



LONDON FIRE BRIGADE

LFC-24-022

Unwanted Fire Call Signals (AFA) - Post Consultation Recommendations

Report to:	Date:
Service Delivery Board	24 January 2024
Commissioner's Board	15 February 2024
Deputy Mayor's Fire and Resilience Board.	5 March 2024
London Fire Commissioner	

Report by: Charlie Pugsley – Assistant Commissioner / Rhys Powell, Prevention & Protection

Report classification:
For decision

For publication

I agree the recommended decision below.

Andy Roe
London Fire Commissioner

Date **This decision was remotely signed on 20 March 2024**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report seeks LFC agreement to deal with the persistent problem of Unwanted Fire Signals (UwFS) by future non-attendance to Automatic Fire Alarms (AFAs) at commercial premises, save for some limited cases, during daytime hours of 07:00 – 20:30 hours. The report reviews previous initiatives, looks at the legal requirements and highlights benefit over risk, by analysing empirical data from the past five years. It also considers the recent consultation report, how other UK FRS have addressed this issue, what the LFB CRMP details, and what previous HMICFRS inspections of LFB have highlighted.

The proposed change is expected to create increased time for risk reduction work such as training, prevention and protection activity, as well as community engagement, while also decreasing risk through reducing unnecessary blue light runs to false alarms.

Proposed decision – the London Fire Commissioner

1. The LFC agrees the implementation of a non-attendance policy to commercial AFAs (non-sleeping) during the hours of 07:00 – 20:30 hours based on an analysis of risk, with exemptions in line with the public consultation proposals, with the addition of grade 1 and grade 2 listed buildings, as well as schools and nurseries.
2. The LFC agrees to provide delegated authority to the Assistant Commissioner for Prevention & Protection to first develop a policy roll-out plan in line with appendices 1 and 4 to this report, and then to implement that plan to roll-out the policy detailed in (1.) above.

1 Introduction and background

- 1.1** Unwanted Fire Signals (UwFS) are calls received by London Fire Brigade (LFB) which are initiated by automatic fire alarm (AFA), to which LFB sends an emergency response, but attending crews establish to be a false alarm.
- 1.2** UwFS have been a persistent problem for LFB over many years and LFB has been actively trying to address the issue since 2005. Whilst some previous initiatives to reduce the number of UwFS have proved briefly successful, others have not, and neither have they proved an efficient nor effective use of LFB resources. Despite the work to address the issue, the overall numbers and trend of UwFS attended by LFB has substantially increased over the years, with the 4-year average from 2019 to 2022 being 21% higher than the previous 4-year average (2015 to 2018).
- 1.3** LFB is the only UK metropolitan fire and rescue service (FRS) that still maintains a 24/7 operational response to all automatic fire alarms. At least 42 other UK FRS's deal with the issue of UwFS via protocol involving non-attendance, and appear to do so (some for many years) without problem. As such, LFB is operating outside of the "norm" across UK FRS's and may not be running the service in the most efficient and effective manner.

- 1.4 The issue of UwFS has been repeatedly highlighted by "His Majesties Inspectorate of Constabulary and Fire & Rescue Service" (HMICFRS), who have recently reported that "*The brigade hasn't done enough to reduce the number of unwanted fire signals*".
- 1.5 The current Community Risk Management Plan (CRMP) makes it clear that LFB plan to be more flexible in the use of resources to improve productivity, to deliver more protection & prevention activities and additional time for operational training. The CRMP goes on to cite that the reduction of AFAs in non-domestic premises will be used to measure the success of the plan. More detail on this can be seen in section 6 of Appendix 1 and the LFB Response Strategy¹.
- 1.6 The current LFB Response Strategy states that "During the lifetime of the CRMP, LFB will consider how to build further resilience and flexibility into our mobilising arrangements" and that LFB will "Become more flexible in how we deploy our operational resources so that we can continue to provide an excellent response, whatever the future holds".
- 1.7 LFB data shows that between April 2022 and March 2023, LFB attended 47,000 false alarm calls. Nearly a third of these were AFAs in non-residential properties, which is circa 23,500 hours in staffing time².
- 1.8 Across London, 98 per cent of all recognised AFA calls are recorded as false alarms on attendance, and only about half of one per cent of AFAs end up being recorded as fires.
- 1.9 During August 2023, LFB commenced a consultation process with regard to the proposals and commissioned TONIC, an independent social research organisation specialising in public consultations, to produce an independent summary of responses to the consultation. TONIC have been successfully used by LFB for previous wide ranging public consultations to inform LFB organisational strategy plans.

2 Objectives and expected outcomes

- 2.1 The main objectives of the proposals in this paper, are to enable LFB to utilise its resources in a more efficient, effective and productive way, and to reduce risks to London communities.
- 2.2 The expected outcomes are as follows;
 - Around 23,500 hours in staffing time could be freed up for additional fire prevention and protection work and operational training.
 - A reduction in risk to London communities through additional fire prevention and protection work.
 - A reduction in risk to London communities and LFB staff, as a result of significantly less blue light appliance journeys. (From April 2022 through to October 2023, LFB vehicles were involved in 127 road traffic collisions (RTC) whilst responding to an AFA on blue lights)
- 2.3 These outcomes will also support the London Mayor's strategic priority to tackle air pollution and his London Environment Strategy for GLA partners to lead by example and assist in meeting a 60 per cent reduction in GLA group CO2 emissions on 1990 levels by 2025.

3 Consultation

- 3.1 The consultation ran from 13th September to 26th October 2023, TONIC undertook the work and delivered a summary report of responses to the consultation (Appendix 2). Pre-consultation work was undertaken to identify those people/businesses that may be affected by the proposals and

¹ <https://www.london-fire.gov.uk/media/8011/lfc-23-069-response-strategy-2023-2026-signed.pdf>

² Figures taken from LFB public consultation publications 2023.

ensure that they were fairly included in the consultation.

- 3.2 Steps taken to consult those affected included a variety of press activities and engagement events which were publicised to a wide range of partners, stakeholders, and communities across the boroughs, as well as across a number of social media channels. The achieved reach was reported as being just over 180,000 with social media platforms logging 3242 clicks to the landing page.
- 3.3 LFB are informed that the numbers of people/businesses which engaged with the consultation process represents a relatively good response. "261 responses were received to the consultation, with 115 (44%) from members of the public, 93 (36%) from London Fire Brigade staff, 34 (13%) on behalf of organisations, and 19 (7%) who preferred not to say."
- 3.4 The respondents raised a variety of points and each of those points is reviewed against risk in sections 8.9 of appendix 1 of this report. It can therefore be seen that LFB have taken note of respondent's concerns, given them due consideration, and where considered appropriate, LFB have changed proposals to address the risks highlighted by the respondents.
- 3.5 Among what TONIC considered to be headline findings of the consultation to include, were; *"Overall, respondents were generally supportive of the proposed change, with exactly half (50%) explicitly stating that they had no concerns regarding its implementation and felt it was a good and welcome idea. This compares with just under a third (30%) who explicitly stated that they felt the proposed change would increase risk and that LFB continue with its current policy of attending AFAs"*. It can therefore be seen that there was greater support from the respondents for the LFB proposal, whilst the number of those that had explicit concerns was significantly lower, and also lower than the number of respondents that identified as LFB staff.
- 3.6 The consultation proposed that LFB will not attend calls to AFAs at non-residential premises between 07:00 and 18:00 hours across all days of the week. During these times, it is considered that the risks would be low and that most buildings will have staff on site who can confirm whether the alarm requires an LFB emergency attendance. LFB will continue to attend all AFA calls that are confirmed by a person to be a suspected fire.
- 3.7 It should be noted that the proposals in this paper have extended the times stated in the public consultation from the published 07:00- 18:00 to the now proposed 07:00-20:30. This is based on risk analysis, and recommendation from the Head of Information Management as per section 4 of this report.
- 3.8 The consultation defined that the following premises would continue to receive an LFB response to AFAs; Private Dwellings/Houses, Flats (includes high-rise), Houses in Multiple Occupation, Mobile/Park homes, Houseboats, Hospitals, Residential care homes/nursing homes/hospices, Children's homes, Specialised housing premises (e.g., sheltered housing, extra care sheltered housing, supporting living), Student accommodation/halls of residence, Residential Boarding schools, Hotels/Motels/B&Bs and other guest accommodation, Hostels (e.g., homeless, rehabilitation)/Youth Hostels, Prisons/Young offenders' institutions/other secure establishments.
- 3.9 Also, the proposal stated that *"high risk sites storing volumes of dangerous substances (e.g. COMAH sites) will continue to receive an emergency response"*.
- 3.10 It should be noted that taking due regard of the points raised by respondents to the public consultation, LFBs longstanding position with regards to automatic fire suppressions in most schools (not currently mandated but major community impact if affected by arson/fire) and the assessment of risk which notes the unique risk to the nation of historic buildings, changes to the original published proposals have been made. The revised proposals now include further exemptions such as; Heritage Buildings, Schools and Nurseries, other buildings of substantial public significance, where LFB consider exemption appropriate through either a future planned review utilising empirical data, a specific local risk assessment in line with a Borough Risk Management Plan, the LFB published Annual Assessment of Risk (AoR), or other methodology as

appropriate.

4 Risk Analysis

- 4.1 Core duties of the FRS in relation to extinguishing fires, are primarily set out in the Fire and Rescue Services Act 2004. There are no extant UK legislative requirements that compel an FRS to attend a call to an AFA if no fire is suspected nor confirmed.
- 4.2 No distinction was made in the original proposals between weekdays and weekends, and this was raised as an issue by some consultation respondents. However, this has subsequently been identified as a very low risk via the risk analysis of empirical data (see appendix 1). Therefore, is not considered necessary to vary any of the options to separate weekends from weekdays.
- 4.3 Risk analysis as detailed in 4.5 of this report and Appendix 1, details that the risk of extending the time to 20:30 is very low. Data shows that the number of AFA fires that occurred between 20:00 to 21:00 across the five-year period was slightly lower than those between 19:00 to 20:00. Additionally, the Head of Business Intelligence recommended the later end time of 20:30 and also advised the later time may avoid unnecessary inefficiencies such as non-available appliances.
- 4.4 Therefore, with very little perceived risk, additional time for fire prevention work and training which can in turn reduce risk to our communities, can be facilitated by extending the timeframe by an additional 30 minutes to 20:30. This will also bring the benefit of less disruption at change of watch times and completely remove attendance to UwFS at commercial properties for day shift crews. So, whilst efficiencies is not a driver for these proposals, it may be noted that if agreed, the proposals may inadvertently also deliver better efficiencies for the LFB.
- 4.5 General risk analysis of empirical data as detailed in the report in appendix 1, has considered the risk of non-attendance when commercial buildings may likely be occupied, and has identified that the morning period (07:00-08:00) is an extremely low risk (only 0.009%*), weekends (07:00-20:30) are very low risk (only 0.06%*), and the early evening period (18:00-20:00) is a very low risk (only 0.02%*). It should also be noted that many commercial premises are likely to be occupied during the wider range of times proposed in this paper, so any future fires are likely to be confirmed by persons in these cases. (*Percentage of all (86,405) emergency calls to the LFB, that have been an AFA, recorded as an actual fire that had to be extinguished, with only a single call to LFB. - Empirical data taken from a five-year period).
- 4.6 The proposed change to the way LFB responds to AFAs is not designed to deliver financial savings, but to allow LFB staff to spend more time on protection and prevention work, such as fire safety checks in homes and businesses, as well as on operational training.
- 4.7 Fire Facts' shows that persons most likely to die in a fire, are those that have vulnerabilities but have not received an intervention by LFB.
- 4.8 The proposals will also reduce the risk to the public through fewer 'blue light' emergency responses. From April 2022 through to October 2023, LFB vehicles were recorded as being involved in 127 road traffic collisions (RTC) whilst responding to an AFA on blue lights. Statistically, it would therefore indicate that 124 (98.7%) of those RTCs occurred whilst responding to a false alarm.
- 4.9 It is estimated that if accepted, the changes put forward in the public consultation will eliminate call outs to approximately 10,000 false alarms per year (eight per cent of LFB emergency calls). This represents a significant amount of time that could be repurposed.
- 4.10 The current LFB Community Risk Management Plan (CRMP) indicates that LFB will adapt responses to be more efficient and cites attendance to AFAs as a measurement of improvement. If

accepted, the proposals will also assist with the CRMP target of 5%³ station time spent on protection work instead of AFAs.

5 Implementation

- 5.1** The actions proposed in this report will require careful management. For example; LFB Control do not currently have any automated method of establishing whether any particular premises may be exempt from the proposals at the point of call. Equally, there is a need to develop new LFB policy/procedure linked to Management of Operational Risk Information policy - PN 800/7.2.d visits and Borough Risk Management Plans, to ensure very clear and specific protocol for any future 'local' exemptions. Within that protocol, feasibility should be considered in line with paragraph 5.2 below, to give Borough Commanders the responsibility to ensure local risks are assessed, appropriate remedial actions have been advised and where appropriate, to apply for consideration within strict new policy parameters, of specific premises to have bespoke exemption from the proposed change.
- 5.2** Work will be required with internal stakeholders, to establish/amend policy and create workable procedures to facilitate the proposals in this report, prior to progressing them. It is therefore recommended that delegated authority is agreed for the Assistant Commissioner for Prevention & Protection to develop and implement a plan to roll-out any new policy as a result of the proposals in this report.

6 Equality comment

- 6.1** 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.
- 6.2** 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.
- 6.3** 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.
- 6.4** 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.
- 6.5** 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.

³ Noting that there is a current proposal to revise the KPIs for Prevention & Protection activity time from 10% and 5% respectively, to 12% and 3% respectively. If the AFA proposal was agreed and introduced, targets may be reviewed in line with normal governance and processes.

- 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.
 - 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.
- 6.6** 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.
- 6.7** 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.
- 6.8** An Equality Impact Assessment (EIA) was undertaken for this initiative in June 2023 (Appendix 3), that was prior to the public consultation process. The assessment indicates that the proposed changes would generally have a positive or neutral impact.
- 6.9** Since the proposals in this paper are largely the same as what was included in the consultation, there are no material differences to the EIA (appendix 3) prepared for the original proposal.
- 6.10** The change in proposals to slightly longer hours than the original plan has been considered from an equality impact perspective and it is not considered to make any material difference to the original EIA.
- 6.11** The proposed increase in exemptions has also been considered from an equality impact perspective and it is considered that this may have a slight positive impact in relation to age, where schools and nurseries have been added to the exemptions. However, the overall impact of the proposals is again not considered to make any material difference to the original EIA.
- 6.12** One element (Race) was recorded as potentially incurring an adverse impact. This was due to *"Local intelligence indicating that some of the local black and minority ethnic (BAME) business groups may be less likely to contact public services. They may also be less likely to understand the legislation and guidance provided to them"*.
- 6.13** To mitigate the impact detailed in 6.9 above, the EIA states;
- *"To mitigate the impact to minority groups LFB are implementing a Risk Based Intervention Programme for premises covered by the Regulatory Reform (Fire Safety) Order which encourages pre-inspection activity and a proactive approach to business engagement and education rather than enforcement. This includes Fire Safety checks and business engagement activity carried out by local Borough Commanders and Fire Stations which is addressed within the Borough Risk Management Plans"*.
 - *"LFB will work to ensure education and engagement is done in an accessible way, including offering translated resources, advice and guidance to support knowledge and understanding of BAME business owners, managers and other responsible persons"*.
- 6.14** The Equality Duty and its impact will be further reviewed and addressed as policies and procedures are developed as a result of any decision made in respect of the proposals in this paper?

7 Other considerations

Workforce comments

- 7.1** It is anticipated that there will be a positive workforce impact because the proposals will provide the opportunity for staff to undertake other work alleviating workload pressures, prioritising other workstreams or training that will maintain competency and/or enhance skills to fulfil career potential, which overall will improve the efficiencies for our workforce to better serve the communities of London.
- 7.2** However, it is recognised that some staff and their representative bodies may view the proposals negatively. Therefore, it will be important to ensure a positive and robust communications programme, to ensure staff fully understand the reasons for change.

