

Fire Safety Guidance Notes and Audit – Version 4.3

This document was produced by the National Fire Chiefs Council as CFOA in 2015. This guidance has been rebranded. It has not been reviewed.

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Introduction

This guidance provides Fire and Rescue Authorities (FRAs) with an overview of the CFOA approach to evaluating fire safety under the Regulatory Reform (Fire Safety) Order 2005 [the Order] and prioritising premises to visit.

The fire safety approach starts with the fire safety evaluation (short audit) and can be escalated to the 2009 audit form. This approach is suitable for all audit, enforcement and inspection visits. It enables staff to assess safety and collect identification and risk data about premises in a systematic and consistent manner. It also reduces the duration of each site visit.

The entire approach allows a number of functions to be carried out by FRAs including the ability to;

- Gather intelligence about premises for databases and inspection/audit schedules;
- Make a rapid assessment of fire safety provisions in buildings;
- Collect FSEC (other buildings toolkit) data;
- Escalate the level of scrutiny, when safety provision is unclear or lacking;
- Determine a risk value for premises, to inform prevention, protection and response;
- Demonstrate a degree of compliance with the Regulators' Code;
- Apply a consistent and verifiable process of determining enforcement action;
- Collect performance monitoring data for the government and FRAs ; and
- Establish a "non-domestic premises" risk profile.

Statutory enforcement action, by competent fire safety inspectors, will be determined by a combination of the outcomes of the process and the professional judgement of the inspector. Enforcement action will also be in accordance with the Regulators' Code and following the methodology of the HSE Enforcement Management Model (EMM). This provides a means of confirming, or otherwise, the enforcement activity.

Review of the CFOA Approach to Fire Safety Audit

FRAs are enforcing authorities for the Regulatory Reform (Fire Safety) Order 2005. CFOA produced the systems and procedures to support the introduction of the Order. These were reviewed after twelve months (by agreement of the Department for Communities and Local Government [DCLG]). The review brought about changes which were introduced to FRAs by in CFOA Fire Safety Guidance Audit Form – version 4.2 [the 2009 audit form].

A further review commenced in 2013, prompted by the Focus on Enforcement review of fire safety. The changes brought about by that review address a range of Better Regulation objectives; providing an additional regulatory tool for FRAs, which is intended to reduce the burden of inspection in safe premises. The 2013 review was based on the learning and understanding gained since the introduction of the Order.

The 2013 review resulted in this version of the Fire Safety Guidance Audit Form (version 4.3). It includes engagement, evaluation and audit processes. The aim is to enable attendance at premises to be cut short when inspectors are satisfied that safety is within sustainable and tolerable limits. The processes also allow for the cancellation of planned visits (if intelligence suggests that higher risk premises should take precedence). References to reflect current Better Regulation and Economic Growth duties are also included.

Benefits

Fire safety regulation aims to reduce risk to life in case of fire (and the societal and economic costs of fire on the community). Fire-fighter deaths and injuries, and fire losses to business, communities, society, heritage and the environment are also safeguarded.

FRAs maintain a risk-based or intelligence-led approach to targeting inspections and visits. CFOA continue to work on improving intelligence-led risk targeting for FRAs.

This guidance provides a simplified method to evaluate fire safety in premises. It must be undertaken by competent inspectors to ensure the adequacy and suitability of the fire safety evaluation, with respect to the features of the premises, the activity carried on there, any hazard present and any other relevant circumstances. Taking such matters into account allows the process to apply to all risks and premises types, according to the competence of the inspector.

The evaluation will indicate a lack of safety in case of fire when significant hazards exist or the inspector has reservations about the adequacy of safety measures. In such cases, the evaluation can be escalated to the 2009 audit form for a more detailed check of premises safety. One of the main changes to the previous system is that the compliance fields on the 2009 audit form are assumed to be 'broadly compliant' and are audited by exception and officer concern.

Inspectors will collect risk data about premises as part of their normal role. This data will enable more efficient and effective targeting of prevention, protection and response resources.

This guidance enables the delivery of a risk-based audit and inspection policy, aligned to the Government's current Integrated Risk Management Planning Guidance Note(s) (IRMP) and the Fire and Rescue National Framework guidance. It facilitates a flexible approach to addressing fire safety risks, as dictated by local drivers, and it provides a foundation from which a business and economic 'growth duty' can be supported.

This guidance has been developed in accordance with the Enforcement Management Model (EMM) and the Regulators' Code, which binds the regulatory activity of FRAs.

Audit Principles

The process frees inspectors to use appropriate approaches to evaluate and assess safety in case of fire and to determine appropriate actions. Fire safety management should support safety in case of fire and ensure that safety measures can be sustained.

Safety is assumed and that assumption is confirmed or challenged according to the findings of the safety evaluation. Many safety measures are physically observable. When safety falls below expected and tolerable levels, the underlying causes must be determined. Other safety measures e.g. management processes and staff training cannot be observed and must be discovered by the skill of the inspector asking appropriate questions to decide whether the safety measure is provided or not. The important factors to be considered are:

- Check by observation and communication (look and listen for evidence, talk to people)
- Establish that a safety measure exists
- Consider fire hazards, control measures and the residual risk of fire (fire risk is a combination of the likelihood and the consequences of fire)
- Only carry out checks to determine whether or not safety fire has been provided
- Where residual risk is unacceptable, escalate the identified areas of concern to the 2009 Audit and Data Gathering form
- Address fire safety matters

Where the outcome of the evaluation is that the risk to people in case of fire is tolerable (or better), the premises are 'safe enough' (i.e. sufficient safety measures are in place to adequately provide safety in case of fire). Where the outcome of the evaluation is that the risk is below tolerable limits, the 2009 audit form is used to probe those areas of concern and

to record the findings. Matters of safety need not be revisited. Unsafe matters must be audited so that a decision can be made. Any opportunity may be taken to raise awareness. FRAs may want to record educational activity.

Stages of Audit

A visit to premises to determine the fire safety risk should consider all the following stages in order to comprise a proactive audit and must account for them in the 2009 audit process.

- FRA database or other intelligence highlights likely high risk premises for inspection.
- Inspector considers the identified premises and gathers relevant information, including (but not limited to) frequency of AFA visits, fire incidents, information shared by other regulators, outcomes of previous fire safety visits / previous compliance or safety records, Primary Authority information, etc.
- Based on the intelligence gathered, determine if a site visit is warranted.
- Try to contact the occupant of the premises and determine;
 - The responsible person / duty holder(s)
 - A convenient date for the audit (FRAs may wish to set a minimum notice period).
- Confirm the date for the audit, giving details of audit process and the expectations when conducting audit using the appropriate CFOA standard letter.
- Prior to the audit, the inspector should ensure familiarity with the premises history.
- Attend the premises, allowing adequate time to evaluate the fire safety.
- Undertake the evaluation.
- Use the matrix to determine the next steps (including; go to more dangerous premises, take non-statutory action, and escalate to the 2009 Audit and Data Gathering Form.
- Record information relevant to areas of concern on the audit form.
- Confirm management and other unobservable requirements (records, maintenance schedules, training and emergency plans, etc.) to support / refute areas of concern and to assess the sustainability of safety measures in the longer term.
- Record compliance level against each area of concern.
- Conduct further physical inspection of some or all of the premises as necessary.
- Consider improvements and enforcement options, discussing the options with the responsible person to determine / help select the most appropriate course of action.
- Provide any additional on-site education and advice as necessary/appropriate e.g. non enforceable advice to further reduce risk via arson prevention, business continuity, environmental, growth duty advice, health and wellbeing signposting etc.
- If necessary consider refining enforcement action by applying the Enforcement Management Model.
- Update fire safety risk management data-base.
- Prepare additional reports or relevant paperwork and send as soon as possible.
- If necessary arrange and undertake any follow up action.

Audit & Inspection Process

The 'audit process' is all regulatory activity undertaken with respect to premises identified for intervention by FRAs. It includes all work from gathering intelligence to the final disposal of any safety or business improvements identified. Site visits are often necessary to evaluate the suitability of fire safety measures and the level of any residual risk. The fire safety evaluation using the short audit form is the first step during a site visit. If the evaluation reveals that

appropriate general fire precautions are in place (to suitable and sufficient standards for the premises), then the inspection process can end at that point. If the evaluation of fire precautions indicate residual concerns or identifies unacceptable risks to people in case of fire, the site visit should be escalated to the 2009 audit form for a focussed audit of the areas of concern. Escalation is used to determine whether safety has been provided or whether improvements in safety must be made.

Starting the Audit Process – Selecting Premises to Visit

FRAs determine inspection priorities according to local fire safety data systems. A wide range of variables influence the fire risk posed by premises.

IRMP guidance note 4 provides a level of analytical benchmarking with the use of relative risk models based on societal risk. Premises deemed to be at high societal risk have historically been under the scope of regulation and consequently assumed to be reasonably compliant.

FRAs use risk based inspection programmes to drive proactive inspections of premises, influenced by matters such as societal risk, fire safety history and operational attendances (including frequency of unwanted fire signals and automatic fire alarms (AFA) and fire incidents). Diagram 1 represents these factors in the two uppermost segments, while other factors that drive proactive inspections are represented in the remaining three segments.

The Regulators' Code requires FRAs to base their regulatory activities on risk at every stage of the regulatory process. This includes targeting where regulatory activity is undertaken as well as the most appropriate method of interaction. <u>Appendix 1</u> discusses some considerations when FRAs and inspectors are targeting premises to visit. This guidance and the short audit method deliver on a number of the requirements of the Regulators' Code by:

- Supporting regulated businesses, etc. to comply and grow;
- Providing a simple and straightforward way to engage with regulated businesses;
- Basing regulatory activity (and enforcement) on risk;
- Ensuring clear information is available to help regulated businesses, etc. to comply; and
- Providing a transparent approach to regulatory activity.

FRAs may take approaches to risk which tackle emerging trends in a business type or by a geographic area that indicates higher risk. FRAs also have a duty to reduce fires and the impact of fires within the community; and dynamic response-driven work can be essential to preventing unnecessary losses. Examples include acting on reports of fire safety concern, seasonal activity and targeting an area suffering an increase in arson attacks.

By targeting and using information and intelligence from a range of sources, a professional opinion can be formed about the need to visit premises, together with the most appropriate method of interaction to undertake on arrival.

Fire safety risk, in premises, can be measured and improved (or reduced) in a number of ways e.g.

- Fire risk can be measured by gathering information via remote methods, including; email, letters, leaflets, questionnaires, business surveys etc.
- Fire risk can be reduced through education, including seminars and meetings to give advice and information.

• Fire safety can be measured and improved through premises visits to evaluate fire safety and its management. Appropriate and proportional enforcement action, (from providing advice to statutory enforcement) improves fire safety and reduces risk.

The short audit process will be helpful to quickly establish that safety has been provided or that more is required. It integrates with the 2009 audit form if escalation to a more detailed method is necessary. The overall process will be of shorter duration.

The Short Audits process – Site Visits

The fire safety evaluation provides a swift and simple process, to enable <u>competent inspectors</u> to assess safety in case of fire. It encourages spending as little time as possible in reasonably safe premises (where residual risks are within tolerable limits) in order to move on to higher risk premises, and realise more significant improvements in safety.

The short audit method, detailed below will assist inspectors to focus on the overarching objective of providing safety for people in case of fire. It will also reduce the burden of audit imposed on compliant businesses.

The evaluation used for the short audit provides insufficient information for FRAs to take statutory enforcement action. Observing or identifying failures that place relevant persons at risk of harm in case of fire will warrant escalation.

Focus on Safety

The short audit method starts with an evaluation of safety. The evaluation is based on a judgement of safety according to what the competent inspector would expect to see (appropriate to the building, its use, etc.) and the standard of general fire precautions actually provided. The general fire precautions are treated as the 'functional requirements' of the Order which, if present to the appropriate standard will provide safety in case of fire. Competent inspectors will consider appropriate benchmark standards in their evaluation, including; the fire safety risk assessment guidance documents issued by Government, relevant British Standards, and standards produced by other bodies. Inspectors must be competent to evaluate safety to a standard appropriate to the premises under consideration.

The presence of relevant standards will generally indicate that enough has been done to provide safety in case of fire (and to comply with the law). However, it is possible that safety can be achieved by alternative methods. (Safety measures taken or needed should be identified in the significant findings for the premises under consideration).

The requirement to provide safety in case of fire (and to comply with fire safety law) rests firmly with the duty holder (as responsible person or otherwise). Inspectors should seek to work with compliant duty holders and those who want to comply; to assist them to meet their obligations under the Order. In cases of extreme risk in case of fire (or non-compliance); FRAs are expected to pursue robust enforcement action.

It is important that GFPs are taken or observed in a manner that provides adequate arrangements for safety in case of fire (both preventive and protective measures). By addressing preventive and protective measures, the GFPs address the likelihood of fire breaking out and the consequences of fire if it does (see <u>Appendix 6</u>). Inspectors need not dwell on the intricacies of individual articles when evaluating safety because all articles are provided for within the scope of the GFPs as shown in <u>Appendix 4</u>. One of the descriptors for compliance level 1 (the safest) in GN 4.2 was "possibly no risk assessment carried out / recorded but building generally satisfactory in all other respects". The short audit method builds on that approach. The most important thing is that appropriate safety measures are in place and providing safety. Inspectors should only need to consult recorded information (flowing from a fire risk assessment), if safety is in doubt or to moderate any decision taken. This should only be necessary at the end of the visit. If the inspector is of an opinion that the arrangements are within tolerable limits, further information is unnecessary.

The GFPs are therefore scalable to suit any premises (simple or complex) according to the competence of the inspector. GFPs need only be adequate in the particular circumstances of each case. For many (but not all) smaller premises (or those with very simple layouts) safety may be easily provided. In such simple premises or where protective measures are already in place the most important factor may be the on-going maintenance of existing safety measures. In more complex premises the provision of increasingly complex and costly solutions will be necessary to adequately mitigate the risk.

Management arrangements should ensure safe systems and procedures are maintained, to preserve safety. A lack of management can cause safe conditions to deteriorate over time, meaning that safety in case of fire cannot be sustained. Both managers and employees contribute to making premises 'safe enough'. Put simply, the investment in control measures and safety arrangements should be proportionate to the risk to relevant persons.

The evaluation process requires competent inspectors to make decisions to determine a course of action (based on a combination of the likelihood and consequence of fire). If premises are unsafe or if it is desirable to delve further into certain safety measures, the process defers to the 2009 audit form and process.

When inspectors have seen and heard enough to evaluate the fire safety at premises, they need to determine the action to take. NB The Order only requires the taking of GFPs 'so far as is reasonably practicable' (in relation to the safety of employees) and 'as may reasonably be required in the circumstances of the case' (for relevant persons who are not employees).

Inspectors need only satisfy themselves that the risk to relevant persons is being managed to ensure adequate safety. It should not be expected that every potential risk from fire is removed or that every article is entirely complied with. FRAs should provide additional advice, on request. Every (regulatory) contact should count and where possible, better business / better regulation advice should be given.

