

## ACCENT HOUSING - FIRE RISK ASSESSMENT



-Locked at all times. CVCTV in operation.

No Gas supply in premis.

North East Region: Teesdale Scheme Name :

Date of Assessment:

1 - 38 Claremont Court Stockton TS176AP Scheme Address :

16th May 2024 Sterile environment and good houskeeping identified during inspection.

Sterile areas identified throughout.

Date of Next Assessment: Heating Installations (Portable/fixed)Gas Installations - Common Areas & General Needs Residential flats.

FRA Frequency: Annual Re-Assessment

Fire & Safety Assessor Kevin Jones

This Fire Risk Assessment has been conducted upon the instruction of Accent Housing.

None fitted within blocks.

Fire detectors in flats in blocks 1 - 4, 9 - 12, 14 - 17, 18 - 21, 22 - 25,26 - 29,34 - 38. Detectors in communal areas and flats in blocks 5- 8 & 30 - 33

Taking the findings of the FRA into account, is the evacuation policy appropriate for the scheme?

Taking the findings of the FRA into account,is the F Due to vulnerability, ########

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Scheme De	etails	Teesdale	
Region:		North East	
Scheme Name:		Teesdale	
Site Address:	Street:	1 - 38 Claremont Court	
	Town:	Stockton	
	Post Code:	TS176AP	
Block & Asset No.		Block 1 - 4 Ass No 9628	
		Block 5 - 8 Ass No 9629	
		Block 9 - 12 Ass No 9630	
		Block 14 - 17 Ass No 9631	
		Block 18 - 21 Ass No 9632	
		Block 22 - 25 Ass No 9633	
		Block 26 - 29 Ass No 9634	
		Block 30 - 33 Ass No 9635	
		Block 24 - 38 Ass No 9636	
Scheme Tel. No:		N/A	Door Security-Locked at all times. CVCTV in operation.
Date of this Assessment		16th May 2024	
		Heating Installations	
		(Portable/fixed)	
		Gas Installations - Common	
		Areas & General Needs	
Date of Next Review		Residential flats.	
Fire Risk Assessment Frequency	/	Annual	
		Annual	
Purpose of Fire Risk Assessmen	ıt	Annual Re-Assessment	No Gas supply in premis.
Fire & Safety Assessor		Kevin Jones	
Director of Customer Experience	9	Sue Mellon	
Customer Partnership Manager		Jan Walsh	
Contract Manager		Mike Williams	
Scheme Manager/Housing Partn	er	Soya Keaveny	
Other staff in attendance		None	
Use of Building		General Needs	
Approximate Number of occupa	nts	40	
Occupancy Profile		Young	
Familiarity of the occupants		Fully Familiar	Sterile areas identified throughout.
Likely state of the Occupants		Alert	Ÿ
PEEPs in place where necessary	1	N/A	
Number of on-site Accent staff		None	
Number of other (non-Accent) st	aff	None	
Support Agency (Supported Hou		N/A	Sterile environment and good houskeeping identified during inspecti
Current Evacuation Strategy.	8/	Stay Put (Delayed) Evacuation	
Evidence that residents have be	en notified of the	Advice notices displayed in	
evacuation procedure		common areas	
History of fires in the building		None	
Business Continuity Plan in plac	e?	Yes	
piu		Type 1 (Common Parts Only -	
		Non Destructive)	
Scope of Assessment			
Scope of Assessment Applicable Fire Safety Guidance		Sleening Accommodation Guide	
Scope of Assessment Applicable Fire Safety Guidance		Sleeping Accommodation Guide Purpose-built flats guide	