Sustainability comments

- 7.3** The environmental cost of attending Unwanted Fire Signals is substantial. The sustainable Development Team supports the strategy to reduce the number of UwFS visits as it would have the positive impact of reducing noise and air pollution, as well as reducing fuel consumption, consequently reducing the LFC's carbon emissions. This aligns with working towards the LFC's Carbon Net Zero target of 2030.
- 7.4** A sustainable development impact assessment (SDIA) will be completed when the new UwFS policy is developed.

Procurement comments

- 7.5** This report does not seek to procure any services nor equipment, and will use existing resources to undertake the proposed engagement and any subsequent policy reviews. Any procurement implications arising from training and/or resources pending the outcomes of the engagement process will be addressed in a subsequent report.

Communications comments

- 7.6** Upon agreement to the proposals for a consultation, a full co-ordinated communications plan will be produced with engagement from the communications team, public affairs, and the community engagement team. This will ensure the target audience is reached in the most efficient and effective manner.

8 Financial comments

- 8.1** This proposal is likely to result in significant cost savings to the brigade in both operational overtime and fuel relating to emergency responses. This expenditure will be closely monitored and any savings identified will be considered as part of the budget process. Further financial analysis can be conducted upon agreement of the proposal.

9 Legal comments

- 9.1** This report seeks to amend Brigade practice and response to 'Unwanted Fire Signal Calls' (AFA) for commercial premises, having completed a public consultation exercise.
- 9.2** A Fire and Rescue Service's core responsibilities in relation to fire safety and firefighting are primarily set out in Sections 6 and 7 of the Fire Rescue Services Act 2004 ('The Act').
- 9.3** Section 6 (Fire Safety) of the Act states;

" (1) A fire and rescue authority must make provision for the purpose of promoting fire safety in its area.

(2) In making provision under subsection (1) a fire and rescue authority must in particular, to the extent that it considers it reasonable to do so, make arrangements for—

- (a) the provision of information, publicity and encouragement in respect of the steps to be taken to prevent fires and death or injury by fire;
- (b) the giving of advice, on request, about—
 - (i) how to prevent fires and restrict their spread in buildings and other property;
 - (ii) the means of escape from buildings and other property in case of fire."

Section 7 (Fire Fighting) of the Act states;

" (1) A fire and rescue authority must make provision for the purpose of—

- (a) extinguishing fires in its area, and
- (b) protecting life and property in the event of fires in its area.

(2) In making provision under subsection (1) a fire and rescue authority must in particular—

- (a) secure the provision of the personnel, services and equipment necessary efficiently to meet all normal requirements;
- (b) secure the provision of training for personnel;
- (c) make arrangements for dealing with calls for help and for summoning personnel;
- (d) make arrangements for obtaining information needed for the purpose mentioned in subsection (1);
- (e) make arrangements for ensuring that reasonable steps are taken to prevent or limit damage to property resulting from action taken for the purpose mentioned in subsection (1)."

Accordingly, the proposal to respond or not to respond to AFA in relation to commercial premises, as a matter of policy, is therefore discretionary and within the general powers of the Commissioner.

- 9.4** The report confirms reducing AFA's for commercial properties, with exceptions, will lead to more time for fire prevention and training in line with the FRS's core responsibilities, thereby making the FRS more efficient and effective.
- 9.5** The proposal is in line with commitments made under the Community Risk Management Plan, and also addresses recommendations made in the HMIC inspection.
- 9.6** The appendices record that the Brigade has identified persons who might be expected to be substantially impacted by the proposal and carried out pre-consultation engagement to ensure they were able to respond fully to the consultation if they wished. The consultation is considered to have been appropriate for this decision. The decision maker must now give consideration to the consultation replies contained in the appendices to the report and summarized above.
- 9.7** Once the proposal has been approved, Policy Number 800 will be amended so there is clear and consistent approach to be taken by all officers.
- 9.8** This report fulfils the obligation set out in the Governance Direction 2018 which requires prior consultation with the Deputy Mayor of Fire in relation to "any other decision that can be reasonably considered to be novel, contentious or repercussive in nature, irrespective of monetary value of the decision involved (which may be nil).

List of appendices

Appendix	Title	Open or confidential*
1	Report - Dealing with Unwanted Fire Signals (UwFS) – This report includes as an appendix of its own - Briefing note - Analysis of calls to Automatic Fire Alarms at commercial premises by the Head of Business Intelligence ICT Information Management	Open
2	Report (TONIC) - Consultation on the proposed change to LFB's response to false alarm attendance	Open
3	EIA for UfWS Policy	Open
4	Implementation Plan – High Level Overview	Open

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

Dealing with Unwanted Fire Signals (UwFS)

Options for Proposal to Restrict
Attendance to Low Risk UwFS
Report by: Rhys Powell (Prevention &
Protection)

OFFICIAL

January 2024

P&P 2024/01 – FP2064 (Underpinning Report)

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1. Introduction

- 1.1. London Fire Brigade (LFB) is the only UK metropolitan fire and rescue service (FRS) that still maintains a 24/7 operational response to all automatic fire alarms. This subject has been explored both nationally and internally, numerous times over many years and a wide range of other UK FRS's have progressed their own extant policy and procedures to deal with this matter by way of non-attendance.
- 1.2. However, though LFB has over a number of years, tried to address the matter in various ways, the move to any form of non-attendance has not been implemented. This brings into question whether LFB are operating the service in the most efficient and effective manner. It can be seen that by continuing to attend all calls to an automatic fire alarm (AFA) actuating, LFB are operating outside of the "norm" across UK FRS's, and this is a point that has also been repeatedly highlighted by the HMICFRS.
- 1.3. The current approach to managing unwanted fire signals (UwFS) started to be introduced in 2004 and concerted efforts from Fire Stations, Control, and Prevention & Protection staff, initially proved successful in delivering significant reductions in the highest call premises. This approach consists of addressing the issue of UwFS with persons responsible for premises where UwFS occur, the reduction of the number of operational response vehicles attending AFA's and call filtering by control operators. However, whilst this procedure remains good practice, the numbers of UwFS attended by LFB has substantially increased since 2015.
- 1.4. This report seeks to review the LFB's position on dealing with UwFS based on data, the risk/benefit of any restriction of attendance to AFAs and to give options for decision on a preferred way forward. Consideration should also be given to extending or varying the times of non-attendance to commercial premises if it is considered that the data analysis indicates a sufficiently low risk.

1.5. Through public consultation, it was proposed that LFB will not attend calls to automatic fire alarms at non-residential premises between 07:00 and 18:00 hours across the seven days of the week. During these times, it is considered that the risks would be lowest and that most buildings will have staff on site who can confirm whether the alarm requires an LFB emergency attendance.

1.6. However, the proposal stated that premises containing a sleeping risk will continue to receive an emergency response – this includes, but is not restricted to:

- Private Dwellings/Houses
- Flats (includes high-rise)
- Houses in Multiple Occupation
- Mobile/Park homes
- Houseboats
- Hospitals
- Residential care homes / Nursing homes / Hospices
- Children’s homes.
- Specialised housing premises (e.g., sheltered housing, extra care sheltered housing, supporting living).
- Student accommodation / halls of residence.
- Residential Boarding schools.
- Hotels/Motels/B&Bs and other guest accommodation.
- Hostels (e.g., homeless, rehabilitation) / Youth Hostels.
- Prisons / Young offenders’ institutions/other secure establishments.

1.7. Also, the proposal stated that “*high risk sites storing volumes of dangerous substances (e.g. COMAH sites) will continue to receive an emergency response*”. As will other buildings of substantial public significance, where LFB consider exemption appropriate through either a future planned review utilising empirical data, a specific local risk assessment in line with a Borough Risk Management Plan¹, the LFB published Annual Assessment of Risk (AoR), or other methodology as appropriate.

1.8. The proposals also indicated that LFB will always attend when called to a fire by a member of the public and will continue to attend Automatic Fire Alarms between the hours of 6pm and 7am.

1.9. The changes are being proposed because across London, ninety-eight per cent of all recognised AFA calls are false alarms on attendance, and only about half of one per cent of AFAs end up being recorded as uncontrollable fires. (Note* The term “uncontrollable fire” in this context, does not necessarily denote a serious or large fire, it is just a fire that was attended by, and extinguished by, LFB) Between April 2022 and March 2023, LFB attended

¹ Subject to feasibility

47,000 false alarm calls. Nearly a third of these were AFAs in non-residential properties. That is equivalent to around 23,500 hours in staffing time.

1.10. In addition, His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) has on two separate inspections of the LFB, referred to the need to address the area of UwFS’s. In 2021 HMICFRS reported that *“The brigade should make sure it addresses effectively the burden of false alarms.”*, *“The brigade needs to do more to reduce unwanted fire signals”* & *“The brigade hasn’t done enough to reduce the number of unwanted fire signals”*.

1.11. The proposed changes to the way LFB respond to AFAs is not designed to deliver financial savings, but to allow LFB staff to spend more time on protection and prevention work, such as fire safety checks in homes and businesses, as well as spending more time on operational training. However, proposals could assist in both preventing or containing any unnecessary or inefficient overspends and will also reduce the risk to the public through fewer ‘blue light’ emergency responses.

1.12. It is estimated that if accepted, the changes put forward in the public consultation will eliminate call outs to approximately 10,000 false alarms per year (8 per cent of LFB emergency calls).

1.13. The following options are presented for decision (choose one option from each section).

Options		
Option 1 A	Non-attendance to commercial AFAs (non-sleeping) during the hours of 07:00 – 20:30 hours.	Recommended option following analysis of consultation responses and further data.
Option 1 B	Non-attendance to commercial AFAs (non-sleeping) during the hours of 07:00 – 18:00 hours.	As proposed for consultation.
Option 1 C	Continue with existing LFB AFA attendance.	Alternative option to do nothing.
Option 2 A (Exemptions)	Exempt additional premises that have particular risk, as identified in the matrix in section 8 below.	Recommended option following analysis of consultation responses and data.
Option 2 B (Exemptions)	Exempt only premises that LFB proposed for the consultation.	As proposed for consultation.

2. Background

- 2.1. The earliest reference of LFB charging for attending AFA's is from 1935, at this time the LFB came under the London County Council (LCC). This practice continued right up until 1991 but was only imposed where the stop message stated, "caused by apparatus". (FCD 3910)
- 2.2. In 1991 LFB stopped charging for attending AFAs. This was as a result of a High Court appeal judgement in 1990 (Thorn Securities v Sackville and Others), of which Northamptonshire County Council as Fire Authority were involved in the case. The judge ruled that under the extant legislation of the time (Fire Services Act 1947) it was unlawful for the Authority to charge for it's attendance. (FCD 3910) Note: The Fire Services Act 1947 has since been repealed and superseded by the Fire Services Act 2004, this new act does enable charging and is explained later in the report.
- 2.3. In 2003 LFB asked the Government for powers which would allow the Brigade to charge for attendance at premises where there were repeat calls as a result of false alarms from AFAs. The request was not successful at that time. (FEP 0459)
- 2.4. In 2004, the Brigade implemented changes in the way in which calls from AFAs are responded to. These changes, which sought to minimise the number of appliances attending each incident and the risks associated with mobilisation, were implemented in two stages: (FEP 1014)
- From April 2004, aerial appliances ceased to be mobilised as part of the pre-determined attendance to automatic fire alarm calls.
 - From September 2004, the pre-determined attendance for automatic fire alarm calls were reduced to one pumping appliance. (Note* FEP 1014 does not state whether this reduced attendance was applied residential premises at that time)
- 2.5. In 2005 a centrally coordinated approach by the Community Safety department supporting a Borough based reduction initiative scheme was piloted in Westminster. This initiative was set up to embody the principles of the then revised CFOA national policy, which was based on the following headline requirements;
- Identify and progressively register fire alarm systems:
 - Use of competent persons to design, install and maintain systems:
 - Promote appropriate management of fire alarm systems:
 - Monitor performance and set Brigade operational response:
- 2.6. The result of this pilot initiative which ran between in 2005 -2007, was reported in FEP 1014 as follows;
- An 8% reduction in the number of UwFS.
 - A decrease of 500 calls
 - An increase in 190 hours of appliance availability for emergency response, training and community fire safety activities.
 - An increase in 760 hours of personnel availability for other core activities.
 - Improvement in the health and safety of appliance crews and members of the

public due to the decrease in 'blue light' journeys.

- 2.7. However, FEP 1014 does not indicate the level of resources that were required to achieve the 8% reduction in the number of UwFS reported for that initiative.
- 2.8. The 2009 London Safety Plan (LSP) approved the introduction of call filtering to assist with the reduction of UwFS. Call filtering subsequently commenced in Brigade Control on 13 July 2009. (FEP1617) Call filtering was applied between 08:00 – 18:30 hrs (Control day-shift hours). It was also proposed that this time window was extended to 06:00 – 21:00 hrs, as it was considered at the time, that the change to 06:00 – 21:00 hrs was not likely to compromise the sleeping risk element (FEP1617). The extended call filtering times are recorded as coming into effect on 03/02/2011 (PN 539).
- 2.9. In June 2009 a Fire Safety Regulation Procedural note (F13) was created under the 500 series and this procedural note is still extant. This procedure runs from initial phone liaison, to written guidance, to meetings, to site visits and co-ordinating with the local LFB Borough Commander to address the more problematic premises.
- 2.10. In July 2013, the "Fifth London Safety Plan" introduced the recovery of LFB costs to repeated calls to false alarms under the empowerment of the Localism Act 2011. Specifically, the plan stated the following;

"More than a third of Brigade attendances turn out to be false alarms, and attendance caused by an automatic fire alarm (AFA) is the most frequent attendance made by the Brigade. We recognise the value of fire alarms in protecting people from fire and reducing the numbers of fire deaths and injuries, however, fire alarms which sound when there is no fire can be a sign of poor fire safety management, so we want to encourage the proper use and management of these systems.

- *We plan to start recovering our costs from the owner or operator of the locations where more than 10 false alarm calls are attended in a rolling 12-month period.*
- *Once a premises has become chargeable all subsequent false alarms would generate a charge. If, at a later date, the number of such calls reduces to nine or less in the previous 12 months and the owner has set up suitable fire safety arrangements then we may waive the charge.*
- *Increase the charge from £260 to £290 per fire appliance per hour. Our charges are based on recovering our costs only."*

- 2.11. In November 2016, the Strategy Committee of the London Fire and Emergency Planning Committee (LFEPA) agreed proposals (FEP 2676), subject to LSP 2017 consultation, for future Unwanted Fire Signals (UwFS) reduction initiatives. Those proposals were as follows:

- Call filtering by Control – review the impact that filtering has had on call handling and introduce further risk-based questioning into call handling.
- Increase the involvement of specialist Fire Safety Officers in AFA reduction.
- The threshold at which cost recovery charging will apply be reduced to eight.

- As part of London Safety Plan 2017 – review the application of a quality call filtering response option for uncooperative premises generating excessive AFA calls to Brigade including an alternative or supplemented emergency response.
- Continue working with National Fire Chiefs Council, the fire alarm and insurance industries to develop effective cooperative practices and contribute to the development of a renewed reliability and confidence in AFA systems through a ‘gold standard’ connection.

2.12. LFEPA also agreed a revised, flexible, Cost Recovery Charging Strategy which would enable LFB to recognise improvements and commitments made by responsible occupiers, but also maintain cost recovery charging for persistent offenders. In addition, they agreed that Finance should write-off or cancel unpaid invoices that were generated by the extant cost recovery strategy. (LFC 0036y) This was following an earlier independent review undertaken (by CS Todd and Associates) as a result of challenges to invoicing for cost recovery of calls to AFAs. The review had concluded that much of the charging being undertaken was outside the scope of the legislation provision.

