



LONDON FIRE BRIGADE

Risk Based Inspection Programme

Report to:

Date:

Operational Delivery Board 16 December 2022

Commissioner's Board 11 January 2023

Deputy Mayor's Fire and Resilience Board..... 31 January 2023

London Fire Commissioner

Report by:

Station Commander Paul Osborne

Report classification:

For decision

For publication

I agree the recommended decision below.

Andy Roe

London Fire Commissioner

Date **This decision was remotely signed on 13 February 2023**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

The Risk Based Inspection Programme (RBIP) is part of the London Fire Commissioner's overall integrated approach to risk management by prioritising the inspection of premises based on risk. The RBIP process is being reviewed nationally. The initial guidance underpinning the approach to RBIPs was originally published in 2004 (updated by CLG in 2009) within the Integrated Risk Management Planning (IRMP). This was carried out in London in 2004 and revised 2009 but has not had a major review/refresh since.

The LFB RBIP Project Team are working alongside the National Fire Chiefs Council (NFCC) to support change. The national definition, classification and use of risk terminology is being reviewed. This will support increasing the interventions that that fire services consider when prioritising risk. The risk interventions will integrate Response and Prevention into this traditionally Protection focused area which will allow the LFB to better engage with its communities.

The review supports improved outcomes and new ways of working, to achieve its aim by reducing risk in London. The new RBIP will achieve the improved outcomes by using a wide range of interventions. It will identify how all LFB risk interventions are measured to demonstrate how we lower (or increase) the risk rating of a premises. This will create a pathway for change in risk to amend the type and/or frequency of future LFB interventions whilst aligning with the LFB Community Risk Management Plan (CRMP).

Proposed decision – the London Fire Commissioner

That the London Fire Commissioner (LFC) approves the revisions to the Risk Based Inspection Programme, to be incorporated into the 2023/24 Delivery Plan.

1 Introduction and background

- 1.1** The initial guidance on the underpinning approach to RBIPs was originally published in 2004 (updated by CLG in 2009) within the Integrated Risk Management Planning (IRMP) framework. The RBIP procedure was initiated in London in 2004 and revised 2009 but has not had a major review/refresh since.
- 1.2** The RBIP is the planned reinspection work of buildings that are known to us and located on our database, Farynor. This is one element of the work of fire safety officers. In the last few years in addition to the impact of Covid 19, the Fire Safety team has had other significant challenges which have impacted on the RBIP. These challenges have included:
- Reduction in number of experienced competent inspecting officers due to retirements and leavers, with significant ongoing demand for competent staff and market rate pressures. This is illustrated by a drop in staff who are competent to undertake higher risk inspections, from 52% in July 2021, to 25.9% in July 2022. The challenge with recruiting and retaining experienced staff is being observed nationally and not just specific to the LFB.
 - Increase in 'demand led work' (greater explanation in Appendix 3) such as the Building Risk Review (BRR) including dealing with higher risk premises with temporarily changed evacuation strategies. Between mid-2020 and December 2021, 8,517 buildings were triaged or audited by staff as part of the BRR.
 - As part of the increase in demand led work staff in the LFB also conduct post-fire audits¹, respond to alleged fire risks and undertake active risk targeting². Teams further undertake building regulation consultations (which are being centralised in the new building regulations consultation hub), deal with licensing applications and enquiries from businesses and communities.
- 1.3** The HMICFRS inspection identified three areas of concern linked to the RBIP. These were:
- **HM12 8** *"The brigade needs to be able to measure that it is meeting the targets set out in its risk-based inspection programme to be assured it is effectively protecting the public from fires."*
 - **HM12 12** *"The brigade should make sure it allocates enough resources to a prioritised and risk-based inspection programme."*
 - **HM12 13** *"The brigade should make sure it puts in place measures so it can meet its planned schedule of fire safety audits."*
- 1.4** Prior to the findings of the HMICFRS being published, LFB had self-identified that the RBIP needed to be refreshed and an internal project was set up in March 2021 to deliver a revised RBIP by April 2023.
- 1.5** The existing RBIP does not effectively differentiate risk in all cases, for example an education establishment with a resident caretaker could be classed as higher risk in the same way a care home could be, due to the sleeping risk and occupancy type. National work led by NFCC (supported by LFB) is underway to redefine a higher risk occupancy. (**Appendix 1**)

¹ London has circa 4-5 times the national average of fires compared to other FRSs; this again reflects the unique risk profile of London.

² An example of active risk targeting: a serious risk is noted in a premises and there are similar/identical premises. Therefore inspections are carried out in these matching premises as a higher risk is foreseeable.

1.6 The RBIP needs refreshing for a number of reasons, including, but not limited to:

- New ways of working will allow responsible persons to use self-service tools (such as the online home fire safety checker). This needs to be incorporated into Brigade practice to improve the efficiency and effectiveness of inspecting officers.
- London has a unique risk profile, e.g., circa 60% of the entire high-rise residential risk and circa 1 million businesses (micro to large businesses).
- The RBIP will need to incorporate the work of the new Building Safety Regulator (BSR) when 'in-occupation' multi-disciplinary team (MDT) inspections begin, see 2.14.
- The RBIP will need to align with the CRMP.
- Recently introduced Fire Safety Checks (FSC) undertaken by frontline crews are a key new area of risk reduction work that is already making a significant difference in terms of familiarisation and checking lower risk premises which are unknown to the LFB. Some crews are discovering higher risks which are then escalated to fire safety teams, leading to full audits and even prohibitions where fire safety concerns are significant enough.
- Frontline operational officers are also being provided with additional training (currently Level 3i in fire safety), which supports the identification of risk.
- The introduction of new technology, such as 999eye.