Appendices 1 - 8 provide further information on the fire safety evaluation, short audit process. Reference should also be made to the <u>CFOA Short Audits Guidance</u>. The following paragraphs introduce the Short Audit evaluation process.

R

The 2009 Audit Form (Parts A-D)

The short audit method concludes with an action from the Action Key, i.e. premises are 'safe enough', or need further investigation because people are perceived to be at risk. When the evaluation indicates a perceived risk or a need for further investigation, the 2009 audit form process will be used.

The following paragraphs introduce the 2009 Audit form and audit process.

Only those matters that give rise to concern during the short audit need be considered within the 2009 audit form. Measures evaluated as 'safe' / tolerable can be defaulted to broadly compliant, e.g. if the matter of concern relates to the fire alarm but measures relating to the exits were acceptable during the evaluation, the exits can be marked as 'Broadly Compliant' and there is no need to re-evaluate the exits under the 2009 audit process.

The 2009 audit form is divided into four parts;

- Part A: Site Information (primarily for fire safety file and FSEC). This information should be collected on each visit to premises for which the FRA holds no intelligence and when changes to intelligence are found. This can be collected on the evaluation form and on the 2009 audit form. <u>Click here for how to complete Part A of the 2009 audit form</u>.
- Part B: Fire Safety Evaluation (Assessing compliance with the Order i.e. that safety in case of fire is provided for relevant persons). This should be checked, first by evaluation under the short audit and (when safety is not adequately provided), by the 2009 audit form. The 2009 form is used to further audit those matters that are not adequately addressed by the evaluation. (Those parts of Part B that were evaluated as adequate need not be subject to further scrutiny). <u>Click here for how to complete Part B of the 2009 audit form</u>.
- Part C: Calculation of relative risk rating and risk level. (The evaluation process can produce a relative risk rating, which can be transferred to the 2009 audit form, when needed). <u>Click here for how to complete Part C of the 2009 audit form</u>.
- Part D: Operational Site Specific Risk Information (where appropriate). Each FRA will adopt an approach to gathering operation risk information to service their needs. <u>Click here for more information about collecting operational risk information</u>.

In addition, there are a number of matrices, action keys, look-up tables and flowcharts which the inspector should consult during the process.

FRAs will have databases and inspection systems in place to capture and rate information gathered through the audit process for various premises types and arrangements.

Appendices 9 – 16 provide further information on the 2009 Audit form and audit process.

Supplementary Information

Information Gathering for Potential Offences

Where non-compliance (with safety critical aspects of fire safety) is found, the consequence can have a major or minor impact on safety. If the impact of non-compliance is major and the likelihood of fire is high, consideration should be given to undertaking an investigation for subsequent prosecution. However, all aspects of the enforcement management model must be applied to determine whether to proceed with this course of action (as well as the FRAs prosecutions Policy).

Standard Letters and Notices

CFOA has issued guidance for the purpose of enforcing the requirements of the law to provide safety to people in case of fire. FRAs should use the Letters and Notices templates, which allow for scalable and proportionate enforcement action while encouraging dialogue between the inspector and those being regulated. <u>CFOA Standard Letter Guidance</u> provides detailed information on the use, intent and operation of letters and notices.

N.B. the outcome of serving a Prohibition Notice sits outside of the compliance levels and is dealt with in a different manner; see <u>CFOA Guidance on Article 31 Prohibition/Restriction Notices</u>.

Better Regulation

The Regulators' Code encourages FRAs to:

- 1. Carry out their activities in a way that supports those they regulate to comply and grow;
- 2. Provide simple and straightforward ways to engage with those they regulate and hear their views;
- 3. Base their regulatory activities on risk;
- 4. Share information about compliance and risk (with other regulators)
- 5. Ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply; and
- 6. Ensure that their approach to their regulatory activities is transparent.

The audit processes described in this document, coupled with the Letters and Notices go some way to satisfying the requirements of the Regulators' Code.

The Order is a 'self-compliant' law insofar as the persons responsible for creating the risk are expected to comply with its requirements. FRAs should recognise that most businesses want to comply with the law (and provide safety in case of fire). FRAs are therefore expected to help businesses etc. to meet their legal obligations without unnecessary expense.

FRAs should, where appropriate, effectively consult with duty holders to minimise the costs of compliance for the business by ensuring that any action eventually taken is proportionate to the risks. Therefore it is suggested that, unless immediate statutory enforcement action is required, inspectors should discuss the circumstances of each case, to resolve points of difference, which can then be reflected in any letter or notice served. Focussing on minimum standards to ensure safety will reduce the burdens imposed on businesses. The reduction in the frequency and scale of fires in, consequence of appropriate preventive and protective measures, will also contribute to economic and business growth.

Where appropriate, FRA's will enter into partnerships and share regulatory data with appropriate regulators to further reduce risk within the community. This may involve the sharing of intelligence / data with those agencies in order to reduce the burden on businesses and to target resources more efficiently and effectively.

CFOA and FRAs will work with the Better Regulation Delivery Office (BRDO) and will engage in the better regulation and economic growth agendas.

IRMP Returns

Annual returns are required by the Department for Communities and Local Government, in order that the Government can ascertain the level of compliance in different premises types against the various Articles within the Order and to determine the extent of community fire protection activities that FRAs are undertaking. For the purpose of the annual returns, both the short audit and the 2009 audit form comprise 'an audit'. Premises that are 'safe enough' following the short audit evaluation will be recorded as compliant, (whether or not a letter is sent to confirm advice given). When inspectors are sufficiently concerned about the fire safety in premises to arrange a return visit, improvements in safety are expected and as such the first visit will be recorded with an 'unsatisfactory' outcome on the annual returns. Subsequent visits will be made (within the same audit) to see that the improvements have been made or that progress is being made against the requirements. When visits are no longer necessary (because sufficient improvement has been delivered), a satisfactory outcome will be recorded to recognise the improvement that the audit had on safety i.e. from finding premises that posed a danger to making those premises safe in case of fire. In circumstances in which improvements have been requested but no return visit will be made, the supposition must be that the required improvements will be made and as such the premises will be safe enough; a satisfactory outcome is recorded.

In order to provide a complete set of returns, several articles have been added to the audit form. These are Articles 27, 29, 30, 31, 32 and 24. No score is attributed as they normally have little bearing on the delivery of fire safety. They should be considered when applying the EMM principles (see <u>Appendix 13</u>) to either confirm the evaluation outcome or recommend a more appropriate enforcement activity.

Articles 27, 29, 30, 31, 32 and 24 generally require either a "Yes/No" answer or "Not applicable". It is important to note that if a prosecution has been taken, this should be recorded elsewhere in the IRMP returns.

Appendix 1 – Short Audit (Targeting Interactions and Inspection Activity)

The cyclic diagram below illustrates factors relevant to FRAs when targeting regulatory work. The five individual factors can have a positive or negative influence on which premises should be subject to a visit. Factors which demonstrate a healthy management attitude, or record a good safety outcome can be used to defer or cancel unnecessary visits. Where factors tend to negative outcomes or suggest cause for concern, a visit may be necessary to improve safety in case of fire. This may be as simple as engagement to offer advice or in the most serious cases an approach which provides detailed records for enforcement purposes.



Diagram 1 - information to support the conduction of a site visit

Unnecessary fire safety visits are wasteful for FRAs and create a burden for businesses etc. The 2009 audit form can be time consuming, especially when the business is fire-safe. The result of a detailed process may do nothing to improve safety or reduce risk.

The Influencing factors

• Fire and AFA history: This will be relevant based on FRA policy. It is accepted that a business suffering a fire may need advice, guidance or a review of the fire prevention measures in the premises.

It is a common theme that a high frequency of unwanted fire signals indicates that premises management may be poor, controls inadequate, or even that the fire alarm has been incorrectly designed, installed or maintained. This may prompt a visit to take a look at the specific issues of the alarm and gather relevant information to correct deficiencies.

• Fire Safety History: This usually includes matters such as previous performance against required fire safety standards, perceived risk and impact of fire at the premises, such as community value (e.g. hospitals) and factors such as societal risk derived from statistic and fire data. This information is principally derived from the outcomes of previous inspections. These forms of information have been widely used and incorporated into existing databases. Post-fire work is a key aspect of risk reduction and supporting business to minimise risk to their undertaking.

• Other Regulatory Information: Many local regulators have developed ways of sharing information about businesses; and CFOA expects the quality of information and data sharing to improve in the future. It may be logical to assume that if a business demonstrates good Health and Safety management, they will also tend towards safety in case of fire. Conversely if a business neglects Health and Safety, it is likely that they will be unsafe in case of fire.

The BRDO are looking at ways in which regulators can share information in support the principles of "collect once, use many times".

- **PA scheme Inspection Plans**: The detail of inspection plans or Primary Authority advice may influence how an inspector interacts with a business and the specific matters they evaluate. It should also be recognised that businesses in the scheme have committed to invest in fire safety management across their business portfolio and may only need local interaction if other indicators prompt a visit.
- **Business Self-Assessment**: Some FRAs undertake surveys to gather information by means other than visits and this is a potential aspect of development for any regulator. Many businesses are happy to provide information on request. CFOA is considering options for self-assessment tools.

Appendix 2 – Short Audit (The Evaluation Process)

This is a qualitative methodology for inspectors to make an initial evaluation of what is being done to control fire risk and to ensure that relevant persons are safe enough in case of fire.

This is achieved by inspectors satisfying themselves that premises are safe in case of fire (using GFPs to measure safety provision). The GFPs provide a series of 'Key lines of enquiry' (KLOE). The process enables short-duration visits to premises, but inspectors must be satisfied that residual risk is within tolerable limits. When the provision of safety is not self- evident, inspectors must make more detailed enquiries to discover what has (or has not) been done.

To make best use of this methodology the knowledge and skill of a competent inspector (as defined by the Competency Framework for Business Fire Safety Regulators) is required so that a professional qualitative judgement on the adequacy of fire safety arrangements can be made.

The principle is one of assessing the provision of GFPs and where necessary, asking open questions of duty-holders and measuring the responses. Any questions posed should promote open conversation, something which can be done as the inspector 'walks and talks'; reconciling the safety they expect with what they see and what they are told.

Competent inspectors will be able to determine the suitability and sustainability of fire safety measures and management arrangements. The suggested KLOE questions provide a starting point of relevant enquiries, for inspectors that might need it. Good business managers will be able to respond to the questions and demonstrate an understanding of the fire safety measures they have in place. The skill of the inspector is to phrase the questions in a manner suitable for the needs of the visit. The use of plain language is preferable to allow the conversation to flow and a determination of safety to be made.

It is important to assess whether or not adequate safety in case of fire has been achieved.

Where the evaluation (and KLOE) indicates that duty holders have poor understanding or poor management arrangements; it will be necessary to probe further to establish what (if anything) is being done to address fire risks. Each KLOE has further 'considerations' associated with it, which may used to elicit more detailed information about specific matters. These are not comprehensive and the skill of the inspector is to 'drill down' to the underlying issues.

The diagram below is based on the 'funnelling' technique of questioning and shows the principle of how the questions should be addressed. It is only necessary to go to the next layer if the inspector is not satisfied by their own evaluation of safety and responses they receive to the first layer.





Observable fire safety deficiencies are likely to be a symptom of underlying issues relating to weakness in management systems. Inspectors should search for the cause of the deficiency, which is normally linked to a failure in the duty to provide adequate fire safety management.

The evaluation process is intended to minimise the time spent visiting compliant or safe premises and thus reduce the burden to business. Where there is valid concern about the fire safety standards or obvious matters of serious non-compliance the visit can be escalated to the 2009 Audit process. In applying this approach, businesses should receive fair and proportional treatment from inspectors, based on the level of fire safety on the premises. A form on which to record the findings of the short audit evaluation is provided in <u>Appendix 5</u> and <u>Appendix 8</u> although full guidance for the <u>short audit method is available here</u>.

Appendix 3 – Short Audit (Determination of Likelihood and Consequence)

Risk is a combination of the likelihood of fire and the consequences if fire were to break out. The short audit evaluation considers how the risk associated with GFPs can be determined and applied to a risk matrix. The diagram below captures this consideration.

How question responses influence outcomes on the decision matrix					
Preventative measures – reducing the likelihood of harm to relevant persons	Protective measures – physical arrangements facilitating safe escape				
Control of ignition sources	Means of escape provision and protection				
Employee instruction and training	Means of detection and warning				
Arrangements for evacuation	Provision of firefighting equipment				
Management procedures	Containment or control of fire spread				

Diagram 3 – Influence of the evaluation of general fire precautions on the Decision Matrix

Preventive (links to likelihood of fire)

The general fire precautions under this heading are included on the following grounds:

Control of ignition sources

If adequately controlled, sources of ignition are unlikely to start a fire. An absence of likely ignition sources reduces the likelihood of fire starting. If not adequately controlled the fire is likely and safety will consequently rest with the protective measures.

Employee instruction and training

Instruction and training can include preventive and protective measures, but the potential to identify fire hazards before they are realised will prevent fires and affect the likelihood of fire. The short audit method also recognises that instruction and training can affect protective measures and the ongoing functioning of safety measures.

Arrangements for evacuation

If no fire has broken out, there is no need (other than for training purposes) to evacuate premises for fire. It is a measure that can keep people safe in case of fire.

Management procedures

Again, good fire safety management will identify fire hazards and deal with them before they can be realised. Management can also have an affect of the consequences of fire.

Protective (links to consequence of fire)

Means of escape

Provided and secured to safely escape the outbreak of fire and have no influence on the likelihood of fire.

Means of detection and warning

Provision should be appropriate to the risk.

Provision of fire fighting equipment

This equipment is provided in case fire breaks out. It does not prevent fire or affect the likelihood.

Containment or control of fire spread

It is only necessary to contain a fire or to control its spread after the fire has started.

Appendix 4 – Short Audit (How General Fire Precautions encompass articles)

The operative parts of the Order (articles 8-22 and regulations made under article 24) are the means by which General Fire Precautions are satisfied. The General Fire Precautions provide an overview of the safety that will be delivered if articles 8-22 are complied with. The table below shows how the General Fire Precautions can incorporate the specific requirements and articles of the Order.