2.13. In 2016/17 a total of £373k in debt for charges raised in respect of call outs to automatic fire alarms (AFA) was written off (FEP 2676).

2.14. On 30th May 2017, the Brigade’s current policy on ‘charging for automatic fire alarms’ was suspended as a result of multiple challenges against invoices (and non-payment) by building occupiers. This was due to ongoing concerns as to whether legislation fully empowered the LFB to lawfully make the charges. The following warning was placed on PN 848, and it is still in place at the date of writing this report.

“Warning

Please note: Charging for AFA’s is currently suspended whilst the charging process is reviewed. For further information or guidance, please contact the FSR Policy Team on extension 30845.”

2.15. In December 2018, LFC approval was given for a specialist team to be set up to address UwFS. The team had two main roles, firstly to steer and direct the UwFS reduction initiatives carried out by officers in local fire safety teams, Borough Commanders and local crews. Their second role was to support the proposed AFA cost recovery processes required for those premises deemed to be ‘persistent offenders’. (LFC 0036y)

2.16. The UwFS team were only trialled and funded for a fixed term of 2 years, and whilst the UwFS Team had some success during the trial, the trial did not demonstrate large scale effectiveness in reducing UwFS levels. The work of the team had also been particularly hindered by the Covid 19 pandemic. Therefore, additional funding was not requested to continue with that work and the trial was concluded.

2.17. On 01/05/2022, the last revision was published (Rev 11), of Fire Safety Guidance Note 54 (FSGN 54) – “False alarms caused by automatic fire & smoke detection”. This particular guidance note was originally produced before 01/12/1997 and it is one of a series produced by LFB to provide advice on various aspects of fire safety. This note is provided to the responsible persons for the premises where the LFB has been called to AFAs which have been false alarms. It also points out that the LFB has the power to charge for

attending persistent false alarms and may start to do so after attending nine false alarms in a 12-month period.

2.18. During September and October 2023, LFB conducted a public consultation on proposed changes to the way LFB respond to Automated Fire Alarms (AFAs). LFB staff were also encouraged to engage with the consultation process and thirty-six percent of the responses received came from people identifying as LFB staff. The outcomes of the consultation are discussed in section 8 of this report.

3. Current Situation

3.1. The Brigade has seen an increase in UwFS since 2018, with the 4-year average from 2019 to 2022 being 21% higher than the previous 4-year average (2015 to 2018). Therefore, whilst some of the previous initiatives have attracted some successes, others have not been successful nor proved an efficient nor effective use of LFB resources and the overall trend is increasing for the numbers of UwFS.

3.2. **PN 412 (Mobilising Policy)** - In line with the current mobilising policy – PN 412, the following occurs;

- Calls to commercial premises generated by automatic fire alarms (AFAs) will receive a normal attendance of one pumping appliance.
- Calls to non-commercial premises generated by AFAs will receive the normal attendance for the incident type.
- Call filtering applies to calls to AFAs, received through the 999 system between 06:00 – 21:00hrs.
- Outside of these times, (i.e. 21:00 – 06:00 hours) calls are not filtered.
- Call filtering - Control staff ask a series of predetermined questions, to establish whether or not the Brigade's attendance is required. The attendance ordered depends on the type of premises. Commercial premises attract a Reduced Attendance of x1 PA.
- Calls to AFA actuating from third parties, such as fire alarm monitoring organisations, telecare services, and passers-by are not subject to the AFA call filtering process.

3.3. **PN 539 (Emergency Call Management)** - The call filtering flow chart is as follows on the next page (taken from - PN 539- Emergency Call Management - Appendix 4);

Figure 1 - AFA call filtering process for residential premises (0600 – 2100 only)

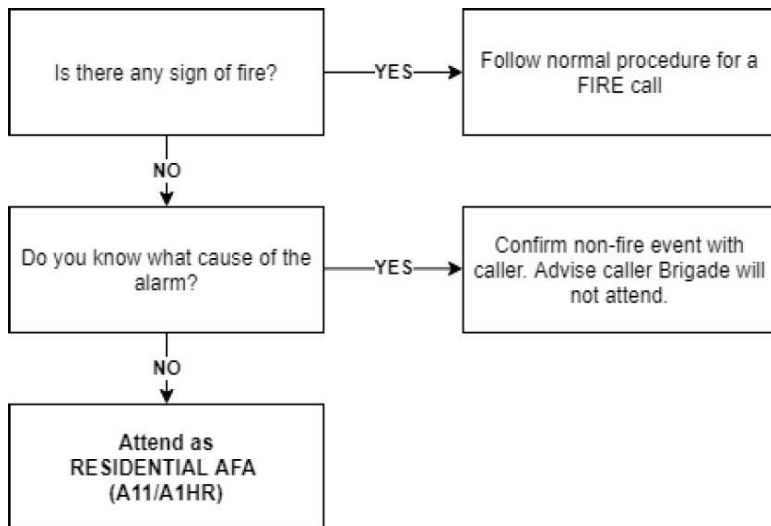
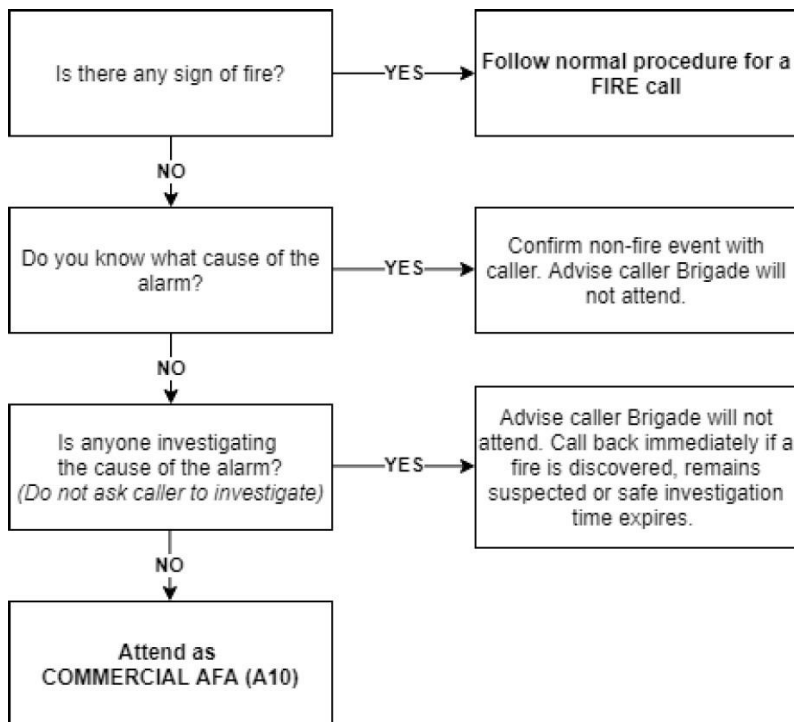


Figure 2 - AFA call filtering process for commercial premises (0600 – 2100 only)



Examples of non-fire events; Accidental or malicious actuation of AFA, fault condition, reset of AFA, burnt cooking, cigarette/vape smoke.

3.4. **Policy Note 697 (Automatic fire alarms – Operational Response)** - PN 697 deals with procedures to be followed by crews attending calls to AFAs. These procedures do not have any bearing on, nor will they be affected by any proposals contained within this paper.

4. LFB Duties and Responsibilities

4.1. The statutory duties of Fire & Rescue Services in England & Wales are set out in the Fire and Rescue Services Act 2004. There are no requirements within this act that compel an FRS to attend a call to an AFA if no fire is suspected nor confirmed. In fact, Part 2, Supplementary Section 18C sets out arrangements for “*Cases where a charge may be made for responding to report of fire etc*”. Specifically, section 18C reads as follows;

“This section applies to a report of fire if—

(a) the report is of fire at premises that are not domestic premises,

(b) the report is false,

(c) the report is made as a direct or indirect result of warning equipment having malfunctioned or been misinstalled, and

(d) there is a persistent problem with false reports of fire at the premises that are made as a direct or indirect result of warning equipment under common control having malfunctioned or been misinstalled.”

4.2. Section 21 of the Fire Services Act 2004 requires the Secretary of State to prepare a Fire and Rescue National Framework. One of the priorities set out in the current extant National framework is “*fire and rescue authorities to: make appropriate provision for fire prevention and protection activities and response to fire and rescue related incidents*”.

4.3. Section 2.9 of the National Framework states; “*Fire and rescue authorities must make provision to respond to incidents such as fires, road traffic collisions and other emergencies within their area and in other areas in line with their mutual aid agreements*”.

4.4. Section 4.6 of the national Framework requires LFB to produce an integrated Risk Management Plan which must include the following extracts;

- *reflect up to date risk analyses including an assessment of all foreseeable fire and rescue related risks that could affect the area of the authority;*
- *outline required service delivery outcomes including the allocation of resources for the mitigation of risks;*

4.5. Therefore, LFB has a duty to make “appropriate provision” to attend fire and rescue related incidents. However, when also looking at the duty to produce an Integrated Risk Management Plan, the LFB has a duty to assess/analyse risk and outline the allocation of resources. In conclusion, the allocation of resources to AFAs is therefore a matter for the LFB to determine, based on risk analysis.

4.6. Under section 5.1 of the National Framework, LFB also has a duty to *“manage their budgets and spend money properly and appropriately, and ensure the efficient and effective use of their resources, pursuing all feasible opportunities to keep costs down while discharging their core duties effectively.”* Therefore, it would follow that LFB therefore have a duty to review attendance to UwFS and the ongoing financial, resource and time implications of doing so.

4.7. Under section 7.4 of the National Framework *“All fire and rescue authorities must cooperate with the inspectorate and its inspectors to enable them to deliver their statutory function.”* And in section 7.5 *“Fire and rescue authorities must give due regard to reports and recommendations made by HMICFRS and – if recommendations are made – prepare, update and regularly publish an action plan detailing how the recommendations are being actioned. If the fire and rescue authority does not propose to undertake any action as a result of a recommendation, reasons for this should be given”.*

5. HMICFRS Inspections

5.1. HMICFRS inspected LFB in both 2018-19 and 2020-21 and reported the following;

5.2. The HMICFRS inspection 2018-19 reported that LFB *“Requires Improvement”* in the area of *“Making best use of resources”*. Specifically, HMICFRS reported the following;

“The London Fire Brigade is, in general, well resourced. However, we found evidence of it being wasteful with its resources. Resource allocation is based on largely historical decisions rather than the risks in the London Safety Plan.

The response standards have largely stayed the same over the past decade, and there is a policy for the public to have equal entitlement to emergency response regardless of differences in assessed risks between different communities.”

“Incident numbers could reduce further and create capacity if there was a drive to reduce false alarms. In the year to 31 December 2018, there were 51,186 false alarms – 48 percent of all incidents attended. The average rate for England is 40 percent.”

5.3. The HMICFRS inspection 2018-19 reported that LFB *“Requires Improvement”* in the area of *“Making best use of resources”*. Specifically, HMICFRS reported the following;

“The brigade should make sure it reviews how it allocates its resources to activities, based on the risks set out in the LSP”.

“The brigade sometimes uses its resources well to manage risk, but there are several areas that need addressing.”

5.4. HMICFRS inspection 2020-21 reported that LFB *“Requires Improvement”* in the area of *“Protecting the public through fire regulation”*. Specifically, HMICFRS reported the following;

“The brigade should make sure it addresses effectively the burden of false alarms.”

“The brigade needs to do more to reduce unwanted fire signals”.

“The brigade hasn’t done enough to reduce the number of unwanted fire signals. In 2020/21, the brigade attended 96,702 incidents, of which 46,919 (48.5 percent) were false alarms. Out of the 46,919 false alarms attended, 34,597 (73.7 percent) were automated fire alarms.”

“Brigade figures show an increase in the number of false alarms and automated fire alarms in 2021 compared to 2020. This means that engines may be unavailable to respond to genuine incidents because they are attending false alarms. It also creates a risk to the public if more fire engines travel at high speed on roads to respond to these incidents.”

“The brigade established an unwanted fire signal team to improve brigade policy on false alarm management. At the time of our inspection, we found much of the team’s work had yet to be put into practice. The brigade should quickly introduce any improvements that will effectively reduce false alarms.”

“The brigade has made little progress in addressing the following area for improvement identified in 2019. As such, the area for improvement remains. The brigade should make sure it addresses effectively the burden of false alarms.”

6. LFB Community Risk Management Plan 2023-2029

6.1. The current LFB Integrated Risk Management Plan which is required by the Government’s Fire & Rescue National Framework is known as the LFB Community Risk Management Plan 2023-2029 (CRMP). Within that plan, the following is stated;

“What we will do differently”.

“Response”

“We will become more flexible in how we use our operational resources so that we can continue to provide an excellent response when you need us in an emergency. We will do this alongside improving our productivity so that we can deliver more prevention and protection activities and train our staff to the high standards you and we expect.”

“Protecting You”

“We will: modernise our services, especially our emergency response, and do our best to predict and ready ourselves to meet future needs as risk changes across London.”

“Representing You”

“We will: use data better so that we make evidence-led decisions to improve our services and drive productivity.”

“Protecting You -Commitment 3 - We will adapt our services as your needs change”.

“Future fit – We will look to the future to ensure we are able to adapt our prevention, protection and response services to the evolving needs of London’s communities.

Adapting to changing demands – We will find underlying trends in our services and forecast to ensure we adapt our prevention, protection and response services for future demands.

Predicting future needs – We will use advanced modelling techniques to enable us to adapt our prevention, protection and response services to changing risks.

Replacement mobilising system – We will improve the way we mobilise and coordinate our response services to improve outcomes for you.”

“How we will measure our improvement”

- *“Staff time spent on prevention and protection activity*
- *Percentage of high-risk home fire safety visits*
- *False alarms due to Automatic Fire Alarms (AFAs) in non-domestic buildings”*

“Measure - False alarms due to Automatic Fire Alarms (AFAs) in non-domestic buildings Target - 20,000 in a year”

7. Evidence Based Risk Analysis

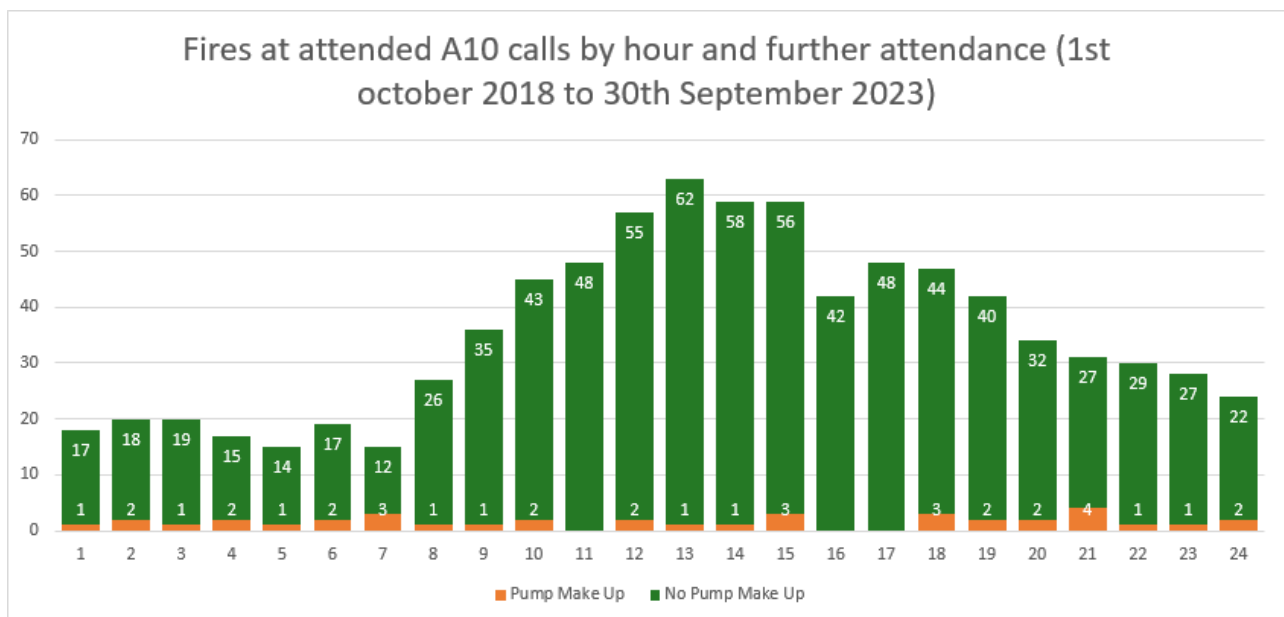
7.1. The Head of Business Intelligence for ICT Information Management has produced a report (Appendix 1) based on five years data to the end of September 2023, the paper concludes the following six points;

- a) Control Operators are good at identifying calls and recognising when calls are as a result of automatic alarms rather than confirmed fire calls. Ninety-eight per cent of all recognised AFA calls are false alarms on attendance.
- b) There is a low risk – around 0.5 percent – of a call recognised as a commercial AFA actuation (A10) resulting in an uncontrollable fire.