1.7 A more effective and efficient renewed RBIP will enable staff to undertake scheduled Active Risk Targeting (ART) on high and low risk premises. Enforcement data for 18 months from 1 April 2021 shows:

- 83% of our Prohibition / Restriction Notices were issued on premises types normally classed as low risk, such as shop and dwellings
- 33.56 % of our Enforcement Notices were issued on premises types normally classed as low risk
- 33.89% of our Notices of Deficiencies were issued on premises types normally classed as low risk
- 50% of CREG's time is spent dealing with enquiries on premises types normally classed as low-risk premises.

1.8 During this period 62% of Protection Delivery's time was spent in high-risk premises. The highest indicator relates to Prohibitions / Prosecutions. In general, these premises are the result of demand led work such as Alleged Fire Risks (AFR-s) / FSC-s and are not usually identified as part of our RBIP. The revised RBIP will utilise a risk prioritisation 'triage' process to include these interventions.

2 Objectives and expected outcomes

2.1 These proposals support the commitments within LFB's Target Operating Model, summarised in the table below.

Ambition Statement	
One	We will work with you to provide localised services that meet your needs
Two	We will make it easy for you to access our services
Three	We will adapt our services as your needs change
Four	We will design services around your needs and concerns

- 2.2** The term 'intervention' will now become the universal term used within Protection & Prevention and Response. Traditionally protection interventions have been based around physical audits carried out by Fire Safety trained staff. These audits follow the same format, e.g. an audit follows an audit (for example 12 months later with no other intervention options that could reflect an increase or decrease in risk).
- 2.3** The renewed RBIP will make use of a wider range of interventions, to include audits, desktop audits, self-service tools for use by businesses/communities, referrals to HFSV/online checker, Fire Safety Checks/ Operational Risk Database (ORD) entries etc. This will ensure that our workforce maximise their time auditing the highest risk buildings whilst teams in Prevention and Response undertake other interventions.
- 2.4** All possible interventions will utilise Prevention, Protection and Response in support of how we can target higher risk more effectively by using new and different ways of interacting with a premises and/or occupant. This will provide us with a wider scope and more capacity within our Risk Based Inspection Programme. These interventions will include a 'Risk Prioritisation' process (triage) to identify the most suitable intervention. The interventions include (but not limited to):
- Self-help tools, including HFSV online tool to enhance prevention collaboration. Business Safety Check tool (NFCC tool initially then supplemented by LFB version when available).
 - Fire Safety Checks (FSC).
 - Phone liaison with Responsible Person/Local Authority liaison.
 - Desktop Audits (FS14.)
 - Short/full audit (physical FS01 inspection).
- 2.5** A risk prioritisation flowchart has been produced to identify the appropriate type of intervention. (**Appendix 2**).
- 2.6** The revised RBIP will incorporate the new definition of higher risk occupancy in line with interim NFCC guidance when it is published by the NFCC in or after April 2023. (**Appendix 1**)
- 2.7** The revised RBIP will also incorporate the six NFCC categories (**Appendix 5**) of risk when undertaking the Risk Prioritisation process. The six categories are:
- Individual Fire Risk – Prevention intervention
 - Societal Fire Risk – Protection intervention
 - Firefighter Fire Risk – Response intervention
 - Environmental Fire Risk – Response/Specialist/Partner intervention
 - Heritage Fire Risk – Protection/Response/Specialist/Partner intervention
 - Community Fire Risk – Bespoke intervention.
- 2.8** The revised RBIP will utilise all LFB risk interventions. They will be measured to enable the LFB to demonstrate how we have lowered (or increased) the risk rating of a premises. This will enable the LFB to create a pathway for change enabling us to amend the type and/or frequency of future LFB interventions.
- 2.9** The revised RBIP will align with LFB's CRMP and be flexible to consider and action local risk for local communities across each borough by:
- Highlighting local risk through ART/inspection or post fire activity.
 - Updating local Fire Safety (Protection) Team Plans to support risk prioritisation.
 - Liaison with Borough Commanders to improve joint situational awareness involving risk in

local boroughs.

- 2.10** The revised RBIP will allow us to utilise data to prioritise risk. Where there is an increased enforcement rate (Prohibitions/Enforcements) and/or identified risk in a specific premises type, this will inform change to our Protection & Prevention interventions. For example, our statistics demonstrate that historical low risk premises (shops and dwellings) are generating enforcement and prohibition notices showing we are identifying and reducing risk in low and high-risk premises. The revised RBIP will be adaptable to meet the needs from available risk data linking to Active Risk Targeting (ART).
- 2.11** ART time will be dependent on the competency of its Protection & Prevention staff as well as data. However, staff at a lower competency level can still inspect lower risk premises such as shops and dwellings, where our enforcement data shows that there are still potentially serious fire safety issues.
- 2.12** We want to support local communities prior to undertaking ART. We will where possible, work with communities, Local Authorities, business partners and commerce, informing them of our forthcoming intervention and how they can self-regulate to comply with the RR(FS)O before we visit. This will enable us to support by education before considering possible enforcement action.
- 2.13** The LFB will support the future delivery of the Building Safety Regulator (BSR) staff.
To avoid duplication, buildings that are subject to review/inspection by the Multi-Disciplinary Team (MDT) of the BSR are not currently planned to be included at that time in the RBIP (unless subject to an intervention at a premises, e.g. Alleged Fire Risk – AFR).
- 2.14** There will be changes to LFB systems, to include but not limited to Farynor, in the short term. Its future replacement will be delivered via the One Risk Project. Relevant policies will be amended and/or updated to reflect changes.