GFP	Articles falling into the scope of respective GFP
4(1)(a) Measures to reduce the risk of fire on the premises 	 A9 – Risk assessment A10 (Schedule 1, Part 3) – Principles of prevention to be applied A11 – Fire safety arrangements A17 – Maintenance A19 – Provision of information to employees A20 – Provision of information to employers and the self-employed from outside undertakings A21 – Training A22 – Cooperation and coordination
and the risk of the spread of fire on the premises	 A9 – Risk assessment A10 (Schedule 1, Part 3) – Principles of prevention to be applied A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A14 – Emergency routes and exits A17 – Maintenance A22 – Cooperation and coordination A37 – Fire-fighters switches for luminous tube signs etc.
4(1)(b) Measures in relation to the means of escape from the premises	A9 – Risk assessment A11 – Fire safety arrangements A14 – Emergency routes and exits A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees A21 –Training
4(1)(c) Measures for securing that, at all material times, the means of escape can be safely and effectively used	 A9 – Risk assessment A11 – Fire safety arrangements A14 – Emergency routes and exits A15 – Procedures for serious and imminent danger and for danger areas A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees A21 – Training [A23 – General duties of employees at work] [A38 – Maintenance of measures provided for protection of fire-fighters]
4(1)(d) Measures in relation to the means for fighting fires on the premises	 A9 – Risk assessment A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees; A21 – Training [A23 – General duties of employees at work] [A38 – Maintenance of measures provided for protection of fire-fighters]

4(1)(e) Measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises 4(1)(f)(i) Measures in relation to the arrangements for action to be taken in the event of fire on the premises, including – measures relating to the instruction and training of employees	 A9 – Risk assessment A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees; A21 – Training A9 – Risk assessment A10 (Schedule 1, Part 3) – Principles of prevention to be applied A11 – Fire safety arrangements A19 – Provision of information to employees A20 – Provision of information to employees and the self-employed from outside undertakings A21 – Training [A23 – General duties of employees at work]
4(1)(f)(ii) Measures in relation to the arrangements for action to be taken in the event of fire on the premises, including – measures to mitigate the effects of the fire	 A9 – Risk assessment A10 – Principles of prevention to be applied A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A14 – Emergency routes and exits A15 – Procedures for serious and imminent danger and for danger areas A17 – Maintenance A22 – Cooperation and coordination A38 – Maintenance of measures provided for protection of fire-fighters

Table 1 – Articles falling into the scope of respective General Fire Precautions

Many articles appear several times and against a number of General Fire Precautions. This reflects the holistic nature of fire safety and how the articles can affect safety across a range of considerations.

Notes for inspectors:

Article 12 (Elimination or reduction of risks from dangerous substances) and Article 16 (Additional emergency measures in relation to dangerous substances) have been omitted from Table 1 because they relate to Special requirements or Process Fire Precautions and unless they are relevant to GFP are therefore matters for regulation by the HSE. For the sake of completeness, Article 12 and Article 16 sit sub-ordinate to Article 4(1)(3)(b) – the use or storage of any dangerous substance.

The inclusion of Article 23 (General duties of employees at work) has also been included for completeness. Although Article 23 does not fall under the duties imposed on responsible persons (and duty holders) under Article 5, an offence may be committed if it is not complied with.

Article 8 (Duty to take general fire precautions) is not listed because it is represented by the list of General Fire Precautions (4(1)(a) to 4(1)(f)(ii)).

Article 24 (Power to make regulations about fire precautions) is not listed because the regulations made so far (Sub-Surface Regulations and Employee Capability Regulations) are appropriate to existing General Fire Precautions and any others are, as yet, unknown.

Appendix 5 – Short Audit (Fire Safety Evaluation form)

A representation of the form used to evaluate whether or not safety in case of fire has been provided is shown below. Full guidance for the form are <u>available here</u>. The forms appear simple, to reflect the application and use of GFPs to assess fire safety, but the importance of employing only <u>competent</u> officers (to undertake technical fire safety work) must be stressed.

N O	OTE: The questions be pinions based on what		inspector to answer from the Not to be confused with the		Good	Tolerable	Poor
1	1 Are ignition sources adequately managed and controlled in the premises to reduce the risk of fire? Consider – work activities, hot works, electrical safety, heating, smoking etc.						
2	2 Are adequate measures in place to control the spread of a potential fire in the premises? Consider – building conditions, stored goods, highly flammable materials, wall coverings etc.						Poor
3	in the premises?		y in the event of a fire en uation plan, exits unobstruc		Good	Tolerable	Poor
4	4 Can persons use the escape routes and final exits safely? Consider –, adequate routes (size/number), travel distance smoke travel, adequately protected and maintained etc.					Tolerable	Poor
5	5 Is there adequate equipment in the premises for extinguishing small fires? Consider – extinguisher type, location, number, accessible, working order etc.					Tolerable	Poor
6	6 Are adequate arrangements in place to detect fires and raise the alarm to those people on the premises? Consider – detection type, sounder locations, adequacy of automatic or manual systems, working order (panel healthy) etc.					Tolerable	Poor
7	7 Are adequate instructions or guidance on procedures to follow in an emergency provided for employees? <i>Consider – initial and refresher training, emergency procedures, emergency notices, calling the fire service etc.</i>					Tolerable	Poor
8	8 Are adequate management procedures in place to mitigate the effects of fires in the premises? Consider – managed system of safety checks and maintenance, consideration to arson, risk assessment and action plan where necessary etc.					Tolerable	Poor
Are sufficient precautions in place to safeguard the safety of relevant persons in case of fire? Circle the appropriate yes/no outcome							2
	udit Outcome (from		Personmended Action				
	udit Outcome (from Decision matrix)		Recommended Action (from Action Key)				
	nate		Inspector name Service Number				

Appendix 6 – Short Audit (Decision Matrix)

The simple matrix (shown below) provides a method to give consistency to inspectors' decisions. The matrix relates to the risk to people in case of fire. Risk is a combination of 'preventative measures' (associated with the likelihood fire occurring) and 'protective measures' (associated with the consequence of a fire when it occurs). The matrix thus resembles many health and safety evaluation tools where the action or outcome is based on a combination of likelihood and consequence.

The matrix outcomes (represented by the coloured boxes) recognise that action might be required even if the likelihood or consequences of fire are at a good standard. Control measures, e.g. simple management actions to prevent fires, can add value to the overall fire safety arrangements. The neglect of any one element can leave an unacceptable residual fire risk.

Duty holders should strive for an outcome within the 'green zone' of the matrix, by providing sustainable fire safety arrangements. An outcome in the amber zone (residual risks are tolerable) may not attract statutory enforcement action but might instead receive useful advice or other non-statutory action to assist in making improvements to their fire safety arrangements.

Where the outcome is within the red zone (residual risks are unacceptable) the matter is likely to need statutory enforcement. In order to gather sufficient detail for the case, the 2009 audit form provides necessary systems and measurement to validate such a decision. If the inspector is in doubt about the outcome, then escalation to the 2009 audit form is warranted to ensure that the most appropriate decision (to protect relevant persons) is reached.

The matrix below provides a simple measurement to indicate an outcome, based on the inspectors' professional judgement and according to the arrangements in place.

Decision matrix: General fire precautions		Preventative measures influencing risk of a fire causing harm (Likelihood)				
		Good	Tolerable	Poor		
Protective measures facilitating safe	Good					
escape (Consequence)	Tolerable					
	Poor					

Diagram 4 – Decision matrix

Meaning of 'Good', 'Tolerable' and 'Poor'

Good – People are not exposed to risk in case of fire. The measures taken by the responsible person has demonstrated they have sustainable fire safety arrangements in place; and that the preventive and protective measures provided on the premises are well managed and maintained.

Tolerable – People may be exposed to some (but not serious) risk in case of fire. Some minor improvements to the preventative or protective arrangements on the premises are necessary. Or measures taken by the duty holder are adequate to keep people safe but they are unable to demonstrate that these are managed or maintained in a sustainable manner.

Poor – People are at high (or serious) risk of injury or harm in case of fire. The duty holder is unable to demonstrate that adequate preventive or protective arrangements are provided on the premises or significant deficiencies have been observed.

Using the Decision Matrix to 'score' outcomes

Decision matrix: General fire precautions		Preventative measures influencing risk of a fire causing harm (Likelihood)				
		Good Tolerable Poor				
Protective measures	Good	-2	-1	0		
facilitating safe escape	Tolerable	-1	0	1*		
(Consequence)	Poor	0	1*	2*		

Diagram 5 – Outcome of evaluation: to take forward to Part C. for data and relative risk data values

The numerical additions to the shaded boxes provide outcome values in a consistent fashion with Part B of the 2009 audit and data methodology. These can be carried forward, where necessary, to part C of the 2009 audit form to satisfy the final calculations to provide a 'relative risk' value.

Important Notes:

Values of -1 and -2 can imply that the premises and people are safe enough in case of fire and the site visit can terminate.

A value of 0 indicates that the principles of the Enforcement Management Model should be applied to moderate the decision-making process.

Values 1* and 2* are shown for completeness or for calculating an interim value, however if the outcome either of these values the fire safety evaluation should be escalated to the 2009 audit form, from which a numerical outcome can be derived.

Letters and notices associated with outcomes are discussed later in this document.

Service Policy Note: Diagram 5 (with numerical values) may be inserted as content to the decision matrix.

Appendix 7 – Short Audit (Evaluation Outcome – Action Key)

The short audit method uses an evaluation of safety, based on the professional judgement of inspectors (considering fire hazards and measures to mitigate them). From this the residual level of safety in case of fire is determined. The action key suggests the action to take, based on the outcome of the decision matrix. The 'action key' uses the colour coded risk from the decision matrix to establish the next steps; from 'no further action' to 'use the 2009 audit process'.

Action Key:	Good arrangements in place to protect people in case of fire	Adequate arrangements in place to protect people in case of fire	Inadequate arrangements likely to result in harm in case of fire
Outcome			
Action	No further action. On site advice and education may be adequate.	Non-statutory action. 'Fire Safety Matters' letter as appropriate.	Statutory action may be necessary. Use 2009 audit process.

Diagram 6 – Outcome-related action key

The suggested action from the Action Key can signify the end of the visit phase of the audit process; if inspectors deem premises safe enough in case of fire; their time can be better spent in premises in which people are at risk in case of fire.

Appendix 8 – The Short Audit Form (including Parts A - C of the 2009 process) Short Audit - Data Gathering and Audit Record

NOTE: This version of the short audit form is for use where FSEC information is not required but values for database calculation of relative risk is required.

Short Audit Da	ate		Time		
Premises ID N	NO.	No. Of Occupiers			
Parent/child record indicator			Parent Premises ID No.		
Site Record Ir			Site record ID No.		
Building / Unit	t No.		UPRN.		
Property Nam	e				
Road (addres	s line 1)				
Address line 2	2				
Locality					
Town					
Post Code			Grid Reference	Easting	Northing
Name of Occu	upier				
Registered ad	ldress of		Post Code		
occupier			Tel No.		
Responsible Person	Name		Position		
	Tel No.				
	Email		Mob No.		
Person Providing	Name		Position		
Information	Tel No.				
	Email		Mob. No.		

Part A values for Part C calculations

Description of occupants	Unty	Untypically mobile for this type of occupancy						
Predominant type	Average mobility for this type of occupancy						0	
	Untypi	cally vulne	rable for thi	is type	of occ	cupancy	2	
Smoke Control	Yes		No		If Vo	s tick belov	,	
Is there an extract	-2				-	ral extract	V	
or positive	-2	· · · · · · · · · · · · · · · · · · ·	5			n. Extract		
pressure smoke					Both			
control system						ment		
covering the					-	surised		
means of escape					FIES:	sunseu		
and/or common								
areas?								
Sprinklers	100%		-20			mises	Tick b	elow
	90%		-7			klered		
Is there an	80%		-4.2		Life S	Safety		
operational	70%		-3					
sprinkler system?	60%		-2.33		Prop	•		
Densentens of	50%		-1.9		prote	ection		
Percentage of	40%		-1.6					
coverage	30%		-1.3					
Tick relevant box	20%		- <u>1.23</u>					
TICK TELEVALLE DOX	10%		-1.1					
	No System		0					
Fire Spread	Yes		No		Tick	one or mor	a hovos	
rile Spieau	0.1				Atriu		e DOVE2	
Building features	0.1		5			otected		
which may assist					voids			
fire spread?				Unprotected				
If yes tick one or					ducts			
more				Surface spread				
					of fla			
					Othe			
Fire alarm/warning					Tick	relevant bo	X	
system	More than adequate					-2		
	Adequate					0		
	Less than adequate					2		
Building size -	Extremely	Very	small		lium	large	Very	Extremely
typical for	small	small		(avei	rage)		large	large
occupancy								
Tick relevant box	-5	-4	-2	()	2	4	5

Part B: Fire Safety Short Audit

Fir	e safety measures for the inspector to evaluate						
NC the wit	DTE: The questions below are phrased for the inspector to answer from bir opinions based on what they hear and observe. Not to be confused th the open question technique required when talking to the business bresentative.	Good	Tolerable	Poor			
1	Are ignition sources adequately managed and controlled in the premises to reduce the risk of fire? Consider – work activities, hot works, electrical safety, heating, smoking etc.	Good	Tolerable	Poor			
	Comment:						
2	Are adequate measures in place to control the spread of a potential fire in the premises? Consider – building conditions, stored goods, highly flammable materials, wall coverings etc.	Good	Tolerable	Poor			
	Comment:						
3	Can persons evacuate the premises safely in the event of a fire emergency in the premises? Consider – signage, lighting, emergency evacuation plan, exits unobstructed and easy to use etc.	Good	Tolerable	Poor			
	Comment:						
4	Can persons use the escape routes and final exits safely? Consider –, adequate routes (size/number), travel distance smoke travel, adequately protected and maintained etc.	Good	Tolerable	Poor			
	Comment:						
5	Is there adequate equipment in the premises for extinguishing small fires? Consider – extinguisher type, location, number, accessible, working order etc.	Good	Tolerable	Poor			
	Comment:						

6	Are adequate arrangements in place to detect fires and raise the alarm to those people on the premises? <i>Consider – detection type, sounder locations, adequacy of automatic or</i> <i>manual systems, working order (panel healthy) etc.</i>	Good	Tolerable	Poor
	Comment:	I	I	I
7	Are adequate instructions or guidance on procedures to follow in an emergency provided for employees? Consider – initial and refresher training, emergency procedures, emergency notices, calling the fire service etc.	Good	Tolerable	Poor
	Comment:	-		
8	Are adequate management procedures in place to mitigate the effects of fires in the premises? Consider – managed system of safety checks and maintenance, consideration to arson, risk assessment and action plan where necessary etc.	Good	Tolerable	Poor
	Comment:			
	e sufficient precautions in place to safeguard the safety of relevant			
	rsons in case of fire? rcle the appropriate yes/no outcome	Ŷ	es	No

Audit Outcome (from Decision matrix)	Recommended Action (from Action Key)	
Date of audit	Time audit	
	completed	
Inspector name	Service Number	

Part C: Calculation of Relative Risk Level

Short Audit	Expected	Description of management	Tick relevan	t Box score	Э
Outcome	Outcome				
- • • • •	equal to				
Equivalent to	full audit				
Part B Score	procedure				
	1	Well above average/Broadly		-2	
		compliant			
	2	Above average/minor low risk deficiencies		-1	
	2				
	3	Average/some deficiencies low risk of harm		0	
	4		Use 2009		
	4	Below Average/possible	audit form	+1	
		enforcement people are at risk of harm	audit ionn		
	5	Well below average/highly likely	Use 2009	+2	
		to require enforcement people are	audit form	TZ	
		at risk of harm	addit ionn		
Part C					
History of Fires	None			0	
,	Yes, One o	r more in last three years		0.2	2
				I	
Unwanted fire	None			0	
signals	Yes, One o	r more in last three years		0.1	
<u> </u>	1				
Known Fire	None			0	
setting activity in	Yes, One o	r more in last three years		0.1	
the area		- -			
					_
Features which			Bring forw	ard from Part	Α
may assist fire	None			0	
spread	Some			0.1	
— , , ,,			1		
Fire loading		average for occupancy		-0.2	<u> </u>
which may assist		the occupancy			
with fire spread	I nigher than	average for the occupancy		0.2	-
Access for	Better than	average for occupancy		-0.1	
firefighting		the occupancy		0	
mongrung		average for the occupancy		0.1	
				0.1	
Water supplies	Better than	average for occupancy		-0.1	
for firefighting		the occupancy		0	
0 0		average for the occupancy		0.1	
				I	
Total number of	Less than 2	20		-0.1	
	Between 20) and 100		0	
people on	Between 20 More than 2			0.1	
people on premises at peak			alculate(Sub T	0.1	
people on premises at peak		100	alculate(Sub T	0.1	

