FIRE PROTECTION MEASURES

17. MEANS OF ESCAPE FROM FIRE

17.1	It is considered that the common parts are provided with reasonable means of escape in case of fire?			Yes	√	No
17.2	More specifically:					
	Adequate design of escapes routes?			Yes	√	No
	Adequate provision of exits?			Yes	√	No
	Exits easily and immediately openable where necessary?			Yes	√	No
	Fire exits open in direction of escape where necessary?			Yes	√	No
	Avoidance of sliding or revolving doors as fire exits where necessary?			Yes	√	No
	Satisfactory means for securing exits? (Right of way over neighbouring property to exits etc).			Yes	√	No
	Reasonable distances of travel:					
	• Where there is a single direction of travel?			Yes	√	No
	• Where there are alternative means of escape?	N/A	√	Yes		No
	Suitable protection of escape routes?			Yes	√	No
	Suitable fire precautions for all inner rooms?	N/A	√	Yes		No
	Escape routes unobstructed?			Yes	√	No
17.3	It is considered that the premises are provided with reasonable arrangements for means of escape for disabled people?			Yes	√	No

17.4 Comments and deficiencies observed:

The fire strategy for these premises is a ‘stay put’ policy. Further information on ‘stay put’ is contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 18 & 19.

Flat entrance doors are FD30s doors.

18. MEASURES TO LIMIT FIRE SPREAD AND DEVELOPMENT IN THE COMMON PARTS

18.1 It is considered that there is:

compartmentation of a reasonable standard[2]? Yes [√] No [ ]

reasonable limitation of linings that may promote fire spread? Yes [√] No [ ]

18.2 As far as can reasonably be ascertained, fire dampers are provided as necessary to protect critical means of escape against passage of fire, smoke and combustion products in the early stages of a fire? [2], [3] N/A [√] Yes [ ] No [ ]

18.3 Comments and deficiencies observed?

Note:- The fire risk assessment inspection was based on a Type 1 – common parts only (non-destructive) fire risk assessment. (Local Government Group guide section 35 refers). Should the building management have concerns over the level of compartmentation a full intrusive due diligence survey should be undertaken to identify any weakness in the building that requires further work to avoid compromising the fire safety of persons in the event of a fire.

19. EMERGENCY ESCAPE LIGHTING IN THE COMMON PARTS

19.1 Reasonable standard of emergency escape lighting system provided[4]? Yes [√] No [ ]

19.2 Comments and deficiencies observed:

Emergency escape lighting complies with the recommendations contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 64.

20. FIRE SAFETY SIGNS AND NOTICES IN THE COMMON PARTS

20.1 Reasonable standard of fire safety signs and notices? Yes [√] No [ ]

20.2 Comments and deficiencies observed:

Fire safety signs comply with the recommendations contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 63.

[2] Based on visual inspection of readily accessible areas, with a degree of sampling where appropriate.
[3] A full investigation of the design of HVAC systems is outside the scope of this fire risk assessment.
[4] Based on visual inspection, but no test of illuminance levels or verification of full compliance with relevant British Standards carried out.

21. MEANS OF GIVING WARNING IN CASE OF FIRE

21.1 Brief description of system in the common parts:

None provided.

21.2 Where a fire alarm system has been provided does it support the fire evacuation strategy for the flats? N/A [√] Yes [ ] No [ ]

21.3 Where a fire alarm system has been provided is it linked to an alarm receiving centre? N/A [√] Yes [ ] No [ ]

21.4 Comments and deficiencies observed:

None.

21.5 Brief description of system in individual flats:

Domestic detection in compliance with BS 5839-6 type LD2 - risk rooms & circulation spaces.

Note:- The provision of fire detection in individual flats is for information only as these areas are outside the scope of the Regulatory Reform Order and therefore this fire risk assessment.

22. MANUAL FIRE EXTINGUISHING APPLIANCES IN THE COMMON PARTS

22.1 Are common areas free from fire extinguishers? Yes [√] No [ ]

22.2 Where applicable, are staff areas provided with fire extinguishers? N/A [√] Yes [ ] No [ ]

22.3 Where applicable, are fire extinguishers readily accessible? N/A [√] Yes [ ] No [ ]

22.4 Comments and deficiencies observed:

No fire-fighting equipment has been provided for residents in the common parts. This complies with the recommendations contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 21.3.

23. RELEVANT[5] AUTOMATIC FIRE EXTINGUISHING SYSTEMS

23.1 Type of system:

None.

23.2 Comments:

None.

24. OTHER RELEVANT[6] FIXED SYSTEMS AND EQUIPMENT

24.1 Type of fixed system:

None.

24.2 Comments:

Ventilation is achieved by the open decks and the door at the head of the staircase.

24.3 Suitable provision of fire-fighters facilities? N/A [√] Yes [ ] No [ ]

24.4 Comments:

None.