- c) Where there is a risk of fire, more than two-thirds (70.8%) happen during daytime hours (8am-8pm).
- d) A non-attendance policy would result in around 18,900 fewer mobilisations each year (about 50 a day)
- e) Fewer mobilisations to AFA’s would impact on reported first appliance attendance times (an increase of up to 12 seconds), but this would still be within the 6 minutes target.
- f) A case can be made for introducing a more robust approach to call filtering for calls to residential AFA’s and, with further analysis of property types and time of day, a custom non-attendance policy in specified situations.

7.2. The graph below (Figure 3) indicates the AFAs that have been recorded as a fire across a five-year period and the time of day across the 24 hours. The Amber section identifies those fires that have resulted in additional appliances attending (make-ups) and the green section indicates the fires that have not required any further resources than the initial attendance. It can be seen that there are very few “make-ups” and a number of those “make-ups” sit outside of the proposed hours of non-attendance.

Figure 3



7.3. Data captured below (Figure 4), also shows us that the number of calls received to AFAs in commercial premises where a fire has been present, are a substantially lower at weekends (36% lower call rate at weekends compared to weekdays).

Figure 4



7.4. Also, given that this data represents the total numbers for the whole of London over the entire five-year period, it can be seen that the risk of a fire being undetected as a result of the proposals in this paper is very low. However, there is a need to consider that depending on the type of commercial premises, they may not be occupied at weekends (but additionally, the risk of a fire starting may also be lower due to a lack of people/processes). This does therefore pose some very low occurrence risk, that a fire being detected by apparatus may not be confirmed by a person during these times.

7.5. Data captured in Fig 3 above also shows that the number of calls received to AFAs in commercial premises where a fire has been present between the hours of 07:00 to 08:00 and 18:00 to 20:00, albeit very low, there is a risk. Again, it could be anticipated that some commercial premises, dependent on use, may be unoccupied during these periods. Therefore, again there is some risk that a fire being detected by apparatus during these specific times, may not be confirmed by a person.

7.6. Further specific data analysis has been undertaken in relation to AFA fires at commercial premises during weekends and between the hours of 06:00 to 07:59, 17:00 to 19:59 on weekdays. This data reveals the following;

7.7. Weekends (Figure 5)

Number of duplicate Calls	Hosereels, jets, monitors	Portable extinguishers	Small means	None	(blank)	Grand Total
0	18	10	23	44	17	51/112
1	6	6	6	15	9	42
2	6	2	1	3	1	13
3	1		1			2
4	1					1
5	1					1
8	1					1
18	1					1
Grand Total	35	18	31	62	27	173

Figure 6

Colour Key to Fig 5		
Green	No Risk	All of the AFA fires highlighted green, apart from the top line, show duplicate calls to the LFB. The AFA fires highlighted green on the top line, indicate that no firefighting action was required. Therefore, none of these recorded AFA fires would have been affected by the non-attendance proposals
Amber	Possible Risk	It is not possible to establish if these single calls came from a person confirming a fire or automated apparatus. Therefore, a non-attendance policy <i>may</i> have resulted in more developed fires in some cases.

7.8. From Fig 5 above, the following can be seen. During weekends only, over the past five years, LFB has attended 173 AFAs at commercial premises which have been recorded as fires. Only 35 of those AFA fires were recorded as being extinguished using ‘hosereels, jets, monitors’. 17 of those 35 had more than one call, so would unlikely be affected by non-attendance to AFA at weekends.

7.9. The apparent risk can be seen on the top line, where during weekends only, over the past five years, LFB has attended 18 AFA fires recorded as being extinguished using ‘hosereels, jets, monitors’, 10 were recorded as using portable extinguishers and 23 using small means (e.g. a pan of water). There were no duplicate calls to these fires, and it is not known as to whether the single originating calls came from apparatus or from persons. The total number of these occurrences over the five-year period equates to 53, which is less than one occurrence per month over the whole of London.

7.10. When analysing this risk, the following should also be noted.

- The risk of non-attendance is considered as very low.
- Only **0.2%** of the 86,405 emergency calls that LFB attended over the past 5 years, were recorded as AFA fires during weekends.
- Only **0.06%** of the 86,405 emergency calls that LFB attended over the past 5 years, were recorded as AFA fires that had to be extinguished, with only a single emergency call being received at weekends.
- Some of the **0.06%** AFA fires from a single call, may have been reported by a person confirming a fire, which would reduce the risk still further.
- If a 999 AFA call is received from automated apparatus to an unoccupied premises and a fire is not confirmed by a person, it is very unlikely that there will be any life risk involved.
- Whilst the use of extinguishing medium has been recorded against 0.06% of weekend AFA fires, the limitations of potential for fire growth or whether any of those fires was already contained (e.g. metal bin fire/physical fire protection measures/smoke from external or contained fire affecting AFA/etc...) are not

known. The likelihood of some of these points, could reduce the risk even further.

7.11. Therefore, it can be seen that whilst accepting there is a risk, that risk is very low, as empirical data from a five-year period, confirms that the risk of LFB receiving a weekend call that results in AFA actually being an unconfirmed fire, is **0.06%** and some of the other points above reduce that risk still further.

7.12. Mornings 06:00 to 07:59 Monday to Friday

Figure 7

Number of duplicate Calls	Hosereels, jets, monitors	Portable extinguishers	Small means	None	(blank)	Grand Total
0		3	5	10	5	8/23
1	1		1	4		6
2	1	1	1		1	4
Grand Total	2	4	7	14	6	33

Figure 8

Colour Key to Fig 7		
Green	No Risk	All of the AFA fires highlighted green, apart from the top line, show duplicate calls to the LFB. The AFA fires highlighted green on the top line, indicate that no firefighting action was required. Therefore, none of these recorded AFA fires would have been affected by the non-attendance proposals
Amber	Possible Risk	It is not possible to establish if these single calls came from a person confirming a fire or automated apparatus. Therefore, a non-attendance policy <i>may</i> have resulted in more developed fires in some cases.

7.13. From Fig 7 above, the following can be seen. During 06:00 to 07:59 Monday to Friday, over the past five years, LFB has only attended 33 AFAs at commercial premises which have been recorded as fires. Only 2 of those AFA fires were recorded as being extinguished using 'hosereels, jets, monitors'. Both of those 2 fires had more than one call, so would unlikely be affected by non-attendance to AFA during 06:00 to 07:59 Monday to Friday.

7.14. An extremely low risk can be seen on the top line, where during 06:00 to 07:59 Monday to Friday, over the past five years, LFB has attended 3 AFA fires recorded as being extinguished using portable extinguishers and 5 using small means. There were no

duplicate calls to these incidents, and it is not known as to whether the single originating calls came from apparatus or from persons. The total number of these occurrences over the five-year period equates to 8, which is less than one occurrence every seven months, over the whole of London.

7.15. When analysing this risk, the following should also be noted.

- The risk of non-attendance is considered as extremely low.
- Less than **0.04%** of the 86,405 emergency calls that LFB attended over the past 5 years, were recorded as AFA fires during 06:00 to 07:59 Monday to Friday.
- Only **0.009%** of the 86,405 emergency calls that LFB attended over the past 5 years, were recorded as AFA fires that had to be extinguished, with only a single emergency call being received at during 06:00 to 07:59 Monday to Friday.
- Either or all of the AFA fires from a single call, may have been reported by a person confirming a fire, which would reduce the risk still further.
- None of the 8 AFA fires that occurred from 06:00 to 07:59 Monday to Friday across the whole 5-year period and across the whole of London, required anything more than a portable extinguisher.
- If a 999 AFA call is received from automated apparatus to an unoccupied premises and a fire is not confirmed by a person, it is very unlikely that there will be any life risk involved.
- Whilst the use of extinguishing medium has been recorded against 0.009% of AFA fires during 06:00 to 07:59 Monday to Friday, the limitations of potential for fire growth or whether any of those fires was already contained (e.g. metal bin fire/physical fire protection measures/smoke from external or contained fire affecting AFA/etc...) are not known. The likelihood of some of these points, could reduce the risk even further.

7.16. Therefore, it can be seen that whilst accepting there is a minimal risk, that risk is extremely low. Empirical data from a five-year period, confirms that the risk of LFB receiving a call during 06:00 to 07:59 Monday to Friday that results in AFA actually being an unconfirmed fire is only **0.009%** and some of the other points above reduce that risk still further.

7.17. Early Evening 17:00 – 19:59 Monday to Friday

Figure 9

Number of duplicate Calls	Hosereels, jets, monitors	Portable extinguishers	Small means	None	(blank)	Grand Total
0	1	6	11	36	7	18/61
1	5	2	4	12	5	28
2	1	1	1	1	1	5
4				1		1
5			1			1
Grand Total	7	9	17	50	13	96

Figure 10

Colour Key to Fig 9		
Green	No Risk	All of the AFA fires highlighted green, apart from the top line, show duplicate calls to the LFB. The AFA fires highlighted green on the top line, indicate that no firefighting action was required. Therefore, none of these recorded AFA fires would have been affected by the non-attendance proposals
Amber	Possible Risk	It is not possible to establish if these single calls came from a person confirming a fire or automated apparatus. Therefore, a non-attendance policy <i>may</i> have resulted in more developed fires in some cases.

7.18. From Fig 9 above, the following can be seen. During 17:00 to 19:59 Monday to Friday, over the past five years, LFB has only attended 96 AFAs at commercial premises which have been recorded as fires. Only 7 of those AFA fires were recorded as being extinguished using 'hosereels, jets, monitors'. 6 of those, 7 fires had more than one call, so would unlikely be affected by non-attendance to AFA during 06:00 to 07:59 Monday to Friday.

7.19. A very low risk can be seen on the top line, where during 17:00 to 19:59 Monday to Friday, over the past five years, LFB has attended 6 AFA fires recorded as being extinguished using portable extinguishers and 11 using small means. There were no duplicate calls to these incidents, and it is not known as to whether the single originating calls came from apparatus or from persons. The total number of these occurrences over the five-year period equates to 17, which is less than one occurrence every three months, over the whole of London.

7.20. When analysing this risk, the following should also be noted.

- The risk of non-attendance is considered very low.
- **Only 0.1%** of the 86,405 emergency calls that LFB attended over the past 5 years, were recorded as AFA fires during 17:00 to 19:59 Monday to Friday.
- Only **0.02%** of the 86,405 emergency calls that LFB attended over the past 5 years, were recorded as AFA fires that had to be extinguished, with only a single emergency call being received during 17:00 to 19:59 Monday to Friday.
- Either or all of the AFA fires from a single call, may have been reported by a person confirming a fire, which would reduce the risk still further.
- Only one of the AFA fires that occurred from 17:00 to 19:59 Monday to Friday across the entire 5-year period and across the whole of London, required anything more than a portable extinguisher.
- If a 999 AFA call is received from automated apparatus to an unoccupied premises and a fire is not confirmed by a person, it is very unlikely that there will be any life risk involved.
- Whilst the use of extinguishing medium has been recorded against 0.02% of AFA fires during 17:00 to 19:59 Monday to Friday, the limitations of potential for fire growth or whether any of those fires was already contained (e.g. metal bin fire/physical fire protection measures/smoke from external or contained fire affecting AFA/etc...) are not known. The likelihood of some of these points, could reduce the risk even further.

7.21. Therefore, it can be seen that whilst accepting there is a risk, that risk is very low. Empirical data from a five-year period, confirms that the risk of LFB receiving a call during 17:00 to 19:59 Monday to Friday, which results in AFA actually being an unconfirmed fire, is only **0.02%** and some of the other points above reduce that risk still further.

7.22. Data shows that the number of AFA fires that occurred between 20:00 to 21:00 across the five-year period was slightly lower than those between 19:00 to 20:00. Therefore, extending the time frame by an additional 30 minutes to 20:30 would bring the benefit of less disruption at change of watch times and completely remove attendance to UwFS at commercial properties for day shift crews, with very little perceived risk and providing more opportunity for other activities such as training.

7.23. Other Risks

7.24. The consultation process did result in additional perceived risks being raised for consideration; these are addressed individually in the consultation section later in this report.

7.25. Any change to LFB policy on attendance to AFA calls at commercial premises will carry a risk and therefore will need careful and diligent management. Part of this management could be to assess the risk on a regular basis as part of the organisational work for the LFB annual assessment of risk.

7.26. The exemptions to proposals detailed in this paper need to have a simple method of

being addressed by LFB Control operators, to minimise risk, ensure appropriate LFB attendance to premises and so as not to overburden Control staff in any way. LFB London Operations Centre (Control) have confirmed that they do not have any method of determining the use of a building nor whether it may be mixed use, unless a caller can confirm this. In all cases of doubt, the default is to send a normal attendance. Therefore, if the proposals in this paper are agreed, work will be required in conjunction with managers of LFB Control to establish a new call filtering process that minimises risk and is not overly onerous on LFB Control operators. This work will need to be undertaken and completed, prior to any future changes being made to LFB attendance to AFAs at commercial premises.

- 7.27. Some commercial properties may pose a risk that cannot be placed in broad terms under the exemptions listed within the proposals detailed in this paper. It should be accepted that any such risks should be considered, and a decision made as to whether the premises should qualify for exemption.
- 7.28. Under these circumstances, it is suggested that a formal exemption process should be developed and opened up to Borough Commanders. It is anticipated that Borough Commanders will be advised by crews locally of any such premises and an application for exemption could be made if the risk is deemed to warrant it.
- 7.29. LFB Control have advised that a tag can be attached to premises records in such cases, but there are limited staff available to undertake this particular type of work. Therefore, an approach to how this work can be undertaken and risks minimised, will need to be developed and formally agreed, prior to any future changes being made to LFB attendance to AFAs at commercial premises.
- 7.30. One identified risk that may require further investigation and should be kept under review in line with the LFB annual assessment of risk, is that data has revealed that there were over the last five years, a number of calls to AFAs recorded as actual fires, where only a single call was received to the LFB.
- 7.31. There were 844 calls to AFA that were recorded as a fire, of which 580 were attended by LFB as a result of only a single call. There is no data available to determine or differentiate which of those calls was made by a person on scene, remote monitoring or by automated apparatus.
- 7.32. During the hours of 08:00 to 20:00, there were 580 calls to AFA that were recorded as a fire, of which 400 were attended by LFB as a result of only a single call. There is no data available to determine or differentiate which of those calls was made by a person on scene, remote monitoring or by automated apparatus.
- 7.33. During the hours of 08:00 to 18:00, there were 504 calls to AFA that were recorded as a fire, of which 344 were attended by LFB as a result of only a single call. There is no data available to determine or differentiate which of those calls was made by a person on scene, remote monitoring or by automated apparatus.

7.34. From April 2022 through to October 2023, LFB vehicles were recorded as being involved in 127 road traffic collisions whilst responding to an AFA on blue lights. It can be seen statistically that 97.8% of AFA's attended by LFB, were recorded as a type of false alarm. Statistically therefore, it would follow that 124 of those RTCs occurred whilst responding to a false alarm.

