



LONDON FIRE BRIGADE

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**Freedom of Information request reference number:** 7764.1

**Date of response:** 07 August 2023

**Request:**

*14 West Street, Bromley, BR1 1RF*

- 1. Is the Senior Fire Safety Officers report in existence regarding the PN (Prohibition Notices) for 14 West Street - issued on the 9th of June 2021?*
- 2. Confirm the purpose of a fire safety audit?*
- 3. Confirm what the risk score refers to within an audit document?*
- 4. Can you explain how the brigade uses the risk scores and provide the tool that translates these scores? Translate the risk scores for EN1 and EN2 regarding 14 West Street and what determiner it provides?*

**Response:**

Please see our response to each of your queries in turn as below:

- 1. Is the Senior Fire Safety Officers report in existence regarding the PN (Prohibition Notices) for 14 West Street - issued on the 9th of June 2021?*

Yes, there is a fire safety inspection report (i.e., "at scene contemporaneous notes") from a visit on 9 June 2021 to 14 West Street, Bromley, BR1 1RF. However, this report is exempt from disclosure under the Freedom of Information Act.

As the information you have requested is part of a criminal investigation, the [FOIA exemption s.30 - Investigations and Proceedings – is engaged](#). Section 30(1)(a)(i) states "Information held by a public authority is exempt information if it has at any time been held by the authority for the purposes of an investigation which the public authority has a duty to conduct with a view to it being ascertained whether a person should be charged with an offence".

Releasing the information, you have requested under the Freedom of Information Act means that the information concerned is released into the public domain; we publish FOIA responses on the Brigade's disclosure log on the LFB website. We believe that the release of such information into the public domain may prejudice the criminal proceedings now underway.

[S.30](#) is not an absolute exemption, and we must consider the public interest test. Disclosure of the requested information could demonstrate to the public that the London Fire Brigade will actively investigate fire safety concerns following the issue of an enforcement notice. A public disclosure may provide assurance to the public that we take breaches of fire safety regulations seriously and will consider prosecution if necessary. However, a disclosure to the public may prejudice any future outcome of an investigation and would not be in the public interest. The fire safety report is very much material from a criminal investigation that is still being assessed by the Brigade with a view to a prosecution decision in due course (and same for any SFSO report made from it). We do not believe that potential evidence to support an investigation/prosecution should be published piecemeal. There is a real risk of prejudice to our investigative and regulatory functions if we were to put such information in the public domain. I believe that maintaining the exemption outweighs the disclosure of the requested information.

2. *Confirm the purpose of a fire safety audit?*

The attached Fire Safety Information & Guidance Note (FSIGN) 201 "*The Fire Safety Audit - overview of principles and enforcement actions*" explains the purpose of a fire safety audit.

3. *confirm what the risk score refers to within an audit document?*
4. *can you explain how the brigade uses the risk scores and provide the tool that translates these scores?*
5. *translate the risk scores for EN1 and EN2 regarding 14 West Street and what determiner it provides?*

I will deal with question 3, 4 and 5 together as they are all about risk scores. I attach a copy of the Brigade's Fire Safety Information & Guidance Note (FSIGN) 116 "*Relative Risk Level - calculation without audit*" which may be helpful. The risk score simply determines the recommended frequency of inspection by Brigade officers. It serves no other purpose.

We have dealt with your request under the Freedom of Information Act 2000. For more information about this process please see the guidance we publish about making a request [on our website](#).

**The Fire Safety Audit - overview of principles and enforcement actions.**

**FSIGN 201**

*Old Inst.: FSIGN 203, 204, 205  
Issue date: November 2022  
200 Series: Audit Process*

**Summary**

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in London.

This Note is intended for internal use, providing information and guidance on the principles and process of a fire safety audit, the application of enforcement outcomes and the relevant legislation including The Order.

This Note is one of a series produced by the Prevention and Protection Policy and Strategy Group to provide additional advice and guidance to officers and Fire Safety Teams on various subjects related to their role. Where appropriate this Note should be used for learning and staff development purposes.

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# 1 Introduction

- 1.1 This FSIGN provides an overview of the auditing principles to support Inspecting Officers (IO) and Fire Safety Advisors (FSA) to regulate premises under the [Regulatory Reform \(Fire Safety\) Order 2005 \(as amended\)](#) (The Order), any regulations made under article 24 of The Order, the [Regulators Code 2014](#) and the London Fire Brigade's (LFB) [Enforcement Statement](#) and [Service Standard](#).
- 1.2 The [Fire Safety Act 2021](#) (the Act) amends article 6 of The Order to clarify that for any building containing two or more sets of domestic premises, The Order applies to the building's structure, external walls, and any common parts, including flat entrance doors (FED). The external walls includes doors or windows in those walls and any attachments such as balconies.
- 1.3 The [Fire Safety \(England\) Regulations 2022](#) (the Regulations), made under article 24 of The Order, require the Responsible Person (RP) of multi-occupied residential buildings to take specific actions, depending on the height of the building, in addition to their existing duties under The Order.
- 1.4 This FSIGN also provides an overview on evaluating the overall fire safety standard of premises, applying the Enforcement Management Model (EMM) and the audit/enforcement outcomes.

## 2 Overview and principles of the Audit Process

- 2.1 The overarching objective of the audit is for the IO/FSA to identify and evaluate whether there are adequate general fire precautions in place at the premises to ensure the safety of relevant persons in case of fire.
- 2.2 There are two types of audit that an IO/FSA can undertake, the Full Premises Inspection and a Sampling Audit. Both types of audit consist of two parts which can be completed in either order by the IO/FSA dependent on their preference:
  - (i) Evaluation of the General Fire Precautions (GFPs) of the premises (i.e. a physical audit).
  - (ii) Evaluation of the fire safety management, maintenance, and arrangements.
- 2.3 A **Full Premises Inspection (FPI)** is a complete inspection of premises, particularly those housing vulnerable people, care premises, specialised housing, and purpose-built blocks of flats, to thoroughly evaluate the fire safety arrangements. IO/FSA should carry out a thorough inspection of the premises, including a visual inspection of the compartmentation and separation, and a detailed evaluation of the GFPs. This evaluation should include a detailed analysis of the management systems, the fire risk assessment, the evacuation strategy and emergency evacuation plan, any maintenance and training records, any external wall systems report and the firefighter access and facilities. IO/FSA should pay particular attention to the suitability of the evacuation strategy, especially the numbers of staff available (both during the day and at night) and their training to support the strategy. Further attention should be given to the fire detection and alarms system where zonal plans should be compatible with the system details. Any ancillary equipment added to the system should be checked for correct operation and suitability for the premises type. See paragraphs 4.34 to 4.39 for further details on the FPI process.
- 2.4 A **Sampling Audit (SA)** is an audit of simple low risk premises where persons in the building are typically 'awake familiar or awake unfamiliar' (e.g. small shops, offices, or industrial units with non-complex means of escape and simultaneous evacuation). IO/FSA should make an initial

evaluation of the measures taken to reduce risk and to ensure that relevant persons are 'safe enough' in case of fire and that the RP has complied with their duties under The Order.

**NOTE:** Simple premises may range from low to high risk dependent upon the use, management, and maintenance of the premises. Where the premises is high risk, IO/FSA should determine whether a more detailed audit is required.

- 2.5 The IO/FSA should satisfy themselves through professional judgement that the quality of the GFPs and fire safety arrangements are within tolerable limits as recognised by benchmark guidance. If the evaluation of fire precautions during a sampling audit reveals deficiencies that place relevant persons at risk, risks to people in case of fire, IO/FSA should consider if an FPI would be appropriate.

### 3 Categories of Audits

- 3.1 There are three categories of audit: Planned, Urgent and Demand Led. To ensure accurate recording and reporting of audits carried out by Prevention and Protection, IO/FSA must ensure that the correct audit category is always used. The categories are defined as follows (See [S200 FS01 procedure](#) for more information):

#### Planned Audits:

- 3.2 Two types of planned audits:

**Programmed Audits** are carried out based on LFB risk-based inspection programme (RBIP), which is generated by the Farynor system based on 'premises risk scores' arising from previous audits or applied by admin.