I	Brought forward from Part A						
Field/element Brought forward from part A		Assessed value/score					
Building size							
Description of Occupants							
Fire warning system							
Smoke Control System							
Operational sprinkler system							
	Subtotal B						
Life risk score	A+B from above						
Relative risk rating	(2 to 8)						
Risk Level	VL to VH						

Signature of Inspector	Date:
Signature of Fire safety Manager	Date:

Appendix 9 – The 2009 Audit and Data Gathering Form 2009 CFOA FIRE SAFETY AUDIT AND DATA GATHERING FORM

Part A: SITE ASSESSMENT (MANDATORY)

Assessment Date	//			Time	:	
Premises, Use And Re	sponsible Per	son Detai	ls [FS Premise	es File Informat	ion]	
Premises ID No.			Number of Oc	cupiers:		
			If more than 1 separate form occupier			
Parent/Child Record Indicator	Parent/Child		Parent Premis	ses ID No.		
(only complete if Multi- Occupied)						
Site Record Indicator			Site Record II	D No.		
Y/N						
Building /Unit No:			UPRN No:			
Area within the building			(Unique Prope No. from Natio Property Gazo			
Property Name:						
Road:						
(Address line 1)						
Address line 2						
Locality						
Town:						
Post Code:			Grid Ref:		Easting	Northing
			2 x 6 figures (max)		
Name of Occupier:						
Registered Address of Occupier:				Post Code:		
				Tel No:		
Name of Owner:						
Registered Address of Owner				Post Code:		
				Tel No:		
Responsible Person:	Name:			Position:		
	Tel No:			Mob No:		
	Email:			Fax No:		
Person Providing	Name:			Position:		
Information if different from above	Tel No:			Mob No:		
	Email:			Fax No:		

Occupancy Profile:	WEEKDAYS	WEEKENDS		
Maximum number of	0000 to 0400	0000 to 0400		
persons affected by	0400 to 0800	0400 to 0800		
smoke, heat & flame from	0800 to 1200	0800 to 1200		
a single fire within 30	1200 to 1600	1200 to 1600		
minutes, assuming no	1600 to 2000	1600 to 2000		
evacuation.	2000 to 2400	2000 to 2400		
Occupancy Type:	FSEC Group	Supplementary Type Number (each Services)		
	V.O. Number: (Valuation Office)			
Description of Occupants:	Atypically mobile for this typ	be of occupancy	- 2	
Predominant Type	Average mobility for this typ		0	
	Untypically vulnerable for the	his type of occupancy	2	
Potential Loss/Risk (see S	Service guidance for detail)			
Sole Supplier in UK:	If yes give brief details		Yes	No
Providing high value or				
unique service or				
products:				
Exceptional Value:	If yes give brief details:		Yes	No
/alue of rebuild and				
estock:				
Heritage Risk:	If yes give brief details:		Yes	No
Building of National				
mportance or				
nternational significance.				
Community Loss:	If yes give brief details:		Yes	No
Exceptional value or				
mpact to the community.				
Chemical Site:	If yes give brief details		Yes	No
			100	
Top Tier COMAH Site:	If yes give brief details		Yes	No
•				

Environmental Risk:	Yes	No		Tick one or more
Significant impact on				boxes below
the environment or community in the			Biological	
event of fire or other			Chemical	
incident	If yes give brief d	letails	Radiation	
			Nuclear	
			Air	
			Explosive	
			Water Contamination:	
Property Loss:			Tick one box	Estimate damage
Estimate the extent	Sub Section 1		Below	within 50m ²
of fire & smoke damage arising from an uncontrolled fire and whether it is likely to be within or	(tick area confine	ed to & damage)		
beyond the building	Confined to ream	or compartment of		
of origin, and estimate the area of	origin:	r or compartment or		
damage within the	Confined to the f	loor of origin:		
building.	Confined to the b	ouilding of origin:		
(Note: Without fire	Sub Section 2			Tick one box
fighting intervention	(total area of dan	nage only)		below
of any description)			Less than 500 m ²	
	Damage beyond	building of origin	500 m ² to 999 m ²	
Only complete sub- section one OR sub-			1000 m ² to 9999 m ²	
section two			10000 m ² to 100000	
			Over 100000 m ²	
Fire Fighter Hazard:	Yes	No		Tick one or more
Building or contents,				boxes below
which may pose a risk to fire fighters.			Hazchem	
nsk to me lighters.			Basement	
Details to be provided in relevant part of Part D		letails	Unfenestrated compartment	
			Underground structure	
			Hazardous Processes	
			Highly Flammables	
			Explosives	
			Sandwich panels	
			Unstable structure	

Premises Features						
Are there fire-fighting Facilities?	Yes	No				Tick one or more boxes below
				Firefighting (Ff)s	haft/s	
				Ff shaft/s with Ff	lift	
	If yes give bri	ef details	S	Staircase with Fi	remain	
				B5 ADB 2007		
				Dry Risers		
				Dry Risers > 8 b	ar	
Details to be provided in				Wet Risers		
relevant part of Part D				Wet Risers > 8 b	ar	
				Other		
Smoke Control: Is there an extract or positive pressure smoke control	Yes No If yes, give		If yes, give brie	f details	Tick one or more boxes below	
system covering means of				Natural extract		
escape and / or common areas?			Mechanical extract			
	-2 0			Both		
Details to be provided in relevant part of Part D				Basement Cleara requirement)	ance (ADB	
				Pressurised		
Sprinklers:	Yes, 100% coverage		-20		If premises sprinklered	Tick one box below
Is there an operational	Yes, 90% cov	verage	-7		Yes, for life safety	
sprinkler system?	Yes, 80% cov	verage	-4.2		Yes, for property protection	
Tick relevant box	Yes, 70% cov	verage	-3		Yes, for both	
	Yes, 60% cov	verage	-2.33			
	Yes, 50% cov	verage	-1.9			
	Yes, 40% coverage		-1.6			
Details to be provided in relevant part of Part D	Yes, 30% coverage		-1.4			
	Yes, 20% coverage		-1.23			
	Yes, 10% cov	verage	-1.1			
	No system		0			

R

Fire Spread	Yes	No	Tick one or n below	nore b	oxes
Building features			Atrium		
which may assist fire spread			Unprotected voids		
If Yes, Tick one or	0.1	0	Unprotected ducts		
more boxes on the right			Surface spre of flame	ad	
Details to be provided in relevant part of			Other		
Part D					
Monitored AFD Present	Yes	No			
Fire alarm system connected to call centre or auto dialler?					
Fire Warning System	More than adequate			-2	
	Adequate			0	
Tick relevant box	Less than adequate			2	
Building Size:					
(see Table 8 for floor areas for different occupancy types)					

Height of building/premis	es			
Total Number of storeys Maximum height of the b Note: Must be a number	uilding including basements			
	Total number of basements in building Total number of levels of basements in building Not used in FSEC			
Occupancy storeys: No of storeys used by this occupier Note: Must be a number for FSEC. This is the multiplier field for occupier. (Total area) = (building footprint) x (occupancy storeys)	Enter number of storeys occupied by the organisation covered by this assessment e.g. floors 1 and 6 to 8 which would be 4 storeys			
Occupancy occupies: Only complete if multi- occupied Note: Free text for FSEC	Specify the <u>actual</u> storeys occupied including basements e.g. floors 5 to 8			

Occupancy basements: No of basement levels used by this occupier where appropriate.	Enter Number of levels below ground for this occupier Only complete if multi-occupied	
Not used in FSEC. In FSEC (occupancy storeys) should include any basement storeys		

Name of assessor:	
Role:	
Service No:	
Signature:	

PART B: REVISED FIRE SAFETY AUDIT

Risk Assessment

	Article 9 - Risk Assessment
Safety Critical Has a suitable and sufficient Fire Safety Risk Assessment been carried out for the premises?	"The responsible person shall make a suitable and sufficient assessment of the risks to which relevant persons are exposed to identify the preventive & protective measures"
Areas of consideration:	Notes:
Fire safety risk assessment undertaken, completed and available.	
Assessment is suitable and sufficient, covering all significant risks.	
 Have persons identified as being especially at risk been identified? For example:- Disabled people Lone workers Young persons Contractors Visitors Location or process etc Dangerous substances 	
Evidence confirming the assessment is reviewed on regular basis	
Responses validated? yes no	
Compliance Level	
Broadly Compliant (Score 0)	
Non Compliant - Minor Deficiency/Risk (Score 5 for all groups)	
Non – Compliant – Major Deficiency/Risk (Score 10 for all groups)	

Significant Findings in Accordance with Part 3 Schedule 1

Safety Critical Have any preventative and protective measures been implemented?			Article 10 – Principles of prevention to be applied "Where the responsible person implements any preventative and protective measures he must do so on the basis of the principles specified in Part 3 of schedule 1"		
Areas of consideration:			Notes:		
 The principles are; Avoiding risks. Evaluating the risks which cannot be avoided. Combating the risks at source. Adapting to technical progress. Replacing the dangerous by non-dangerous or less dangerous. Developing a coherent overall prevention policy which covers technology, organisation of work and the influence of factors relating to the working environment. Giving collective protective measures priority over individual protective measures. Giving appropriate instructions to employees. 					
Responses validated? Compliance Level	yes r	סו			
Broadly Compliant (Score 0)					
Non - Compliant - Minor Deficiency/Risk (Score 3 for all groups) Non – compliant – Major Deficiency/Risk (Score 5 for all groups)					
Safety Critical Is there effective Fire Safety Management?		Article 11 - Fire Safety Arrangements "The responsible person shall make appropriate arrangementsfor the effective planning, organisation control, monitoring & review of preventive and protective measures"			
--	------------------	---	----	--	--
 Areas of consideration: Effective management attitude to fire safety. Clear company policy. Effective emergency plan recorded where appropriate Responsibilities clearly defined. Effective systems of communication in place to inform employees and other responsible persons 		Notes:			
in multi-occupied premise Responses validated?	yes		no		
Compliance	Compliance Level				
Broadly Compliant (Score 0) Non - compliant Minor Deficiency/Risk (Score group					
A= 3, B= 2, C= 1, D= 1)					
Non – compliant Major Deficiency/Risk (Score group A= 5, B= 3, C= 2, D= 2)					

		Article 17 – Maintenance
Safety Critical Are fire safety provisions being adequately maintained?		"Where necessary in order to safeguard the safety of relevant personsthe responsible person must ensure that the premises and facilities, equipment & devices provided are subject to a suitable system of maintenancein an efficient statein efficient working order and in good repair"
Areas of consideration:		Notes:
 Fire systems and equipment subject to suitable systems of maintenance. Regular testing by competent person/s. Evidence of maintenance available. Extract systems subject to suitable systems of maintenance 		
Responses validated?	yes no	
Compliance Leve		
Broadly Compliant (Score 0)		
Non - compliant Minor Deficiency/Risk (Score group A=8, B= 8, C=5, D=4)		
Non – compliant Major Deficiency/Risk (Score group A=15, B=15, C=10, D=8)		

Safety Critical Are suitable arrangements in place to ensure that facilities, equipment and devices for use by or the protection of fire fighters under this Order or any other enactment, including any enactment repealed or revoked by this Order, are maintained in an efficient state, in efficient working order and in good repair?		Article (38) – Maintenance of measures provided for protection of fire-fighters "Where necessaryto safeguard the safety of fire- fighters in the event of fire, the responsible person must ensurefacilities, equipment and devices provideduse by or protection of fire- fighterssuitable system of maintenancemaintained working order and in good repair".
Areas of consideration:		Notes:
 Are testing and maintenance records available and up to date? Are fire fighting shafts fully protected? Are access boxes to dry/wet risers secured? Are measures in place to ensure co-operation between occupiers for the maintenance of facilities? 		
Responses validated?	yes no	
Compliance Level		
Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non – compliant (Score 3 for all groups)		

Is adequate provision made to pro employees?	vide information to	Article 19 – Provision of information to employees "The responsible person must provide his employees with comprehensible and relevant information"
Areas of consideration:		Notes:
 Risks to them identified from risk assessment. Preventative and protective measures. Appropriate procedures to be taken in the event of an emergency. Nominate sufficient number of competent persons to secure evacuation. Inform other responsible persons. Young persons controls. Provide information on dangerous substances. * Not applicable where no employees (e.g. HIMO'S)		
Responses validated?	yes no	
Compliance Level		_
*Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non – compliant		
(Score 1 for all groups)		

Is adequate information provided to employers and employees from outside undertakings?		Article 20 – Provision of information to employers and the self-employed from outside undertakings "The responsible person must ensure that comprehensible and relevant information is provided to employees from outside undertakings and to ensure such employees from outside undertakings are provided with appropriate instructions and comprehensible and relevant information regarding any risks to that person".
 Areas of consideration: Comprehensible and relevant information provided to employers from outside undertakings with regard to risks and preventative and protective measures. Employees from outside undertakings provided with appropriate instructions and comprehensible and relevant information regarding risks to that person. 		Notes:
Responses validated?	yes no	
Compliance Level		_
Broadly Compliant (Score 0)		
Non – compliant		
(Score 1 for all groups)		

Is there adequate co-operation and between responsible persons where more sharing responsibilities or hav premises?	Article 22 – Co-operation and co-ordination "Where two or more responsible persons share, or have duties in respect of, premises (Whether on a temporary or a permanent basis) each such person must, co-operate, Take all reasonable steps to co- ordinate necessary measures, and provide information.	
Areas of consideration:		Notes:
 Co-operation to enable com requirements and prohibition under this Order. Reasonable steps taken to e with requirements and prohil under this Order. Reasonable steps taken to i responsible persons with reg In case of explosive atmosp overall responsibility for the responsibility to co-ordinate all relevant measures to pro- 		
Responses validated? yes no		
Compliance Level		4
Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non – compliant (Score 2 for all groups)		

Training

		Article 21 – Training
Safety Critical Are employees being effectively trained?		<i>"The responsible person must ensure that his employees are provided with adequate safety training"</i>
Areas of consideration:		Notes:
 Induction training. On transfer or working with new of New equipment or change with ex Introduction of new technology. New systems of work. Emergency procedures. Safe practice. Safe handling of dangerous substates Training for the evacuation of disates Training being delivered by competent Evidence of training available. * Not applicable where no employees (e.g.)	isting. ances. bled people etent person.	
Responses validated? yes	no	
Compliance Level		
*Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non - compliant Minor Deficiency/Risk (Score group A=3, B= 2, C=1, D=1)		
Non – compliant Major Deficiency/Risk (Score group A=6, B=4, C=2, D=2)		