3 Implementation

- 3.1** A number of risk prioritisation models will be trialled to identify the most efficient and effective ways of triaging risk (e.g. triage being conducted by admin staff compared to Fire Safety Advisors/Inspecting Officers).
- 3.2** Liaison and feedback from the Community Forum will be sought to understand the needs of our communities and if there are specific areas of risk that concern them.
- 3.3** The NFCC business safety checker will be utilised as part of the suite of self-service tools, the LFB are looking to enhance this capability through the acquisition of its own enhanced online business safety checker tool (funded by protection uplift grant funding).
- 3.4** A competent workforce within Protection that is suitably and sufficiently trained to audit high risk premises is required for the RBIP. Trained staff levels need to be linked to volume of work to enable specialist Protection staff to focus on the highest risk properties.

4 Evaluation

- 4.1** The NFCC have provided challenge and support throughout the project assisting in its development. The most recent peer review was 15 November 2022. We will continue this partnership beyond the implementation date in supporting the national development of RBIP's.
- 4.2** Data captured will include the number of all different interventions allowing us to measure the change to risk level and the intervention type, from self-service tools to physical audits. Additionally, the risk score of a premises may not remain static, and it will be expected that risk scores (and revisit/intervention periods) will be adjusted following successful interventions by LFB.
- 4.3** Statistical data will be utilised to measure whether the RBIP has resulted in reducing risk and increasing the reinspection periods for a range of premises.

- 4.4** LFB staff will conduct customer surveys following interventions to provide quality assurance.
- 4.5** There is an internal Quality Assurance team that currently undertakes 'level 1' assurance work. Engagement is underway with Service Delivery Assurance within LFB – subject to exploratory work, level 2 assurance may also be implemented around this work.
- 4.6** Evaluation of the RBIP will take place after 3, 6 and 12 months and will consider staffing levels assigned to the RBIP (as highlighted by the HMICFRS), progress against the inspection programme and local team plan and different ways of working (e.g. methods of triage).
- 4.7** The following summary identifies the evaluation to be undertaken:
- 3 Months: Report on outcome of risk prioritisation pilot feeding into internal learning loop. Review resourcing (staff and systems/processes) against volume of work³.
 - 6 Months: Assessment of Farynor and the impact of completing risk prioritisation interventions. Review resourcing against volume of work.
 - 12 Months: Project wholesale review linking in with NFCC and to confirm alignment. Review resourcing against volume of work.

5 Equality comments

- 5.1** The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 5.2** It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 5.3** The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 5.4** The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 5.5** Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

³ Also considering competency levels of available staff.

- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 5.6** The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 5.7** Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- tackle prejudice
 - promote understanding.
- 5.8** An Equalities Impact Assessment (EIA) has been completed and is regularly reviewed as part of the Project Management process to ensure all aspects of the project support Equalities, Diversity and Inclusion.
- 5.9** In addition, the Project Team have asked a representative of Organisational Development to include the Project's EIA as part of their Panel Process, where internal and external stakeholders can review and enhance the EIA.

6 Workforce comments

- 6.1** The project team have engaged with our staff throughout this process. Engagement has included in person and virtual meetings, staff survey and video messaging to provide opportunity for challenge and confirmation on a range of engagement platforms. Communication regarding the RBIP will continue throughout the project and beyond its delivery date. It is not anticipated that there will be any workforce implications for staff using the updated process.
- 6.2** The trade unions will be provided with this report.

7 Sustainability comments

- 7.1** This report discusses the advancement and use of online self-help tools for low-risk premises, which may have a positive impact relating to business travel and fuel usage.
- 7.2** This report does not introduce any significant sustainability impacts. Where new policies and/or corporate projects arise, they are subject to the Brigade's sustainable development impact assessment process.

8 Procurement comments

- 8.1** The recommended option raises no concerns from a Procurement perspective due to the anticipated spend being at or below the Commissioner's tendering threshold. If the spend exceeds this threshold we expect purchasing to be in accordance with Standing Orders.

9 Communications comments

- 9.1** The Communications Plan is divided into three phases: Before, during and after implementation. The Project Team have already started staff engagement and promoting the RBIP project by:
- Providing regular updates in Fire Safety News. Providing updates to Staff Briefings in person and on MS Teams,
 - Using MS Stream to provide updates, with a supporting MS Form to gather feedback and observations,
 - In person presentations and discussions with Prevention and Protection Teams,

- 9.2 The RBIP work must involve Prevention and Protection staff throughout the delivery of the project so that they can participate in its evolution as it is key to their work. The Project Team regularly update Protection Delivery Teams to receive feedback and comment on an informal basis, comments are logged within the project SharePoint folder to support future communication.
- 9.3 Looking forward, scheduled discussions are ongoing regarding wider LFB communication facilities, e.g., Yammer, Hotwire etc. this is with a view to promote continual awareness of the RBIP project across all departments within the LFB and relevant external partners both pre and post implementation.
- 9.4 The team have regular liaison with the CRMP team which will be in place up to and post the implementation of the project.
- 9.5 Contact has been made with the staff officer for the AC Fire Stations to plan the communication strategy for operational staff as fire stations are a key part in the intervention process involving FSC's within risk prioritisation.
- 9.6 The use of online digital tools and the development of future community engagement including feedback will be supported by utilising money set aside from the Protection uplift fund.
- 9.7 Online self-service tools will be developed so that we support communities to better understand our role, their duties and fire related risk. Protection staff will use a range of interventions to support our communities and be able to show that where evidenced, risk has been reduced.