7.35. Further regular review in line with the LFB annual assessment of risk is recommended to obtain more information and a better and regularly informed understanding of the risk related to single calls. However, this risk should be broadly considered in the following context;

- The data is taken from a five-year period (1,824 days) across the whole of London.
- Analysis of accuracy of recording of AFA incidents recorded as fires is not known.
- The Analysis of severity of fire incidents when responding to commercial AFAs contained in Appendix 1, suggests that *"the risk of a call to a commercial AFA actuation resulting in an uncontrollable fire is less than 0.52 percent."*
- 89% of the attendances between 08:00 – 20:59, required no firefighting, small means firefighting or the action wasn't recorded.
- Of the AFA incidents recorded as fires, is not known at this stage how many of the incidents with single emergency calls were made by persons rather than apparatus.
- These calls represent a very small proportion of AFAs attended by LFB, with most (98.7%) being recorded as a type of false alarm.

7.36. An option could be not to make any changes to AFA responses, but the following risks should also then be considered if that option were chosen;

- The numbers and trend of UwFS attended by LFB, is likely to continue to substantially increase over the years, this could unnecessarily stretch LFB resources and increase a wide range of risks. LFB will not be in a position to divert resources to use additional time to reduce risk in other areas such as Home Fire Safety Visits, Fire Safety Checks and Training, etc.
- 'Fire Facts'² shows that persons most likely to die in a fire, are those that have vulnerabilities but have not received an intervention by LFB. Failing to deliver a changed approach to UwFS may prevent more time being created for targeted fire prevention activity, particularly for those most at risk in our communities.
- London has a highly complex built environment with an estimated 800-1 million micro – large sized business enterprises. Failing to deliver a changed approach to UwFS may prevent more time being made available for targeted fire protection activity (such as Fire Safety Checks), reducing risks to businesses in our communities.

² <https://data.london.gov.uk/dataset/fire-facts--fire-deaths-in-greater-london>

- There is an increased training burden with evolving risks such as wildfires and terrorism response. Failing to deliver a changed approach to UwFS may impact on training time for our front-line crews.
- If out of line with national direction, further HMICFRS inspections may result in difficult outcomes for the LFB.
- As the numbers of UwFS increase, the risk of LFB vehicles being involved in road traffic collisions (RTC) whilst responding to an AFA on blue lights increases. This poses greater risk to both the wider community and LFB staff.

8. Consultation

8.1. In August 2023 the LFB Communications department was engaged to undertake a consultation process with regard to the proposals which were stated at the time. The LFB Communications department subsequently procured the services of TONIC, an independent social research organisation specialising in public consultations, to produce an independent summary of responses to the consultation. TONIC have been successfully used by LFB previously, for wide ranging public consultations to inform LFB organisational strategy plans.

8.2. LFB ran a public consultation to hear the views of residents, organisations, businesses, community groups and LFB staff. Ahead of the consultation launch, LFB Public Affairs and Community Engagement teams joined Deputy Commissioner Dom Ellis and Assistant Commissioner Charlie Pugsley to talk with community stakeholders and explain the aims behind the proposed AFA policy changes and to address any questions. Roundtable discussions were held with organisations including those that manage heritage buildings, represent businesses and building management organisations.

8.3. The consultation ran from 13th September to 26th October 2023 and TONIC undertook the work to deliver a summary of responses to the consultation.

8.4. TONIC reported the following;

“261 responses were received to the consultation, with 115 (44%) from members of the public, 93 (36%) from London Fire Brigade staff, 34 (13%) on behalf of organisations, and 19 (7%) who preferred not to say.”

8.5. TONIC also included the demographic of the respondents which can be seen in their report (Appendix 2)

8.6. Pre-consultation work was undertaken to identify those people/businesses that may be affected by the proposals and ensure that they were fairly included the consultation. LFB were subsequently informed that the numbers of people/businesses which engaged with the consultation process represents a relatively good response.

8.7. The respondents raised a variety of points and each of those points is reviewed against risk in sections 8.9 of this report. Among what TONIC considered to be headline findings of the consultation to include, they wrote the following;

“Overall, respondents were generally supportive of the proposed change, with exactly half (50%) explicitly stating that they had no concerns regarding its implementation and felt it was a good and welcome idea. This compares with just under a third (30%) who explicitly stated that they felt the proposed change would increase risk and that LFB continue with its current policy of attending AFAs.

8.8. It can therefore be seen that there was greater support from the respondents for the LFB proposal, whilst the number of those that had explicit concerns was significantly lower.

8.9. The main concerns that TONIC identified in their report are contained in the following matrix, LFB has provided a response to those points and indicated what action may, where appropriate, be required;

8.9.1		
8.9.1	Respondent Concern	“What happens when an AFA is triggered by an actual fire? How many buildings will be lost because of this? One is too many.” (Member of the Public)
	LFB Response	<p>The current proposals are limited to commercial premises only, and only during hours that those premises are expected to normally be occupied. Therefore, the expectation, based on data analysis as detailed in section 7 above, is that in those circumstances, the occupants will be alerted to any fire by the apparatus or persons in the vicinity and they will make an emergency call to request an LFB response.</p> <p>In addition to this, LFB is the only UK metropolitan FRS that still attends all AFAs in commercial premises, data analysis detailed in section 7 above, indicates that our proposals are very low risk, and this appears to also be demonstrated by other UK FRSs. Therefore, it is not anticipated that any buildings will be lost due to the proposals contained within this paper.</p> <p>The proposals in this report are intended to allow LFB to repurpose time to use for training and community safety work such as home safety visits or fire safety checks – these will in turn reduce risk to London communities. LFB data shows that people that have vulnerabilities but are not known to LFB, are the most likely people to die in a fire. Therefore, the potential for the initiative to free up more time for community safety work is very important.</p>
	Action Required	Prior to progressing any changes to LFB response to AFAs in commercial premises, should undertake a communications programme to ensure the community is made aware of any changes. This action should also include specifically targeting the business community occupying commercial premises.

8.9.2	Respondent Concern	<p>“I have been to many AFAs that turned into fully developed fires, they would have been far worse if the arrival times were further delayed.” (LFB staff)</p>
	LFB Response	<p>LFB does attend calls to AFAs where fires have been recorded and data indicates that the majority (59%) of those types of incidents that occurred in the past five years, were in residential premises. The proposals do not include any changes to LFB response to residential premises. Therefore, all AFA calls to residential premise will continue to receive a full LFB response.</p> <p>Data analysis indicates that there is less than 0.5 percent risk of a call recognised as a commercial AFA actuation resulting in an uncontrollable fire. Where there is a risk of fire, more than two-thirds (70.8%) happen during daytime hours (8am-8pm). The proposals put forward in this paper are limited to daytime hours only and they do not include any reduction to LFB attendance to residential premises. Therefore, as previously indicated;</p> <p>Where calls to AFAs in commercial premises have actually been due to fire, data demonstrates that emergency calls are received from persons as well as any automated apparatus that may be present. As the proposals are limited to hours when commercial properties are anticipated to be occupied, the data indicates that the risk of fire going unreported is very low.</p> <p>Additionally, freeing up time spent attending unwanted fire signals (UwFS) can be spent on other work, such as Fire Safety Checks, Home Fire Safety Visits and engaging with communities – this additional work should also help improve standards of fire safety in businesses. Also, the risk created by blue light runs to UwFS will be reduced.</p>
	Action	<p>LFB should monitor the outcomes of any changes in line with the LFB published “Assessment of Risk”.</p> <p>Prior to progressing any changes to LFB response to AFAs in commercial premises, should undertake a communications programme to ensure the community is made aware of any changes. This action should also include specifically targeting the business community occupying commercial premises.</p>
8.9.3	Respondent Concern	<p>“The non-attendance of fire crews to businesses will likely see unnecessary escalation of fire and greater potential of life risk to business owners, equally impacting responding fire crews who will be faced with a</p>

		more developed fire and subsequently deteriorating conditions.” (Fire Brigades Union)
	LFB Response	<p>LFB does attend calls to AFAs where fires have been recorded and data indicates that the majority (59%) of those types of incidents that occurred in the past five years, were in residential premises. The proposals do not include any changes to LFB response to residential premises. Therefore, all AFA calls to residential premise will continue to receive a full LFB response.</p> <p>Data analysis indicates that there is less than 0.5 percent risk of a call recognised as a commercial AFA actuation resulting in an uncontrollable fire. Where there is a risk of fire, more than two-thirds (70.8%) happen during daytime hours (8am-8pm). The proposals put forward in this paper are limited to daytime hours only and they do not include any reduction to LFB attendance to residential premises. Therefore, as previously indicated;</p> <p>Where calls to AFAs in commercial premises have actually been due to fire, data demonstrates that emergency calls are received from persons as well as any automated apparatus that may be present. As the proposals are limited to hours when commercial properties are anticipated to be occupied, the data indicates that the risk of fire going unreported is very low.</p> <p>Additionally, freeing up time spent attending unwanted fire signals (UwFS) can be spent on other work, such as Fire Safety Checks, Home Fire Safety Visits and engaging with communities – this additional work should also help improve standards of fire safety in businesses. Also, the risk created by blue light runs to UwFS will be reduced.</p>
	Action	LFB will be monitoring the outcomes of any changes. This will include time spent on Protection (fire safety) & Prevention activities, which is are monitored as a Key Performance Indicators (KPI).
8.9.4	Respondent Concern	“Having managed buildings before I find it frustrating that certain staff are not trained to understand the fire alarm panel [or] how to determine which detector has gone off, where the detector has activated, [and the] cause of the activation.”
	LFB Response	The responsibility of staff training for commercial premise does not fall under the remit of London Fire Brigade. If you own, manage or operate a business, you need to comply with fire safety law. The main law is the Regulatory Reform (Fire Safety) Order 2005 or "the Fire Safety Order". It applies across England and Wales and came into force on 1 October

		<p>2006. As part of your responsibilities under the Act, you need to make sure Employees are provided with adequate fire safety training.</p> <p>Regardless of whether or not staff are trained in the intricacies of any particularly sophisticated AFA system, the simple process of making an emergency 999 call if the system actuates and there is a confirmed fire, remains the same. Therefore, this issue is not expected to have any bearing on the proposals included in this paper.</p>
	Action	<p>LFB will continue to ensure advice around this matter is available on the external facing LFB website.</p> <p>LFB will ensure that highlighting the responsibility to check that employees are provided with adequate fire safety training, will be included as part of the communication plan (and support for businesses) for the roll out of the policy change.</p>
8.9.5	Respondent Concern	<p>When everything went from LFB Fire Risk Assessment to Self-Assessment things like training were not checked on.” (Organisation)</p>
	LFB Response	<p>This is a matter of legislation and the responsibility of staff training for commercial premise does not fall under the remit of London Fire Brigade. The persons that own, manage or operate a business, need to comply with fire safety law. The main law is the Regulatory Reform (Fire Safety) Order 2005 or "the Fire Safety Order". It applies across England and Wales and came into force on 1 October 2006. As part of the responsible persons remit under the Act, they need to make sure Employees are provided with adequate fire safety training.</p> <p>Regardless of whether or not staff training has been checked, the simple process of making an emergency 999 call in the event of a fire remains the same. Therefore, this issue is not expected to have any bearing on the proposals included in this paper.</p>
	Action	<p>LFB will continue to ensure advice around this matter is available on the external facing LFB website.</p> <p>LFB will ensure that highlighting the responsibility to check that employees are provided with adequate fire safety training, will be included as part of the communication plan (and support for businesses) for the roll out of the policy change.</p>
8.9.6	Respondent Concern	<p>“These Boroughs should be exempt from this proposal due to the number of AFAs that actually turn into Fires. On Soho's ground alone over the last 5 years 75 commercial AFAs have turned into fires. You have not taken</p>

	<p>into account the identified risks in the Borough Risk Management Plans.” (LFB staff)</p>
<p>LFB Response</p>	<p>LFB managers responsible for Soho have subsequently provided data to support the claim of 75 commercial AFAs have turned into fires. When that data has been reviewed, it has revealed that there is no time of day given for the 75, but other data provided at the same time indicates that over 53% of those fires occurred outside of the times the non-attendance to AFAs is being proposed. The majority (66/75) appear not to have required any further attendance (make-ups). There is no indication of severity for any of the fires. There is no indication of how many received additional calls confirming a fire, which would have meant they would have been attended irrespective of proposals.</p> <p>LFB does attend calls to AFAs where fires have been recorded and data indicates that the majority (59%) of those types of incidents that occurred in the past five years, were in residential premises. The proposals do not include any changes to LFB response to residential premises. Therefore, all AFA calls to residential premise will continue to receive a full LFB response.</p> <p>Data analysis indicates that there is less than 0.5 percent risk of a call recognised as a commercial AFA actuation resulting in an uncontrollable fire. Where there is a risk of fire, more than two-thirds (70.8%) happen during daytime hours (8am-8pm). The proposals put forward in this paper are limited to daytime hours only and they do not include any reduction to LFB attendance to residential premises. Therefore, as previously indicated;</p> <p>Where calls to AFAs in commercial premises have actually been due to fire, data demonstrates that emergency calls are received from persons as well as any automated apparatus that may be present. As the proposals are limited to hours when commercial properties are anticipated to be occupied, the data indicates that the risk of fire going unreported is very low. In particular, Soho is known to be highly populated during daytime hours, so it is very unlikely that a fire would go unnoticed.</p> <p>As part of the work to prepare for the proposals in this report, LFB Control have been consulted and have advised that it is possible to tag a premises if there is any particular risk identified in a Borough Risk Management Plan (BRMP). It is also acknowledged that joint work will need to take place with LFB Control in order to progress the proposals in this report.</p> <p>Westminster’s own Borough Risk Management Plan (BRMP) specifically states;</p>

		<p><i>“We will also focus our protection services on reducing call volume to unwanted fire signals from Automatic Fire Alarms (AFAs). Call volume to AFAs in Westminster is higher than any other LFB borough and reduces the time available for crews to undertake other activity such as training, prevention and engagement, as well as reducing overall appliance availability. We will use LFB data sets to identify premises with highest call volumes and, in conjunction with our Regulatory Fire Safety team, engage with building owners and responsible persons to ensure that attendances are minimised.”</i></p> <p>Therefore, freeing up time spent attending unwanted fire signals (UwFS) can be spent on other work, such as Fire Safety Checks, Home Fire Safety Visits and engaging with communities – this additional work should also help improve standards of fire safety in businesses.</p> <p>Additionally, the risk created by blue light runs to UwFS will be reduced.</p>
	Action	<p>LFB will be monitoring the outcomes of any changes. This will include time spent on Protection (fire safety) & Prevention activities, which are monitored as a Key Performance Indicators (KPI).</p> <p>LFB should work with LFB Control to establish policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p>
8.9.7	Respondent Concern	<p>“In 99% of commercial AFAs I attend the staff are not capable of dealing with an AFA on their own. You need to communicate to every organisation exactly what will happen and the consequences.” (LFB staff)</p>
	LFB Response	<p>The responsibility for AFA’s and staff training for commercial premise does not fall under the remit of London Fire Brigade. The persons that own, manage or operate a business, need to comply with fire safety law. The main law is the Regulatory Reform (Fire Safety) Order 2005 or "the Fire Safety Order". It applies across England and Wales and came into force on 1 October 2006. As part of the responsible persons remit under the Act, they need to make sure Employees are provided with adequate fire safety training.</p> <p>Regardless of whether or not staff are trained in the intricacies of any particularly sophisticated AFA system, the simple process of making an emergency 999 call if the system actuates and there is a confirmed fire, remains the same. Therefore, this issue is not expected to have any bearing on the proposals included in this paper.</p>
	Action	<p>LFB will continue to ensure advice around this matter is available on the external facing LFB website.</p> <p>LFB will ensure that highlighting the responsibility to check that employees are provided with adequate fire safety training, will be</p>

		included as part of the communication plan (and support for businesses) for the roll out of the policy change.
8.9.8	Respondent Concern	“There should be a training session to ensure all parties understand the new procedure/policy. A staff member may be too quick to reset a system or not investigate thoroughly enough, meaning that an early preventive intervention will be missed and may lead to crews arriving to more developed incidents.” (Member of the Public)
	LFB Response	The responsibility for AFA’s and staff training for commercial premise does not fall under the remit of London Fire Brigade. The persons that own, manage or operate a business, need to comply with fire safety law. The main law is the Regulatory Reform (Fire Safety) Order 2005 or "the Fire Safety Order". It applies across England and Wales and came into force on 1 October 2006. As part of the responsible persons remit under the Act, they need to make sure Employees are provided with adequate fire safety training. However, LFB will be looking to undertake a communications programme.
	Action	LFB will continue to ensure advice around this matter is available on the external facing LFB website. LFB will ensure that highlighting the responsibility to check that employees are provided with adequate fire safety training, will be included as part of the communication plan (and support for businesses) for the roll out of the policy change.
8.9.9	Respondent Concern	“Have allocated trained staff members in the place of work, per shift per floor, relating to the size of the building. A well-practiced routine will also give reassurance to visitors and vulnerable service users. Make it compulsory and provide evidence of approved training to be renewed every two years.” (Member of the Public)
	LFB Response	The responsibility for AFA’s and staff training for commercial premise does not fall under the remit of London Fire Brigade. The persons that own, manage or operate a business, need to comply with fire safety law. The main law is the Regulatory Reform (Fire Safety) Order 2005 or "the Fire Safety Order". It applies across England and Wales and came into force on 1 October 2006. As part of the responsible persons remit under the Act, they need to make sure Employees are provided with adequate fire safety training. However, LFB will be looking to undertake a communications programme.

