

# Scrutiny Review Group - Fire Safety

## Minutes - 17 July 2019

### Attendance

#### Members of the Scrutiny Review Group - Fire Safety

Cllr Philip Bateman MBE  
Cllr Greg Brackenridge (Chair)  
Cllr Alan Butt  
Bob Deacon  
Cllr Susan Roberts MBE  
Cllr Jacqueline Sweetman

#### Employees

Martin Stevens (Scrutiny Officer) (Minutes)  
Richard Lawrence (Director of Regeneration)  
Kate Martin (Director for Assets and City Housing & Vice Chair WV Living Company Board)  
Martyn Sargeant (Head of Governance)  
Peter Taylor (Head of City Development)  
Julia Nock (Head of Assets)  
John Scott-Lee (WV Living Chief Operating Officer)  
Jagtar Singh (Project Manager)  
Neal Shore (Interim Compliance Officer)

#### Witnesses

Kevin Manning (Assistant Director Property Services – Wolverhampton Homes)  
Simon Bamfield (Head of Commercial Services and Stock Investment – Wolverhampton Homes)

## Part 1 – items open to the press and public

*Item No.*    *Title*

- 1            **Apologies for Absence**  
Apologies for absence were received from Cllr Simon Bennett and Karen Ryder (One Voice).

The Chief Executive of Wolverhampton Homes (Shaun Aldis) had also sent his apologies as an invited person to the meeting.

2 **Declarations of Interest**

Cllr Phil Bateman declared a non-pecuniary interest on the item, "Fire Safety at Schools Update" as Chair of Governors at Ashmore Park Nursery School.

3 **Minutes**

The minutes of the meeting held on 6 February 2019 were approved as a correct record.

As a matter arising the Chair stated that he had continued to give presentations on the work of the Fire Safety Scrutiny Group including to the Tenant Management Organisations. He was pleased to report that local fire stations had been reporting a large uptake in safe and well visit referrals from the organisations.

The Chair of the Group reported that he was now the Chair of the West Midlands Fire Authority which had given him better access on a national level. He had attended a recent Building Safer Futures Conference where a representative from the MHCLG (Ministry of Housing, Communities and Local Government) had spoken about the Government introducing new legislation on composite materials and toxicity. During the conference they had received a presentation from a University Professor who was a leading national authority on the level of toxicity various products gave off. It was clear deaths in fire were hugely increased where there were products giving off hydrogen cyanide during the fire. 80% of people who died in a fire did so from breathing in toxic fumes rather than from the flames of the fire.

4 **Civic Halls - Fire Safety Strategy**

The Director for Regeneration referred Members of the Group to the current Civic Halls Fire Strategy document produced by Tenos which had been circulated with the agenda for the meeting. He stated that there was a robust fire strategy in place as part of the overall scheme which exceeded current regulations based on the present designs. The strategy did not include the provision of sprinklers. It was deemed that these were not required. If there was a need to look at sprinklers, they had advised the team they could be included, but there would be a programme delay and cost increase.

The Head of Project and Works stated that the Tenos report was the most current they had; it was however based on the initial design scheme, which had evolved over the last few months. They had worked with the independent Fire Safety Consultants and a new updated report would be available in the next few weeks.

The Chair referred Members of the Group and the Director of Regeneration to Paragraph 7.24 on the Tenos report. The paragraph stated, "We have been instructed by our client (Space and Place Architects) to design the fire strategy on the basis that sprinklers will not be provided as this is an aspiration of their client." The Chair expressed his utmost concern about this paragraph. The Fire Safety Scrutiny Group had, in March 2018, made a number of recommendations to the Council's Cabinet. One of those recommendations was that sprinklers should be fitted in all major Council refurbishment projects, unless a report was brought specifically explaining the reasons why not. He therefore found paragraph 7.24 of the report very strange, as it completely contradicted the recommendation from the Fire Safety Scrutiny Group. He asked for a full explanation on paragraph 7.24 of the Tenos Report and wanted to know which person from the Council had given the instruction.