10 National Fire Chiefs Council comments

- 10.1 The draft paper was shared with the NFCC on 14 November for peer review prior to the final draft for ODDB. Their review was returned with supportive comments regarding the direction the LFB are working.
- 10.2 The RBIP team have and will continue to regularly meet to discuss the RBIP process to confirm it links to the national guidance including any methodologies flowing from the Definition of Risk project when published in 2023.
- 10.3 The NFCC have suggested as part of the RBIP the LFB should give consideration to New Risk Groupings for Occupancies and potential for two strategies for 'risk based' approaches. This concept discusses splitting the RBIP into two separate priorities: The first is focused on identified and known 'Highest Risk' occupancies (as defined in NFCC guidance) with interventions specifically designed to monitor and maintain compliance at these properties. This should be resourced as a priority over an achievable period (for example 1- 5 years) based on specific risk factors, national guidance and available resources. The second priority will be focused on 'Unknown but potential/foreseeable risk' occupancies (for example shops with HMO's above as described elsewhere in this paper) and is resourced with any spare capacity after the 'known highest risk' programme mentioned above is properly resourced. The number of properties in this second priority is by definition currently 'unknown' - but in London is likely to be very large and current resourcing levels mean that this will take even longer to complete (for example 5 -10 years) if the strategic objective is an initial visit to all these properties to identify and reduce potential risk using both Protection and Operational crews. It will of course be possible to reduce this timescale if additional resources are provided but that is unlikely given competing priorities.

11 Financial comments

- 11.1 The Project Team have discussed the scope of any work required to the programme database (Farynor) with Terrie Gobind-Crooks. It is likely that there will be a cost implication for the proposed work, however, this is dependent on the output requirements of the flowcharts. A more accurate assessment of the database requirements will be known once the various iterations are progressed through by the working group. Marc Gibbons is working with Terrie Gobind-Crooks to confirm the required expenditure whilst identifying solutions to progress the relevant work within the database

company Farynor. It is anticipated that the Protection Uplift fund will cover the cost of any changes and therefore there will not be a requirement to increase the revenue budget, nor a requirement for capital funding.

11.2 The NFCC has confirmed that there will not be a cost to utilise the Business Safety Checker application. There may however be a licence agreement with an associated cost (to be confirmed) due to the sharing of data. This could potentially be funded through existing. However, circa £600k has already been successfully bid for from Protection Uplift Funding, part of which could be used to develop an LFB specific Business Safety Checker tool if required.

12 Legal comments

12.1 The London Fire Commissioner is the enforcing authority for the Regulatory Reform (Fire Safety) Order 2005 in Greater London (Article 25) and has a duty to enforce the Order (Article 26). To do so the LFC appoints Fire Safety Inspecting Officers with statutory powers (Articles 26 and 27) including to enter premises and require the production of written records. In carrying out these duties, the LFC must have regard to the statutory Regulators' Code made under the Legislative and Regulatory Reform Act 2006 which states at section 3 that regulators should base their regulatory activities on risk. The proposals in this report are to adopt risk-based responses to premises identified as non-compliant and are in keeping with these duties.

List of appendices

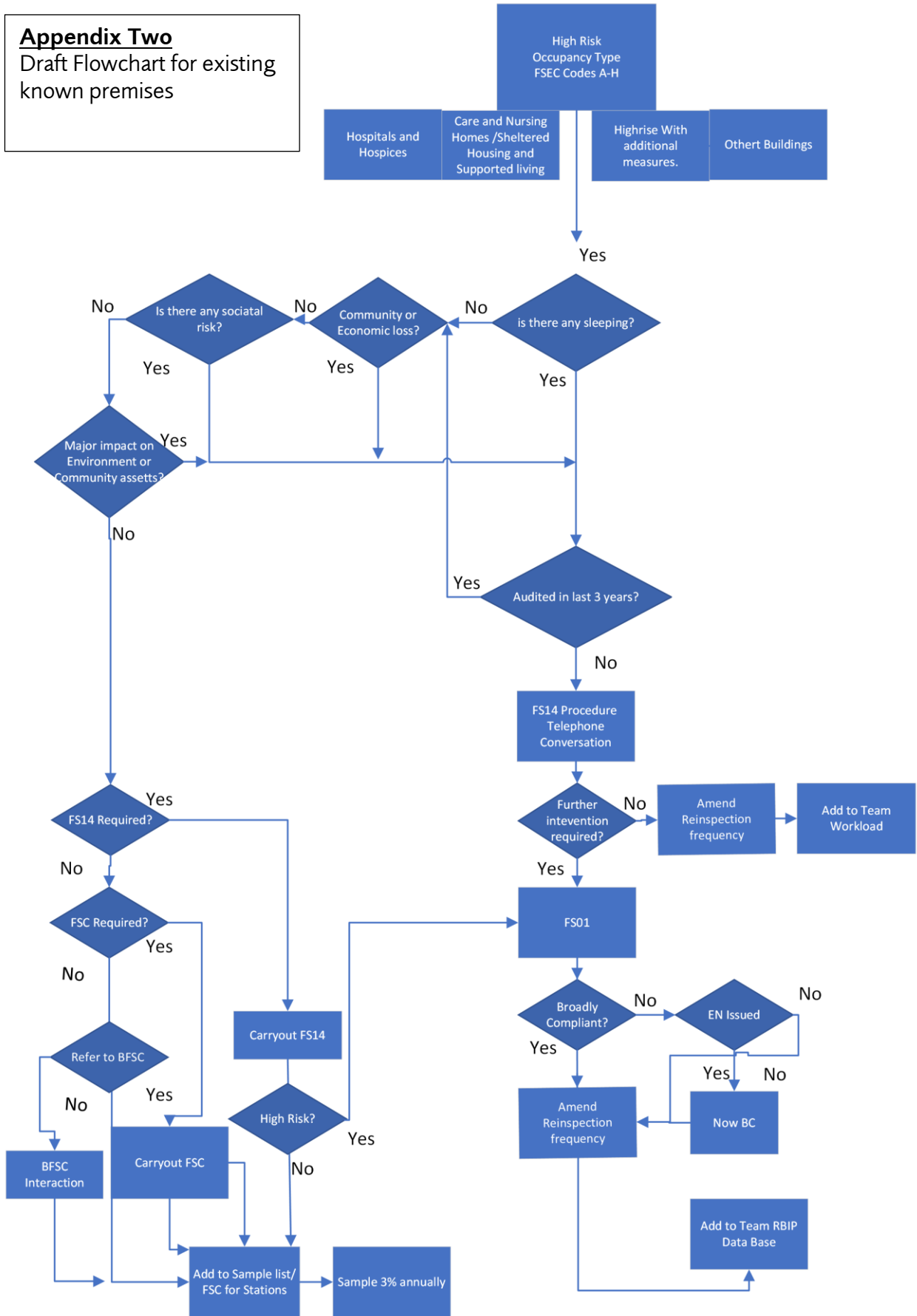
Appendix	Title	Open or confidential*
1	Higher Risk Occupancies - Preliminary Guidance V1 Published.docx	Open
2	RBIP Flowchart 8th October.vsd	Open
3	RBIP Past and Future Model.docx	Open
4	Equalities Impact Assessment	Open
5	Table 1 – Risk categories – impact and consequence	Open