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Building Details	Teesdale		
Construction Date	193		
Construction Type	Concrete Frame		
Roof Finish	Pitched-Clay Tile		
Conversion or purpose-built	Purpose Built		
Number of flats (self-contained)/rooms (HMOS, shared houses)	38		
Number of storeys above ground	Three		
Number of storeys below ground	None		
Is there a habitable basement?	N/A		
Number of internal Staircases per Block			
(protected or unprotected?)	One-Unprotected per block		
Number of External Staircases per Block	None		
External Balcony part of escape route?	No		
Unusual features	None		
Building complexity	Simple		
Building Access Conditions for Fire Brigade	Vehicular Access to one or more		
· ·	elevations		
Surroundings: Residential/Commercial	Residential		
Fire Provision Currently in F	Place		
Fire Detection and Warning System	Flats and common areas linked		
Grade of fire alarm	Grade D		
Category of fire alarm	LD3 Minimum Protection		
Additional Comments:			
	Non Maintained System -		
Emergency Lighting Provision	Common Areas		
Additional Comments:			
Portable Fire Extinguishers	None fitted		
Additional Comments:			
Fixed Fire Fighting Installations	None fitted		
Additional Comments:			

None fitted within blocks.

Fire detectors in flats in blocks 1 - 4, 9 - 12, 14 - 17, 18 - 21, 22 - 25,26 - 29,34 - 38. Detectors in communal areas and flats in blocks 5- 8 & 30 - 33

Taking the findings of the FRA into account, is the evacuation policy appropriate for the scheme?

Taking the findings of the FRA into account,is the FRA fequency correct?

Due to vulnerability o #######

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		Sig	gnificant Findings - Fire			
Teesdale						y 2024
Ref:		Yes-No-N/A	Observation/Comments/	Rating Rating	Target Completion Date	<del>-</del>
Action Ref:	Potential Area of Fire Risk	2	Actions Required	K Rg	get nple e	Referred To:
Acti		Yes		Risl	Tar Cor Dat	Ref To:
	<u></u>		Fire Hazards			
1.1	Electrical Sources of Ignition: Electrical Installation within common areas		No issues identified at time of asessment			l
	(Fixed Wiring, sockets, switches, light fittings) in good condition and no obvious damage	Yes		Low		
1.2	Valid Electrical Installation Condition Reports held on file.(Common Areas)	Yes	All ELCR uoloaded to Active H	Low		
1.3	Valid Electrical Installation Condition Reports held on file. (General Needs Flats)	Yes	Sample dip Flat 24 - 29/03/26 ActiveH	Low		
1.4	Electrical App/PA Testing - all portable appliances tested within past 12 months	N/A	No Portable appliances identified within the common areas at time of asessment			
1.5	Absence of trailing leads and adapters	Yes	Non present within the common areas at time of assessment	Low		
1.6	Mobility Scooters - Stored/charged in		No Scooters present at time of assessment			
2	common areas, purpose built store/resident flat  Smoking:	N N		'		
	Are there any risks associated with smoking	Yes	A Strict No-Smoking Policy within the Common	Med		
3	in the building? Tenants allowed to smoke within their own		areas.Tenants allowed to smoke within their flats	ğ		
3.1	Adequate security against arson?	Yes	Door Security-Locked at all times. CVCTV in operation.	Low		
3.2	Is there an absence of unnecessary fire load in close proximity to building?	Yes	Generally good housekeeping observed ,externally .	Low		
4	Heating Installations (Portable/fixed)					
4.1	Gas Installations - Common Areas & Gener If portable heaters are used, are there		peds Residential flats.  Non present within the common areas at time of	Т		
4.1	suitable controls?	N/A	assessment	•		
4.2	Are fixed heating installations subject to regular maintenance?	N/A				
4.3	Valid LGSC held on file for each residential flat that contains gas appliances.	A/N	No Gas supply in premis.			
5	5 Cooking:					
5.1	Are reasonable measures taken to prevent fires as a result of cooking?	N/A	No cooking facilities within the common areas			
5.2	Where there is extraction ventilation in communal kitchens are filters changed/	N/A				
6	cleaned and ductwork cleaned regularly?  Lightning Protection System:					
6.1	Does the building have a lightning protection	N/A	None fitted			
7	system, If so, is it adequately maintained?  Housekeeping:	Z				
7.1	Is the standard of housekeeping adequate?	Yes	No issues identified at time of assessment	Low		
7.2	Are all electrical/intake/service cupboards		A chair has been stored in the electrical intake			<b>.</b>
	secure and free from general waste, contractors waste and residents personal items.	S	cupboard in block 5 - 8.HP advsed to remove.	Med	13/6/24	Partnership Manager 1
7.3	Are combustible materials separated from ignition sources and stored appropriately?	Yes	Sterile areas identified throughout.	Low		
7.4	Are unnecessary accumulations of combustible materials or waste avoided?	Yes	Sterile areas identified throughout.	Low		
7.5	Are hazardous materials stored appropriately		No issues identified at time of assessment			
	(i.e. oxygen cylinders, flammable materials, explosive products, oxidising products, aerosols)	Yes		Low		
8	Furniture/furnishings on escape routes and	oth	l er communal areas:			
8.1	Furniture/furnishings in good condition, fire retardant and complies with 1988	A/N	No Furniture/furnishings within the common areas			
9	Other Significant Fire Hazards:					
9.1	Are there other significant fire hazards that are inadequately controlled?	Yes	Sterile environment and good houskeeping identified during inspection.	Low		
			re Protection Measures			
<b>10</b> 10.1	Means of Escape from Fire:  Is it considered that the building is provided		Single direction MOE and single staircase			
10.1	with reasonable means of escape in case of fire?	Yes	Tomigio direction MOE and single stall case	Low		
10.2	Escape routes unobstructed and maintained in a sterile condition?	Yes	Checked-No issues at time of inspection	Low		
					_	