**HQ Directed or Area Team Active Risk Targeting (ART) audits** are audits involving premises types identified by Prevention and Protection Management, AFSMs or TLs as requiring specific targeting due to a particular type of risk, local knowledge, or emerging trends. For example, residential buildings above shops/commercial premises or ductwork fires in restaurants or takeaways.

#### Urgent Audits:

- 3.3 These are audits that should be done as a matter of urgency following receipt of information about an Alleged Fire Risk (AFR) in a premises (i.e. complaint from member of public, referral from local fire station) (See [FSIGN 423](#)), or the issue of an article 31 Prohibition/Restriction Notice outside of office hours. Other examples include, post fire/incidents (See [FSIGN 206](#)), response to enforcement activity or due to a temporary change to an evacuation strategy in blocks of flats etc.

#### Demand Led Audits

- 3.4 Audits carried out on demand, following internal or external notifications, or referrals about risk that are determined as non-urgent. Examples include, station notification forms, unwanted fire signals, audits in response to fire safety checks by fire stations (See [PN 875 'Visual audit including fire safety checks'](#) for more information) and 'reactive audits'.

**NOTE:** An IO/FSA can only raise 'Reactive Audits' on an ad hoc basis whilst out onsite, where they identify premises that may have potentially higher risks, which justifies an immediate audit to reduce risk. For example, a sleeping risk above commercial premises where the IO/FSA has noted separation concerns between them.

## 4 Auditing

### Pre-Audit Checks

- 4.1 Before undertaking an audit, IO/FSA should carry out several pre-audit checks. Please note the following list is not a definitive list and IO/FSA should determine which pre-audit checks are appropriate for the premises, except where checks are marked as must.
- 4.2 The IO/FSA must check the [Primary Authority Register website](#) to determine if the premises is in the Primary Authority scheme. If there is a partnership in place, IO/FSA must check for any Primary Authority Advice and/or Inspection Plans. These documents must be considered in relation to the audit and any proposed enforcement action. All reasonable attempts should be made to arrange an appointment prior to auditing premises in a Primary Authority partnership. See [FSIGN 610: Primary Authority \(Partnership\) Schemes](#) for further information.
- 4.3 The IO/FSA must check if an Operation Risk Database (ORD) entry and/or an Electronic Premises Information Plate (e-PIP) has been created for the premises. The information held by these databases should be confirmed during the audit, and any discrepancies or errors noted should be brought to the attention of the local Fire Station using the station notification process detailed in [FSIGN 113](#). See [PN 800: Management of Operational Risk Information](#) for more information.
- NOTE:** Any ORD or E-PIP entry can be found using [IMapping](#), by searching the premises address: clicking 'what would you like to do?'; 'Map Features'; 'Operation Risk'.
- 4.4 The IO/FSA should also check Farynor and the Fire Safety Portal (eFSF) to confirm the following:
- Name and contact details of the RP and/or duty holder (DH).
  - Company address (particularly if a national or multi-site company).
  - Detail of any fire protection measures, firefighting facilities, fire engineered solutions.
  - Detail of any enforcement history, alterations, or prohibition notices.
  - Any operational risk information e.g. previous station notification forms.
  - Lone worker risks e.g. abusive behaviour by RP, premises linked with criminal activity etc.
  - Records of the design and materials in external walls, and copies of the floor and building plans for high-rise residential buildings (HRRB) as required by the Regulations.
- 4.5 Check the Information Management System (IMS) for relevant incident information.
- 4.6 Check previous Operational and Fire Safety involvement at the premises using [IMapping](#) such as fires, special services, false alarms, fire safety checks, HFSV details, station visits, hydrants, listed building status etc. IMapping also has a measuring tool to size the premises and other useful information. IO/FSA should use the previous 3 years data from the date of the audit.
- 4.7 Check the [Care Quality Commission](#) for registered care homes and hospitals, [Companies House](#) for the RP details and the [National Heritage List for England](#) or [IMapping](#) for details on listed buildings.
- 4.8 For post fire/incident audits, IO/FSA should, where available, check any Senior Fire Safety Officer (SFSO) or Fire Investigation reports, as these may provide relevant information that should be reviewed as part of the audit. For example, what failed in the evacuation process that resulted in rescues or issues with access or equipment that delayed firefighting operations.

### Making appointments for Audits

- 4.9 Wherever possible IO/FSA should book appointments for audits at premises. This may be critical if there are security/privacy measures (e.g. in specialised housing, healthcare, banks etc.), or

where there are infection prevention control measures (e.g. care homes or hospitals). Unannounced visits at these premises may cause security issues or the relevant staff member(s) may not be onsite to assist during the audit. Appointments enable the RP or onsite representative (OSR) to gather all relevant documentation and provide access to the premises.

**NOTE:** Some housing providers are removing the 'Drop Lift Key' entry to blocks of flats due to security concerns. Therefore, access may be restricted.

- 4.10 Audits can be carried out as an unannounced visit, where necessary, at short notice, or if it is suspected that persons may be at risk. When unannounced visits are made, IO/FSA should consider the activities of the premises. For example, it may not always be practical to audit a restaurant during busy lunchtime serving hours.
- 4.11 Any IO/FSA that does not have a warrant card, does not have powers of entry under article 27 of The Order. Therefore, they will need to make an appointment and be invited onto the premises.

### **Audit not possible**

- 4.12 Where IO/FSA are unable to audit the premises, they should complete a Gen 1 form and upload it to the case file. The job sheet on the Workload app should be completed as below:
- (i) Vacant Premises.  
Time spent recorded at steps 40.00, 40.10 and 40.20. The premises must then be recorded as vacant/unoccupied in accordance with [FSIGN 115: RRL System](#).
- (ii) Other Enforcing Authority (e.g. single private dwellings or Crown premises).  
Time spent recorded at steps 40.00 and 40.10 and the audit cancelled at step 40.99.

### **Refusal of Entry**

- 4.13 If an occupier refuses an IO/FSA entry for valid reasons, a further appointment should be made. If the occupier appears to be obstructive without valid reason, or becomes abusive or aggressive, IO/FSA should confirm their powers under article 27 of The Order, referring to their warrant card and outlining their powers of inspection. If the occupier continues to be obstructive the audit should be terminated, and the occupier informed that they are committing an offence under The Order, which means they could be liable for prosecution.
- 4.14 The IO/FSA must then:
- Make contemporaneous notes in a legal notebook including the time, date, address of premises, name, role and description of the person obstructing the audit, name of any witnesses, detail of what was said and done by the IO/FSA and person obstructing the audit.
  - Place a note in the lone worker risk field on the audit form or on Farynor.
  - Notify the Team Leader (TL) or Deputy Team Leader (DTL).
  - Consult with Central Regulation Enforcement Group (CREG).

### **Commencing an audit**

- 4.15 Audits should begin with the IO/FSA identifying themselves and producing their identification card and authenticated warrant. In multi-occupied premises, there may be several RP and/or representatives e.g. occupiers, building manager etc. that need to be aware of the visit.
- 4.16 The IO/FSA should inform the RP/OSR of the following:

- The purpose of the audit, including a brief reference to The Order, LFB role and the opportunity to provide advice and guidance. It should be made clear that it is not for the IO/FSA to carry out the FRA for the premises and that the responsibility for complying with The Order lies with the RP.
  - The scope of the audit and approximate duration. This can include an outline of what areas and/or systems are to be inspected/sampled, the required documentation to be viewed or sampled and with whom the IO/FSA may need to speak to.
- 4.17 The IO/FSA **must** verify or enter the location/property/protection detail on the audit form:
- For previously audited (i.e. known) premises, the location/property/protection detail may be pre-populated. The IO/FSA must check this information is correct and make amendments where necessary.
  - If changes are required to the address, alias address or enforcement history, IO/FSA should notify FSR admin via the 'notes to admin' field on the audit conclusion page.
  - For previously unaudited (i.e. unknown) premises, the location/property detail and contact fields will be blank. The IO/FSA must gather this information and enter it on the audit form.