[5] Relevant to life safety and this risk assessment (as opposed purely to property protection).
[6] Relevant to life safety and this risk assessment (as opposed purely to property protection).

MANAGEMENT OF FIRE SAFETY

25. PROCEDURES AND ARRANGEMENTS

25.1 Fire safety is managed by: [7]

South Lakes Housing.

25.2 Competent person(s) appointed to assist in undertaking the preventive and protective measures (i.e. relevant general fire precautions)? Yes [√] No [ ]

Comments:

None.

25.3 Is there a suitable record of the fire safety arrangements? Yes [√] No [ ]

Comments:

Fire safety arrangements for the common parts are limited to testing and maintenance of equipment. These matters are recorded within the planned maintenance programme.

25.4 Appropriate fire procedures in place for the common parts? N/A [√] Yes [ ] No [ ]

Comments:

The common parts are considered a place of relative safety.

25.5 Persons nominated and trained to use fire extinguishing appliances? N/A [√] Yes [ ] No [ ]

Comments:

It is not recommended that fire extinguishers are provided in the common parts of purpose-built blocks of flats where they may cause injury if incorrectly used by residents.

[7] This is not intended to represent a legal interpretation of responsibility, but merely reflects the managerial arrangement in place at the time of this risk assessment.

25.6 Persons nominated and trained to assist with evacuation, including evacuation of disabled people? N/A [√] Yes [ ] No [ ]

Comments:

No staff are permanently employed in these premises. Residents are responsible for their own evacuation should a fire occur in their individual flat. All other residents may "stay put".

25.7 Appropriate liaison with fire and rescue service (e.g. by fire and rescue service crews visiting for familiarization visits)? Yes [√] No [ ]

Comments:

The Fire and Rescue Service are welcome to visit the common parts of the premises at their discretion.

25.8 Routine in-house inspections of fire precautions (e.g. in the course of health and safety inspections)? Yes [√] No [ ]

Comments:

The common parts are visited by staff carrying out duties on a regular basis. Any breach of fire precautions may be observed and reported at these times.

26. TRAINING AND DRILLS

26.1 Are all staff given adequate fire safety instruction and training on induction? N/A [√] Yes [ ] No [ ]

Comments:

No staff are permanently employed in the common parts of these premises.

26.2 Are fire drills carried out at appropriate intervals? N/A [√] Yes [ ] No [ ]

Comments:

The Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 78.6 states:

"While fire drills and practice evacuations are used in many buildings to reinforce fire awareness training, it is neither practical nor necessary to carry them out in purpose built blocks of flats. Even in blocks with communal fire alarm systems, this is unrealistic. In large sheltered housing schemes incorporating extensive communal amenities, such as hairdressers, cafeterias and shops, fire drills may be necessary. However, these will still only apply to people present in the common parts. Residents within their flats would not be expected to take part in fire drills".

26.3 When the employees of another employer work in the premises:

Is their employer given appropriate information (e.g. on fire risks and general fire precautions)? Yes [√] No [ ]

Is it ensured that the employees are provided with adequate instructions and information? Yes [√] No [ ]

Comments:

Employees of another employer who visit the common parts have no duties in the event of a fire other than to close the door of the room on fire and withdraw and call the fire service.

27. TESTING AND MAINTENANCE

27.1 Adequate maintenance of common parts? Yes [√] No [ ]

Comments and deficiencies observed:

None.

27.2 Weekly testing and periodic servicing of fire detection and alarm system? N/A [√] Yes [ ] No [ ]

Comments and deficiencies observed:

A fire alarm and detection system has not been provided in the common parts.

27.3 Monthly and annual testing routines for emergency escape lighting? Yes [√] No [ ]

Comments and deficiencies observed:

Testing of the emergency lighting system complies with the guidance contained in the Local Government Group guide – Fire safety in purpose-built blocks of flats – Section 81.5.

27.4 Annual maintenance of fire extinguishing appliances? N/A [√] Yes [ ] No [ ]

Comments and deficiencies observed:

Please refer to Section 22.4. No fire-fighting equipment is to be provided in common parts.

27.5 Periodic inspection of external escape staircases and gangways? N/A [√] Yes [ ] No [ ]

Comments and deficiencies observed:

None.

27.6 Six monthly inspection and annual testing of rising mains? N/A [√] Yes [ ] No [ ]

Comments and deficiencies observed:

None.

27.7 Weekly and monthly testing, six monthly inspection and annual testing of fire-fighting lifts? N/A [√] Yes [ ] No [ ]

Comments and deficiencies observed:

None.

27.8 Weekly testing and periodic inspection of sprinkler installations? N/A [√] Yes [ ] No [ ]

Comments:

None.

27.9 Routine checks of final exit doors and/or security fastenings? Yes [√] No [ ]

Comments:

None.

27.10 Annual inspection and test of lightning protection system? N/A [√] Yes [ ] No [ ]

Comments:

None.

27.11 Periodic inspection of fire doors? Yes [√] No [ ]

Comments:

None.