Appendix One

Reference –

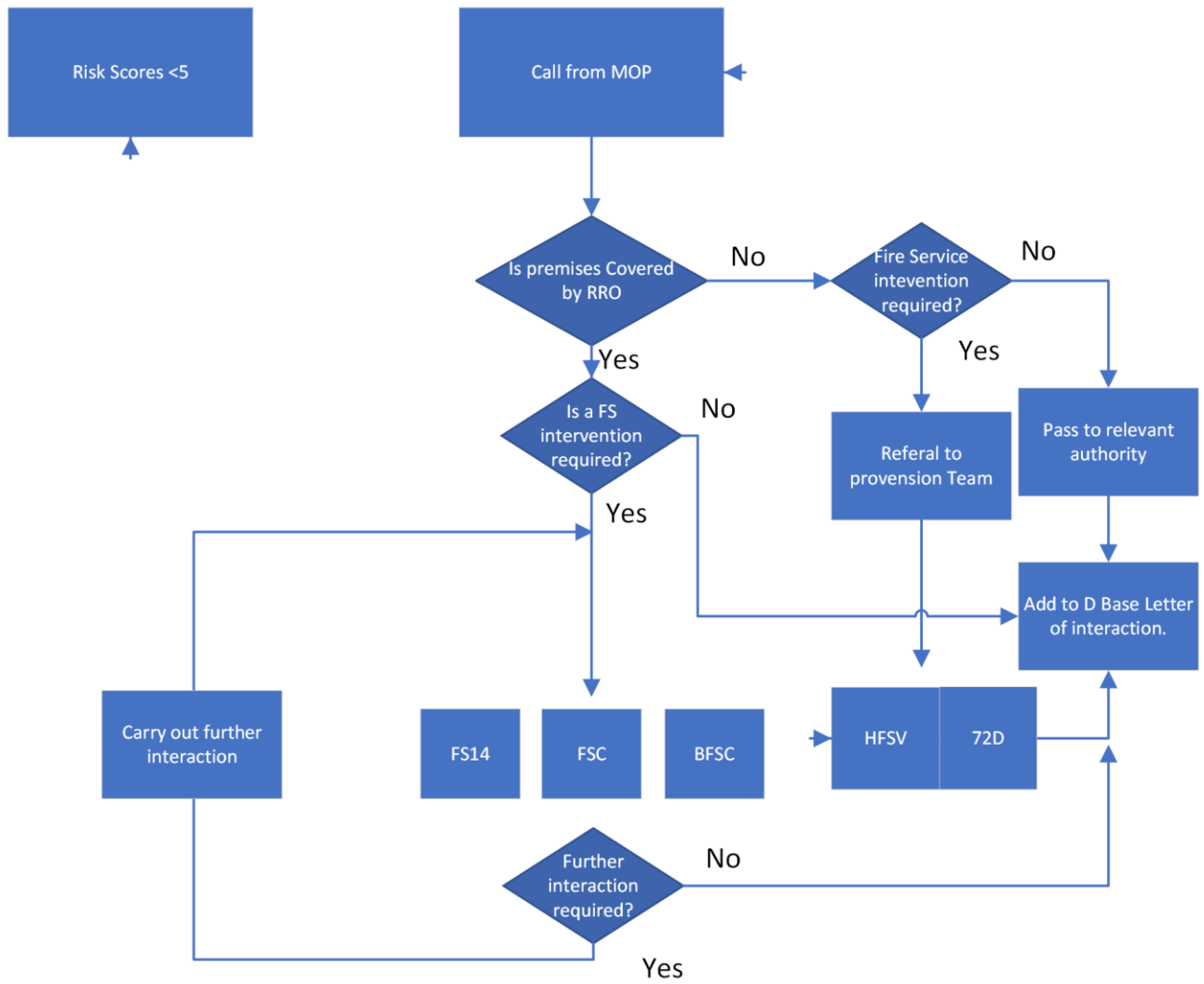
*Preliminary Guidance Technical Note
Higher Risk Occupancies*

Appendix Two
Draft Flowchart for existing known premises



- The (draft) flowchart supports the risk prioritisation process. The outcome supports the administrator in identifying the relative risk level and the process that best supports the building: Audit, FS14, sample pot (risk reduced to low risk), FSC, Business Safety Checker, HFSV.

Draft Flowchart for unknown premises



Appendix Three – RBIP background

The original RBIP was set up so that the Fire Safety Regulation (FSR) workload was divided as follows.