## Auditing

### Part 1 – Evaluation of General Fire Precautions

#### Safety Critical Articles

- 4.18 The IO/FSA should assess the 'safety critical articles' of The Order on every audit. These are those considered most important to the safety of persons in case of fire. They are:
- Article 9: Fire Risk Assessment (FRA)
  - Article 11: Fire safety arrangements
  - Article 13: Fire detection and fire alarms
  - Article 14: Means of escape
  - Article 15: Emergency plan
  - Article 17: Maintenance
  - Article 21: Training
- NOTE:** In HRRBs article 38: Maintenance of Fire-fighter facilities, is also categorised as safety critical.
- 4.19 To assess the safety critical articles, IO/FSA should carry out a physical inspection of the premises (i.e. the physical audit). This gives IO/FSA the opportunity to sample and evaluate the GFPs. This includes, but is not limited to the following:
- Final exits and critical escape routes e.g. corridors, staircases, and external routes.
  - Fire doors, fire stopping and compartmentation that supports the evacuation strategy.
  - Higher risk areas such as kitchens, electrical intake rooms or other rooms with significant fire loading / ignition sources or storage of dangerous substances etc.
  - Capacities/areas of significant public gathering e.g. halls, bars, dance floors, auditoriums.
  - The exit capacity is adequate for maximum numbers.
  - Fire safety systems such as suppression systems, fire detection and fire alarm systems, smoke control, evacuation lifts, automatic door release mechanisms, etc.
  - The storage or charging of electrically powered vehicles e.g. mobility scooters, e-scooters, cars etc.
  - Display of fire safety instructions in multi-occupied residential buildings.



- 4.20 In addition to the above, the following should also be considered in premises containing one or more domestic premises as clarified by the Act:
- FEDs (where appropriate and safe to do so).
  - External wall systems and any attachments to those walls (e.g. balconies, solar shading devices, photovoltaic (solar) panels etc.)
  - Balconies and potential fire spread e.g. barbeques, fire loading, materials, smoking etc.
  - The buildings structure (e.g. timber frame, modern methods of construction etc.) or structural fire resistance e.g. any visual issues/defects to compartmentation and/or separation.
- 4.21 In multi-occupied residential buildings, IO/FSA should also assess compliance with the Regulations 2022 (See FSIGN 420 for more information).

### Relevant Optional Articles

- 4.22 Where premises have specific features that need auditing or where fire safety deficiencies not covered by the safety critical articles are noted, IO/FSA should extend the audit to assess the relevant 'optional article(s)' of The Order. They are:
- Article 8: General Fire Precautions (deficiencies not recorded under any other article).
  - Article 10: Principles of prevention to be applied.
  - Article 12: Dangerous substances.
  - Article 13: Firefighting equipment.
  - Article 16: Measures for dealing with dangerous substances.
  - Article 18: Safety assistance.
  - Article 19: Employee information.
  - Article 20: Information to employers.
  - Article 22: Co-operation and Co-ordination.
  - Article 23: General duties of employees at work.
  - Article 37: Fire-fighter switches.
  - Article 38: Maintenance of Fire-fighter facilities.
- 4.23 To assess the optional articles IO/FSA should audit the following (this is not an exhaustive list):
- Firefighting equipment.
  - Firefighting access & facilities e.g. rising mains, lifts, wayfinding, secure information boxes, evacuation alert systems, floor and building plans etc.
  - Dangerous substances.
  - Co-operation and co-ordination between RPs in multi-occupied premises.
  - Catering kitchen ductwork.
  - Fire separation between occupancy types.
  - The use of competence persons.
  - Information provided to outside undertakings e.g. contractors.
  - Alternative fuel sources e.g. photovoltaic (solar) panels, bulk energy storage systems etc.
- 4.24 Optional articles automatically default to 'not checked' or 'not applicable' on the audit form. IO/FSA are **not** required to mark optional articles 'broadly compliant' if they are not sampled.

### Physical Audit

- 4.25 The IO/FSA should physically inspect/sample sufficient GFP to satisfy themselves that relevant persons are 'safe enough' in case of fire. This will include **all** safety critical articles and any

relevant optional articles as appropriate. There is no need for the IO/FSA to audit all the premises in a sampling audit, only enough to determine compliance with The Order.

4.26 During the physical audit, IO/FSA should review the GFP and life safety systems and make observations in the relevant article fields of the audit form. Where an IO/FSA has doubt over the functionality of a life safety system they may ask the RP/DH to demonstrate it is in an efficient state, in efficient working order and in good repair. For example, closing fire doors with automatic hold-open devices to ensure they close fully into their frame or testing the operation of an automatic opening ventilation system.

4.27 The IO/FSA are not expected to test any fire safety systems themselves, if required this should be arranged with the RP. Where fire safety systems are found to be deficient, the IO/FSA should consider whether any interim measures are required.

**NOTE:** IO/FSA **must** record which areas they have sampled in the audit conclusion. This should be a list and not indicated as a percentage.

4.28 Where there is evidence of a poor fire safety standard and/or poor fire safety management during the audit of the safety critical articles (i.e. a number of deficiencies identified under the safety critical articles), IO/FSA should consider whether a FPI may be required that would include all the relevant optional articles and greater scrutiny.

## **Part 2 - Evaluation of fire safety management, maintenance, and arrangements**

4.29 A lack of management, maintenance and arrangements can cause safe conditions to deteriorate over time, meaning that safety in case of fire cannot be guaranteed. The purpose of auditing is to check that the GFPs (i.e. physical safety critical features, fire safety systems, staff training and fire drills) are, and will be, sustained.

4.30 To audit the fire safety arrangements, IO/FSA should question the RP/DH about the management systems in place e.g. testing and maintenance regimes, final exit and means of escape checks, how to report fire safety deficiencies and the emergency procedures etc. Questioning allows IO/FSA to determine whether the RP/DH has a good understanding of the fire risks and measures taken to mitigate these. IO/FSA may also wish to question staff to check staff training and their understanding of actions to take in case of a fire etc.

4.31 To further evaluate the fire safety management, maintenance and arrangements, IO/FSA should review all available documentation relating to fire safety, where recorded, to assess whether these documents demonstrate compliance with The Order and any regulations made under article 24. Such documents and records include:

- FRA.
- Fire Safety Policies or other related policies e.g. smoking/vaping policies.
- Staff training records and employees' capabilities (see [The Fire Safety \(Employees' Capabilities\) \(England\) Regulations 2010](#)).
- Fire evacuation drill logs.
- Personal Emergency Evacuation Plans (PEEPS) and Person-Centred Fire Risk Assessments (PCFRA).
- Testing, maintenance, service, or commissioning records of fire safety systems (e.g. emergency escape lighting, smoke control and firefighting equipment).
- Fire detection and fire alarm logbook, including management of false alarms (see [FSIGN 209 The Reduction of False Alarms and Unwanted Fire Signals](#)).

- Fire risk appraisal of external walls (FRAEW).
  - Catering Ductwork Post-Clean Verification of Cleanliness report.
  - Record of monthly checks of lifts and essential fire-fighting equipment (See the Regulations).
  - Contents of Secure Information Box e.g. name, address and contact of the RP, floor plans etc.
  - Checks and maintenance of fire doors include FEDs and associated hardware.
- 4.32 The IO/FSA should carry out a more comprehensive inspection of these documents and records when undertaking an FPI. All documents checked should be recorded in the relevant article's observations or the audit conclusion.
- 4.33 As it is not a requirement of article 17 or 38 of The Order to keep maintenance records, you may find on occasion that there are no documents to review. In these circumstances, questioning of both the RP/OSR is vitally important to ensure that maintenance and testing is taking place and by competent persons. This is the same for staff training under article 21.
- 4.34 Where documentation is not available onsite to review, IO/FSA should request these are e-mailed to them to be viewed via their mobile working device whilst at the premises. Where this is not possible, records should be assessed post audit and the RP contacted to discuss any issues.