	Action	<p>LFB will continue to ensure advice around this matter is available on the external facing LFB website.</p> <p>LFB will ensure that highlighting the responsibility to check that employees are provided with adequate fire safety training, will be included as part of the communication plan (and support for businesses) for the roll out of the policy change.</p>
8.9.10	Respondent Concern	<p>"[Advise] on the following: how to read your addressable panel; how to operate the panel properly whilst finding the active detector; best advice to search for active detector; enhanced advice on safe ways to look for active sensors, like checking doors for heat, using backs of hands when touching, etc. Policy on two or more separate detectors in an area going off, or two different technology sensors going off. In the Intruder alarm world this scenario would be classed as a "Sequentially Confirmed Intruder" and get police response where a single detector would not. I would say if you are seeing multiple detectors activate that you call 999 rather than investigate as it may be a moving fire." (Unidentified)</p>
	LFB Response	<p>The responsibility for AFA's and staff training for commercial premise does not fall under the remit of London Fire Brigade. The persons that own, manage or operate a business, need to comply with fire safety law. The main law is the Regulatory Reform (Fire Safety) Order 2005 or "the Fire Safety Order". It applies across England and Wales and came into force on 1 October 2006. As part of the responsible persons remit under the Act, they need to make sure Employees are provided with adequate fire safety training.</p> <p>LFB will be looking to undertake a communications programme. However, Due to the wide variety of systems available and with an estimated circa 1 million business enterprises in London³, it would not be possible for the LFB to provide tailored advice and the responsibility above is reiterated.</p>
	Action	<p>LFB will continue to ensure advice around this matter is available on the external facing LFB website.</p> <p>LFB will ensure that highlighting the responsibility to check that employees are provided with adequate fire safety training, will be included as part of the communication plan (and support for businesses) for the roll out of the policy change.</p>

<https://www.statista.com/statistics/1177347/number-of-businesses-in-london/#:~:text=There%20were%20just%20over%201.04,1.13%20million%20businesses%20in%202020.>

8.9.11	TONIC Analysis of Responses	The most common suggestion for other exemptions was for residential properties housed within the same buildings as non-residential businesses, such as flats situated above shops or restaurants, or apartments contained within the same building as offices. It was suggested that some of these residential properties may be recorded as having a different address to the businesses they share a building with, and therefore may be negatively impacted by the proposed change.
	LFB Response	<p>This repeated point raised by respondents, does warrant further consideration by LFB. However, although it does represent a perceived risk, there is no current availability of specific data to analyse in order to determine whether or not this issue presents a particular risk.</p> <p>In addition, LFB Control have no way of determining whether any particular premises is mixed use, unless they are informed at the point of call. Alarm Receiving Centres (ARCs) who manage and pass on fire alarm calls should have basic data on the premises the fire alarm signal originates from.</p> <p>Additionally, residential accommodation should have suitable fire separation from any commercial elements of the building.</p>
	Action	<p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals. Specifically in this instance, LFB need to consider how the issue of residential property within mixed use premises is addressed. Control do not currently have any automated method of establishing whether mixed use buildings contain any form of residential element or sleeping risk. A solution could be, to add a question to the call filtering process, and if there is any doubt as to whether there is residential or sleeping risk element to the mixed use, then a full normal attendance should be despatched.</p> <p>LFB will be monitoring the outcomes of any changes. This will include time spent on Protection (fire safety) activity, which is monitored as a Key Performance Indicator (KPI).</p>
8.9.12	Respondent Suggestion	Exempt Transport hubs (particularly the tube network)
	LFB Response	These types of locations do not have any sleeping accommodation and have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will numerous members of public. Therefore, there is no reason to exempt these types of premises.
	Action	<p>No current action required.</p> <p>Review this action if any of the following highlights a particular change of risk in respect of these types of premises;</p>

		<ol style="list-style-type: none"> 1. A future planned premises risk review utilising empirical data. 2. A future local premises risk assessment in line with a Borough Risk Management Plan and associated new protocol as a result of the proposals in this paper. 3. Any future changes within the LFB Assessment of Risk (AoR). 4. Other methodology as appropriate.
8.9.13	Respondent Suggestion	Exempt Listed and heritage buildings
	LFB Response	<p>This point raised by respondents, has also been raised internally within LFB for further consideration. Heritage properties are considered as a notable risk in the LFB Assessment of Risk (AoR) and the fire in Notre Damme highlighted the catastrophic societal, cultural and financial impact such a fire could have. LFB is therefore recommending exempting listed and heritage buildings from the proposal of non-attendance to AFA.</p> <p>LFB responds to an average of 33 fires in grade I and II* buildings a year. In particular cases this can give rise to significant loss of heritage to London. Grade 1 listed building are considered to be of high historic importance.</p> <p>There are 4 world heritage sites in London and Historic England cites that here are 1400 grade 1 listed buildings in London, although the number of buildings that may have a fire alarm may much lower as this number includes monuments, portions of wall etc.</p>
	Action	<p>Based on the relatively small number of Grade 1 and 2 listed and the focus on heritage buildings in the AoR, heritage buildings should be added to the exempted list.</p> <p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p> <p>Major national heritage premises, e.g. museums, national attractions and galleries, should have a Premises Risk Assessment recorded as per PN 800 and should as per policy, be visited once per year by local watches. Grade 1 listed buildings could have an underwrite added to their address as part of this process so that Control would automatically see that the building would require an attendance.</p> <p>Control do not currently have any automated method of establishing whether any particular premises is listed or heritage. A solution could be, to add a question to the call filtering process, and if there is any indication as to it being a listed or heritage premises, then an appropriate attendance should be despatched.</p>

8.9.14	Respondent Suggestion	Exempt Schools and nurseries
	LFB Response	<p>Schools do not generally have any sleeping accommodation unless they are boarding schools, in which case they will be classed as residential and exempt anyway. Also, whilst children are present, schools and nurseries have staff on site who will evacuate children and make an emergency 999 call to LFB in the event of a fire.</p> <p>However, LFB have previously noted that that while the life risk is low, the community impact is high and that due to a lack of staff during school holiday periods, schools should be urged to have sprinklers installed. Therefore, in this instance, consideration should be given to exempting schools and nurseries.</p>
	Action	<p>It is recommended that schools and nurseries are exempted from the proposals in this report.</p> <p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p>
8.9.15	Respondent Suggestion	Exempt Community buildings such as halls and food banks
	LFB Response	<p>These types of locations do not have any sleeping accommodation and generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present. Also, data has not suggested that this type of premises presents a particular risk. Therefore, there is no reason to exempt these types of premises.</p>
	Action	<p>No current action required.</p> <p>No current action required.</p> <p>Review this action if any of the following highlights a particular change of risk in respect of these types of premises;</p> <ol style="list-style-type: none"> 1. A future planned premises risk review utilising empirical data. 2. A future local premises risk assessment in line with a Borough Risk Management Plan and associated new protocol as a result of the proposals in this paper. 3. Any future changes within the LFB Assessment of Risk (AoR). 4. Other methodology as appropriate.

8.9.16	Respondent Suggestion	Exempt Telecommunication hubs
	LFB Response	<p>These types of locations do not have any sleeping accommodation and larger hubs may have staff on site who will make an emergency 999 call to LFB in the event of a fire. Also, data has not suggested that this type of premises presents a particular risk. Therefore, there is no reason to exempt these types of premises.</p> <p>Such sites should also have business continuity arrangements in place which may include suppression. Any critical infrastructure could be exempted by local action via the local station as part of BRMP work as noted elsewhere.</p>
	Action	<p>No current action required.</p> <p>Review this action if any of the following highlights a particular change of risk in respect of these types of premises;</p> <ol style="list-style-type: none"> 1. A future planned premises risk review utilising empirical data. 2. A future local premises risk assessment in line with a Borough Risk Management Plan and associated new protocol as a result of the proposals in this paper. 3. Any future changes within the LFB Assessment of Risk (AoR). 4. Other methodology as appropriate.
8.9.17	Respondent Suggestion	Exempt Electrical supply buildings
	LFB Response	<p>These types of locations do not have any sleeping accommodation and data has not suggested that this type of premises presents a particular risk.</p> <p>Electrical supply buildings generally offer good protection in relation to fire spread, and due to the danger of death from electrocution, attending crews are very limited in any actions they may take at these types of premises. Therefore, there is no reason to exempt these types of premises.</p>
	Action	<p>No current action required.</p> <p>Review this action if any of the following highlights a particular change of risk in respect of these types of premises;</p> <ol style="list-style-type: none"> 1. A future planned premises risk review utilising empirical data. 2. A future local premises risk assessment in line with a Borough Risk Management Plan and associated new protocol as a result of the proposals in this paper. 3. Any future changes within the LFB Assessment of Risk (AoR). 4. Other methodology as appropriate.

8.9.18	Respondent Suggestion	Exempt Buildings that provide a specific useful purpose for the running of the city (e.g., the Stock Exchange, the Bank of England, police headquarters and training centres)
	LFB Response	<p>These types of locations do not have any sleeping accommodation and generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present. Also, data has not suggested that this type of premises presents a particular risk.</p> <p>Feedback from the pre-consultation work to engage the business community, indicated that due to the cost of business interruption, there will be processes in place for the 'investigation period' (e.g. on-site staff make checks, who would then call 999 in the event of a fire), as well as significant investment in well managed fire detection and safety systems.</p> <p>However, LFB recognises that some individual sites e.g. police HQ or training centres, could present a significant societal/community impact in the event of a fire and therefore could be considered for exemption to the proposals in this report. The level of risk and whether exemption may apply would need to be determined on an individual premises basis.</p>
	Action	<p>Consider new LFB policy/procedure linked to PN 800/7.2.d visits and Borough Risk Management Plans, to give Borough Commanders the responsibility to ensure local risks are assessed and as appropriate, to apply for consideration of specific premises to have bespoke exemption from the proposals in this report.</p> <p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p> <p>Control do not currently have any automated method of establishing whether any particular premises may hold an exemption. A solution could be to add a tag against the premises in the control mobilising system. However, consideration needs to be given to workload and limited available resources to facilitate this work in the initial stages of any local identification of potentially exempt premises.</p>
8.9.19	Respondent Suggestion	Exempt Places with animals (such as shelters, stables, farms, and pet shops)
	LFB Response	It is considered unlikely that any commercial premises would be unoccupied during daytime hours if the business involves the care of animals. Also, data has not suggested that this type of premises presents a particular risk. Therefore, there is no reason to automatically exempt these types of premises.

		<p>However, LFB recognises that some individual sites could present a risk to animals in the event of a fire. Therefore, following a local review of such premises indicating that all appropriate safety precautions have been undertaken and a significant risk to animals still exists, then the premises could be considered for exemption to the proposals in this report. The level of risk and whether exemption may apply would need to be determined on an individual premises basis.</p>
	Action	<p>Consider new LFB policy/procedure linked to PN 800/7.2.d visits and Borough Risk Management Plans, to give Borough Commanders the responsibility to ensure local risks are assessed and appropriate remedial actions have been advised. Borough Commanders should then have a procedure open to them if they still feel it appropriate, to apply for consideration of specific premises to have bespoke exemption from the proposals in this report.</p> <p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p> <p>Control do not currently have any automated method of establishing whether any particular premises may hold an exemption. A solution could be to add a tag against the premises in the control mobilising system. However, consideration needs to be given to workload and limited available resources to facilitate this work in the initial stages of any local identification of potentially exempt premises.</p>
8.9.20	Respondent Suggestion	Exempt Buildings that used cladding
	LFB Response	<p>The proposals extend only to commercial premises which do not have any sleeping accommodation and generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present. Also, fires involving cladding being on the external face of the building, should be highly visible when compared to internal fires, greatly increasing the probability of further calls to fire by persons. Therefore, there is no reason to exempt these types of premises.</p>
	Action	No Action required.

8.9.21	Respondent Suggestion	Exempt Derelict and unoccupied buildings
	LFB Response	<p>The proposals extend only to commercial premises which do not have any sleeping accommodation and it is unlikely that any derelict/unoccupied buildings would have a well maintained and managed fire alarm system.</p> <p>Also, data has not suggested that this type of premises presents a particular risk in relation to AFAs. Therefore, there is no reason to automatically exempt these types of premises.</p>
	Action	No Action required.
8.9.22	Respondent Suggestion	Exempt Storage and self-storage facilities
	LFB Response	<p>The proposals extend only to commercial premises which do not have any sleeping accommodation and these types of premises generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present.</p> <p>Also, data has not suggested that this type of premises presents a particular risk in relation to AFAs. Therefore, there is no reason to automatically exempt these types of premises.</p>
	Action	No action required.
8.9.23	Respondent Suggestion	Exempt Buildings containing significant amounts of lithium-ion batteries
	LFB Response	<p>High risk sites storing volumes of dangerous substances will continue to receive an emergency response, where LFB consider exemption appropriate through the LFB published Annual Assessment of Risk (AoR).</p> <p>Whilst, data has not suggested that this type of premises presents a particular risk in relation to AFAs, LFB notes that this may be a relatively new and potentially increasing situation due to the changing technologies being employed.</p> <p>Therefore, whilst there is no reason to automatically exempt these types of premises, following a local review of such premises indicating that all appropriate safety precautions have been undertaken and a significant risk remains, then the premises could be considered for exemption to the proposals in this report. The level of risk and whether exemption may apply would need to be determined on an individual premises basis.</p>

	Action	<p>Consider new LFB policy/procedure linked to PN 800/7.2.d visits and Borough Risk Management Plans, to give Borough Commanders the responsibility to ensure local risks are assessed and appropriate remedial actions have been advised. Borough Commanders should then have a procedure open to them if they still feel it appropriate, to apply for consideration of specific premises to have bespoke exemption from the proposals in this report.</p> <p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p> <p>Control do not currently have any automated method of establishing whether any particular premises may hold an exemption. A solution could be to add a tag against the premises in the control mobilising system. However, consideration needs to be given to workload and limited available resources to facilitate this work in the initial stages of any local identification of potentially exempt premises.</p>
8.9.24	Respondent Suggestion	Exempt Multi-storey car parks connected to other buildings
	LFB Response	<p>The proposals extend only to commercial premises which do not have any sleeping accommodation. It is likely that this type of premises will have a constant flow of people using the site who will make an emergency 999 call to LFB in the event of a fire.</p> <p>The recent media coverage of the car park fire at Luton Airport may have given heightened awareness of this type of premises, but it should be noted that a fire in this type of premise would not be advantaged nor disadvantaged by the presence of an AFA system, as open sided car parks would struggle to have effective AFA due to wind.</p> <p>Also, data has not suggested that this type of premises presents a particular risk in relation to AFAs. Therefore, there is no reason to automatically exempt these types of premises.</p>
	Action	No action required.
8.9.25	Respondent Suggestion	Exempt Buildings (and buildings that house collections and archives) as listed in the Department for Culture, Media and Sport's guidance for the protection of cultural property in the event of armed conflict.
	LFB Response	These types of premises will continue to receive an emergency response, where LFB consider exemption appropriate through the LFB published Annual Assessment of Risk (AoR).