The Chair referred Members of the Group to pg. 16 of the Fire Safety Strategy (pg. 34 of the agenda pack) where under the heading internal fire spread linings, there was a table (Table 6.1) under paragraph 6.3. One of the recommendations from the Fire Safety Scrutiny Group to the Council's Cabinet in March 2018 had been that only zero rated fire retardant materials would be used in refurbishment projects, the table however referred to materials that were not zero-rated. He asked if his understanding was correct, that some of the materials that would be used in the Civic Halls refurbishment were not zero rated and some were actually class 3. If this was the case, it would mean that a recommendation of the Fire Safety Scrutiny Group to the Council's Cabinet had been disregarded.

The Chair stated that the whole process of the Civic Halls had not been one which had stood the Council in good stead. There had been a substantial increase in the budget from what had been originally set a few years ago, there had also been significant delays and it seemed clear that fire safety had not been at the heart of the refurbishment plans. He was shocked that the Regeneration Department of the Council had commissioned a report by Tenos which effectively in paragraph 7.24 of the report had said that the Council had told fire safety experts not to consider sprinklers. He thought this question should have been left for the fire safety experts to determine. The Chair had recently attended a meeting with the Regeneration Department and the fire safety consultants from Tenos. He commented that he had told the consultants from Tenos that he did not point any blame at them because they were using existing legislation in the compilation of the report. He and Members of the Group had repeatedly stated that the current legislation was not fit for purpose, as the Hackitt Inquiry had concluded. The Fire Safety Scrutiny Group wanted the Council to set its own fire safety standards in all areas of the work they undertook. He was extremely disappointed that the Regeneration Department had not taken on the points the Fire Safety Scrutiny Group had consistently made and had been relayed to them on a number of different occasions.

The Head of Project and Works responded that the Tenos Fire Strategy report had been written in March 2019 and Officers in collaboration with Tenos were now reviewing some of the materials in the design. With reference to the meeting with the fire consultants prior to the Civic Halls Board meeting, she could confirm all of the Chair's comments had been taken on board. On the matter of sprinklers, if they were to be included in the design they would require approval for the funds. They were trying to establish where paragraph 7.24 of the report had originated because she was not aware of a formal instruction given to put sprinklers in or out of the Civic Halls. There was a natural break in the refurbishment project at the moment because the contractor had gone bankrupt. In this natural break, they had time to re-evaluate the project, take on board the comments of the Group and go through the complete design. The most important aspect was to take on the learnings from the last few months and move forward with the project.

A Member of the Group complimented the Chair of the Group stating that he had done a remarkable job as Chair, which he thought was partly due to his extraordinary knowledge on fire safety matters. He was glad that he had uncovered the anomalies in the Tenos Fire Safety Strategy document relating to sprinklers and fire retardant materials. The Local Authority needed to take into account the views of the Fire Safety Scrutiny Group. It was critical that the refurbishment of an iconic building and others across the city were dealt with appropriately in relation to Fire Safety. There

was now an ideal opportunity to improve fire safety at the Civic Halls and given the national inquiries following the Grenfell tragedy and all the previous work of the Fire Safety Group, it would be unwise not to press the case that sprinklers should be installed. He was aware of the budget pressures, but he felt they should not take precedent over matters of public safety. He believed that the project should not move forward without the approval for sprinklers. The building needed to be as safe as it could be and sprinklers were a fundamental part of ensuring the highest standards of fire safety.

Members expressed their frustration that the spirit of the recommendations from the group were not being adhered to. The Grenfell tragedy was a wake-up call but it appeared in the instance of the Civic Halls it was not having an effect on the decisions regarding sprinklers and using zero rated fire retardant materials.

The Chair of the Group expressed disappointment with the former Interim Director of Place who had left the Council in March 2019. This was because he had articulated to the Group at the last meeting that he had commissioned an independent report into whether sprinklers should be installed at the Civic Halls, but no report on this subject matter had materialised. There was clearly a systematic block somewhere in the Council on sprinklers. He wanted lessons to be learnt and for all future development and major refurbishment to include sprinklers, hard wired fire alarms and for zero fire rated retardant materials to be used. If they were not going to be used, he wanted there to be a report explaining the reasons why not. Dame Hackitt as part of her inquiry had noted that safety had been put aside in developments. Attitudes to fire safety needed to change, she had declared the current regulations as not fit for purpose. The Council needed to lead the way on fire safety and to not put costs before safety. It was important that projects such as the i9 and the West Side Development were built to high fire safety standards, abiding by the existing not fit for purpose legislation was not good enough, as it had already been declared broken by Dame Hackitt.