### **Full Premises Inspection**

- 4.35 This should comply with all the details in Parts 1 and 2 above but in far greater detail than a SA and should include all relevant option articles as standard. During the physical audit, IO/FSA should inspect all accessible areas of the premises and carry out a detailed assessment and evaluation of the fire protection measures. The second part of a FPI involves a detailed evaluation and assessment of the GFPs, the FRA and the fire safety management, maintenance, and monitoring arrangements. These audits should be carried out with the RP or a site representative to provide access to all required areas and information.
- 4.36 With regard to the management arrangements, it is expected that the IO/FSA conducting the FPI will evaluate in greater detail the records of the systems in place, their testing and maintenance arrangements, and that these are reflected in the standards found by the IO/FSA, whilst auditing the physical features of the premises.
- 4.37 The emergency plan and evacuation strategy should be discussed at length to decide whether it is suitable, sufficient, and achievable given the premises type and the ability of occupiers to evacuate. Evidence should be seen that appropriate quality training and refresher training has been undertaken by the staff in this plan and that sufficient staffing levels will always be available to put the emergency plan into operation, especially when few staff are on duty, such as during night time hours.
- 4.38 The emergency plan and evacuation strategy should always be site specific and be detailed in the FRA as suitable for the premises, with a fire detection and fire alarm system and passive/active fire systems that supports the strategy. As part of their training, staff should be aware of the plan, the fire alarm system, the abilities/vulnerabilities of people, and the methods required to commence and complete evacuation if necessary. The detail of PEEPs and PCFRA's should also be inspected to ensure any specific measure for evacuation of an individual are able to be undertaken at all material times, such as, additional training on the use of evacuation equipment e.g. evacuation chairs, skids etc. As part of this detailed evaluation of the evacuation plan, staff should be questioned about their training, knowledge, and capability to put the plan into practice.

- 4.39 Appropriate resident engagement should be taking place and the residents should be fully aware of the evacuation strategy and how to evacuate in an emergency, whether the strategy is 'stay put', simultaneous evacuation, progressive horizontal evacuation or other.

**NOTE:** Reference should be made to FSIGN 421 and 422 and the checklists within, for additional detail in the undertaking of FPI in premises with vulnerable sleeping risk. [FSIGN 420](#) provides additional detail on auditing multi-occupied residential premises, including purpose-built blocks of flats, the Act, and the Regulations.

### **Audit Processing**

- 4.40 The IO/FSA must evaluate and 'score' each relevant article of The Order as part of the audit process. These can be scored as 'Broadly Compliant' where there are no or very low risks to relevant persons. Where fire safety deficiencies are identified that may place one or more persons at risk in case of fire, IO/FSA can score as either 'low risk' or 'high risk' depending upon the likelihood and severity of harm because of the deficiencies found.

**NOTE:** Some articles (e.g. article 15) are scored as 'compliant' or 'non-compliant'.

- 4.41 If the IO/FSA scores an article as low risk, high risk or non-compliant they must make sufficient observation notes against each article to assist them to evaluate the GFPs and determine any necessary enforcement actions. These notes also assist those vetting the audit.
- 4.42 Where deficiencies in the GFPs result in an IO/FSA scoring an article as 'low risk, high risk or non-compliant', the IO/FSA must enter the reason for failure and the remedy on the audit form, as these notes will form the Schedule for any informal or formal enforcement action. See [FSIGN 308: Enforcement Notice](#) for further information on drafting failures and remedies.

**NOTE:** Where the audit outcome is Level 1 Verbal Action, competent IO/FSA are not required to complete the failure and remedy sections on the audit form for any articles scored as low or high risk, as no schedule is needed. This is **only** acceptable, if the information relating to these failures and any recommended action is recorded elsewhere within the audit form, i.e. in the observation notes field for the article or in the audit conclusion.

- 4.43 The FSO1 Form has a feature ('set all too broadly compliant') that allows competent IO/FSA to score all safety critical articles as broadly compliant automatically. IO/FSA can **only** use it for simple, very low risk non-sleeping premises (for example small shops, offices or single industrial units), that have adequate means of escape, fire detection and fire alarm systems, no Unwanted Fire Signals and no significant deficiencies or risks to persons identified in the safety critical articles. When this feature is used, IO/FSA **must** provide a suitable and sufficient summary in the audit conclusion detailing why they deemed the premises broadly compliant.
- 4.44 To ensure the accuracy of the information gathered, all audits forms should be submitted for vetting or completed within 28 days from the date the audit, unless in exceptional circumstances agreed by the TL or CREG.

### **Safety Issues identified during an audit**

- 4.45 At the commencement of or during an audit if an IO/FSA finds themselves in a situation that they find uncomfortable or where they feel personally threatened, they should consider:
- Immediately removing themselves from situations that pose a threat to their personal safety.
  - Use their MySOS device or mobile telephone. See [FSIGN 119](#) for more information.
  - Contact their Line Manager to report the issues and seek guidance on any action required.

- Record Lone Worker risks (general site/specific premises) on the audit form.

### **Public safety issues identified during an audit**

- 4.46 IO/FSA must have an awareness of [PN 736 'Safeguarding of adults at risk'](#) and [PN 305 'Safeguarding of children at risk'](#), which contain referral paths for safeguarding issues and [PN 829 'hoarding'](#).
- 4.47 If an IO/FSA becomes aware of anyone who is at risk of abuse or neglect from themselves or others they have a responsibility to make a safeguarding referral via the [Person At Risk \(PAR\) form](#) as per the policies above.
- 4.48 Consideration should also be given to raising a welfare concern via the [Person At Risk \(PAR\) form](#) if the occupant has welfare needs e.g. no heating, no lighting, no food, vermin infestation etc.
- 4.49 If other public safety issues are identified (e.g. criminal/illegal acts, illegal house of multiple occupancy (HMO), inappropriate sleeping accommodation, potential modern slavery/abuse/poor working conditions) the IO/FSA should do the following:
- Consider personal safety and remove themselves from any situation that poses a threat.
  - Contact their TL/DTL to report the issues and seek guidance on any action required.
  - Contact the police or relevant authorities.
  - Use their MySOS device if they feel threatened.
- 4.50 Where appropriate IO/FSA should send a Station Notification form.
- 4.51 If an IO/FSA becomes aware of a resident whose behaviour/characteristics increase the risk of fire and/or make them less able to react to and/or escape from a fire, they should promote the benefit of a Home Fire Safety Visit (HFSV). These visits may be especially beneficial, where IO/FSA have concerns about fire spread from a resident's balcony (e.g. BBQs, smoking or fire loading) to which they do not have access to during an audit. IO/FSA should be aware that anyone is able to book an HFSV by completing the online form on the LFB website. See [PN 926 'HFSV - Management and Planning'](#) for more information.

### **Health and Safety Issues identified during an audit**

- 4.52 Where IO/FSA identify non-fire related health and safety issues during an audit, these should be reported to the relevant authority. Examples include inappropriate storage of explosives, fireworks, ammunition and/or black powder. IO/FSA should record any referral to another enforcing authority in the audit conclusion.

### **Evaluating Overall Fire Safety Standard and Audit Conclusion**

- 4.53 When an IO/FSA has completed both parts of an audit, they must evaluate the overall fire safety standard on the premises as either 'broadly compliant', 'low risk' or 'high risk'. This evaluation must take account how the safety critical and relevant optional articles are scored to determine the overall collective effect and impact of any deficiencies in the GFPs.

**NOTE:** The IO/FSA must record a justification for the overall fire safety standard selected in the audit conclusion, even when broadly compliant. Where they have included deficiencies to be included on a notice, they must why they are of the opinion it has contravened The Order.

**NOTE:** Where IO/FSA have scored any safety critical article as low risk, high risk, or non-compliant the 'overall fire safety standard' in the audit conclusion cannot be scored as broadly compliant.