		<p>These types of locations usually have staff on site may have a policy or procedure for an 'investigation period' of the alarm actuation and who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present. Also, data has not suggested that this type of premises presents a particular risk.</p> <p>However, LFB recognises that some individual sites could present a significant societal/community impact in the event of a fire and therefore could be considered for exemption to the proposals in this report. The level of risk and whether exemption may apply would need to be determined on an individual premises basis.</p> <p>Therefore, if a premises of this type is identified and it sits outside of the LFB published Annual Assessment of Risk (AoR), following a local review of such premises indicating that all appropriate safety precautions have been undertaken and a significant risk remains, then the premises could be considered for exemption to the proposals in this report. The level of risk and whether exemption may apply would need to be determined on an individual premises basis.</p>
	Action	<p>Consider new LFB policy/procedure linked to PN 800/7.2.d visits and Borough Risk Management Plans, to give Borough Commanders the responsibility to ensure local risks are assessed and appropriate remedial actions have been advised. Borough Commanders should then have a procedure open to them if they still feel it appropriate, to apply for consideration of specific premises to have bespoke exemption from the proposals in this report.</p> <p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p> <p>Control do not currently have any automated method of establishing whether any particular premises may hold an exemption. A solution could be to add a tag against the premises in the control mobilising system. However, consideration needs to be given to workload and limited available resources to facilitate this work in the initial stages of any local identification of potentially exempt premises.</p>
8.9.26	Respondent Suggestion	Exempt Gyms
	LFB Response	The proposals extend only to commercial premises which do not have any sleeping accommodation and these types of premises generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present.

		Also, data has not suggested that this type of premises presents a particular risk. Therefore, there is no reason to exempt these types of premises.
	Action	No action required.
8.9.27	Respondent Suggestion	Exempt Theatres, cinemas, stadiums, and other venues
	LFB Response	<p>The proposals extend only to commercial premises which do not have any sleeping accommodation and these types of premises generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present.</p> <p>Also, data has not suggested that this type of premises presents a particular risk in relation to AFAs. Therefore, there is no reason to automatically exempt these types of premises.</p> <p>However, it is noted that some theatres can be very old, so would sit within the Heritage/listed properties category. Heritage properties are considered as a notable risk in the LFB Assessment of Risk (AoR) and the fire in Notre Damme highlighted the catastrophic societal, cultural and financial impact such a fire could have. LFB is therefore recommending exempting listed heritage buildings from the proposal of non-attendance to AFA.</p>
	Action	<p>Where theatres are identified as heritage or Grade 1 and 2 listed buildings, given the focus on heritage buildings in the AoR, these particular premises should be added to the exempted list.</p> <p>LFB should work with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.</p> <p>Control do not currently have any automated method of establishing whether any particular premises is listed or heritage. A solution could be, to add a question to the call filtering process, and if there is any indication as to it being a listed or heritage premises, then an appropriate attendance should be despatched.</p>
8.9.28	Respondent Suggestion	Exempt Buildings that contain a basement
	LFB Response	The proposals extend only to commercial premises which do not have any sleeping accommodation and these types of premises generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present.

		Also, data has not suggested that this type of premises presents a particular risk in relation to AFAs. Therefore, there is no reason to automatically exempt these types of premises.
	Action	No action required.
8.9.29	Respondent Suggestion	Exempt Large complex buildings
	LFB Response	The proposals extend only to commercial premises which do not have any sleeping accommodation and these types of premises generally have staff on site who will make an emergency 999 call to LFB in the event of a fire, as will members of public if present. Also, data has not suggested that this type of premises presents a particular risk in relation to AFAs. Therefore, there is no reason to automatically exempt these types of premises.
	Action	No action required.

9. Approach taken by other UK FRS's

- 9.1. London Fire Brigade (LFB) is the only UK metropolitan fire and rescue service (FRS) that still maintains a 24/7 operational response to all automatic fire alarms.
- 9.2. **Greater Manchester FRS** - From August 2020, Greater Manchester FRS stopped attending AFAs where there is no sleeping accommodation between 08:00 and 19:00 hours unless the caller confirms fire.
- 9.3. **Merseyside FRS** will not provide an emergency response to fire calls generated by AFA systems unless a call is received via the 999-system confirming a fire, or physical signs of fire, at the premises in question. This protocol will apply 24 hours a day unless an exemption is granted. Some of these exemptions are automatically applied and some have to be applied for ("exceptional" exemptions).

9.3.1. Automatic Exemptions:

- All single private domestic dwellings and all dwellings where the responsibility for the safety of the occupier rests with the individuals who reside there will automatically BE EXEMPT from this policy 24 hours a day. This includes:
 - Single dwellings
 - Sheltered housing
 - Houses of multiple occupancy (HMO)
 - Multi-storey accommodation

- Sleeping risk premises are automatically exempt between night-time hours from 19:30 to 07:30. This includes:
 - Hospitals
 - Hostels
 - Hotels
 - All premises with a reliable AFA system that meets the MFRS definition of 'coincidence', and the standard set out in BS5839-1:2017. Where a 'coincidence' system develops a trend of unwanted fire signals (UwFS), the automatic exemption status of the concerned premises may be reviewed and in the absence of a satisfactory resolution, may be revoked.

9.3.2. Exceptional Exemptions:

Any Responsible Person that considers their premises to have exceptional circumstances, due to a fire risk assessment which relies on MFRS responding to investigate fire alarm actuations in order to ensure the safety of occupants, may apply for an exceptional exemption. The aim of an exceptional exemption is to allow Responsible Persons a reasonable window of opportunity to address the failings in their fire risk assessment.

Each case is considered on its own merits and must meet the following conditions:

- The onus is on the Responsible Person to submit their case to MFRS.
- The case must be based upon high risk to persons resulting from MFRS' UwFS protocol.
- Exemptions will not be granted where MFRS believe that the Responsible Person can take reasonable action to mitigate the risk.

Exemptions will only be a temporary measure; they will be reviewed within 12 months and MFRS expect the Responsible Person to work towards achieving a permanent satisfactory.

9.4. South Yorkshire Fire & Rescue

9.4.1. Since January 2020, South Yorkshire Fire & Rescue no longer automatically mobilise fire engines to automatic fire alarms in some types of commercial premises. Rather than automatically send fire engines to premises the moment a fire alarm goes off, they will only mobilise fire engines if they receive a call to confirm there is definitely a fire.

9.4.2. The premises this applies to are;

- Offices
- Shops
- Industrial buildings
- Public buildings like libraries or museums
- Places of worship

9.4.3. The premises this does not apply to are;

- Domestic properties with fire / smoke alarms
- Other sleeping risk premises – including hospitals, sheltered housing, care

or homes, houses of multiple occupation, flats, high-rise tower blocks, hotels, bedsits, boarding schools, colleges, universities or halls of residence

- Schools
- Heritage sites
- Large industrial sites, covered by COMAH legislation
- National critical infrastructure.
- Shops with homes or sleeping accommodation above/below

9.5. Tyne & Wear FRS

9.5.1. Since 1 June 2015 TWFRS have not automatically responded to investigate fire alarm activations in non-residential premises between the hours of 08:00 and 18:00.

9.5.2. Since 1 October 2019 TWFRS have not automatically responded to investigate fire alarm activations in educational premises between 08:00 and 18:00, Monday to Friday, during term time (if applicable).

9.5.3. Since 1 July 2021 TWFRS have not automatically responded to investigate fire alarm activations in healthcare premises between 08:00 and 18:00, Monday to Friday, excluding public holidays.

9.5.4. TWFRS always respond to calls 24 hours a day if:

- A back up call is received through 999 reporting a fire or signs of fire (such as a smell of burning)
- A premises been granted an exemption by Tyne and Wear Fire and Rescue Service
- Single private domestic dwellings and sheltered accommodation schemes
- Other residential premises such as hostels, hotels and care homes
- Registered Control of Major Accident Hazards (COMAH) sites
- Premises who have successfully applied to TWFRS for exemption

9.5.5. TWFRS will also respond to educational premises such as universities, colleges and schools including pre-schools on weekends, bank holidays and during school holidays.

9.5.6. TWFRS AFA response policy applies to calls received directly from premises and through alarm receiving centres.

9.5.7. Exemptions -There are two types of exemption that can be applied for.

9.5.8. Fire Alarm Exemption - To be considered for this exemption, the premises fire alarm system must meet certain criteria. Applicants need to provide:

- Certification confirming that the fire alarm detection system has been installed to BS 5839 Part 1 or equivalent standard (preferably with third party accreditation)
- Evidence that the fire alarm detection system is serviced and maintained in compliance with the recommendations of BS 5839 Part 1 or equivalent standard
- Certification confirming that a fire signal output is only obtained when at least two independent triggering signals are present at the same time (preferably with third party accreditation). This is referred to as a 'Coincidence Alarm' in BS5839.

9.5.9. Exceptional Exemption - Applicants can apply for this exemption for their premises if:

- The premises does not meet the criteria for Fire Alarm Exemption
- The Responsible Person for the premises believes that there are exceptional circumstances

Applicants need to explain the exceptional circumstances in full and all applications are considered on an individual basis.

9.6. West Mids FRS

9.6.1. WMFRS will not attend an AFA unless a caller confirms signs of smoke or fire. If they receive a call to the same premises as a result of the activation of a second detector head at the same premises in ten minutes, then an attendance will be made. Exceptions to this are explained below.

9.6.2. WMFRS Fire Control (FC) will determine the level of call challenge needed depending upon the type of Premises where the alarms are actuating and the information from the caller. The mobilising system will assist Operators by offering prompts attached to specific incident types which will instruct the Operator as to the level of call challenge that will be needed for the incident type that is selected.

9.6.3. WMFRS Fire Control will always challenge a call to a sleeping managed premises and an attendance will only be made if the premises give fire control a reason to attend.

9.6.4. WMFRS Fire Control will not challenge a call to a hospital. However, unless a call is received from a member of staff confirming that there is a fire, the attendance will only be a business support vehicle.

9.6.5. WMFRS Fire Control will not challenge a sleeping non-managed premises and an attendance will be made.

9.6.6. WMFRS will not attend a call to a non-sleeping premise unless a call is received from a member of the premises confirming signs of smoke or fire. If there is a further call the activation of a second detector head within ten minutes an attendance will be made.

9.7. West Yorkshire FRS

9.7.1. The pre-determined attendance for unconfirmed AFA actuations received either via an Alarm Receiving Centre (ARC) or via 999 direct from the premises is as follows:

9.7.2. Between 08:00hrs and 19:00hrs – Unconfirmed AFA call received – No attendance from the Service. This level of response is only appropriate Monday to Friday

9.7.3. Between 19:00hrs and 08:00hrs – Unconfirmed AFA call received - 1 pump attendance. This minimum level of response will also occur 24 hours on Saturday, Sunday and Bank Holidays.

This will apply to all commercial premises with the exception of:

- Sleeping Premises (including such premises as hospitals, care homes hotels etc.)

- Educational Premises
- COMAH Sites
- Heritage Sites
- Specific risk premises as authorised by the Senior Operations Response Manager

9.7.4. The premises detailed above will continue to attract a PDA as follows;

- Between 08:00hrs and 19:00hrs – 1 pump attendance
- Between 19:00hrs and 08:00hrs – 2 pump attendance

9.7.5. Unless specific risks have been highlighted resulting in an increase of these levels which must be authorised by the Senior Operations Response Manager.

9.7.6. Confirmed fires will attract a full or enhanced emergency response, dependent upon the information received.

9.7.7. Current procedures for responding to domestic premises are not affected by this policy.

9.8. UK FRS's

9.8.1. The following table is taken from the UK government website, and it indicates how many UK FRS's have a non-attendance policy to frequent AFA incidents and how this has progressed over an 18-year period to 2018.

Non-attendance for frequent AFA incidents

Year ending 31 March	Total known	FRSs	%
2000	33	1	3%
2001	33	1	3%
2002	33	1	3%
2003	33	1	3%
2004	33	1	3%
2005	34	2	6%
2006	34	2	6%
2007	35	5	14%

Year ending 31 March	Total known	FRSs	%
2008	26	6	17%
2009	36	7	19%
2010	38	7	18%
2011	39	8	21%
2012	40	9	23%
2013	40	10	25%
2014	40	12	30%
2015	40	13	33%
2016	40	12	33%
2017	41	13	32%
2018	42	13	31%

10. Analysis of Options

Options	
Option 1 A	Non-attendance to commercial AFAs (non-sleeping) during the hours of 07:00 – 20:30 hours.
Option 1 B	Non-attendance to commercial AFAs (non-sleeping) during the hours of 07:00 – 18:00 hours.
Option 1 C	Continue with existing LFB AFA attendance.

<p>Analysis of Option 1</p>	<p>No distinction was made in the original proposals between weekdays and weekends, and this has been identified as a very low risk through the risk analysis of empirical data. Therefore, is not considered necessary to vary any of the options to separate weekends from weekdays.</p> <p>The proposed hours in option 1B, of non-attendance between 07:00 – 18:00, were the times proposed as part of the consultation process.</p> <p>General risk analysis as a result of the consultation responses has considered when commercial buildings may likely be occupied, identified that between 07:00 to 08:00 may be too early for some and beyond 18:00 maybe too late for others. However, the risk analysis of empirical data, indicates that the morning period is an extremely low risk (0.009%), and the early evening period (18:00-20:00) is a very low risk (0.02%).</p> <p>Data shows that the number of AFA fires that occurred between 20:00 to 21:00 across the five-year period, was slightly lower than those between 19:00 to 20:00. Therefore, extending the time frame by an additional 30 minutes to 20:30 would bring the benefit of less disruption at change of watch times and completely remove attendance to UwFS at commercial properties for day shift crews, with very little perceived risk.</p> <p>Data indicates that 96 AFA fires (10 being make-ups) occurred during these potentially unoccupied periods (including weekends) over the last five years. However, this figure equates to less than 20 per year across the whole of London and it should also be noted that many commercial premises are likely to be occupied during the wider range of times proposed in these options.</p> <p>General risk analysis as a result of the consultation responses has also considered when commercial buildings may likely be occupied and identified some commercial buildings may not be occupied at weekends. However, data shows that LFB recorded 173 calls to AFA as fires during these potentially unoccupied weekend periods over the last five years. This figure equates approximately 35 per year across the whole of London.</p> <p>Only 35 of those 173 AFA fires were recorded as being extinguished using 'hosereels, jets, monitors'. 17 of those 35 had more than one call, so would unlikely be affected by non-attendance to AFA at weekends. Therefore, the risk analysis indicates that weekends are very low risk (0.06%).</p> <p>It should also be noted that many commercial premises are likely to be occupied during the weekend.</p> <p>The Head of Business intelligence suggests that the later end time of 20:30 may avoid unnecessary inefficiencies such as non-available appliances. Therefore, whilst not a driver for these proposals, it may be noted that option 1A may inadvertently also deliver better efficiencies for the LFB.</p>
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	Option 1C is not a proposal and is not recommended, but has been included in case it is considered that the risk of non-attendance is too great.
Option 2 A (Exemptions)	Exempt additional premises that have particular risk, as identified in the matrix in section 8.
Option 2 B (Exemptions)	Exempt only premises that LFB proposed for the consultation.
Analysis of Option 2	<p>The proposed exemptions in option 2B, were the exemptions proposed as part of the consultation process. They do not take into account, the additional risks identified through the consultation and risk analysis process.</p> <p>The additional exemptions proposed in option 2A were identified through the consultation and risk analysis process. They consist of the following;</p> <ul style="list-style-type: none"> • Heritage Buildings • Schools and Nurseries • Other Buildings of significant importance that have been identified locally, included as a risk within a Borough Plan and been formally agreed by due process to be included as exempt on an individual basis only.