The Director of Regeneration said that to reassure the Group, the Fire Safety Strategy report for the Civic Halls was due to be updated and would certainly address the issues raised in paragraph 6.3 and 7.24. A change to installing sprinklers could be accommodated, there would need to be a discussion, but it would have an effect on the programme timing and costs and mitigation would be required. The Chair had met with Tenos to raise his concerns and they were updating the strategy. The West Side project was in the early stages of design and so there was a lot more autonomy to put in the right future proofing levels for fire safety. The i9 scheme was already developed, contractors appointed and planning secure. It was being delivered externally, if the project design was to be revisited, there was a risk that the project would not go ahead. Accordingly, they would have to look at other measures such as retro fit and redesign as i9 had been designed to meet current legislation.

A Member of the Group commented that as a new contractor needed to be appointed for the Civic Halls it was a perfect time to ensure that the Civic Halls refurbishment design included sprinklers and zero-rated fire-retardant materials. There needed to be urgent talks to ensure the design ensured the highest standards of fire safety. It was a waste of the group's time if they were going to be continually ignored. Members of the Group agreed with the comment.

The Chair expressed disappointment that he had not been invited to meetings of the Cabinet, in his capacity as the Lead Member for the Fire Authority, when an issue concerning fire safety had arisen, this was in violation of the recommendation that had been made and had been accepted by the Council's Cabinet in March 2018. On a positive note the Chair remarked that the Council was leading the way nationally on fire safety in a number of areas, such as the work being done by WV Living and Wolverhampton Homes. It was the Regeneration Department which was not understanding the significance of the Grenfell Tragedy, the not fit for purpose current legislation and the work of the Fire Safety Scrutiny Group.

**Resolved:** That the Chair of the Council's Fire Safety Scrutiny Group on behalf of the Group arrange a meeting with himself, the Managing Director of the Council, the Director of Regeneration and the Leader of the Council to raise the importance of having sprinklers installed at the Civic Halls and using zero rated fire retardant materials during the refurbishment.

5 **West Side Regeneration Plans - Fire Safety**

The Director for Regeneration stated that the West Side scheme was progressing based on the outline consent received in the previous year. Detailed work was ongoing with the developer to conclude the legal agreements further to Cabinet's approval of the scheme in February 2019. They were hoping that the legal process to allow the scheme to go forward for planning and subsequent construction would take place in the Autumn. As part of this process there had been conversations about the design and the requirements of future proofing the design for future regulations. His colleague, the Head of City Development had been leading on the scheme in collaboration with developers Urban & Civic.

The Head of City Development remarked that there was a particular focus that egress from the building was carefully designed and planned. The West Side scheme was at a good point in the design for the Fire Safety Scrutiny Group to have an impact. The developers had made a commitment to engage with the Fire Safety Scrutiny group and they would attend with the architects and necessary specialists to have detailed discussions about the design. They were however driving a high standard in terms of fire safety regardless.

The Chair asked when the West Side scheme developers would be available to attend a meeting of the Fire Safety Scrutiny Group, there was a meeting planned for when the Phase 1 Report of the Moore-Bick Inquiry was published, which was currently scheduled for release in October 2019. The Head of City Development suspected this would be too early to look at the detailed designs. The Chair suggested February/March 2020, he was however keen to talk to them early before detailed designs had been finalised. The Head of City Development stated that he could invite them to the planned October session for an initial discussion in addition to looking at the detailed designs the following year. There was also a planned meeting with the Chief Executive of the Developers and the Leader and Managing Director in the near future, so he could relay some of the points raised by the Group. The Chair asked that the Head of City Development to relay all the relevant points the Group had raised during the previous item to the Chief Executive of the Developers.

6 **i9 Update on Project**

The Director for Regeneration remarked that the i9 project was in its final stages of pre-development. If sprinklers were to be installed they would have to be retro fitted. There had been discussions in June 2018 at City Centre Portfolio Board, where it had been resolved that the building would progress without the inclusion of sprinklers. His concern was that if it was to be reviewed there would be a detrimental effect to the project. The Head of City Development commented that a decision to install sprinklers at this stage would require a complete redesign of the basement floors, which would have a serious knock-on effect for the delivery timetable of the scheme. The i9 scheme was at a critical juncture, it was reliant on LEP funding, the spending window for which was becoming increasingly tight. The contractor had been on board for over six months and they were trying to get the scheme on site as soon as possible. A fundamental re-design of the building could effectively prevent the project from going ahead.