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10.3	Exits easily and immediately openable where	S	Fitted with thumbturn operating handle	3		
	necessary, without a key?	Yes		Low		
10.4	Reasonable distances of travel where there is a single/alternative direction of travel?	Yes	Minimal travel distance single MOE route single stair.	Low		
10.5	Escape routes lead to final exits and open in	Yes	Fitted with thumb turn operating handles-No issues at	Low		
10.6	direction of escape where necessary?  Do failsafe's on locked exit doors function	N/A	time of inspection  No failsafe's on locked exit doors in use			
10.7	correctly?  Is it considered that the building is provided					
	with reasonable arrangements for means of escape for disabled people?	N/A		•		
11	Measures to Limit Fire Spread and Develop	men	f:			
11.1	Is it considered that the compartmentation is		Blocks 5 - 8 (WO 1183916) 22 - 25 (1183919) 26 - 29			
	of a reasonable standard?	o <sub>N</sub>	1183926) 30 - 33 1183927) Appears to be a fire compartmentation breach in the electrical intake cupboard on the ground floor where the cables pass into the rear wall Flat door 38 has been forced entry and damaged beyond repair. Replacement door requested WO no. 1178619	Med	13/6/24	Fire Safety Manager
	Is there reasonable limitation of surface finishes that might promote fire spread (walls, floors, ceilings)?	Yes	Sterile internal walls clear of all combustables.	Low		
11.3	Are fire dampers/shutters provided in		None fitted within blocks.			
	ducts/refuse chutes to protect means of escape against fire, smoke and combustion products?	N/A		•		
11.4	Compartmentation within roof spaces of a satisfactory standard?	Yes		Low		
11.5	Loft hatches fire resisting?	Yes	60 minute FR Loft hatches	Low		
11.6	Fire stopping above cross-corridor fire doors within suspended ceiling void of a satisfactory standard	N/A	No suspended ceilings within the common areas			
11.7	Smoke Control Systems (AOV's) Are records of annual testing available?	N/A	No smoke control systems within the common areas			
11.8	Roller shutter doors (fire resisting)	N/A	No roller shutters within the common areas			
12	Communal Area Fire Doors (Inspection to i	nclu	de - construction, hinges, closure devices, intumeso	ent/s	moke seal	condition,
	glazing systems and maximum gaps betwe	en d				
12.1	Communal fire doors to FD30s standard and in a serviceable condition,	N/A	No additional communal area fire doors			
12.2	"Fire door keep shut/locked" signage displayed on both sides of all applicable doors.	N/A	No additional communal area fire doors			
12.3	Hold open devices operate at the sounding of the alarm and are in a serviceable condition	N/A	No additional communal area fire doors			
13	Flat entrance doors (Internal Common Area	ıs)				
13.1	Do flat entrance doors open onto internal	Yes	Single directional MOE route corridors and staircase.	Low		
14	escape routes? Flats with a single direction of escape to a		e escane stairway (Evternal Raiceny)			
	Do the flat entrance doors that open onto an	ənigi	No external balcony in premis			
	external balcony have to be passed during an escape?	N/A				
14.2	Are the separating walls between the flats		None identified during inspection			
1	and the balcony floor that have to be passed during an escape, fire-resisting up to a height	N/A				
	of 1.1m?					
15	Emergency Escape Lighting:					
15.1	Is the emergency lighting correctly specified and installed as per BS 5266-1:2016	Yes	Appers to be installed to the correct standard	Low		
15.2	Are all emergency lighting units in good condition and securely fixed to walls/ceilings	Yes	Apper to be seccure and in good condition	Low		
15.9	Are records of monthly testing available?	Yes	Last record of monthly tests on ActiveH 07/05/2024- ActiveH	Low		
15.10	Are records of annual testing available?	Yes	Last record of test 23/102023-ActiveH	Low		
16	Fire Safety Signs and Notices:	_				
	Are the correct Fire Action/Advice notices displayed in prominent locations within the common areas?	Yes	Positioned in each block entrance.	Low		
16.3	Directional fire escape signage in place and adequate?	N/A	Single directional MOE route corridors and staircase.			
16.4	Is there a suitable LIFT sign i.e. do not use in case of fire.	Y Y	No lift on site			
17	Means of giving Warning in case of Fire:					
	or giving training in case of file.					