Safety Critical Are suitable arrangements in place to m elimination or reduction of risks from da substances?	0	Article 12 – Elimination or reduction of risks from dangerous substances "Where a dangerous substance is present the responsible person shall ensure that risk related to the substance is either eliminated or reduced as far as is reasonably practicable"
 Areas of consideration: Adequate controls. Control of ignition sources. Mitigate detrimental effects. Safe handling, storage & transport Elimination reduction controls. Suitable signage & safety inform Particular account in risk assess of young persons. 	ation.	Notes:
Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non - compliant Minor Deficiency/Risk (Score group A=3, B= 3, C=3, D=3)		
Non – compliant Major Deficiency/Risk (Score group A=5, B=5, C=5, D=5)		

Are there suitable additional emergence provided to safeguard all relevant perse accident, incident or emergency related substances in or on the premises? Note: Not included as Safety Critical as article may mean a failure in Article 12	ons from an d to dangerous s failure in this	Article 16 – Additional emergency measures in respect of dangerous substances The responsible person subject to the risk assessment, must ensure that information on emergency arrangements is available, suitable warning and other communication systems are established, escape facilities are provided and maintained, provide information to relevant accident and emergency services and display information at the premises. In the event of an incident occurring take immediate steps and permit only essential persons to the affected area and provide PPE, specialised equipment and plant
 Areas of consideration: Information on emergency arrar available. Suitable warning and other comsystems are established to suppremedial actions and rescue op Information provided to accident services available and displayed Plans are in place for immediate taken in the event of an incident Personal protective equipment, specialised equipment and plant available in case of an incident 	nmunication port response, perations. It and emergency d at the premises. e steps to be t occurring. clothing, it provided	Notes:
Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non – compliant		
(Score 1 for all groups)		
(J -1 - /		

Are there adequate number of compet arrangements in place to assist the res undertaking the preventative and prote	sponsible person in	Article 18 – Safety assistance "The responsible person mustappointcompetent persons to assist him in undertaking preventive and protective measures"
 Areas of consideration: Sufficient number of competent persons appointed. Sufficient training given to competent persons. Co-operation between appointed persons. Information given to non-employees. Information to other employers. Co-operation between responsible persons 		Notes:
Compliance Level		
Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non – compliant		
(Score 1 for all groups)		

Means of Escape

Safety Critical Is effective means of escape provided and	I maintained?	Article 14 – Emergency routes and exits Where necessary to safeguard the safety of relevant persons in case of fire the responsible person must ensure that routes to emergency exits and exitsare kept clear at all times and where required, to be adequately illuminated by emergency lighting.
Areas of consideration:		Notes: Indicate the areas of the premises inspected
• Emergency routes and exits.		
• Safe and quick evacuation.		
 Number and distribution of emergency routes and exits, for relevant persons. 		
Direction of door openings.		
Refuges where appropriate		
Correct use of revolving doors.		
Suitable door fastenings.		
Signage.		
Emergency lighting.		
Compliance Level		
Broadly Compliant (Score 0)		
Non compliant Minor Deficiency/Risk		
(Score group A 10, B 10, C 8, D 5)		
Non – compliant Major Deficiency/Risk		
(Score group A=26, B=26, C=20, D=13)		

Safety Critical Are employers carrying out their general fire precaution responsibilities?	Article 8 - General Fire Precautions (see Article 4 meaning of general fire precautions) The responsible person must– Take such general precautions as will ensure, so far as is reasonably practicable, the safety of any of his employees or relevant persons
 Areas of consideration: Measures to reduce the risk of fire and fire spread (Prevention and Compartmentation issues) Measures for securing that, at all material times, the means of escape can be safely and effectively used (not covered by Article 14). Portable appliance testing (PAT) Fire Loading Arson measures 	Notes:
Compliance Level	
Broadly Compliant (Score 0)	
Non compliant Minor Deficiency/Risk (Score group A=7, B=7, C=4, D=3)	
Non-compliant Major Deficiency/Risk (Score group A=13, B=13, C=8, D=5)	

Fire Warning Arrangements

Safety Critical	Article 13 – fire warning
Are effective fire warning arrangements provided?	"Where necessarythe responsible person must ensure that the premises are equipped with appropriate fire detection equipment,".
Areas of consideration:	Notes:
 Appropriate system for the risk. Audibility levels. Appropriate levels of detection. Management of unwanted fire alarm signals. Commissioning / Installation certificates available. 	
Compliance Level	
Broadly Compliant (Score 0)	
Non compliant Minor Deficiency/Risk	
(Score group A=10, B=5, C=5, D=5)	
Non – compliant Major Deficiency/Risk	
(Score group A=26, B=13, C=13, D=13)	

Are effective fire-fighting equipment an provided?	rangements	Article 13-fire fighting equipment "Where necessarythe responsible person must ensure that the premises are equipped with appropriate fire-fighting equipment".
 Areas of consideration: Appropriate levels and standard of FFE. FFE suitably positioned. Suitable signage for FFE provided. Nominated persons sufficiently trained in FFE available to them. Contacts with emergency services regarding fire-fighting, rescue work, first-aid and emergency medical care. 		Notes:
Compliance Level		
Broadly Compliant (Score 0)		
Non – compliant		
(Score 1 for all groups)		

Evacuation

Safety Critical Are there adequate procedures, including safety drills, in case of serious and imminent danger?	Article 15 – Procedures for serious and imminent danger and for danger areas "The responsible person must establish & where necessary give effect toproceduresto be followed in the event of serious & imminent danger to relevant persons, nominatecompetent persons to implement procedures, inform & instruct relevant persons concerned"
 Areas of consideration: Appropriate procedures in place for evacuation in case of fire. Safety drills. Sufficient number of competent persons to manage evacuation e.g. Fire marshals and wardens appointed where appropriate Have persons with a disability been taken into account? Prevention procedures to restrict exposure of relevant persons to risk, unless trained. Information and signage 	Notes:
Responses Validated Yes No	
Compliance Level	
Broadly Compliant (Score 0) Non – compliant	
(Score group A=5, B=3, C=2, D=2)	

Has suitable notice been given to the fire authority regarding the installation of fire-fighters switches? "Prescribed voltage" means: 1000v AC or 1500v DC between two conductors. 600 v AC or 900 v DC between conductor and earth		Article 37 – Fire-fighters' switches for luminous tube signs etc. "This article applies to apparatus" "designed to work at a voltage exceeding the prescribed voltage" "The cut off switch must be" "placed, coloured or marked as to satisfy" "the fire authority" The responsible person must give suitable notice to the fire authority showing where the cut off switch is to be sited, coloured or marked" <u>Note</u> This article does not apply to licensed premises authorised for the exhibition of a film Notes:
Areas of consideration:		
Are luminous discharge tubes fitted Are cut off switches provided? Are cut off switches sited coloured a accordance with current IEE Regula Consider application to photovoltaic Has correct notice been given to the		
Compliance Level		
Not applicable (Score 0)		
Broadly Compliant (Score 0)		
Non – compliant (Score 1 for all groups)		

Are employees carrying out their general duties while at work?		Article 23 – General duties of employees at work Every employee must, while at work take reasonable care for the safety of himself and others, co-operate with their employer, inform their employer or any other employee with specific responsibility for the safety of his fellow employees of any hazard
Areas of consideration:	Notes:	
Reasonable care being taken by employ harm to others who may be affected by omissions at work. Employees co-operate with their employ compliance with any duty or requirement Are hazards identified by the employed employer (or other employee with spect for safety) i.e. are reporting mechanism Compliance Level		
Not Applicable (Score 0)		
Broadly Compliant (Score 0)		
Non – compliant (Score 1 for all groups)		

Action - Add all the points from the above section enter below and use this in the 'Overall audit result' section overleaf to assess the overall level of compliance and initial enforcement expectation

Total Score of previous sections	

The following Articles <u>do not attract a score</u> and are for information only (primarily to inform Government IRMP Returns) however these issues should be considered when applying the EMM

Has the Responsible Person prevented an		Article 27 – Powers of inspectors
inspector from exercising their powers under		Notes:
this Article where a prosecution has <u>not</u> been		
taken		
Yes No		

Has the Responsible Person failed to comply		iled to comply	Article 29 – Current alterations notices
with any alterations notice served on the premises where a prosecution has <u>not</u> been taken			Notes:
Yes No Not applicable		Not applicable	

Has the Responsible Person failed to comply		iled to comply	Article 30 – Current enforcement notices
with any enforcement notice served on the			Notes:
premises where a prosecution has <u>not</u> been		has <u>not</u> been	
taken			
Yes No Not applicable		Not applicable	

Has the Responsible Person failed to comply		iled to comply	Article 31 – Current prohibition notices
with any prohibition notice served on the			Notes:
premises where a prosecution has <u>not</u> been		has <u>not</u> been	
taken			
Yes No Not applicable		Not applicable	

Has the Responsible Person failed to comply		iled to comply	Article 32 – Offences
with any other Article, not mentioned			Notes: Please give details of which
elsewhere on this form, where a prosecution		a prosecution	Article and details.
has not been taken			
Yes No Not applicable		Not applicable	

Article 24 Secretary of State's Power to make		ower to make	Article 24 – Power to make Regulations
additional regulations about fire precautions		e precautions	Notes: Please give details
Yes	No Not applicable		

OUTCOME OF AUDIT

Initial Enforcement Expectation (IEE)

Tick relevant box and take score forward to part C of form.

Compliance Level 1	Compliance Level 2	Compliance Level 3	Compliance Level 4	Compliance Level 5
Score of 0-25	Score of 26-35	Score of 36-45	Score of 46-55	Score of 56 plus
Better Regulation advice Fire Safety Matters (improvements sentence)	Fire Safety Matters (improvements sentence)	Fire Safety Matters (people at risk sentence)	Enforcement Notice	Enforcement Notice 'Fast track'

Notes

1. Action Plan is not an Initial enforcement action, this maybe an outcome of taking informal action, subject to request by the relevant duty holder

2. The outcome of "Prohibition" has now been excluded and should be dealt with separately in accordance with current Service Policy

Application of the Enforcement Management Model (EMM)

In all cases except compliance level 1 and 2 apply the Responsible Person Factors of the Enforcement Management Model in order to confirm the enforcement activity, if the outcome is compliance level 4 or 5 then the "Strategic Factors" should also be applied (see guidance for this audit and data gathering process).

Confirmed enforcement activity after application of EMM principles					
Better Regulation advice and / or Fire Safety Matters (improvements sentence)	Fire Safety Matters (people at risk sentence)	Enforcement Notice	Enforcement Notice 'Fast track'		
Non-statutory Letter	Non-statutory Letter	Apply EMM strategic factors	Apply EMM strategic factors. Consider prosecution		

If any variation from the outcome of the EMM process is considered by the inspecting officer this should be agreed with their line manager, if justified and agreed, the reasons for this should be recorded in box below.

Signature of Inspector:	Date:
Signature of Fire Safety Manager:	Date:
(Following Management Review where necessary)	

R

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	Safety Critical Articles/Risks						
		Group A	Group B	Group C	Group D		
Article	Description	Sleeping Unfamiliar	Sleeping familiar + Licensed	Public unfamiliar	Workplac e familiar	Level of deficiency /risk	
8	General Fire Precautions	13	13	8	5	Major Minor	
9	Risk Assessment	10	10	10	10	Major	
		5 5	5 5	5 5	5 5	Minor Major	
10	Principles of prevention	3 5	3	3	3	Minor Major	
11	Fire safety arrangements	3	2	1	1	Minor	
12	Dangerous substances	5 3	5 3	5 3	5 3	Major Minor	
13	Fire Warning/alarm	26	13	13	13	Major	
14		10 26	5 26	5 20	5 13	Minor Major	
	Emergency routes and exits Procedures for imminent	10	10	8	5	Minor	
15	danger	5	3	2	2		
17	Maintenance	15 8	15 8	10 5	8 4	Major Minor	
21	Training	6 3	4 2	2 1	2 1	Major Minor	
38	Maintenance of Firefighters measures (risers, etc.)	3	3	3	3		
	O	ther Articles	/Risks				
Article	Description		Sleeping Unfamiliar	Sleeping familiar + Licensed	Public unfamiliar Workplace	N/A	
13	Firefighting equipment	1	1	1 1			
16	Additional measures – dangerous substances			1	1 1		
18	Safety Assistance		1	1 1			
19	Information to employees		1	1 1			
20	Information to employers from outside und	1	1	1 1	.		
22	Co-operation and co-ordination	2	2	2 2	-		
23	Employees duties			1	1 1		
37	FF switches for luminous tubes			1	1 1		
Max Score		128	109	89 77			

Summary Scoring Matrix (included for completeness)

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PART C: CALCULATION OF RELATIVE RISK LEVEL

Management and O	ther	Issues			
Element	Des	scription		Score	Score for this
<u>Fire Safety</u> Management	Le vel	Description of Fire Safety Management		Bring fo	premises rward from Part B
	1	Well above average			
(Compliance Level Score)	2	Above average		-1	
If no Part (B)	3	Average		0	
carried out select X = 0 Score	4	Below average		1	
	5	Well below average		2	
	X	Fire Safety Management Not Assessed		0	
History of Fires	Nor			0	
		s, 1 or more in the last three years		0.2	
Unwanted fire	Nor	· · · · · · · · · · · · · · · · · · ·		0	
<u>signals</u>	Yes, 1 or more in the last 3 years				
Known <u>fire setting</u>	None			0	
activity in the area	Yes	, 1 or more in the last 3 years		0.1	
Features which				Bring	forward from part A
may assist fire spread	Nor	ne		0	
spread	Yes			0.1	
Fire Loading which	Lower than average for the occupancy			-0.2	
is likely to assist with fire spread	Average for the occupancy			0	
	Hig	her than average for the occupancy		0.2	
Access for fire	Bet	ter than average for the occupancy		-0.1	
<u>fighting</u>	Ave	rage for the occupancy		0	
	Poorer than average for the occupancy			0.1	
Water supplies	Bet	ter than average for the occupancy		-0.1	
	Average for the occupancy			0	
	Poorer than average for the occupancy			0.1	
Total <u>number of</u>	Les	s than 20		-0.1	
<u>people</u> in premises at peak time	Bet	ween 100 and 20		0	
	Мо	e than 100		0.1	
		SU	B TO	TAL (A)	Calculate or Auto calculate