The Chair asked if zero rated fire retardant materials would be used in the building both internally and externally. The Head of City Development responded that there had been ongoing discussions through various design meetings throughout the process on the specification and in particular on the cladding material. There had been some up lifts to the specification of the materials used as from what had been compliant with the current building regulations model. Some of the insulation materials did not carry the highest fire rating in parts of the building. At the current point in time he was not sure of the implications of substituting the materials for improved performance. They were still in dialogue with the architect and developer on this matter.

A Member of the Group commented that on major building projects there should be a section in reports which specifically addressed the matter of fire safety. The Chair commented that this had been recommended in March 2018 to Cabinet and he would raise the matter with the Leader and Managing Director. The i9 Building was another example of the Fire Safety Scrutiny Group's recommendations being ignored. He would raise serious concerns with the Leader if flammable materials were going to be used on the outside of the building. The location of the building was at a strategic transportation point in the City and a fire would cause significant community and economic disruption.

## **7 i10 Update on Remedial Work**

The Director for Assets and City Housing informed the Group that from last month she had taken over responsibility for City Assets as part of her role, this included what was commonly known as Corporate Landlord. The i10 building was one area which they were reviewing.

The Head of Assets commented that the final report from consultants Aecom had been received on the i10 building. The Council needed to make a decision on the action to be taken with reference to the external cladding on the i10 building. They were also having discussions with the contractor Balfour Beatty, to find the evidence on what they installed in terms of fire stopping and installation on the i10. This had been challenging and they were still awaiting the information. They had promised to provide the information they had been asking for over the next two weeks. Legal advice was also being sought. A specification had been put together and they were working with the consultancy company, Arcadis, who were compiling a number of options and costs on matters such as removing and replacing the cladding and

looking at the associated implications for firestopping and insulation. The report was due to be completed by 2 September 2019.

The interim compliance Officer described in detail the issues regarding the i10. Aecom had stated that they would not recommend flammable materials being incorporated on any building. Balfour Beatty had been asked to provide information on what basis the original cladding specification had changed to what was on the building, some questions regarding the thickness of the insulation and some questions on the curtain walling and a service shaft. In addition, on the main escape corridor there were some defects, for which the Council had already obtained rectification costings should Balfour Beatty not agree to carry out the works. A legal opinion had been sought, which could be relayed confidentially in the future.

The Chair commented that the Consultant's report had vindicated the concerns the Group had expressed about the i10. He praised the Aecom report that had also picked up on the fact that the fire alarm could not be heard in all parts of the i10 building. He hoped lessons could be learnt from the i10 building for all projects in the future. Overall, he was pleased that progress was being made on rectifying the problems with the i10 building.

## 8 **Fire Safety at Schools Update**

The Interim Compliance Officer stated the fire risk assessments for the 46 community schools had been completed with the exception of one new school which would be done before they started operating. They had been requesting that community schools provide an update on the actions identified in the fire risk assessments. They were also asking schools to return a form, twice a term, confirming that regular fire checks were being undertaken such as extinguishers, evacuation drills, emergency arrangements and provision of Fire Marshals. At the previous meeting he had reported that 40-45% of schools were returning the forms on a regular basis. Subsequently, the Head of School Organisation had written to all schools who were not returning the forms. They were now up to 85% compliance. The process would be relaunched at the beginning of the next school year, reaffirming what was required in addition to a "How to Guide."

The Interim Compliance Officer remarked that they had offered to roll out the training to schools which had been given to the site responsible persons looking after corporate and community buildings.

The Chair complimented Officers on the substantial improvement in schools responding to the fire safety returns. It was in the interests of schools to carry out the checks, the Fire Service would be more than happy to assist schools with their fire safety checks. Fire prevention work was critical to the safety of children.

The Interim Compliance Officer confirmed that the Director of Education would continue to write to academy schools on a periodic basis reminding them of their legal obligations with reference to Fire Safety.