- 4.54 Once the overall fire safety standard has been selected, the audit form will automatically calculate the 'Initial Enforcement Expectation' (IEE) based on the scoring detailed in [FSIGN 203](#) and Appendix 1 of FSIGN 420 for HRRB. The IEE gives an indication of the audit outcome and potential enforcement action.
- 4.55 The IEE should not change unless discussed with the TL/DTL or using the EMM. If the IEE is changed without application of EMM, IO/FSA should record the reasoning within the audit conclusion e.g. re-scoring an article or scoring an additional optional article.
- 4.56 When concluding an audit, the IO/FSA should discuss the following with the RP/OSR:
- The outcome and any verbal advice on risks, improving standards or business continuity.
  - Any immediate or remedial actions needed to remove, reduce or control identified risks.
  - Any potential level of any enforcement action generated by the IEE.
  - Agreed timescale for any remedial actions.
- 4.57 The IO/FSA should record the discussion with the RP in the audit conclusion and where possible, obtain a signature on the Audit Form. Where an audit conclusion meeting is not possible onsite, IO/FSA should contact the RP/OSR within 3 working days to discuss the outcomes of the audit. The IO/FSA should confirm the verbal advice via e-mail or by a 'FS01\_01: Premises Broadly Compliant Letter' to the RP within 10 working days of the audit.
- 4.58 The audit conclusion must contain details of what has been sampled/inspected by the IO/FSA during the audit i.e. areas checked (e.g. west staircase) and the reason for audit etc.

## 5 Enforcement Management Model and calculating the confirmed action

- 5.1 The Enforcement Management Model (EMM) allows IO/FSA to make consistent, reasonable, and proportionate enforcement decisions based on clear guidelines, which will be robust if challenged, and auditable. This tool allows IO/FSA to verify the IEE following an audit.
- 5.2 The EMM can be used to raise or lower the enforcement level if the IEE is, in the professional judgement of the IO/FSA, not appropriate given all the circumstances of the case as outlined below. The IO/FSA can alter the IEE outcome by one level after the application of the EMM, whereas TLs and CREG can raise or lower the enforcement by more than one level.
- 5.3 The application of the EMM is only to be used where the IEE is Level 2 and above. Where the IEE is Level 1 and an IO/FSA or TL deems it necessary to take informal or formal enforcement action, they should consider the risk against the scoring of the audit and rescore the relevant articles where appropriate to alter the IEE. Where an audit outcome deviates from the original IEE, the justification for this must be recorded in the audit conclusion.

**NOTE:** the "consider EMM" button located in the audit conclusion page of the audit form is a mandatory step and must be completed to progress all audits, even those that have a broadly complaint outcome. The reason the "consider EMM" button is still a mandatory step on broadly compliant audit outcomes is only due to the functionality of the audit app. When fire safety officers have a broadly compliant audit outcome, they are not to alter the IEE and should select and confirm broadly compliant in the "consider EMM" drop down list.

- 5.4 The EMM consists of two series of questions:
- Responsible Person Factors.
  - Strategic Factors.

## **Responsible Person Factors and Flowchart (see FSIGN 203 for details)**

- 5.5 The IO/FSA must consider the RP factors for audits that have an IEE of a level 2 NoD or above.
- 5.6 RP factors are specific to the RP and their activities e.g. the RPs attitude towards fire safety and history of incidents or enforcement action. They can be used to confirm the IEE or alter the enforcement level up or down by one level, e.g. from a NoD to an EN, or from an EN to NoD.
- 5.7 A management review meeting should take place between the IO/FSA and TL/DTL to discuss the application of the RP factors. The outcome of the management review meeting should be documented in the audit conclusion on the audit form.

## **Strategic Factors and Flowchart (see FSIGN 203 for details)**

- 5.8 The IO/FSA must apply the strategic factors for audits that have an IEE of a level 4 EN or above.
- 5.9 These are a range of strategic factors that may impact the final enforcement decision. IO/FSA must be satisfied that the IEE:
- coincides with public interest.
  - protects vulnerable groups (e.g. children, patients, and older persons).
  - achieves sustained compliance with The Order and reduces the risk to an acceptable level.
  - has a positive impact in social/political terms.
- 5.10 When considering public interest, IO/FSA and their TL/DTL must satisfy themselves 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. Some of the factors to be considered are detailed in LFB Enforcement Policy Statement. Every situation is unique and the public interest factors for and against a given enforcement activity need to be balanced.
- 5.11 Certain issues may have a significant bearing on public expectation e.g. fatal fires involving vulnerable groups such as children or older persons. While public expectation must be carefully considered, it should not determine the action taken.
- 5.12 A management review meeting should take place between the IO/FSA and TL/DTL to discuss the application of the strategic factors. The outcome of the management review meeting should be documented in the audit conclusion or management review field on the audit form.

## **Confirming the enforcement level and actions**

- 5.13 Once the EMM has been applied, the IO/FSA should tick the 'considered EMM' box and select the 'confirmed action' on the audit form. If the IEE is different from the confirmed action, the IO/FSA **must** enter a suitable justification in the pop-up field for raising or lowering the enforcement level.
- 5.14 The TL should review any audit that has had the enforcement level altered and the IO/FSA should set the audit form for TL review. This process confirms that the TL is satisfied with the comments in the audit conclusion regarding the management review meeting.
- 5.15 Before taking any enforcement action, IO/FSA must determine if the business is in the Primary Authority Partnership scheme, as this may affect the enforcement activity taken and/or the persons who need to be notified. See [FSIGN 610: Primary Authority Schemes](#).
- 5.16 The IO/FSA should not select 'confirm action' until they are satisfied with the score for each article; the score for the 'overall fire safety standard' and the EMM has been considered and applied. Once the action is confirmed, the audit form is locked against any further changes.

- 5.17 Where the application of the EMM or following a discussion with the TL/DTL changes the IEE, IO/FSA must inform the RP/OSR of the confirmed audit outcome and discuss potential timescales for any proposed enforcement action.

## 6 Audit outcomes and enforcement action

- 6.1 There are five potential audit outcomes, four of which result in a level of enforcement action. These audit outcomes are:

### Verbal Action – Level 1

- 6.2 Verbal Action is likely to be used in the following circumstances:
- There are adequate GFPs and relevant persons are at very low risk in case of fire.
  - The RP/DH is compliant or broadly compliant with The Order, but additional measures would further reduce the risk.
  - The RP/DH demonstrates a positive attitude to fire safety and agrees to take any minor remedial actions required.
- 6.3 IO/FSA must record why they are of the opinion that the premises are broadly compliant with The Order in the audit conclusion.
- 6.4 Verbal action is an important part of the audit process to assist the RP/DH to further raise fire safety standards and/or implement measures for the safety of firefighters. Any verbal advice given during an audit should be recorded in the relevant sections on the audit form.
- 6.5 Where verbal advice is given, IO/FSA should confirm this by e-mail or a FS01\_01: Premises Broadly Compliant Letter, detailing the advice, with a copy uploaded to the case file.
- 6.6 Due to the way Relative Risk Level (RRL) scores are rounded up/down, there are occasions when a 'Verbal Action' outcome does not make enough difference to reduce the RRL sufficiently to move the premises down the RRL matrix (FSIGN 115).
- 6.7 Taking the information written above into account, and the need for the Commissioner to demonstrate that its intervention activity is viable, the following applies: IOs and FSAs, when re-visiting premises as part of the programmed re-inspection process (or any other re-visit), should note the existing RRL score. Where, on auditing the premises, the new RRL is the same as the previous recorded outcome, this may not demonstrate that the intervention activity of the Commissioner has sufficient impact. Therefore, officers should, using their own professional judgement, consider lowering the RRL by at least 0.25, or to a level commensurate with the risk that the premises poses. This is to be agreed and sanctioned by the TL, and an RRL set that will ensure that the Commissioner can demonstrate that intervention activity is a viable method of reducing risk in London. Any reduction considered for an RRL must be maintained within its own FSEC Code.
- 6.8 Officers will record the new RRL, and the justification for this, in the 'Instructions to Admin' box on the electronic audit form. This will generate an email for admin to change the RRL on Farynor.
- 6.9 Following an intervention, if the RRL decreases below RRL 5, the premises would move to the sampling/monitoring area of the RRL matrix. In these circumstances, the property must be assessed against the 6 NFCC Risk Categories (Risk Prioritisation Process Appendix A)
- Societal
  - Individual
  - Community



- Firefighter
- Environmental
- Heritage

6.10 Where one or more of the above 6 risk categories has been identified, and where this risk cannot be further reduced by actions recommended by the Officer, the RRL should stay at level 5 to ensure that the premises remains in the Reinspection Programme. An explanation of this outcome will be recorded in the audit conclusion following discussion with the Team Leader.