- Demand Led Work includes, but is not limited to Post Fire Audits, general enquiries from members of the public and Building Consultations.
- Active Risk Targeting is providing the relevant FSR response to intelligence from borough-based sources, e.g. a LFB Borough Commander may be provided with information on a premises, or group of premises, when meeting with local borough based multi-agency partners.
- Other Work includes all other FSR work not classed within the other areas and could include attendance at multi agency meetings.

Due to several factors the current workload is predominantly Demand Led (which may not be high or higher risk) with little or no opportunity to work on the other areas of work.



Reasons for this change include staff carrying out Building Risk Review inspections, the increased frequency of auditing the 1000+ high rise buildings with a changed evacuation strategy, supporting operational staff with the Fire Safety Check process along with London's ever changing, increasingly complex building environment. These factors, including externally influenced priorities, e.g. Home Office guidance for specific buildings and premises types has meant reduced capacity for RBIP and ART work.

This review of the RBIP will make FSR more efficient by targeting Higher Risk Premises and reducing Demand Led Work so the FSR workload will look more like this.



This review is concentrating on the two main areas: increasing efficiency and capacity to reach and interact with higher risk premises and unknown premises and to reduce work (to include all aspects of FSR work, e.g. consultations, not just audits) on lower risk premises.

The advantage being that more higher risk premises will be identified and interacted with reducing the possibility of an incident and reducing the impact and consequences if an incident does occur. There is a potentially higher reputational risk if an incident occurs at higher risk property that we have not interacted with as opposed to an incident at a low-risk premises that we have interacted with.

In this Paper we use the term 'intervention'. Traditionally Protection interventions have been based around physical audits carried out by Fire Safety trained Inspecting Officers. As part of this project all possible interventions will support how we can target higher risk more effectively and by using new and different ways of interacting with premises means

we have a wider scope and more capacity within our Risk Based Inspection programme, e.g. the Project Team would like to explore how Self-Help tools/a Business Safety Check tool (similar to the LFB's Home Fire Safety Checker) can be used as a means of triage and signposting.

The aim of this project is to carry out a thorough review of the LFB's current RBIP, and implement the findings, to ensure the LFB's future RBIP is current, flexible, and fit for purpose, including the HMICFRS observations which included.

- Staff were focusing on reactive work, not high-risk work.
- Decline in number of high-risk audits.
- LFB Risk Based Inspection programme, 2 years past review date
- Most staff understand the risk-based methodology
- No records of premises visited more than once
- No record of risk score changes
- No dates and reasons for risk score changes.

The Project Team are currently carrying out (or have carried out).

- Liaising with Chris Callow at NFCC regarding new guidance on Higher Risk Occupancies*. This guidance has highlighted that London has many thousands of buildings in scope, therefore making a risk-based triage process essential. The triage format will be a considerable amount of work for the Project Team as it will be based on the national definition of higher risk and due to the number of premises within the LFB area it is likely that an automated triage process may be required due to the resource implications of carrying out this manually.
- Following the NFCC three stage approach to reviewing RBIPs.
 1. Phase 1 - Review and explore principles underpinning inspection and associated activities
 2. Phase 2 - Review and explore potential 'inspection programme models' based on their value to risk reduction, enforcement and efficiency
 3. Phase 3 – Review principles underpinning 'inspections' and content for updated guidance
- Review of data available on risk & historical LFB documentation.
- Met with DAC Norman regarding risk scoring work in East Sussex FRS/the South East region/NFCC and to identify best practice and reclassification of risk. The proposals are aligned with the NFCC Higher Risk Occupancies* guidance document, samples of the definitions are used below. DAC Steve Norman's approach is at a strategic level of risk appraisal, which includes the operational and fire safety delivery across East Sussex. This report uses the 6 categories of risk from his findings, to use in the triage process, as a toolkit.
- Review of DAC Norman's East Sussex/NFCC work and how to incorporate into LFB project.
- Review of Higher Risk Occupancies from NFCC*.
- Staff engagement through questionnaire around RBIP
- Collect, understand and integrate staff feedback into the project.

* NFCC Higher Risks Occupancy guidance note is the NFCC's Preliminary Guidance Technical Note-Higher Risk Occupancies-Preliminary Guidance and Relative Priorities for Risk Based Inspection Programmes and other Protection Activities.

Appendix 4 – Equality Impact Assessment

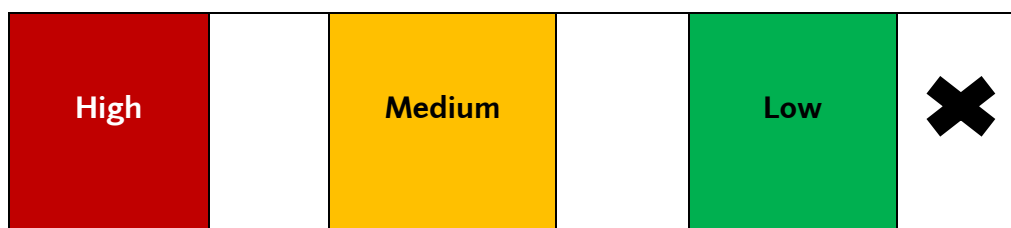
The **purpose** of an EIA is to give **as much information as possible** about potential equality impacts, to demonstrate we meet our **legal duties** under the Equality Act 2010.

Please read the EIA Guidance [on Hotwire](#) before completing this form.

1. What is the name of the policy, project, decision or activity?

Review of the Risk Based Inspection Programme

Overall Equality Impact of this policy, project, decision or activity (**see instructions at end of EIA to complete**):



2. Contact details

Name of EIA author GC Mark Reed

Department and Team FSR Delivery

Date of EIA 12/05/2021 (Last monthly review 20/09/2022)

3. Aim and Purpose

What is the aim and purpose of the policy, project, decision or activity? To carry out a full review of the Fire Safety Risk Based Inspection Programme to see if it is still fit for purpose and to see where it can be adapted to support a larger number of risk-based inspections to higher risk premises.