## 9 **WV Living & Wolverhampton Homes - Update on Projects**

The WV Living - Vice-Chair of the Company Board stated that at the previous meeting of the Fire Safety Scrutiny Group they had challenged them on their new

build programme. She was now pleased to outline in a letter to the Chair of the Fire Safety Scrutiny Group, included with the agenda pack, that sprinklers would be fitted in all new build homes for rent and sale at the building development at the Marches at Lakefield Road in Wednesfield. This was the largest WV Living building development scheme to date in the City. The second part of the letter was regarding a stronger approach to fire safety in all their new build homes. As of June 2019, WV Living would be fitting integrated sprinkler systems in all of their future new build homes across the City. They had an ambitious programme for house building across the City. They already had 1000 homes in the pipeline and their first scheme had sold. They were working with the WV Chief Operating Officer to plan their next commercial plan until 2026. As part of the plan fire safety would be integral and integrated sprinkler systems would form a central part of their fire safety strategy.

Members of the Group applauded and thanked the WV Living Company Board for their stronger approach to fire safety and especially the news about sprinklers being included in all their new builds in the future. This excellent news was most welcome, and Members of the Group completely endorsed the new approach. Fire safety was of paramount importance, making any extra cost for sprinklers completely justified. A fire could have a devastating impact and therefore any system which would help mitigate a fire was the correct approach. They completely supported the contents of the letter to the Chair of the Fire Safety Scrutiny Group.

A Member of the Group commented that the installation of sprinklers in new build WV Living properties was a huge positive step forward and would make all the difference for tenants. She thanked the WV Living Team and the Chair of the Fire Safety Scrutiny Group who had recently given a presentation to the WV Living Company Board on fire safety.

The Chair stated he would be presenting on fire safety at a regional level and was actually giving a presentation on the forthcoming Saturday. In his role as Chair of the Fire Authority he hoped to influence the West Midlands Combined Authority (WMCA) on fire safety matters and therefore hoped other local authorities would follow WV Living's lead. He believed other regions could be influenced by the work being carried out in the West Midlands. He believed England should have the same standards of fire safety as Wales and Scotland for new build dwellings. The new approach by WV Living he saw as a first step in a very long campaign moving forward. He was extremely pleased with WV Living's stronger approach to fire safety and thanked them for their collaborative approach with the Fire Safety Scrutiny Group. Sprinklers would only add approximately 0.5-1% cost in new builds, which was about the cost of new carpets. Insurance premiums would also be reduced but most importantly it would save lives.

The WV Chief Operating Officer gave a short presentation on technical points regarding the fire safety strategy of WV Living. The presentation slides are attached to the signed minutes. He particularly highlighted that there was no incoming gas supply to any of the new build properties with all heating and cooking appliances being electric. Management of the blocks including the maintenance of the communal areas would be provided by Wolverhampton Homes. The WV Living Board would be reviewing the potential to use zero fire rated materials where possible. All WV Living Board papers relating to property development proposals would in future include a reference to fire safety as a key consideration to be given in the design and costing of each scheme at the first stage.

The Assistant Director Property Services – Wolverhampton Homes stated that he was pleased to confirm that all new build schemes for Wolverhampton Homes from the date of the WV Living letter to the Chair of the Fire Safety Scrutiny Group, included in the agenda pack, would also be fitted with sprinklers. This would ensure consistency across the City and they would be working with City of Wolverhampton Council to ensure the scope and specification were identical. Wolverhampton Homes did build on a number of infill sites across the City.

The Chair of the Group praised Wolverhampton Homes for the decision that had been made on including sprinklers in new build schemes. He was very proud of the exemplary attitude Wolverhampton Homes had shown over the last two years on matters of fire safety. Wolverhampton Homes nationally had an outstanding name. He asked the Assistant Director of Property Services for Wolverhampton Homes to pass on his and the Fire Safety Scrutiny Group's appreciation of the action they had taken. Members of the Group fully endorsed the Chair's comment.

The Head of Commercial Services and Stock Investment – Wolverhampton Homes stated that Wolverhampton Homes managed 36 tower blocks across the City. There was also one Council owned block which was leased to Sanctuary Housing (Hampton View in Heath Town). 6 High rise blocks were privately managed.

The Head of Commercial Services and Stock Investment – Wolverhampton Homes gave an update on the infrastructure work being undertaken in the tower blocks managed by Wolverhampton Homes. A copy of the presentation slides are attached to the signed minutes. The consultation with residents had already started on the first phase. Open evenings about three months from delivery were normally held for residents explaining how they would be impacted by the work and the benefits. They also met with lease holders.