### **Notification of Fire Safety Deficiencies (NoD) – Levels 2 and 3**

6.11 A NoD can be issued where IO/FSA identify deficiencies with the GFPs, where there is a low risk of harm to persons in case of fire. They can be used where the IO/FSA wants to provide a formal written record of the deficiencies.

6.12 IO/FSA must record why they are of the opinion that the deficiencies have contravened The Order i.e. the inclusion of a failing on a NoD needs sufficient justification.

6.13 There are two levels of NoD; a level 2 NoD can be issued for minor/less serious deficiencies with the GFPs, and a level 3 NoD for all other low risk deficiencies.

6.14 A NoD must be used in the following circumstances:

- To address less risk critical deficiencies in the preventative and protective measures or management arrangements.
- If the same or similar deficiencies were previously brought to the RP/DHs attention via verbal action and no action has been taken to rectify the deficiencies.
- Where IO/FSA has a lack of confidence that the RP will adequately address the deficiencies.

6.15 Follow-up re-inspections are not mandatory for NoDs, although IO/FSA can request follow-up visits where they deem them necessary, subject to a management review with the TL. NoD follow ups should be in accordance with the [S300-FS16 procedures](#).

6.16 Any NoD issued on a higher risk premises e.g. care homes, hospitals or HRRBs etc. must always be followed up. Follow ups are also recommended in low or medium rise purpose-built block of flats where the NoD includes compartmentation, FEDs, structure, or external wall systems.

**NOTE:** Follow-ups on NoDs in lower risk premises may be carried out with a desktop audit to check compliance.

**NOTE:** There may also be important information on NoDs that IO/FSA must take note of in the FSIGNs for specific premises. For example, [FSIGN 211: Auditing heritage premises](#), details the consultation process with the Local Authority Conservation Officer. Any NoD sent must be copied to the Conservation Officer.

### **Enforcement Notice (article 30) – Level 4**

6.17 An enforcement notice (EN) should be served when deficiencies pose a high risk of harm to relevant persons in case of fire and which if rectified would remove or reduce the risk level. Due to the risk to relevant persons, a set timescale is given to rectify the deficiencies identified.

6.18 IO/FSA must record why they are of the opinion that the deficiencies have contravened The Order i.e. the inclusion on a EN needs sufficient justification.

- 6.19 An EN is a statutory notice. Failure to comply with the requirements of an EN is an offence under The Order. All ENs must be followed-up in accordance with the [S300-FS03a procedure](#), to check the EN has been complied with and the risk removed or reduced to tolerable levels.
- 6.20 An EN may be used in the following circumstances:
- To address high risk deficiencies in GFP or fire safety management.
  - The RP/DH demonstrates a negative attitude to fire safety and taking remedial actions.
  - The same or similar deficiencies were previously brought to the RP/DH attention via a NoD and no action has been taken to rectify the deficiencies.

**NOTE:** For further information on ENs, see [FSIGN 308: Enforcement Notice](#). There may also be important information on ENs that IO/FSA must take note of in the FSIGNS for specific premises. For example, [FSIGN 211: Auditing heritage premises](#), details the enforcement consultation process with the Local Authority Conservation Officer. Any Notice sent must be copied to the Conservation Officer.

### **Enforcement Notice (Consider Prosecution) – Level 5**

- 6.21 Where the IEE is enforcement notice (consider prosecution), IO/FSA/TL **must not** use the EMM to alter this and should always consider prosecution. IO/FSA should complete a 'FS\_F\_14 notification of fire safety investigation form' in accordance with [FSIGN 304: Investigation of possible offences](#). Where the IEE is Level 5, the IO/FSA and TL should have a management review meeting and record the outcome in the audit conclusion.
- 6.22 For more information also on prosecutions and cautions, see [FSIGN 305](#) and [FSIGN 306](#).

### **Prohibition/Restriction Notice (article 31)**

- 6.23 Prohibition notices (PN) or restriction notices (RN) are not an enforcement outcome from the audit process. They are served when the risk to relevant persons is so serious that the use of the premises ought to be prohibited or restricted, usually due to matters affecting means of escape, ignition sources, and the potential for rapid development of fire and smoke. See [FSIGN 309](#).

## **7 Non-Mobile Auditing: 'Paper FS01 Audits'**

- 7.1 The IO/FSA will normally process their audits form and enforcement schedules on the Fire Safety App. However, there will be occasions where staff will not have access to their MWT and/or ICT systems. For example:
- Not having access to a MWT because it is lost, damaged or stolen.
  - Prolonged hardware or software issue and/or failure of ICT infrastructure.
  - Instruction from FSR Management e.g. due to a safety or security risk.
- 7.2 On such occasions, there are two Paper Audit Forms to enable IO/FSA to continue to process audits by replicating the mobile audit form:
- **FS01\_09 Paper Audit Form** - is for printing for completion manually during the audit.
  - **FS01\_09 Electronic Audit Form** - is for completion on the desktop PC and emailed to FSR Admin for processing if the audit has resulted in a NOD or EN.
- 7.3 Appendix 2 provides detailed information on 'Paper FS01 Audits'.

**NOTE:** This does **not** include desktop audit forms, which should be completed in accordance with [FSIGN 212](#).

## 8 Team Leader Vetting

- 8.1 Other than when listed in paragraph 8.3, audits by competent IO/FSA that result in Verbal Action do not always require Team Leader (TL) or Deputy Team Leader (DTL) vetting or FSR Admin involvement to process the job. Competent IO/FSA can submit the completed audit form straight to Farynor by selecting the submit icon. The information entered on the audit form under the Location/Property detail are updated to the property detail tab on Farynor and a copy of the audit form saved to the documents tab.
- 8.2 It is vital that address and audit details are correctly completed by the IO/FSA before submitting. This includes the premises size, as this affects the risk rating of the property.
- 8.3 The following audits must always be vetted by TL/DTL:
- Sleeping premises with vulnerable occupants (e.g. care homes, hospitals, hotels, hostels) and HRRBs.
  - Full Premises Inspections.
  - Audits by an IO/FSA on development.
  - Audits where the IEE has been altered by the application of the EMM (Level 2 and above) or for exceptional deviations.
  - Audits resulting in any enforcement action.
  - Where requested by the TL/DTL for quality assurance purposes or management review.
  - Where requested by the Quality Assurance team.
- 8.4 The TL is required to monitor work submitted by the IO/FSA in the 'Review Jobs' screen under the Mobile Working module in Farynor. The approval process requires the TL to click on, open the Audit form, and review the contents submitted by the IO/FSA. In most cases, this should be undertaken within 5 working days from the date of submission.
- 8.5 If an audit form contains errors, the TL/DTL can amend minor mistakes or reject the audit form, which sends it back to the IO/FSA mobile device for correction. If the TL/DTL rejects a form, they must explain the reasons for the rejection. When a form is approved, the job is submitted to the workload for Admin to process.
- 8.6 Audits, especially those with a level 4 or 5 outcome, may also be vetted by CREG for Quality Assurance or other purposes.

## 9 Operational Considerations

- 9.1 As well as checking compliance with The Order, a fundamental part of an audit is for IO/FSA to assess the access, facilities, equipment, and devices provided for the use by or protection of firefighters. As well as fire safety related design elements that may affect firefighting tactics e.g. combustible cladding, evacuation alert systems etc.

**NOTE:** Any maintenance issues with firefighter facilities are dealt with under article 38.

- 9.2 To ensure the effective planning for firefighting and safety of firefighters, where IO/FSA identify any risks to operational crews, for example (this is not an exhaustive list):
- poor access/facilities.
  - dangerous substances.
  - oxygen cylinders.
  - unusual/complex layout etc.
  - black powder storage.