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17.1	Is the fire detection and warning system		Fire detectors in flats in blocks 1 - 4, 9 - 12, 14 - 17,	_		
	appropriate for the occupancy and fire risk?	Yes	18 - 21, 22 - 25,26 - 29,34 - 38. Detectors in	Low		
			communal areas and flats in blocks 5- 8 & 30 - 33	_		
17.2	Is the fire detection and warning system		Appers to correctly specified.			
	correctly specified and installed as per BS	Yes	[ ''	Low		
	5839-1:2017	>				
17.3	Is the fire detection and warning system		Records available on ActiveH			
	maintained/tested and all certificates saved on	S	The sort as a valuable of the street	>		
	1	Yes		Low		
	file. (BS 5839-1:2017)					
17.4	Are there heat detectors located in the		No service rooms within premis.			
	Kitchen, Boiler, Plant Room and Laundry?	N/A	'			
	· ·	_				
17.5	Is the fire alarm panel remotely monitored,		Not remotly monitored maintainance and testing			
	and if so are there records of regular testing?	Yes	recorded on Active H	Low		
		>				
17.6	Are smoke/heat detectors within General Needs		Individual smoke detection is tested under planned works.Ter			
	flats subject to an annual inspection and the	Yes		Low		
	results recorded on an in date Landlord Gas	>		۲		
	Safety Record (LGSR)					
18	Fire Extinguishing Equipment:					
	Portable fire extinguishers - appropriate	N/A	Non fitted within the common areas			
	type/number/position?	Ž		L.		
18.2	Correct signage displayed by each fire	A/N				
	extinguisher?	Ž		'		
18.3	Fire blanket in communal kitchen, secured to	A				
	the wall, complete with signage?	N/A		٠.		
18.4	Hose Reels - fitted, maintained?	⋖	Non fitted within the common areas	·		
	,	Ž				
18.5	Dry/wet risers - Full access to all inlet/outlet	_	Non fitted within the common areas			
	boxes. All inlet/outlets secured and/or	NA				
	securing straps fitted to outlet valves?					
18.6	Records available of fire fighting equipment	-				
10.0		4				
	servicing within past 12 months	N/A		'		
19	, , , , , , , , , , , , , , , , , , , ,		Management of Fire Safety	•		
	, , , , , , , , , , , , , , , , , , , ,		Management of Fire Safety Residents will call 999			
19	servicing within past 12 months  Are there suitable arrangements for			Low		
19	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?		Residents will call 999	Low		
<b>19</b> 19.1	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety	Yes	Residents will call 999 Fire risk assessment carried out periodically results	Low		
<b>19</b> 19.1	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?		Residents will call 999  Fire risk assessment carried out periodically results uploaded to Active H.Housing partners carryout			
19 19.1 19.2	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety checks	Yes	Residents will call 999 Fire risk assessment carried out periodically results	Low		
<b>19</b> 19.1	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety checks  Sheltered Schemes & Regional Offices - Are	Yes Yes	Residents will call 999  Fire risk assessment carried out periodically results uploaded to Active H.Housing partners carryout	Low Low		
19 19.1 19.2	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety checks  Sheltered Schemes & Regional Offices - Are there sufficient number of qualified Fire	Yes	Residents will call 999  Fire risk assessment carried out periodically results uploaded to Active H.Housing partners carryout	Low		