The Head of Commercial Services and Stock Investment – Wolverhampton Homes remarked that retro fitting of sprinklers would start in the Autumn. Kitchens, bedrooms, living rooms and bathrooms would have sprinklers installed in the apartments in the tower blocks. All communal areas would also have sprinklers installed. The Fire Rescue Service would be notified automatically if the sprinklers were activated and a secondary signal would be sent to the Concierge Management Centre. The current programme budget for the tower block improvements was approximately £29 million plus the costs of the sprinkler's installation of a further £19.2 million. It was anticipated that the budget would need to increase as they were finding further problems as they carried out works, which was to be expected given the age and condition of the buildings.

A Member of the Group congratulated Wolverhampton Homes on their work undertaken to date in Chetton Green Tower Block.

The Chair stated that he was grateful for the update from Wolverhampton Homes and he welcomed all the work they had completed and the work they had outlined would be undertaken in the future.

10 **Private Housing Services Update**

The Director for Assets and City Housing introduced the item on private housing. From May 2018 the Council had received guidance from the MHCLG (Ministry for Housing, Communities and Local Government) on how they should approach inspections in private blocks under the Housing Act arrangements. They had been working closely with partners and consultants to review privately owned high rise blocks in the City.

The Project Manager stated that to date they had completed fire safety inspections at St Cecilia's in Wednesfield and The Studios, located just outside the City Centre. They were in dialogue with the property managing agents to develop some action plans to remedy the various issues that had been discovered. With reference to the three Liberty Height blocks, which were student accommodation blocks, located just off the Wednesfield Road, he was in the process of organising inspections to take place during the Summer when the students were on vacation. They were watching with interest what enforcement action other local authorities were taking in regard to privately owned residential tower blocks.

The Director for Assets and City Housing confirmed that the blocks they were investigating did not have ACM cladding on them. The three Liberty Height blocks did originally have the ACM cladding but that was removed. The inspection during the Summer of the Liberty Height Tower blocks was part of a proactive approach to ensure they were being well managed.

The Chair complimented Officers on the work being undertaken with reference to privately owned tower blocks. Ensuring they were well managed was an integral part of fire safety.

The Chair stated that he was arranging for a press release to be published highlighting some of the excellent work that had taken place over the last two years. A photograph of the group would also be taken at the end of the meeting. He thanked the Fire Safety Scrutiny Group Members and supporting Officers for their efforts since the inception of the Group.

The Chair stated that he hoped a site visit in the future would be facilitated by Wolverhampton Homes to see sprinklers being installed at some of the Council owned residential tower blocks. The site visit could also incorporate a visit to look at some access issues at one of the Council owned estates in Hallett's drive and a couple of other locations. He hoped the visit would take place early next year.

The Assistant Director Property Services – Wolverhampton Homes responded that he would welcome a site visit from the Group. They would be in touch with the Scrutiny Officer to ensure the timing was appropriate to observe the installation of sprinklers and other maintenance work. He suggested about three hours for the visit.

11 **National Updates**

The Chair stated he had attended the Fire Safety Conference at the West Midlands Fire Service the previous day. He expected new legislation within months. He had welcomed people to the Conference and had informed them of some of the excellent work being undertaken in Wolverhampton. Representatives from around the region and further afield were impressed with the work he had described from WV Living, Wolverhampton Homes and the Council.

The Chair referred to the national consultation documents which had been circulated with the agenda. He was aware that the Director for Assets and Housing would be giving a response on behalf of the Council and he suspected Wolverhampton Homes would also give a response. The West Midlands Fire Service would be submitting a response as would the National Fire Chiefs Council.

**Resolved:**

- A) That the Fire Safety Scrutiny Group delegate authority to the Chairman of the Group to officially respond on behalf of the group to the Building a Safer Future – Proposals for reform of the Building Regulatory System Consultation.
- B) That the Fire Safety Group delegate authority to the Chairman of the Group to officially respond on behalf of the group to the Regulatory Reform (Fire Safety) Order 2005 – Call for Evidence.

12

**Next Meeting**

The Chair reported that he intended to call a meeting of the Fire Safety Scrutiny Group after the publication of the Phase 1 Report from the Moore-Bick Inquiry, which was scheduled to be released in October 2019.