Building and Occ	upant Features		
Element	Description	Score	Score for this premises
Building size:	Extremely small	-5	
(- (Very small	-4	
(see Table 8 for floor areas for	Small	-2	
different	Medium	0	
occupancy	Large	2	
types)	Very large	4	
	Extremely large	5	
Description of		rward fron	n Part A occupancy table
<u>Occupants:</u> <u>Predominant</u> <u>Type</u>	A. SURPRISINGLY MOBILE FOR THIS TYPE OF OCCUPANCY	-2	
<u> </u>	B. AVERAGE MOBILITY FOR THIS TYPE OF OCCUPANCY:	0	
	C. SURPRISINGLY SLOW FOR THIS TYPE OF OCCUPANCY	2	
Fire Warning	Brin	g forward	from Part A FWS section
<u>System</u> :	D. MORE THAN ADEQUATE	-2	
	E. ADEQUATE	0	
	F. LESS THAN ADEQUATE	2	
Is there an	Br	ing forwar	d from Part A SC section
extract or positive pressure <u>smoke</u>	G. YES	-2	
control system covering M of E and / or common areas?	H. NO	0	
Is there an	Bring forward from part A sprinkler table		
operational sprinkler system	I. YES, 100% COVERAGE	-20	
installed and	J. YES, 90% COVERAGE	-7	
maintained in	K. YES, 80% COVERAGE	-4.2	
working order?	L. YES, 70% COVERAGE	-3	
	M. YES, 60% COVERAGE	-2.33	
	N. YES, 50% COVERAGE	-1.9	
	O. YES, 40% COVERAGE	-1.6	
	P. YES, 30% COVERAGE	-1.4	
	Q. YES, 20% COVERAGE	-1.23	
	R. YES, 10% COVERAGE	-1.1	
	S. NO SYSTEM	0	

SUB TOTAL (B)	Calculate or Auto calculate
LIFE RISK SCORE (A brought forward +B)	Calculate or Auto calculate
RELATIVE RISK RATING (2 to 8) Note	Auto calculate
RISK LEVEL (VL to VH please note graphic equaliser reviewed May 2008)	Auto calculate
Signature of Assessor/Inspector:	Date:
Signature of Fire Safety Manager: (Following Management Review Where Necessary)	Date:

Key to the Colour Coding used in the 2009 Audit Form

Key to colour coding					
Pale green background	Premises file information				
Blue border	FSEC Data				
	(any number indicates FSEC score for field)				
Bright green	Calculation				
Pale yellow background	Score taken/brought forward				
Pale Blue background	IRMP Data				
Bright yellow background	SSRI – Operational Site Specific Risk Information				

Appendix 10 – 2009 Process (Risk Groups and Scores Against Articles)

The relative position of premises (FSEC Codes A-T as shown below) may not reflect the relative risk of the premises represented. CFOA is undertaking work, commensurate with its Business Safety Strategy and Priority 6 (promote an intelligence-led approach ensuring FRS can make effective business decisions to resource an effective protection function with professional staff). The work will further refine the relative risk of premises in the FSEC (Fire Service Emergency Cover) categories.

	Risk Groups (derived from the IRMP Note 4 and 17 FSEC categories)						
Groups	Group A	Group B	Group C	Group D			
FSEC Code	Sleeping Unfamiliar	Sleeping familiar & Licensed premises	Public unfamiliar	Workplace familiar			
Α	Hospitals						
В	Care Homes						
С	HMO						
D		Flat					
E	Hostel						
F	Hotel						
G		Converted flat					
Н	Other Sleeping						
J			Further education				
К			Public buildings				
L		Licensed premises					
М			School				
Ν			Shop				
Р			Other public building				
R				Factory			
S				Office			
Т				Other workplace			

Table 2 – FSEC premises codes categorised into risk groups A-D

The 'Weighting / score awarded to Articles' and the associated 'Scoring Matrix' (shown below) show some of the articles of the Order and how scores are attributed when an absence of suitable safety is found (according to whether the failure has a major or a minor impact on fire safety for the 2009 audit process). The Scoring Matrix in particular shows how enforcement action can be aligned to cumulative scores for dangerous conditions.

	Weighting/score awarded to Articles										
Safety 0	Critical Articles/Risks										
	Description	Gro	oup A	Gr	Group B Grou		oup C Group D		Level of		
Article Number		Sleeping Unfamiliar		Sleeping familiar + Licensed		Public unfamiliar			rkplac amiliar	deficiency / risk	
8	General fire precautions	13		13		8		5		Major	
		7		7		4		3		Minor	
9	Risk assessment	10		10		10		10		Major	
		5		5		5		5		Minor	
10	Principles of prevention	5 3		5 3		5 3		5 3		Major Minor	
11	Fire safety arrangements	5 3		3 2		2		2		Major Minor	
12	Dangerous substances	5		5		5		5		Major	
13	Fire warning/alarm	3 26		3 13		3		3 13		Minor Major	
		10		5		!₿-		5		Minor	
14	Emergency routes and exits	26		26		20		13		Major	
		10		i i -				5	Minor		
15	Procedures for imminent	5		3		2		2			
17	danger Maintenance	15		15		10		8		Major	
21	Training	8 6		8 4		5 2		4		Minor Major	
		3		2		1		1		Minor	
38	Maintenance of firefighters measures (risers, etc.)	3		3		3		3			
Other A	rticles/Risks			_							
Article Number	Description	on Slee Unfa					r + I unfamiliar		Workp familia		
13	Firefighting equipment	1		1		1 1			1		
16	Additional measures – dangerous 1 substances		1	1		1			1		
18 19	Safety assistance Information to employees				_1 _1		1 1		1 1		
20	Information to employers from outside undertakings	I ¹			1		1 1		1		
22	Co-operation and co-ordination				2		2		2		
23 37	Employees duties FF switches for luminous tubes				1		1		1		
31			128		1 109		89		1 77		
	Maximum score				109		09		11		

Table 3 – Scoring of Articles for the 2009 Audit process

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Cumulative Risk Scoring Matrix

The cumulative risk score from all applicable articles is used to give the inspector a recommended enforcement action.

	Scoring Matrix					
Compliance level	Total Score	Recommended Enforcement Action				
1	0-25	*Broadly Compliant - business protection advice - Fire Safety Matters (improvements sentence)				
2	26-35	Fire Safety Matters (improvements sentence) - Inform & educate				
3	36-45	Fire Safety Matters (people at risk sentence)				
4	46-55	Enforcement Notice				
5	56+	**Enforcement Notice 'Fast track' and normally a short Timescale				
*Note: There is no requirement to apply the EMM principles for Compliance Levels 1 and 2		**Note: time scale to be set by individual and consider prosecution. Also see guidance below regarding responsible person and strategic factors.				

Table 4 – 2009 audit process (scoring matrix) to indicate compliance level

Notes:

- 1) **"Enforcement Notice, Fast track" This refers to the issuing of an Enforcement Notice as a matter of urgency. Consequently, where it is necessary to consult others before serving the notice (which could delay the issue of a notice by weeks) this can often be undertaken by phone or e-mail to speed the process up significantly and serve the notice as soon as possible. With a compliance level 5 the inspector may consider setting relatively short timescales but should also take account of the relevant circumstances, risk, amount and type of work required etc.
- 2) By virtue of article 30(2)(c) not less than 28 days can be given for the responsible person to take the steps required by an Enforcement Notice. FRAs are advised to contact their local courts to determine the approach they might take to receiving an appeal to an enforcement notice and how quickly they might process the notice and subsequently notify the FRA. Some courts have intimated that they would treat the 28 days with a wide degree of discretion. Where this is the case, FRAs may wish to take note of the advice received.
- 3) It should be noted that an 'Action Plan' is not an Initial Enforcement Expectation, and is an outcome of the Responsible Person or duty holder contacting the FRA to request the use of an action plan, subsequent to receiving a letter.

Appendix 11 – How to complete 'Part A' of the 2009 audit form (Site Assessment)

Site information must be gathered, or verified, when information is missing or has changed for each premises visited. Inspectors need only verify the information previously collected and amend if there are changes. This part of the form gathers information for identification of the premises/contacts and for FSEC purposes.

Premises, use and responsible person details, etc.

In order to ensure accurate address identification, the basic premises address details will be generated to provide unique and accurate identification of buildings. Personnel should always use this to ensure that they input the correct location details. (*This makes the cross matching of premises in different databases more accurate*).

- <u>Premises I.D No.</u>: This unique number is allocated by each FRA fire safety risk management database to each individual premises record.
- <u>Number of Occupiers</u>: Enter the number of occupiers' e.g. individual businesses or organisations within the building.

<u>Note</u>: If premises are multi occupied, separate information should be gathered for each occupancy type, with further information gathered to account for the building as a whole. The latter should include all common areas, and where necessary take account of any risks identified in the individual occupancies.

• <u>Parent Child/Record Indicator</u>: This indicates whether the record is part of a hierarchy i.e. in the case of a multi-occupied building each individual premises (part of building with an individual occupier) may be assigned as a 'Child record' within the fire safety risk management data base and the whole building envelope and common parts/systems may be a 'Parent record', the parent record links the hierarchy together.

Note: Consistent with FSEC methodology.

- <u>Parent Premises I.D. No</u>.: This unique number is allocated by each FRA fire safety risk management database to each individual Parent premises record.
- <u>Site Record I.D. Indicator</u>: This indicates whether the record is a 'Site Record' in the FRA fire safety risk management database i.e. in the case of large sites such as Hospitals which normally have several buildings contained within a boundary, each individual building can be linked. This can have many advantages such as recording risk information that applies to all the site only once, etc.
- <u>Site Record I.D. No.</u>: This unique number is allocated by each FRA fire safety risk management database to each site record.
- Address Details of premises being audited: These will be allocated by the FRA database,
 - Building/Unit No. (area within building)
 - UPRN Ideally this should be a unique premises reference number from the National Land and Property Gazetteer or other database.
 - Property name
 - Road
 - Address (line 1)
 - Address (line 2)
 - Locality
 - Town
 - Post Code
 - Grid reference

- <u>Name of Occupier</u>: This will generally be the name of the company or organisation, rather than an individual.
- <u>Registered Address of Occupier</u>: For businesses that operate nationally or regionally, details of the company head office or company secretary are required. It is not necessary to seek the name of the individual company secretaries, just the registered address and other contact details. Nearly all companies will have their legal identity registered at Companies House and inspectors should, where there is any doubt, verify this information via the public information available at Companies House.
- <u>Name & Registered Address of Owner</u>: Only complete these where a building is in multi occupation, otherwise indicate 'N/A'. In some cases, premises are managed for the owner by a management company. Where this is the case, details of the agents should normally be recorded rather than the owner.
- <u>Responsible Person Details</u>: The audit should ideally be carried out in the presence of the predominant duty holder, and their details are to be entered here.

Irrespective of who is present at the audit, inspectors may need to use their powers to identify the Responsible Person. This is a legal term, defined in Article 3 of the Fire Safety Order.

• <u>Person Providing the Information</u>: Provide details of the person giving the information. (See above, this may be the person traditionally recorded as 'the contact').

Occupants

This section looks at the occupancy of the building by times of day, occupancy group and the mobility of the occupants.

- <u>Occupancy Profile</u>: Identify/estimate the maximum number of persons that could be harmed by fire within 30 minutes, **assuming no evacuation**. This should be entered alongside each time group by reference to the range groups A to E (or none) indicated at the top of this section on the form.
- Maximum number of persons at risk of harm from a single fire within 30 minutes, assuming no evacuation

This requires a judgment of the proportion of the building through which a fire and/or smoke may spread within the 30 minutes. The estimate should include the effect of fire or smoke stop doors but ignore the action of active fire suppression and smoke control systems, such as sprinklers and shutters, and/or any active firefighting intervention.

The assessment of 'compartment' should not be limited to the Building Regulations definition nor should personnel spend too much time making this judgment. A reasonable estimate is all that is required.

It should be borne in mind that where such a fire would affect the escape routes from a building, the maximum probable loss of life may include all occupants.

When carrying out a survey on an individual occupier in multi-occupied premises, separate audits should be completed for each occupier, as well as for the building as a whole.

 <u>Occupancy Type</u>: The 'VO Number' (Valuation Officer Code number) and '<u>FSEC Group'</u> will normally be generated automatically by the fire safety risk management database by entering the appropriate 'Supplementary line number' (each FRAs own premises code).

If the occupancy has changed, update the supplementary line number on the database which should automatically update the other codes.

It should be noted that there may be more than one code that could apply, e.g. a shop with a large storage area, however, only the predominant use of the premises should be recorded.

- <u>Description of Occupants</u>: The information required is whether the predominant type of occupant is more or less vulnerable than the type of person most commonly found in the type of premises being assessed. Simply tick the box alongside the appropriate description.
- ٠

Potential loss/risk

For all questions in this section, where a potential hazard is identified, brief written details can be recorded on the audit form.

The questions in this section are defined by specific criteria, rather than a personal interpretation by the responsible person. Answer 'Yes' or 'No' and where appropriate add brief details.

- <u>Sole supplier</u>: If the building is a commercial or public sector building which provides a high value or unique service, it should be identified in this section. Examples include manufacture of specific items in the UK or perhaps a specialist regional treatment centre only at certain hospitals.
- <u>Exceptional Value</u>: Properties with a value of close to or exceeding £100,000,000 (One hundred million pounds) should be included in this section. This approximates to the rebuilding and restocking of a large shopping precinct.
- <u>Heritage Risk</u>: Details should be provided in this section if the building (and / or content) being assessed is of national or international significance. There are no hard and fast rules but if the building is listed on the National Monuments Record it could be considered a heritage risk. Historically significant content must also be considered, e.g. fire at the National Library of Wales threatened many national treasures but building is of modern construction. The National Monuments Record is maintained by Historic England (previously English Heritage). Links to useful web-sites for respective areas are:

Historic England

Historic Wales

Northern Ireland Buildings Database

 <u>Community Loss</u>: This question aims to identify buildings, which if involved fire could result in significant consequential loss to the local community. The building may be occupied by a large employer, if the business was unable to operate or was to close, sever economic loss would result and or many people would be affected (unemployed).

To qualify, the loss of the building/business must represent more than an inconvenience, the number of persons affected (unemployed) should be at least 100. Consideration should also be given to the likelihood of people being able to find alternative employment in the area. The destruction of a local school will be disruptive but alternative arrangements to educate pupils can normally be put in place quite quickly.

- <u>Chemical site</u>: Tick box if it is a chemical site but not a COMAH site (i.e. less than qualifying thresholds shown in <u>schedule 1, part 1 of COMAH regulations</u>) and insert brief details and where appropriate make reference to other relevant documents such as 7(2)(d) information.
- <u>Top Tier COMAH Chemical site</u>: Tick box and insert brief details of main risks and make reference to relevant major incident plan etc.
- <u>Environmental Risk</u>: Significant economic, ecological, health and / or wellbeing impact on in the event of fire or other incident. This may be because of firefighting water run-off or because of the product stored or process undertaken. Examples might include a large fertiliser store.
- <u>Property Loss</u>: Complete only sub section 1 <u>or</u> 2.

Assuming no intervention of any kind the potential for loss due to an uncontrolled fire in the building of origin and the potential for loss due to fire spread from the building of origin to surrounding buildings must be estimated.

This requires a judgment to estimate the proportion of the building through which a fire and/or smoke may spread **ignoring** the action of active fire suppression and smoke control systems, such as sprinklers and/or any active firefighting intervention.

If the fire is likely to be confined to the room/compartment or floor or building of origin complete sub section 1 only, or if the fire is likely to spread beyond the building to adjacent premises, complete sub section 2 only.