Who is affected by this work (all staff, specific department, wider communities?)
Protection Fire Safety staff.
 This will be predominantly staff based in Fire Safety Protection Delivery however staff from across the LFB may need to reference and use the findings.
Our communities who live and work in higher risk premises.
 If the Risk Based Inspection Programme changes, some premises may no longer be part of our re-inspection schedule, or the frequency of inspection will be decreased. These premises may be used by our communities with protective characteristics. However, this review will be looking at ways we can target and audit higher risk premises more effectively so

	more higher risk premises, and those premises identified by borough-based colleagues and other agencies, can be audited.
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4. Equality considerations: the EIA must be based on evidence and information.

<p>What consultation has taken place to support you to predict the equality impacts of this work?</p>	<p>Support has been provided in this EIA by Shilla Patel.</p> <p>This EIA is a working document and will be reviewed monthly throughout the project. Shilla Patel, along with colleagues in the Inclusion Team, have asked to be kept updated as the project progresses so they can provide the relevant guidance, advice and support with the EIA for this project.</p> <p>No further consultation has taken place at this time.</p>
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5. Assessing Equality Impacts

Use this section to record the impact this policy, project, decision or activity might have on people who have characteristics which are protected by the Equality Act.

Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
Age (younger, older or particular age group)	Neutral	Due to the nature and content of this project the information may be quite complex and challenging. The content needs to be reviewed to ensure that the content is understandable by the end reader.	GC Reed, whilst carrying out initial pre project work found supporting documentation 'heavy going' and it needs dedicated time to read, assimilate and understand.
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Positive	Linked with the reason above all communications and documentation need to be in a format to be understood. Once communications and documentation are ready to be released, they will be proofread by a third party to see if any adjustments, formatting, colours etc. need to be included. Advice and support with this will be requested from the Learning Support Team. All electronic communications and documentation will be provided in a format that provides the reader to 'zoom' in and out.	This is based on normal working practices.
Gender reassignment	Neutral	This is a gender-neutral project and gender-neutral language will used in all	This is based on normal

(someone proposing to/undergoing/undergone a transition from one gender to another)		communications and documentation, where required. If any legal documentation is used or quoted then the legal gender definition will be used, if required.	working practices.
Marriage / Civil Partnership (married as well as same-sex couples)	Neutral	This project should not impact this protected characteristic.	This is based on the Project Manager's experience of this area of Fire Safety. If staff with this protected characteristic are impacted then this will be factored in when regularly reviewing this EIA as the project progresses.
Pregnancy and Maternity	Neutral	This project should not impact this protected characteristic.	This is based on the Project Manager's experience of this area of Fire Safety. If staff with this protected characteristic are impacted then this will be factored in when regularly reviewing this EIA as the project progresses.
Race (including nationality, colour, national and/or ethnic origins)	Neutral	This project should not impact this protected characteristic.	This is based on the Project Manager's experience of this area of Fire Safety. If staff with this protected characteristic are impacted then this will

			be factored in when regularly reviewing this EIA as the project progresses.
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Neutral	This project should not impact this protected characteristic.	This is based on the Project Manager's experience of this area of Fire Safety. If staff with this protected characteristic are impacted then this will be factored in when regularly reviewing this EIA as the project progresses.
Sex (men and women)	Neutral	This is a gender-neutral project and gender-neutral language will be used in all communications and documentation, where required. If any legal documentation is used or quoted then the legal gender definition will be used, if required.	This is based on normal working practices.
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral	This is a gender-neutral project and gender-neutral language will be used in all communications and documentation, where required. If any legal documentation is used or quoted then the legal gender definition will be used, if required.	This is based on normal working practices.

6. Impacts outside the Equality Act 2010
What other groups might be affected by this policy, project, decision or activity?
Consider the impact on: carers, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, autism, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.

This project will have a positive impact for LFB staff as it aims to provide a more user-friendly Policy and Procedure by reducing and removing any difficult to understand fire safety specific language.

If the Risk Based Inspection Programme changes, some premises may no longer be part of our re-inspection schedule, or the frequency of inspection will be decreased. These premises may be used by our communities with protective characteristics. However, this review will be looking at ways we can target and audit higher risk premises more effectively so more higher risk premises, and those premises identified by borough-based colleagues and other agencies, can be audited.

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)

How does this work help LFB to:

Eliminate discrimination?	Ensuring all staff understand the progress and results of this project will ensure all staff have the same opportunities to understand and use the findings so no group will be discriminated against.
Advance equality of opportunity between different groups?	As the communications and documentation will be a standardised accessible to all format, all groups will have the same information provided in the same way so there will be no barriers to equality of opportunity.
Foster good relations between different groups?	As all groups will be able to understand and implement the findings and be provided with the same information there will be no barriers between groups.

8. Mitigating and justifying impacts

Where an **adverse** impact has been identified, what steps are being taken to **mitigate** it? If you're unable to mitigate it, is it **justified**?

Characteristic with potential adverse impact (e.g. age, disability)	Action being taken to mitigate or justify	Lead person responsible for action
Disability	<p>The content needs to be reviewed to ensure that the content is understandable by the end reader.</p> <p>Once communications and documentation are ready to be released, they will be proofread by a third party to see if any adjustments, formatting, colours etc. need to be included.</p> <p>All electronic communications and documentation will be provided in a format that provides the reader to 'zoom' in and out.</p>	GC Reed

Gender reassignment	<p>All communications and documentation will be gender neutral, where required.</p> <p>If any legal documentation is used or quoted then the legal gender definition will be used, if required.</p>	GC Reed
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Now complete the RAG rating at the top of page 1:

High: as a result of this EIA there is evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

Medium: as a result of this EIA there is potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the actions identified in box 8 above.