- lack of compartmentation.
- higher than usual fire loading.
- salvage plans in place.

they should notify stations using the [SFS A020 a2a](#) station notification form in accordance with [FSIGN 113](#) and [PN 784](#).

- 9.3 Where operational risk information is identified that needs to be made available to crews immediately, this should be passed over to the relevant Watch Officer for consideration or inclusion on the ORD in the most expedient way, for example in person or via the telephone. This must still be followed up by a Station Notification SFS\_A020\_a2a Form following the normal procedure.

## 10 Document History

### Impact assessments

Equality		Sustainability	
Health, Safety & Welfare	xx/mm/yyyy	Risk Assessment	xx/mm/yyyy

### Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
All	New Document	28/02/2012
All	Minor amendments throughout	06/12/2013
	Addition of references to PAPS	15/01/2015
	Updated to reflect withdrawn FS14	12/05/2015
All document	Complete revision	14/06/2017
All	Changed to support new LFC governance	01/04/2018
All document	Complete revision and introduction of the Full Premises Inspection	15/04/2019
All	Full revision implementing the Fire Safety Act 2021, changes to pre-audit checks and audit types.	01/05/2022
All	Full revision to incorporate the Fire Safety (England) Regulations 2022 and other minor amendments.	13/10/2022
6.6 to 6.10	Instruction to support a demonstration of a reduction in risk level when audits result in broadly compliant/verbal action outcome.	21/04/2023

# Appendix 1 – Auditing multi occupied premises

## Multi Occupied premises – extent of responsibility of occupiers

- 1 In multi-occupied premises, there may be several RPs/DHs for several separate occupied areas. There will be a RP for the common MoE routes, staircases and/or common fire alarm/lighting systems. (E.g. a managing agent, building manager or building owner. These are usually shown on Farynor as the 'default property').
- 2 Other occupier's responsibility for safety extends from their occupied area to a place of ultimate safety. Therefore, this will include some shared responsibility for the common means of escape and they will have shared responsibility to co-operate and coordinate with the RP/DH for the common MoE (default property) to ensure adequate fire safety measures are in place.

## Simple Multi Occupied premises

- 3 These types of building include multi-storey office blocks or shopping centres where the floor layout and risk is very similar on each floor and effective management control is in place for common areas. In these cases, the audit should sample the common means of escape and fire safety systems (default property) **only**.
- 4 The occupiers should **only** be sampled as part of the default property audit to verify cooperation and coordination and evaluate the suitability of the fire safety systems in place. The individual occupiers should not be audited separately unless a significant risk is identified in one of the occupied areas by questioning of the RP of the default property. (e.g. areas of significant public gathering, sleeping risk, storage or use of dangerous or flammable substances, breaches in compartmentation, high fire loading and/or ignition sources).
- 5 Occupiers or additional properties should not be added to the location of a multi occupied building unless they are individually audited due to the identified risks above.

## Complex Multi Occupied Buildings or sites

- 6 This type of building may include a range of significantly different premises uses, with a range of risks and fire safety arrangements e.g.: hospital sites with office/research/training/accommodation buildings, industrial sites, shopping centres with combined cinemas and bowling alleys etc., office blocks with combined shops and hotels etc.
- 7 In these cases, the initial audit should be of the common MoE and fire safety systems (default property). Once the audit of the default property has been completed, the IO/FSA can decide on which of the other occupiers/buildings require an additional audit due to their use, risks, and fire safety arrangements. Occupied areas of significant public gathering, sleeping risks, storage or use of dangerous or flammable substances, breaches in compartmentation, high fire loading and/or ignition sources and which have not been previously audited or risk scored should be audited as a priority and details collated.
- 8 Separate occupiers or additional properties should not be added to the location of a multi occupied building unless they are individually audited due to the identified risks above.

## Appendix 2 – Using 'Paper FS01 Audits'

1. The IO/FSA should print out a Paper FS01 Audit Form from:
  - 'New Office Document': Start > New Office Document > Forms (Community Safety) > FS Forms > FS01\_09P - Non-Mobile Audit Form Paper version.
2. The IO/FSA should carry out pre-audit checks of the premises to:
  - Identify if the premises has a file on Farynor and/or if a job already exists.
  - When the premises was last audited.
  - Location details, protection details, property details and contacts.

The IO/FSA should enter this information into Section 1 'location/property detail' of the paper form and verified/amended onsite as necessary.

3. The IO/FSA should carry out the audit of the premises following guidance in Section 4 above:
  - The IO/FSA should complete Section 1, 2, 3 of the Paper Audit Form onsite during the audit.
  - The IO/FSA should also complete the following parts of Section 4 onsite during the audit and discuss enforcement expectations with the RP/OSR:
    - IEE.
    - Confirmed enforcement activity.
    - End of audit discussion notes (including signature of representative).
    - Name and address for service of documents.
    - Time allowed for completion works.
  - The remaining parts of Section 4: Relative risk calculator (RRL), other authorities to notify, specific instructions to admin, risk to operational personnel and TL comments should be completed when the IO/FSA returns to the office.
4. If the premises audited contains a risk to operational personnel e.g. dangerous substances, the IO/FSA should notify the local station in accordance with Section 9 above.

**NOTE:** Depending on the outcome of the audit and any proposed enforcement action, the IO/FSA should follow step(s) 5 or 6 below.

5. **Confirmed Enforcement Action - Verbal Action:**
  - Store the Paper FS01 Audit Form in a secure place.
  - When an IO/FSA has a new MWT and/or all ICT systems are back in working order – either raise a 'reactive audit' for the premises address using the Fire Safety Audit App or request Admin raise a Job.
  - Copy the information from the Paper FS01 Audit Form into the audit form on the Fire Safety Audit App using the MWT.

**NOTE:** MWT Users are responsible for making sure that they process audits as soon as they receive their MWT and/or the ICT systems are working.

6. **Confirmed Enforcement Action – NoD or EN:**

- The IO/FSA should open the 'FS01\_09 - Non-Mobile Audit Form – Eversion' and complete this electronically.
- The IO/FSA should input the information recorded in section 1-4 of the paper form into the electronic form and complete section 5 (the audit Schedule) to enable Admin to draft the NOD or EN.
- The IO/FSA should save the electronic form as: 'PAPER AUDIT - File number /No File - Full address (including postcode) - Reason for audit - Audit outcome.'

E.g. PAPER AUDIT FORM – 01/1000 – Hampton House, 20 Albert Embankment. Lambeth. SE1 7TJ – Post Fire – Enforcement Notice.

- The IO/FSA should complete the Relative Risk Calculator for the property audited and enter the risk score on to the audit form under the Property Detail section. The Relative Risk Calculator can be found on hotwire:

Home > Operations > Fire Safety Regulation > Fire Safety Regulation Job Procedures > [Online RRL Calculator](#).

**NOTE:** IO/FSA/Admin can get the risk score for the Location from Farynor (if available). If the Location does not have a risk score leave this field blank.

- The IO/FSA should e-mail the electronic audit form to their TL or DTL for vetting. The subject of the e-mail should state:

'Paper Audit - Enforcement Outcome - File Number/ No File - Full address (including postcode) - Reason for audit'.

- The e-mail should be marked as 'high importance'.

## TL Instructions

1. The TL should:
  - Vet section 1-5 of the audit form
  - Insert their comments into Section 4 – TL Comments.
2. Once the TL is satisfied they should e-mail the electronic form to FSR Admin Support [FSR-AdminSupport@london-fire.gov.uk](mailto:FSR-AdminSupport@london-fire.gov.uk) with the IO/FSA copied in. The subject bar should state; 'Paper Audit' - File Number/ No File - Full address (including postcode) - Reason for audit - Enforcement Outcome.  
The e-mail should be marked as 'high importance'.
3. The TL should post the paper form to FSR Admin Union Street for scanning and uploading.

**NOTE:** TLs are responsible for ensuring that a draft NoD or EN is received back from Admin. If they do not receive a draft NoD or EN from Admin in 3 working days, they should contact an Admin TL to check on the progress of the draft NoD or EN.