19 19.1 19.2 19.3	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety checks  Sheltered Schemes & Regional Offices - Are there sufficient number of qualified Fire wardens.	N/A Yes Yes	Residents will call 999  Fire risk assessment carried out periodically results uploaded to Active H.Housing partners carryout	Low Low		
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19.1 19.2 19.3 19.4 19.5 19.6 19.7 19.8	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety checks  Sheltered Schemes & Regional Offices - Are there sufficient number of qualified Fire wardens.  Offices - Are there suitable arrangements for ensuring the premises are evacuated?  Offices - Are there suitable arrangements for evacuating disabled people?  Offices - Are there suitable arrangements for meeting the fire service on arrival and providing relevant information?  Offices/IL Schemes - Is there a suitable assembly point?  Offices - Are fire drills carried out at appropriate intervals?  Evacuation Policy  Taking the findings of the FRA into account, is the evacuation policy appropriate for the	N/A N/A N/A N/A N/A Yes Yes	Residents will call 999  Fire risk assessment carried out periodically results uploaded to Active H.Housing partners carryout schme inspections periodically.  Purpose built premis stay put delayed evacuation			
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19.1 19.2 19.3 19.4 19.5 19.6 19.7 19.8 20 20.1	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety checks  Sheltered Schemes & Regional Offices - Are there sufficient number of qualified Fire wardens.  Offices - Are there suitable arrangements for ensuring the premises are evacuated?  Offices - Are there suitable arrangements for evacuating disabled people?  Offices - Are there suitable arrangements for meeting the fire service on arrival and providing relevant information?  Offices/IL Schemes - Is there a suitable assembly point?  Offices - Are fire drills carried out at appropriate intervals?  Evacuation Policy  Taking the findings of the FRA into account, is the evacuation policy appropriate for the scheme?  Miscellaneous	Yes N/A N/A N/A N/A Yes Yes	Residents will call 999  Fire risk assessment carried out periodically results uploaded to Active H.Housing partners carryout schme inspections periodically.  Purpose built premis stay put delayed evacuation policy in place	Low Low	16/5/24	
19.1 19.2 19.3 19.4 19.5 19.6 19.7 19.8 20 20.1	servicing within past 12 months  Are there suitable arrangements for summoning the fire service?  Do relevant staff carry out regular fire safety checks  Sheltered Schemes & Regional Offices - Are there sufficient number of qualified Fire wardens.  Offices - Are there suitable arrangements for ensuring the premises are evacuated?  Offices - Are there suitable arrangements for evacuating disabled people?  Offices - Are there suitable arrangements for meeting the fire service on arrival and providing relevant information?  Offices/IL Schemes - Is there a suitable assembly point?  Offices - Are fire drills carried out at appropriate intervals?  Evacuation Policy  Taking the findings of the FRA into account, is the evacuation policy appropriate for the scheme?  Miscellaneous  Taking the findings of the FRA into account, is	N/A N/A N/A N/A N/A Yes Yes	Residents will call 999  Fire risk assessment carried out periodically results uploaded to Active H.Housing partners carryout schme inspections periodically.  Purpose built premis stay put delayed evacuation policy in place  Due to vulnerability of customers and the current		16/5/24	