27.12 Are suitable systems in place for reporting and subsequent restoration of safety measures that have fallen below standard? Yes [√] No [ ]

Comments:

None.

27.13 Other relevant inspections or tests:

None.

28. RECORDS

28.1 Appropriate records of:

Fire drills?	N/A	√	Yes		No	
Fire training?	N/A	√	Yes		No	
Fire alarm tests?	N/A	√	Yes		No	
Emergency escape lighting tests?			Yes	√	No	
Maintenance and testing of other fire protection systems?	N/A	√	Yes		No	

28.2 Comments:

None.

FIRE RISK ASSESSMENT

The following simple fire risk level estimator is based on a more general health and safety risk level estimator contained in BS 18004: 2008.

Potential consequences of fire ► Likelihood of fire ▼	**Slight harm**	**Moderate harm**	**Extreme harm**
Low	Trivial risk	Tolerable risk	Moderate risk
Medium	Tolerable risk	Moderate risk	Substantial risk
High	Moderate risk	Substantial risk	Intolerable risk

Taking into account the fire prevention measures observed at the time of this risk assessment, it is considered that the hazard from fire (likelihood of fire) at these premises is:

Low [√] **Medium** [ ] **High** [ ]

In this context, a definition of the above terms is as follows:

- **Low -** Low likelihood of fire as a result of negligible potential sources of ignition or high degree of preventative measures.
- **Medium -** Normal fire hazards (e.g. potential ignition sources) for this type of occupancy, with fire hazards generally subject to appropriate controls (other than minor shortcomings).
- **High -** Lack of adequate controls applied to one or more significant fire hazards. Such as to result in significant increase in likelihood of fire.

Taking into account the nature of the premises and the occupants, as well as the fire protection and procedural arrangements observed at the time of this risk assessment, it is considered that the consequences for life safety in the event of fire would be:

Slight harm [√] **Moderate harm** [ ] **Extreme harm** [ ]

In this context, a definition of the above terms is as follows:

Slight harm: Outbreak of fire unlikely to result in serious injury or death of any occupant (other than an occupant sleeping in a bedroom in which a fire occurs).

Moderate harm: Outbreak of fire could foreseeably result in injury (including serious injury) of one or more occupants, but it is unlikely to involve multiple fatalities.

Extreme harm: Significant potential for serious injury or death of one or more occupants.

Accordingly, it is considered that the risk to life from fire at these premises is:

Trivial [√] **Tolerable** [ ] **Moderate** [ ] **Substantial** [ ] **Intolerable** [ ]

Comments: None.

A suitable risk-based control plan should involve effort and urgency that is proportional to risk. The following risk-based control plan is based on one advocated for general health and safety risks:

Risk Level	Action and timescale
Trivial	Little or no action is required.
Tolerable	No major additional controls required. However, there may be a need for consideration of improvements that involve minor or limited cost.
Moderate	It is essential that efforts are made to reduce the risk. Risk reduction measures should be implemented within a defined time period. Where moderate risk is associated with consequences that constitute extreme harm, further assessment may be required to establish more precisely the likelihood of harm as a basis for determining the priority for improved control measures.
Substantial	Considerable resources may have to be allocated to reduce the risk. If the building is unoccupied, it should not be occupied until the risk has been reduced. If the building is occupied, urgent action should be taken.
Intolerable	Building (or relevant area) should not be occupied until the risk is reduced.

Note that, although the purpose of this section is to place the fire risk in context, the above approach to fire risk assessment is subjective and for guidance only. All hazards and deficiencies identified in this report should be addressed by implementing all recommendations contained in the following action plan. The risk assessment should be reviewed regularly.

ACTION PLAN

It is considered that the following recommendations should be implemented in order to reduce fire risk to, or maintain it at, the following level:

Trivial [√] **Tolerable** [ ]

Priorities:

A. Recommendations that should be implemented immediately or as soon as reasonably practicable.
B. Recommendations that should be implemented in the short term.
C. Recommendations of a non-urgent nature - medium term.
D. Recommendations for longer term consideration.
E. Recommendations for asset protection only.

Recommendations	Priority	Action by whom	Date action taken
• Please note, there will often be more than a single solution to a fire safety deficiency. Further discussion may be required with regards to alternative remedies. Before you make any alterations to the premises you may need to apply to Building Control for approval. • The nature of fire safety is subjective. It cannot therefore be guaranteed that Fire and Rescue Service fire safety inspectors will necessarily agree with the professional opinions expressed in this fire risk assessment. In such cases all parties should discuss disparities and agree the way forward.			
1. <u>Review of Fire Risk Assessment</u> This fire risk assessment should be reviewed by a competent person by the date on page 1 or at such earlier time, as there is reason to suspect that it is no longer valid or if there has been a significant change in the matters to which it relates, or if a fire occurs.	D		

PHOTOGRAPHIC SECTION

-- END OF REPORT --