- 'Firefighter Hazard' Where known, the inspector will need to establish whether the building or its contents could pose a risk to fire-fighters. Hazards might include:
 - Building construction that could lead to rapid structural collapse of walls, floors or ceilings, e.g. cladding panels, high bay storage racking etc.
 - Contents, e.g. hazardous chemical storage.
 - Processes, e.g. foundry work, gas or vapours under pressure.
 - Internal layout, e.g. large complex internal layout with or without restricted points of entry

Premises features

• <u>Are there Fire-fighting facilities?</u>: The inspector will need to identify specific features that are provided and maintained for fire-fighting purposes. Be careful not to confuse arrangements for means of escape e.g. a protected staircase, with dedicated firefighting provisions such as a fire fighting staircase.

If known, tick any of the facilities that are provided, and provide a short prose description where further clarification is needed, for example to identify a particular staircase that is a firefighting shaft.

'Is there an extract or positive pressure smoke control system?'

Does the building have smoke control systems designed to either prevent smoke entering, or extract smoke from, the means of escape and/or common areas? The most common of these systems are mechanical or natural extraction e.g. town centre developments, or pressurisation of staircases and escape routes.

The inspector will need to identify whether such a system exists, and where known, the exact nature of the system.

Note: Extra categories have been added to this section as the requirements for firefighters have changed in Approved Document B (ADB) i.e. Staircase with Fire main- B5 ADB 2007 and Dry Risers > 8 bar, Wet Risers > 8 bar.

 <u>Is there an operating sprinkler system</u>: If a sprinkler system is installed and is being adequately maintained, an estimate of the total floor area of the building, including all floors, covered by the system should be made and recorded on the form. It may be that only two floors in a four storey building are covered; in which case a figure of 50% should be recorded. The inspector should attempt to identify the purpose of the installation i.e. life safety or property protection.

Generally, life safety sprinklers, as fitted in Town Centre developments, will have dual valves, etc. which will assist in identifying the grade of sprinklers fitted.

Note: Details of other fixed installations using water or other extinguishing media should not be entered on the form.

• <u>Building features which may assist fire spread</u>: The inspector will need to exercise professional judgement to assess whether there are any particular features that would

adversely affect the normally expected spread of a fire. Where such features exist, indicate in the tick boxes and provide a description as necessary.

- <u>Monitored AFD Present</u>: Is the fire alarm system connected to a call centre or via an autodialler i.e. can a '999' emergency call be made, other than by the occupants of the building?
- <u>Fire Warning System</u>: The inspector's aim here is to establish whether or not the standard of the fire warning and/or detection system installed within particular premises is:
 - More than adequate i.e. the occupants are at less risk than those in a similar building which has a standard system
 - Adequate
 - Less than adequate i.e. the occupants are at a greater risk than those in a similar building which has a standard system

In most cases the warning system will be standard. Some standards for particular premises are benchmarked in the Guidance Documents published by the Government. However it should be borne in mind that in some buildings, a shout of 'fire', the provision of rotary gongs or whistles etc. may be considered as 'adequate'.

For example, an L1 or L2 automatic fire detection system in a residential care premises would be 'adequate' as that is the standard expected for this type of occupancy. Similarly, a shout of 'FIRE' in a small single room factory unit, with minimal numbers, might also be adequate.

Similarly, an enhanced fire detection and/or warning system may be present, but where this has been provided to compensate for a deficiency in other areas e.g. the lack of twodoor protection to an escape route, the provision should only be considered as 'adequate' as it does not make the building any safer than a standard installation with adequate measures provided elsewhere.

- <u>Building Size</u>: To answer this question, the inspector will need to estimate the building or occupancy floor area in the case of multi-occupied premises e.g. in a five storey single occupied premises with each floor being 100m² in area, the total building size would be 500m². Similarly, if the form is being completed for an occupier in a multi occupied premises and that occupier only takes up two floors the figure should be entered as 200m². Compare the above calculated total floor area with the figures given in Table 8, appendix 16, choosing the row for the correct FSEC occupancy group. The figure will fall into one of the seven size groups which should be ticked on the audit form.
- <u>Height of building</u>: Additional fields have now been added to this section of the form in order to align to changes to FSEC
 - <u>Total number of storeys in the building</u>: Enter the maximum height of the building including basements.
 - Note: This is the multiplier field for building size
 - <u>Total number of basements in building</u>: Enter the total number of levels of basements in building
 - <u>Occupancy storeys</u>: Only complete if multi-occupied, specify the actual storeys occupied by the organization including basements e.g. floors 5 to 8
 - <u>Occupancy occupies</u>: Enter number of storeys occupied by the organisation covered by this assessment e.g. floors 1 and 6 to 8 which would be 4 storeys
 - Note: Free text for FSEC
 - <u>Occupancy basements</u>: Enter number of basement levels used by this occupier where appropriate.

Appendix 12 – How to complete 'PART B' of the 2009 audit form (Fire Safety)

The determination of on-site fire safety will start with the fire safety evaluation process. When concerns are found by an inspector, the 2009 audit form will be used. There is no need to inspect all of the premises, during the evaluation process or when using the 2009 audit form process, especially if the evaluation revealed no significant issues. Only areas of concern need to be completed in the 2009 audit form (areas of satisfaction can be marked as such). Appendix 4 may be used as a guide to those areas of 'Part B' that should be checked if the evaluation raises concern against general fire precautions.

The visit should normally include a physical inspection of risk critical parts of the building, which can include the following (among others).

- Common parts and fire safety systems of multi-occupied premises
- Final exits .
- Ground floor •
- Where relevant at least one upper/lower floor •
- Protected/external staircases •
- External routes •
- Access and facilities provided for fire-fighters •
- Areas of significant public gathering .

However, if poor levels of safety or verification are discovered the remainder of the premises may warrant inspection.

The articles in 'Part B' of the 2009 audit form have been arranged so that the first 9 areas have a check box that confirms whether the explanations given by the duty holder have been validated by observation or questioning of staff for example.

(Verification may have already been completed during the evaluation process and the physical inspection of some or all of the premises to check if safety in case of fire has been provided. coupled with questions posed to the duty holder to ascertain whether non-observable fire safety matters have also been addressed). When this has taken place, an objective score can be assigned to the Article.

Once the inspector has completed all relevant areas of the 2009 audit form, scoring in accordance with the guidance on the form (and Appendix 10) the scores are then accumulated to give an overall score. This will ensure that the implications of a serious issue within a building are not diluted by an area that is deemed less serious.

Giving Values to non-Compliance

The 2009 audit form applies a weighting to the applicable articles of the Order and provides a 'compliance level' of between 1 and 5 (see Cumulative Risk Scoring Matrix). The weighting is also adjusted between 4 different groups of premises by the application of different non compliance scores. Inspectors are expected to account for occupancy during the evaluation process when determining whether fire safety measures are adequate. These 4 groups are derived from the IRMP Note 4 and the 17 FSEC categories (see Appendix 10).

These groups are determined by the risks they share and the fire safety guidance that applies to them and should be considered at every stage of involvement with premises.

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• Group A

The majority of sleeping risks where the occupants are unfamiliar with the building

Group B

Flats where the occupants are familiar with the layout and licensed premises

• Group C

Educational / leisure facilities and shops where the most of the occupants are not familiar with the layout

Group D

Workplaces where the occupants are familiar with the layout

More complex safety measures are expected in higher-risk premises in order to adequately mitigate the associated risk. The list below shows the highest-risk score that each inspection group can attract under the 2009 audit form process (see appendix 10).

- Premises in Group A (the highest risk premises) can score a maximum of 128 points;
- Group B 109 points;
- Group C 89 points; and
- Group D 77 points (lower risk premises).

The 2009 form deemed certain articles to have a greater influence on safety and articles 8 to 15, 17, 21 & 38 attracted a higher risk score and were assigned as safety critical. Articles *13 (fire warning) & 14 (means of escape) were deemed important and therefore attracted the highest risk scores.

*N.B. Article 13 was divided in to its constituent parts, so that fire alarms and fire fighting equipment could be assigned separate risk scores because the affect on safety of these two provisions is significantly different.

The consequence of the non-compliance with these Articles can have either a minor or major impact on safety in case of fire.

Example: a fire alarm system is installed within a hotel but not all of the bedrooms have been fitted with appropriate detection. Professional judgment may deem that this has a minor impact on safety in case of fire. If the alarm had catastrophically failed in the same hotel, professional judgement would identify that this has a major impact on safety. In this way enforcement action is kept appropriate and proportionate.

When aspects of safety have already been evaluated as 'safe enough', the 2009 audit form can be annotated as broadly compliant for those matters. Any matters that need further drill-down should be further examined and a judgement made about its contribution to the safety of people in case of fire. N.B. Broadly compliant means that the fire risk is tolerable / 'safe enough' for the occupancy and other circumstances relevant to the case.

All of Part B of the 2009 audit form must be addressed through a combination of those matters already evaluated as broadly compliant and those for which a further drill-down is necessary. Where the requirements of the Order do not apply, the 'not applicable' option should be marked.

Points and calculations

Calculations for Part B are normally undertaken by a fire safety risk management database and not the inspecting officer. They are provided to enable the inspector and business to be aware of the underlying process and impacts of decisions made.

Appendix 13 – Moderating Enforcement Decisions (The EMM)

The process of auditing and inspecting premises, assessing risks and making enforcement decisions, will embody the principles, expectations and methodology of the Enforcement Management Model (EMM). The model was produced by the Health and Safety Executive and is considered national best practice. CFOA adapted and summarised this model for use by FRAs.

This document has considered the EMM throughout the audit processes described. During the early part of audits, the principles of the EMM are considered in the gathering of intelligence about the premises under consideration and the fire safety evaluation confirms whether or not the standard of general fire precautions provide safety in case of fire. Where inspections are escalated to the 2009 audit form, the EMM is used again to confirm the enforcement action that should be taken. The EMM allows inspectors to make consistent and fair enforcement decisions based on clear guidelines, which are auditable and will be robust if challenged.

Principal Objectives

When Part B is complete, the 'responsible person factors' should be applied in order to confirm the enforcement activity. If the outcome is compliance level 4 or 5 then the "strategic factors" should also be applied.

Note: Several articles were added to the audit form (articles 27, 29, 30, 31, 32 and 24) to which no score is attributed. These should be considered when applying the EMM principles.

These tests will involve a series of questions, relating to the responsible person or duty holder, which allows the enforcement decision to be verified or modified. Finally (in the case of compliance levels 4 or 5) the enforcement decision will be set against a number of strategic factors to confirm the decision or establish the need for a management review.

N.B. if the enforcement action recommended from the outcome of the EMM is inappropriate, and the inspector is considering alternative enforcement action, guidance should be sought from the relevant line manager with the evidence that supports this view. The inspector should agree the appropriate enforcement action with the line manager and if it is agreed that the enforcement action requires changing (based on the evidence provided) this should be noted and attached to the audit form.

Responsible Person Factors

The responsible person factors tabled below identify factors (relevant to the responsible person / duty holder), which may influence the enforcement decision. The factors can confirm the enforcement action or move the severity of enforcement up or down by one level (see Table 5 and Diagrams 7 and 8). (The flowcharts vary according to relevant and appropriate factors).

Responsible Person Factors	
Descriptor	Definition
Does the responsible person have a history of relevant enforcement action being taken?	
Yes (some/many)	On the same or similar issues, by notices, prosecutions or informal action.
No	No enforcement has been issued on the same or similar matters.
Is there a history of operational incidents at the premises?	
Yes (some/many)	There is a history of operational incidents (e.g. fires, AFA's, and spillages etc.)
No	There is no history of related incidents at the premises (inc. from other agencies).
What is the intention of the responsible person in non-compliance? (Usually discovered when gathering evidence for creating a case for prosecution)	
Economic advantage sought	Minimum legal requirements are deliberately avoided for commercial gain.
No economic advantage sought	
What is the level of perceived harm? (Included in consideration of general fire precautions)	
Serious	A risk of serious harm to life as a result of the matter under consideration.
Not serious	There is little or no risk of serious harm.
What is the cause of non-compliance / perceived / actual harm?	
Inadvertent	Reasonable actions taken from position of understanding but something missed.
Deliberate	Actions that create risk are knowingly carried out or permitted and endanger life.
Omission	Actions that create risk are carried out or permitted only in ignorance.
What is the inspection history of the responsible person?	
Extensive	There is a history of significant problems, advice and poor inspection ratings.
Some	There is a history of nominal or piecemeal problems, especially with new/or obscure duties, rating history is in the average range.
None	There is a history of compliance, acceptance of advice, consistently high standards and low inspection rating.
What is the standard of general conditions?	
Poor (High risk)	There is a general failure of compliance across a range of issues, leading to intolerable risks.
Tolerable	Taking a holistic view of safety, the measures in place adequately address risks.
Good (Low risk)	Full compliance across the whole range of indicators with no notable omissions.
What is the attitude of the responsible person to fire safety?	
Indifferent	The attitude to fire safety is generally poor. Professional relationship is strained.
Passable	The attitude to fire safety is generally open and reasoned. Effective communication can be established.
Good	The attitude to fire safety is generally enthusiastic and proactive; actively seeking advice and pursuing solutions.

Table 5: Responsible person factors (to consider when determining course of action)

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When an enforcement notice should be served, the procedure in Diagram 7 should be followed. This allows for movement to 'consideration of prosecution' or 'informal action'.



Diagram 7: Evaluation Outcome - Enforcement Notice

Registered office: National Fire Chiefs Council Limited, 71-75 Shelton Street, London, United Kingdom, WC2H 9JQ. Registered in England as Limited Company No 03677186. Registered in England as Charity No. 1074071. VAT Registration No. 902 1954 46 When a Letter (Fire Safety Matters – people at risk sentence) should be sent, the procedure in Diagram 8 should be followed. This allows for movement to a less formal Letter (Fire Safety Matters – improvements sentence) or the serving of an enforcement notice.



Balance the responses to the areas above along with the weighting that should be given in each case. The final outcome relies on which of the columns 'weighs most heavily' in terms of the impact on the safety of the premises. Then consider the strategic factors in table 6.

Diagram 8: Evaluation Outcome – Fire Safety Matters – people at risk

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Strategic Factors

There are a range of strategic factors (see Table 6 and Diagram 9) that may impact on the final enforcement decision. Inspectors should consider the public interest and vulnerable groups (e.g. children, patients, and the elderly), and the broader socio-political impact of enforcement action. Strategic factors qualify the decision; they do not determine it.

When considering public interest, inspectors and Fire Safety Managers must be satisfied that the proposed action will produce a net benefit to the wider community, in terms of reducing risk and in the costs of pursuing a particular course of action. Public interest can be difficult to assess.

Inspectors should contemplate: What would a reasonable person expect from the FRA in the circumstances? A further test is whether the decision can be justified if challenged in law.

Certain issues may have a significant bearing on public expectation, for example fatal fires involving vulnerable groups. While public expectation must be carefully considered, it should not determine the action taken.

The process of applying the strategic factors is illustrated in Diagram 9. The proposed enforcement actions are tested against the strategic factors – see Table 6. The flow-chart leads to a confirmed enforcement action that should be subject to a review by the Fire Safety Manager where it does not address all the strategic factors or accord with the enforcement policy.