Cover Sheet Fire Page 6 of 12

## 16th May 2024

Photographs - Fire
Teesdale
hair stored in block 5 - 8 electrical meter intske cupboard



mpartment breachs to blocks, 5 - 8, 22- 25 , 26 - 29 & 30 -33





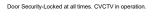
Flat 14 requires new door closer.



Flat 23 requires ease and adjust to fill exessive gaps.



Flat 38 requires new FD30s fitting.



Heating Installations (Portable/fixed) Gas Installations - Common Areas & General Needs Residential flats.





Emergency light in good condition and secured.



signated bin store for each block.



No Gas supply in premis.

## 6. Risk Calculator - Fire The following risk estimator is based on the general health and safety risk level estimator contained within BS 8800: 1996. Guide to occupational health and safety management systems 1. Taking into account the fire prevention measures observed at the time of this risk assessment, it is considered that the hazard from the fire (the probability of ignition) at this building is: (please insert x below) LOW MEDIUM HIGH 2. Taking into account the nature of the building, the occupants, the fire protection afforded and any procedural arrangements observed at the time of the assessment, it is considered that the consequences for life safety in the event of a fire would be: (please insert x below) Heating MAJOR CRITICAL Installat

The definition of the above terms is as follows:
PKA REVIEW Prequency No Gas supply in premis.

MINOR Outbreak of fire is unlikely to result in serious injury or death of any occupant (other than the occupant sleeping in a bedroom in which a fire occurs).

An outbreak of fire could result in injury of one or more occupants, but is unlikely MAJOR to lead to fatalities. CRITICAL There is significant potential for serious injury or death of one or more occupants.

3. The above estimates are then read into the following matrix table to give the overall risk level for the site:

Fire Hazard	Minor	Sterile areas	Critical
Low	Trivial	Tolerable	Moderate
Medium	Tolerable	Moderate	Substantial
High	Moderate	Substantial	Intolerable

When the level of risk is establis Sterile environment and good houskeeping identified during inspection.

Risk Level	Guide to actions and appropriate timescales
Trivial	No action is required
Moderate	Efforts should be made to reduce the risk level and this should be carried out within the specified time periods.
Substantial	Considerable resources may have to be allocated to reduce the risk level. It may be necessary to limit the occupation of some parts until urgent remedial action is
Intolerable	The building (or the relevant area) should not be occupied until the risk is reduced.

None fitted within blocks.

Fire detectors in flats in blocks 1 - 4, 9 - 12, 14 - 17, 18 - 21, 22 - 25,26 - 29,34 - 38. Detectors in communal areas and flats in blocks 5- 8 & 30 - 33

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Taking the findings of the FRA into account, is the evacuation policy appropriate for the scheme?

Taking the findin Due to vulnerability 16/05/2024

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Action Plan - Fire								
	Teesdale	16th May 2024						
Moderate								
Potential area of fire risk	Observation/Comments / Actions Required	Risk Rating	Completion Date	Referred To:	Task ID No.			
Measures to Limit Fire Spread and Development:	Comparmentation breachs to electrical meter intake cupboards in Blocks 5 - 8 (WO 1183916) 22 - 25 (1183919) 26 - 29 1183926) 30 - 33 1183927) Appears to be a fire compartmentation breach in the electrical intake cupboard on the ground floor where the cables pass into the rear wall.	Moderate	13/06/24	Project Manager (Building Safety) Works project Tracker.Requested works through Repairs portal				
Houskeeping	A chair has been stored in the electrical intake cupboard in block 5 - 8.	Moderate	13/06/2024	HP advised to remove				
Measures to Limit Fire Spread and Development:	Flat door 38 has been forced entry and damaged beyond repair. Replacement door requested WO no. 1178619	Moderate	13/06/2024	Project Manager (Building Safety) Works project Tracker.Repair requested through Repairs portal				

Door Security-Locked at all times. CVCTV in operation.

Heating Installations (Portable/fixed)
Gas Installations - Common Areas & General Needs Residential flats.

No Gas supply in premis.

identified Sterile areas identified throughout.

Sterile
environment
and good
houskeeping
identified
during
inspection.

Cover Sheet Fire Page 10 of 12

None fitted within blocks.

Fire detectors in flats in blocks 1 - 4, 9 - 12, 14 - 17, 18 - 21, 22 - 25,26 - 29,34 - 38. Detectors in communal areas and flats in blocks 5- 8 & 30 - 33

Taking the findings of the FRA into account, is the evacuation policy appropriate for the scheme?

Taking the findings of the FRA into account,is the FRA fequency correct?

vulnerability of customers and the

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