Low: as a result of this EIA there are no adverse impacts predicted. No further actions are recommended at this stage.

Appendix 5

Table 1: Impact/Consequence Risk Categories

	Impact/Consequence Risk Categories					
Fire Risk/Impact	Individual Fire Risk	Societal Fire Risk	Firefighter Fire Risk	Environmental Fire Risk	Heritage Fire Risk	Community Fire Risk
Definition	The potential, in a fire situation, for the death or injury of an individual or group within a single fire compartment e.g. occupants of a flat, house	The potential, in a fire situation, of death or injury of individuals or groups in multiple compartments due to the fire not being contained to compartment of origin e.g. fire spread through voids or external wall systems.	The potential, in a fire situation, for the death or injury of a firefighter due to the hazardous items or processes contained within a premises, complex layout or where firefighters are unable to use their normal safe systems of work and require an adapted tactical firefighting plan for the premises.	The potential, in a fire situation (or other incident), for a fire to negatively impact the environment in the immediate or wider vicinity of a premises through the involvement of environmental hazards in a fire or the firefighting interventions required to extinguish the fire e.g. foam, water, controlled burn.	The potential, in a fire situation, for the partial or total loss of items, premises or sites of heritage value through their heritage listing or otherwise historic value.	The potential, in a fire situation, that the impact of that fire on the local or wider community is significant. This may be linked to public risk perception, sense of wellbeing, mental health, financial position, loss of public services, social interaction, political and media impact etc. e.g. loss of a school or hospital.
FRS Intervention	Prevention, Education	Protection, Education	Response, Education	Response /Specialist /Partner / Education	Protection /Response /Partner / Education	Bespoke intervention / Education
Description	The personal safety of persons other than firefighters, or other emergency responders working under the direction of the Fire and Rescue Services, who may be directly affected (fatalities, injuries, illness, or injury or damage to health) or indirectly affected because of the strain on the health service.	The personal safety of persons other than firefighters, or other emergency responders working under the direction of the Fire and Rescue Services, who may be directly affected (fatalities, injuries, illness, or injury or damage to health) or indirectly affected because of the strain on the health service.	The direct impact on the safety of firefighters (or other emergency responders working under the direction of the Fire and Rescue Services) who may be affected. Encompassing fatalities, injuries, illness or injury or damage to health.	The consequences from an onsite event which would result in contamination or pollution of land, water or air with harmful biological / chemical / radioactive matter or oil, flooding, disruption or destruction of plant or animal life.	Recognition of the value placed by society on the site's cultural and historic presence as part of the fabric of the national and local community. Encompassing where possible the net economic cost, including both direct (e.g. loss of artefacts, goods, buildings, structures, etc) and indirect (loss of business, tourism, etc) costs.	Encompassing the social consequences of an event, including availability of social welfare provision; disruption of facilities for transport; damage to property; disruption of the supply of money, food, water, energy, or fuel; disruption of an electronic or other system of communication; homelessness, evacuation, avoidance of behaviour; and public disorder due to anger, fear, and / or lack of trust in the authorities.
Legislation & Guidance	Prevention Standard IRMP Steering Group Integrated Risk Management Planning: Policy Guidance Community Safety Dwellings – Proof of Concept Report Community fire safety strategies. www.communities.gov.uk/fire/safety/pr	Protection Standard IRMP Guidance Note 4 NFCC Higher Risk Occupancies Paper	Fire and Rescue Service Operational Guidance - Operational Risk Information Provision of Operational Risk Information System (PORIS)	IRMP Steering Group Integrated Risk Management Planning: Policy Guidance Environmental Protection	IRMP Steering Group Integrated Risk Management Planning: Policy Guidance Protection of Heritage Buildings and Structures National Heritage Act 1983	

	evention/firesa fetytoolbox					
	Dwellings – Proof of Concept					
High Risk	<p>Single private dwellings with:</p> <p>People with Mobility, Cognitive or Sensory Impairment in flats (including supported living and sheltered accommodation), houses and HMOs</p> <p>People already in receipt of care package in flats (including supported living and sheltered accommodation), houses and HMOs</p> <p>People who smoke in flats (including supported living and sheltered accommodation), houses and HMOs</p>	<p>High Dependency Occupancies such as Care Homes, Specialised Housing, Supported living</p> <p>18m + High rise residential identified by BRR as high Risk (SE)</p> <p>Hotels above 11m (unfamiliar sleeping) risk</p>			Grade 1 Listed ?	<p>Critical National Infrastructure</p> <p>Municipal waste sites.</p> <p>Archive storage?</p>
Medium Risk	<p>People who live in flats</p> <p>People who live in houses with floors over 4.5m</p>	<p>11m + Medium Rise identified as higher risk and SE</p> <p>Hotels below 11m (sleeping unfamiliar)</p> <p>HMO above 3 floors</p>				
Low Risk	<p>People who live in houses</p>	<p>Primary Authority Partner premises*</p> <p>Low rise purpose built blocks of flats</p> <p>HMOs 3 floors and below.</p>				
Partners	<p>Local Authority</p> <p>Housing Providers</p>	<p>Primary Authority partners</p>		<p>Environment Agency</p> <p>Local Authority Environmental Health</p>	<p>English Heritage (Historic Buildings and Monuments Commission for England)</p> <p>National Trust</p> <p>Royal Palaces Salvage Team</p>	<p>Bespoke partners dependent on premises type.</p>

Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: **NO**