There is no ranking of importance implied in the progression through the factors, however the final question must be— does the proposed action meet the principles and expectations of the FRA?

	Strategic Factors						
Does the action coincide with the Public Interest?							
Yes	The action results in a net benefit to the wider community in terms of targeting						
	resources on risk and meeting public expectations of the fire authority						
No	The action results in a net disadvantage to the wider community in terms of addressing risk, targeting resources on risk and failing to meet public expectations of the fire authority						
Are vulnerable gro							
Yes	The action results in control of risk to vulnerable groups						
No	The action does not result in control of risk to vulnerable groups						
What is the long-te	erm impact of the action?						
Sustained compliance	The action is sufficient to achieve sustained compliance across the range of risks associated with the premises						
No long-term impact	The action is insufficient to secure sustained improvements and that problems may be expected at subsequent visits						
What is the effect	of the action on other responsible persons?						
Positive effect	Other responsible persons in the same industry, geographical location or wider business community are deterred from committing similar offences or encouraged to adopt a more favourable view of fire safety requirements. The action taken broadcasts a positive message about fire safety						
Negative effect	The course of action undermines both positive responsible persons perception of the fire authority and the wider appreciation of the standard of fire safety required						
What is the initial i	impact of the action?						
Benchmark achiever	The action secures compliance with the relevant benchmark						
Incomplete compliance with the benchmark	The action does not secure full compliance with the benchmark						
	onal impact of the action?						
Acceptable	There is a net benefit to the employees and others who might be affected. NB -Risk is the overriding concern, and that the wider impact may be a qualifying issue, but is not definitive. E.g. Where the strict application of the law would result in the closure of the premises or unemployment, then all of the ramifications of the action are to be taken into account. The net benefit of the enforcement action in this situation is for the inspector to judge						
Unacceptable	There is a net disadvantage to employees and others who might be affected, from the action taken. NB - Risk is the overriding concern, and that the wider impact may be a qualifying issue, but is not definitive.						
	s and expectations of the enforcement policy been met?						
Yes	The policy has been followed						
No	The policy has not been followed						

Table 6: Explanation of EMM Strategic Factors



Answers 'weighted' to the right-hand side should trigger a management review to determine the suitability of the action considered. Answers 'weighted' to the left-hand side should confirm the intended action.

Diagram 9 EMM - Strategic Factors

Confirmed Enforcement Activity

The following enforcement activity may be confirmed:

- **Reasonable Standard** better regulation advice, educate & inform no follow-up inspection required
- Non-statutory action (no revisit) better regulation advice, educate & inform no intention to conduct a follow-up inspection
- Fire Safety Matters (revisit) better regulation advice, educate & inform follow-up intended
 - Action Plan (appropriate to all Fire Safety Matters letters, if requested) better regulation advice, educate & inform follow-up inspection may be required
- Enforcement Notice statutory action plus better regulation advice, educate & inform follow up inspection always required
- Enforcement Notice 'fast track' better regulation advice, educate and inform close monitoring and follow up inspection always required. Additionally consider prosecution after applying both responsible person and strategic factors.

[With respect to follow-up action, the term 'inspection' is used instead of 'audit' to reflect the fact that the unsafe matters (in need of improvement) must be inspected to see that safety has been secured. Follow-up action does not form the grounds for another audit or full evaluation of the premises.]

Appendix 14 – How to complete Part C of the 2009 audit form (Calculation of Relative Risk etc.)

Part C of the audit form is used to bring together numerical values from the previous parts.

The premises information and fire safety evaluation will consider life safety and the potential loss or risk to the community in case of fire, at a local or national level. Competent officers will exercise professional judgment to determine the 'relative risk' rating for premises visited. Relative risk is the comparison made between different premises across the 17 Fire Services Emergency Cover model (FSEC) categories.

From the data collected, and professional judgments made by the inspector, a determination can be made as to the risk of a fire occurring, the risk to persons and the potential impact on the community.

There are a series of other questions, relating to unwanted fire signals, local fire setting and sprinkler provision among others where a numerical value is either entered or automatically brought forward from other parts (see below).

Finally a relative life risk score is generated (in accordance with FSEC) which feeds into the table in Appendix 10, table 4 to produce a risk level between 'very low' and 'very high' for each FSEC category.

Calculating the relative risk score

=3+LOG(C5)+LOG(IF(C4<-1,-1/C4,IF(C4>1,C4,1))) Where C4 = life risk score And C5 = fire frequency

This FSEC formula and the fire frequency table below from Government guidance for the FSEC Toolkit – 'Calculation of other buildings fire frequencies' by Mott MacDonald July 2006, shows the empirical evidence utilised in arriving at the relative life risk score.

Calculation of other buildings fire frequencies (Mott MacDonald July 2006)

		Relative Risk Bands					
	Average FSEC Societal	Very High	High	Medium	Low	Very Low	
Occupancy Type	Life Risk Fire Rate	FSEC Life Risk Score					
	per 1,000,000	10+	>10 to 3	>3 to <-3	-3 to <- 10	<-10	
	Buildings per year	Relative Risk Scores					
Hospitals and Prisons (A)	676	>=6.83	<6.83- >=6.31	<6.31- >5.35	<=5.35- >4.83	<=4.83	
Hostels (E)	167	>=6.22	<6.22- >=5.70	<5.70- >4.75	<=4.75- >4.22	<=4.22	
Care Homes (B)	128	>=6.11	<6.11- >=5.58	<5.58- >4.63	<=4.63- >4.11	<=4.11	
HMO's (C)	106	>=6.03	< <u>6.03</u> - >=5.50	<5.50- >4.55	<=4.55- >4.03	<=4.03	
Houses converted to flats (G)	106	>=6.03	< <u>6.03</u> - >=5.50	<5.50- >4.55	<=4.55- >4.03	<=4.03	
Purpose built Flats (D)	106	>=6.03	< <u>6.03</u> - >=5.50	<5.50- >4.55	<=4.55- >4.03	<=4.03	
Hotels (F)	77	>=5.89	<5.89- >=5.36	<5.36- >4.41	<=4.41- >3.89	<=3.89	
Shops (N)	63	>=5.80	<5.80- >=5.28	<5.28- >4.32	<=4.32- >3.80	<=3.80	
Other sleeping accommodation (H)	21	>=5.32	<5.32- >=4.80	<4.80- >3.85	<=3.85- >3.32	<=3.32	
Schools (M)	11	>=5.04	<5.04- >=4.52	<4.52- >3.56	<= <u>3.56</u> - >3.04	<=3.04	
Further Education (J)	11	>=5.04	<5.04- >=4.52	<4.52- >3.56	<= <u>3.56</u> - >3.04	<=3.04	
Public Buildings (K)	11	>=5.04	<5.04- >=4.52	<4.52- >3.57	<=3.56- >3.04	<=3.04	
Other buildings open to the public (P)	11	>=5.04	<5.04- >=4.52	<4.52- >3.56	<= <mark>3.56-</mark> >3.04	<=3.04	
Licensed Premises (L)	10	>=5.00	<5.00- >=4.48	<4.48- >3.52	<=3.52- >3.00	<=3.00	
Factories/Warehouses (R)	4	>=4.60	<4.60- >=4.08	<4.08- >3.12	<=3.12- >2.6	<=2.60	
Other Workplaces (T)	4	>=4.60	<4.60- >=4.08	<4.08- >3.12	<= <mark>3.12-</mark> >2.60	<=2.60	
Offices (S)	3	>=4.48	<4.48- >=3.95	<3.95- >3.00	<=3.00- >2.48	<=2.48	

Table 7 Relative Risk matrix – fire safety inspection (no occupancy multiplier)

Notes on Table 7: The societal life risk fire rates in this table differ from those used in the FSEC toolkit:

1. In FSEC, the societal life risk fire rates quoted in the risk definitions are rounded values so are slightly different to those above.

- The societal life risk fire rates quoted in this table for some occupancy types (shops, offices etc.) are half those used in FSEC - this is because FSEC divides the fire frequency by 2 for buildings only occupied during the day
- 3. Prisons were previously included in "Other sleeping accommodation" but are now included in the "Hospitals" category as the fire frequency in prisons is more similar to that of hospitals. The figures for these two categories have therefore changed. Youth Offending Institutes and Immigration Detention Centres should also be included in this category.
- 4. The gaps in the relative risk scores between risk levels (e.g. for Hospitals, the relative risk score ranges from 6.78 to 6.31 for high risk and 6.13 to 5.53 in medium risk there is an apparent gap here with no risk level for relative risk scores between 6.31 and 6.13) is a consequence of the way in which these relative risk scores are calculated and is not an error. Correct calculation of relative risk, with whole (integer) numbers for the FSEC life risk score will not produce results outside of the ranges given above.
- 5. The societal life risk scores achievable by a property in FSEC ranges from +12 to -34.

The 2009 review amended the relative risk matrix, which was published in the audit guidance when the Order was first introduced. That review changed the range of some of the categories (very low to very high). The amendments were a result of changes to the numbers of premises and the number of fires since the last review.

These calculations are normally undertaken by a fire safety risk management database and not the inspecting officer, they are only provided to enable the inspector and business to be aware of the underlying process and impacts of decisions made.

Management and other issues

• <u>Fire Safety Management (Compliance Level Score)</u>: Enter the compliance level score determined from Section B. If no Part B has been completed, select Fire Safety Management Not Assessed (code x) this should default to a zero score.

Note: The compliance level score of 1-5 generates a different score within the calculation e.g. a compliance level score of 4 (poor for the occupancy) generates a calculation figure of +1 (see audit form for details).

- <u>History of Fires</u>: Do not rely entirely on recorded figures, as the premises may have had smaller fires not reported to the Fire and Rescue Authority.
- <u>Unwanted Fire Signals</u>: Similar to fires, check whether there has been any unwanted fire alarm signals, in addition to those recorded by the FRS.
- <u>Known fire setting activity in the area</u>: A history of local fire setting, even if only recorded as FDR3 fires will suggest an increased risk of arson.

Where such activity is known, this should be discussed with the duty holder and general arson protection advice should be given, to ensure that the premises, and ultimately the safety of people in case of fire are not adversely affected.

- <u>Fire loading likely to assist with fire spread</u>: Inspectors should use their professional judgement to assess the potential for fire spread. Matters to be taken into account are:
 - Compartmentation within the building.
 - Surface linings.
 - Presence of combustible materials and substances.
 - Lack of fire resistance or lack of maintenance of existing provisions.
 - Presence of flammable vapours, dusts or other materials.

Once assessed, this should be compared to the generic type of risk normally associated with that occupancy type e.g. the presence of flammable vapour in a petroleum storage

depot can be considered as normal for that occupancy, but a similar situation in a hardware shop would be classified as high.

• <u>Water Supplies and Access for Fire-fighting</u>: It is not the intention for the inspecting officer to have to carry out surveys of the water supplies, and similarly, there may be little or nothing that can be done to improve access for fire appliances.

It should be remembered that the data collected will have an overall influence on the risk presented by any particular premises, and where these two factors cannot be ascertained, the default indication should be 'average'.

• <u>Total number of people in the premises at peak time</u>: Simply tick the appropriate box. This question is directed at the maximum likely, or known, number of people in the unit or overall building depending on whether the audit is for the whole building or a particular occupier.

This is not the same question as in 'Part A' which relates to the occupancy of largest compartment etc.

Building and occupant features

All the information in this section is brought forward automatically from other parts of the form if these sections have been completed. The data includes building size, the mobility of the occupants, sprinkler coverage and fire warning systems.

Appendix 15 – How to complete Part D of the 2009 audit form (SSRI)

Guidance for FRAs

FRAs will have their own policies for gathering information for operational use and should have relevant procedures in place for inspectors to gather information that will be useful to the Service. Any such policy or procedure should form the basis for 'Part D' of the 2009 audit form and should be appended as appropriate.

Several issues that should be considered by the inspector when collating this information are:-

- Only collect Site Specific Risk Information (SSRI) where necessary, not all fields will be applicable to all premises
- Bear in mind SSRI information is primarily for the initial attendance
- Consider the urgency of this information. In addition to recording it in the fire safety risk
 management database the inspector may need to bring this to the attention of relevant
 operational personal and Fire Control as a matter of urgency by some other method (see
 relevant FRAs policy)
- As a result of risk information discovered, action may need to be taken by the inspector to mitigate that risk or the issue may need to be referred to operations for action
- 7(2)(d) information card/form and visit by operations maybe required
- Frequency of visits will normally vary between fire safety and operational crews
- It may be desirable for the SSRI information to be held against sites, individual buildings or in the case of multi-occupied buildings against premises i.e. parts of buildings

Appendix 16 - Floor Space Factors

	M^2								
FSEC Group	Extremely Small	Very Small	Small	Medium	Large	Very Large	Extremely Large		
	-5	-4	-2	0	2	4	5		
Hospitals	< 500	500 to 650	651 to 2000	2001 to 10000	10001 to 50000	50001 to 100000	> 100000		
Care Homes	< 200	200 to 350	351 to 640	641 to 1500	1501 to 2500	2501 to 4500	>4500		
Houses in Multiple Occupation	< 30	30 to 80	81 to 300	301 to 700	701 to 2300	2301 to 20000	> 20000		
Purpose Built Flats	< 1400	1400 to 3000	3001 to 5000	5001 to 8300	8301 to 10300	10301 to 12600	> 12600		
Hostels	< 123	123 to 220	221 to 350	351 to 750	751 to 1900	1901 to 4000	> 4000		
Hotels	< 201	201 to 350	351 to 650	651 to 1300	1301 to 3600	3601 to 9500	> 9500		
Houses Converted to Flats	< 251	251 to 300	301 to 400	401 to 500	501 to 600	601 to 1000	> 1000		
Other Sleeping Accommodation	< 51	51 to 90	91 to 140	141 to 360	361 to 1500	1501 to 4200	> 4200		
Further Education	< 331	331 to 560	561 to 2000	2001 to 6000	6001 to 15000	15001 to 32000	> 32000		
Public Buildings	< 101	101 to 200	201 to 350	351 to 950	951 to 2700	2701 to 7500	> 7500		
Licensed Premises	< 151	151 to 250	251 to 400	401 to 700	701 to 1200	1201 to 2300	>2300		
Schools	< 201	201 to 400	401 to 1000	1001 to 2500	2501 to 6000	6001 to 13000	> 13000		
Shops	< 61	61 to 130	131 to 200	201 to 500	501 to 1400	1401 to 6000	> 6000		
Other Premises Open to the Public	< 101	101 to 175	176 to 300	301 to 1000	1001 to 3300	3301 to 8000	> 8000		
Factories and Warehouses	< 101	101 to 260	261 to 715	716 to 2400	2401 to 7000	7001 to 15000	> 15000		
Offices	< 100	100 to 200	201 to 400	401 to 1000	1001 to 2700	2701 to 9400	>9400		
Other Workplaces	< 51	51 to 100	101 to 300	301 to 600	601 to 700	701 to 800	> 800		

Table 8 – Scores associated with Floor Space factors, where zero values denote a default score

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