## Admin Instructions

1. The Admin TL should maintain a 'Paper Audit' spreadsheet that records the following information:
  - File Number/Job Number (once job is raised).
  - Full Address (including postcode).
  - Reason for Audit.
  - Enforcement Outcome.
  - Date Electronic Form Received.
  - Date NoD/EN sent out.



- Date paper form received.
  - Date electronic file of paper form is uploaded to file on SharePoint.
2. When admin receive an electronic/paper Audit Form with a NoD or EN from a TL, they should record the relevant information above in the 'Paper Audit Form' spreadsheet.
  3. The Admin Officer should raise a non-mobile FS01 job for the premises and follow the following instruction depending on circumstances:

**Farynor not working**

- Admin Officer should make a note of the file number and address and save the electronic form into a shared folder to raise a non-mobile FS01 Job once Farynor is working again.

**Farynor working and file on Farynor**

- Raise a non-mobile FS01 job (Job step 20.01).
- Section 1 data updated manually onto Farynor.
- Enter bring forward date in to Farynor.

**Farynor working and no file/property on Farynor**

- Open file or add property on Farynor/Gazetteer.
  - Raise a non-mobile FS01 job (Job Step 20.01).
  - Section 1 data updated manually onto Farynor.
  - Enter bring forward date in to Farynor.
4. Admin Officer to draft NoD or EN manually using the template on 'New Office Document': Start > New Office Document > Forms (Community Safety) > FS Forms > FS03\_01c – Schedule for EN or NOD.
  5. Admin Officer to send draft NOD or EN to TL and MWT User for vetting. Once the NoD or EN has been approved and sent out, the Admin Officer should update the 'Paper Audit' Spreadsheet.
  6. Once Admin has received the paper form, the 'Paper Audit' Spreadsheet should be updated, and the Admin Officer should send the paper form to Record Services (Ground Floor Union Street) for scanning. Record Services should scan the paper form and save the file as 'Non-Mobile Audit FS01 Form' and send the scanned document to the relevant area Triage. The Admin Officer should upload the electronic file of the scanned paper form to the relevant SharePoint file and update the 'Paper Audit' Spreadsheet.

**Suggested Reading for using Paper FS01 Audits**

- [FSIGN 115: Relative Risk Level](#)
- [FSIGN 103: FSEC Code and Valuation Office Code](#)
- [FSIGN 203: The Fire Safety Audit – Processing Mobile Jobs and Completing the Audit Form](#)
- [FSIGN 610: Primary Authority \(Partnership\) Schemes](#)

## Summary

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) in London.

This Note is intended for internal use, providing information and guidance on assigning a Relative Risk Level to new premises and existing premises with a '0' risk rating..

This Note is one of a series produced by Fire Safety Regulation HQ Policy Groups to provide additional advice and guidance to officers and Fire Safety Teams on various subjects related to their role.

Where appropriate this Note should be used for learning and staff development purposes.

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# 1 Introduction

- 1.1 The Commissioner's principle aim is to make London a safer city by reducing the fire risk in premises through its inspection regime. As part of the Fire Safety Regulation Strategy we are committed to the following:
- Targeting unknown, high risk premises
  - Maintaining levels of audit at high risk premises e.g. sleeping risks
  - Taking a risk-based approach to enforcement activity
  - Improving efficiency of Inspecting Officers (IOs)
- 1.2 To achieve these aims IOs should be focused on carrying out audits at high risk premises in order to drive down risk across London. To free up resources to target this high risk, a mechanism is needed to reduce the time spent on lower risk premises.
- 1.3 To address this, premises that have not been previously audited and risk scored will be assigned an average risk score. A decision can then be made on whether an audit is required in accordance with FSIGNs 201-205 and the team plan. This Fire Safety Regulation Guidance Note details how and when to assign an average risk score.
- 1.4 The process will allow Team Leaders (TL) and Area FSR Group Managers greater control over the workloads in their areas, and introduces more flexibility to use resources effectively in targeting risk.
- 1.5 It also allows FSR Teams to take no action with the current backlog of '0' risk rated premises until such time as a job is raised on the premises. At that time, an average risk score will be applied and the job will be issued. This may or may not result in an audit determining the actual risk.
- 1.6 Consideration is being given to introducing an automated IT programme to assign average risk scores on all existing '0' risk rated premises (vacant premises excluded) but until such time, it should be understood that any '0' risk rated premises effectively has the average risk score for that property type.
- 1.7 Assigning the average risk score will result in the premises falling within the 'sample' inspection programme category. This will ensure that the premises is integrated into the inspection programme whilst only assigning auditing resources when sufficient risk is identified to do so.
- 1.8 It is intended that only vacant premises will retain or be assigned a '0' risk score rating (FSEC 'X').

## 2 Assigning an average risk score

- 2.1 An average risk score is only to be applied to premises that are currently rated '0' on the Farnor system or when setting up a new premises record. The average risk score to be applied has been determined as:

FSEC Type	Average Score
A	5.25
B	5
C	4.25
D	4.25
E	5.25
F	5
G	4.25
H	4.25
J	4

FSEC Type	Average Score
K	4
L	4
M	4
N	4
P	4
R	4
S	3.75
T	3.25
X	0

- 2.2 For new jobs on premises not recorded on the Farynor premises database, admin will identify the property FSEC code from the available information and if necessary, through other sources such as those described in section 3. If unable to identify the FSEC code, seek advice from the FSR admin manager.
- 2.3 Existing '0' rated premises should be left as they are. They will be amended when a new job is raised or in the event an IT solution is applied to automatically amend all '0' rated premises to an average risk score in accordance with FSEC codes. Note that premises with a 'vacant' occupier FSEC code will remain as '0' risk rated.

### **3 Updating the average risk score**

- 3.1 The average risk score will only be amended when there is a need to conduct an audit. The audit will then update the risk score to reflect what was found at the time of the audit.
- 3.2 Admin should inform the IO/TL on the job notes that an average risk score has been applied. If the job requires the premises to be visited, an audit will result in a specific risk score. The need for an audit is driven by the risk inspection programme (current team plan) and an assessment of the information available with the job. Do not conduct an audit if the team plan does not call for the premises to be audited and the available job information does not indicate sufficient reason to conduct an audit.

### **4 Sources of information**

- 4.1 Although not normally necessary, there are times when additional information may assist in understanding, identifying, and assessing premises. Various sources of information are available. The following list is not exhaustive, but may be useful:
- Google Search – can be used to find information such as the type of occupancy etc.
  - Google Maps – inputting the address or postcode can give you an idea of the location and size of a building footprint. The 'Street View' function can show the building frontage.
  - Multimap – similar to Google maps but 'Bird's Eye' function can also show you the number of floors above ground.
  - Yell.com – can confirm occupier name, address and premises use.
  - Rateable Value Lists – can give premises use and floor size for each individual occupancy.
  - Council Tax Lists – can confirm features like flats above shops, when used in conjunction with rateable value list.
  - Companies House – (website: <https://www.companieshouse.co.uk/>) can confirm business names and give details of registered addresses.
  - Quick Address (QAS) – can confirm the address and sometimes the occupier.
  - Local Knowledge – from the stations or other IO's can tell you a great deal about the premises.
  - Cognos/IMS – can give history of fires and Unwanted Fire Signals.
  - FARYNOR – can give existing premises information.

## Document History

### Impact assessments

Equality	01/02/2012	Sustainability	30/03/2015
Health, Safety & Welfare	xx/mm/yyyy	Risk Assessment	xx/mm/yyyy

### Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
	New Policy	01/09/09
Section 3	Clarified advice on using FS14 for 'new build' consultations. Added section on aborted post incident audits.	11/06/2010
All	FSIGN Format	28/02/2012
1.3	Refs to FSIGN 201-205 corrected	27/11/2012
4.2	Fields corrected to align with new version of RRL Calculator	27/11/2012
All	Withdrawal of FS14 and introduction of application of an average (median) risk score	11/05/2015
All	Changed to support new LFC governance	01/04/2018
2.1	FSEC category C reintroduced, New format applied	07/02/2022
All	Change to reflect the RR(FS)O – AS AMENDED	01/05/2022