11. Conclusion

- 11.1. LFB has been actively trying to address the issue of UwFS since 2005, and whilst some previous initiatives to reduce the number of UwFS have proved briefly successful, others have not, and neither have they proved an efficient nor effective use of LFB resources. Despite this work, the overall numbers and trend of UwFS attended by LFB, has substantially increased over the years.
- 11.2. To date, LFB has not trialled any non-attendance initiatives in relation to AFAs, but is the only UK metropolitan fire and rescue service (FRS) that still maintains a 24/7 operational response to all automatic fire alarms. A wide range of other UK FRS's have addressed UwFS by way of non-attendance and LFB have not been made aware of any particular problems that have been faced as a result.
- 11.3. There are no extant legislative requirements that compel an FRS to attend a call to an AFA if no fire is suspected nor confirmed.
- 11.4. Two separate HMICFRS inspections have reported on the need for LFB to do more to reduce UwFS, yet the numbers of UwFS attended by LFB have continued to rise.
- 11.5. The current LFB CRMP indicates that LFB will adapt responses to be more efficient and cites attendance to AFAs as a measurement of improvement.

- 11.6. Of the AFAs attended by LFB, 98.7% were recorded as a type of false alarm.
- 11.7. From April 2022 through to October 2023, LFB vehicles were recorded as being involved in 127 road traffic collisions (RTC) whilst responding to an AFA on blue lights. Therefore, statistically, 124 (98.7%) of those RTCs occurred whilst responding to a false alarm.
- 11.8. Analysis of empirical data taken from the past five years, indicates that of the AFAs in commercial buildings attended by LFB during the hours of 07:00 to 20:00, the risk of an unconfirmed fire is minimal. Even when aggregated, the additional risk does not even reach as high as 0.09%. There are also other variables to that data (e.g. potential building occupation/recording issues) which could mean the risk is even lower.
- Morning 07:00 - 07:00 Mon-Fri = Extremely low risk (0.009%)
 - Evening 17:00 to 19:59 Mon-Fri = Very low risk (0.02%)
 - Weekend = Very low risk (0.06%)
- 11.9. Data indicates that extending the time frame by an additional 30 minutes to 20:30 would bring the benefit of less disruption at change of watch times and completely remove attendance to UwFS at commercial properties for day shift crews, with very little perceived risk.
- 11.10. The LFB consultation process proposed non-attendance to AFAs in commercial buildings between 07:00 – 18:00, this did not distinguish between Monday – Friday or weekends. However, as we can see above, extending the non-attendance period from 07:00 to 20:30 across all days of the week, would add very little risk, but would increase availability of operational day shift crews to undertake preventative work and training.
- 11.11. Pre-consultation work was undertaken to identify and fairly include those people/businesses that may be affected by the proposals. The numbers of people/businesses which engaged with the consultation process are considered to represent a relatively good response.
- 11.12. The consultation process has revealed some useful points to consider, and where appropriate, proposals have been amended to address valid concerns. For example, exempting heritage buildings or the proposal to give Borough Commanders the responsibility to ensure local risks are assessed and as appropriate, to apply for consideration of specific premises to have bespoke exemption from the non-attendance proposals in this report.
- 11.13. All points raised in the consultation process have been collated, responded to and where appropriate, action proposed within this report.
- 11.14. The actions proposed in this report will require careful management. For example; work will be required with LFB Control to establish/amend policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.

12. Recommendations

12.1. The recommended options are options 1A & 2B as follows;

Option 1 A	Non-attendance to commercial AFAs (non-sleeping) during the hours of 07:00 – 20:30 hours.
Option 2 A (Exemptions)	Exempt additional premises that have particular risk, as identified in the matrix in section 8.

12.2. It is recommended that strategic authority be delegated to develop and implement a plan to progress the following actions;

Establish policy and procedure	Work with LFB Control to establish policy and procedure to facilitate the proposals in this report, prior to progressing those proposals.
	Specifically, also consider how the issue of residential property within mixed use premises is addressed. Explore additions and amendments to the call filtering process.
	Explore the potential for any automated method of identifying exempt premises, listed or heritage buildings or those buildings that contain any form of residential element or sleeping risk.
	Explore the possibility of underwrites being added to addresses, so that Control staff can automatically see that individually exempt buildings require an emergency response.
Ensure Provision of Local Risk Assessment & Exemption Identification	Explore the potential for new policy/procedure linked to PN 800/7.2.d visits and Borough Risk Management Plans, to give Borough Commanders the responsibility to ensure local risks are assessed and as appropriate, to apply for consideration of specific premises to have bespoke exemption from the proposals in this report. Should there be repeated UwFS at such premises identified, then the BRMP or station plans could reflect activity to reduce these via direct local engagement.
	Confirm that major national heritage premises, e.g. museums, national attractions and galleries, have a Premises Risk Assessment recorded as per PN 800 and are as per policy, visited once per year by local watches.

Undertake a communications programme.	Prior to progressing any changes to LFB response to AFAs in commercial premises, undertake a communications programme to ensure the community is made aware of any changes. This action should also include specifically targeting the business community occupying commercial premises.
	Ensure that highlighting the responsibility to check that employees are provided with adequate fire safety training, is included as part of the communication plan (and support for businesses) for the roll out of the policy change. Also, continue to ensure advice around this matter is available on the external facing LFB website.
Implement Agreed Changes	Once all policy and procedure are agreed and in place, and the appropriate communications programme has been undertaken, then implement changes.
Monitor & Review	<p>Monitor the outcomes of any change of risk in respect of any of the types and use of commercial premises that may sit within the remit of non-attendance to AFA's.</p> <p>Review non-attendance both collectively and individually, if any of the following highlights a particular change of risk in respect of these types of premises;</p> <ol style="list-style-type: none"> 1. A future planned premises risk review utilising empirical data. 2. A future local premises risk assessment in line with a Borough Risk Management Plan and associated new protocol as a result of the proposals in this paper. 3. Any future changes within the LFB Assessment of Risk (AoR). 4. Other methodology as appropriate.
	Monitor time spent on Protection (fire safety) & Prevention activities, in line with Key Performance Indicators (KPI).

13. Appendices

Appendix 1	Briefing note - Analysis of calls to Automatic Fire Alarms at commercial premises – Author - Head of Business Intelligence ICT Information Management
Appendix 2	Report - Consultation on the proposed change to LFB's response to false alarm attendance – Author – External consultants TONIC

Appendix 1 –



Briefing note

01 December 2023

Subject

Analysis of calls to Automatic Fire Alarms at commercial premises

Brief for

Director of Transformation

Author

Head of Business Intelligence | ICT Information Management

This note sets out the impacts of introducing a non-attendance policy, at all times of day, to calls to commercial fire alarms (when there are no other indications of fire).

Conclusions

1. Control Operators are good at identifying calls and recognising when calls are as a result of automatic alarms rather than confirmed fire calls. Ninety-eight per cent of all recognised AFA calls are false alarms on attendance.
2. There is a low risk – around 0.5 percent – of a call recognised as a commercial AFA actuation (A10) resulting in an uncontrollable fire.
3. Where there is a risk of fire, more than two-thirds (70.8%) happen during daytime hours (8am-8pm).
4. A non-attendance policy would result in around 18,900 fewer mobilisations each year (about 50 a day)
5. Fewer mobilisations to AFA's would impact on reported first appliance attendance times (an increase of up to 12 seconds), but this would still be within the 6 minutes target.
6. A case can be made for introducing a more robust approach to call filtering for calls to residential AFA's and, with further analysis of property types and time of day, a custom non-attendance policy in specified situations.

Approach

Analysis of incidents attended by the LFB typically focus on the outcomes as recorded in the Incident Management System (IMS). To understand the impacts of introducing a non-attendance policy to 999 calls, this note focuses on the data recorded at the point of mobilisation by 999 Control Operators. This data, which uses the mobilisation Incident Type Codes ("ITC") is then compared to the outcome of the incident as recorded post-event in the IMS. The analysis ignores duplicate calls to the same reported incident.

The last five years data has been used, but it should be noted that there was a twenty-one per cent reduction in the number of mobilisations to commercial AFA's in 2020 due to fewer call during covid restrictions.

All calls to fire

In the last five years (1st October 2018 to 30th September 2023), there were 355,729 emergency 999 calls which Control Operators classified as a report of an actual or suspected fire ("call to fire"). This number is made up of all "A" type ITCs plus the "NAFA" code used for successfully call filtered commercial AFA's.

The full table of A type ITC's is shown in Annex A, but for example A1 is used to mobilise a response to a reported "fire" whereas A10 is used to mobilise a response to "AFA Commercial Premises".

Of all calls to fire, seven-in-ten (74.2%) were recorded – post event in IMS – as a type of false alarm; one-in-four was a fire event (24.3%) with the remaining being other types of special service incidents (1.5%).

In classifying reports of calls to fire, 46.2 per cent of these calls (162,525 calls) were identified as an AFA actuation (in all premises types, i.e. A10 or A11 mobilisations). Of the calls responded to as being an AFA actuation, most (98.5%) were recorded as a type of false alarm, 1 per cent were a fire event with the remaining being other types of special service incidents. This suggest that

Control Operators are good at identify calls and recognising when calls are as a result of automatic alarms rather than confirmed fire calls.

Calls to commercial AFA

Around two-thirds of calls identified as needing a response to an AFA actuation were identified as coming from commercial premises (54.7% of A10 & A11 calls are A10). One-in-fourteen calls are successfully call challenged using the call filtering process⁴ and no attendance made (“NAFA”).

Of the calls where an A10 response was sent, most (98.7%) were recorded as a type of false alarm, very few were a fire event (0.95% or 844 incidents) with the remaining being other types of special service incidents.

The normal predetermined response to an A10 incident is to mobilise one fire engine. In a 2022 around 20,566 mobilisations were made responding to A10 incidents: that’s over 50 a day.

Severity of fire incidents when responding to commercial AFA’s

There were 844 occasions when a response to an A10 commercial AFA resulted in a fire. Of these, around half (49.3%) required no firefighting action to be taken (no firefighting or burned out).

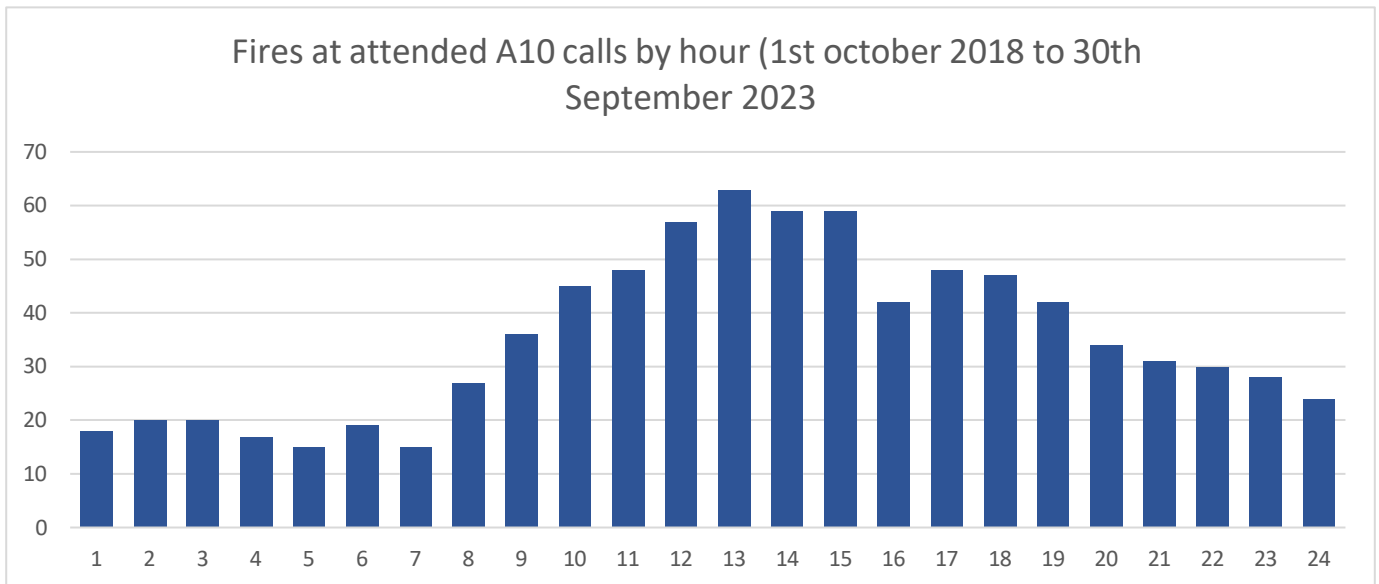
Firefighting actions	Number	Percentage of A10 incidents
None	375	0.42%
Small means	160	0.18%
Hosereels, jets, monitors	115	0.13%
Not recorded	99	0.11%
Portable extinguishers	86	0.10%
Other	9	0.01%
Total	844	

This would suggest that the risk of a call to a commercial AFA actuation resulting in an uncontrollable fire is less than 0.52 percent (460 fires requiring an intervention of 88,888 responses to A10 commercial AFA’s, including those where the firefighting action was not recorded).

Fire time of day

The chart that follows shows, for the fires that occur at attended A10 incidents, the hour of the day when they happen. Where there is a risk of a fire occurring at an attended AFA, two-thirds (70.8%) happed during daytime hours (8am-8pm). A third happened between midnight and 9am (33.6%).

⁴ [Policy number 0539 - emergency call management](#)



Hindsight and fire reporting

There is a view that this analysis benefits from the hindsight and assurance of having sent a response. That view can be expressed with the comment often made by crews that “... we never turn out to a false alarm; we only ever drive back from one. “

That view can be contrasted with the findings from the English Housing Survey⁵ which shows that when people in their own home experience a fire, only a quarter were attended by a fire and rescue service:

“In 2016-17, 332,000 households in England had experienced a fire at home in the last two years. In the majority of these households, the fire was put out by someone in the household, or the fire went out by itself. A quarter (25%) of fires were put out by the fire and rescue services.”

The survey results suggest that many people do feel equipped to deal with small incidents of fire in their own homes. It may then be fair to infer that people in commercial premises, where fire safety regulations require the provision of firefighting equipment and extinguishers, would make similar choices and actions. Yet, as the alarm has actuated and a 999 call then made, a response is made regardless.

Response to AFA by other fire and rescue services

In preparing this note, fire services have not been contacted to confirm their current policy on alarm attendance. However, a report⁶ from the Fire Industry Association published in 2015, 10 FRSs challenged all AFA calls with robust questions, while 21 FRSs did not attend unconfirmed AFAs on weekdays during daytime, for low-risk commercial buildings. Further, some FRSs stopped attending AFAs, such as Kent Fire and Rescue Services (KFRS), Dorset & Wiltshire Fire and Rescue Service (DWFRS), and North Wales Fire and Rescue Services.

⁵ English Housing Survey: Fire and fire safety, 2016-17

<https://www.gov.uk/government/statistics/english-housing-survey-2020-to-2021-feeling-safe-from-fire/english-housing-survey-2020-to-2021-feeling-safe-from-fire>

⁶ AFA response procedure, 2015, Fire Industry Association. <https://www.fia.uk.com/news/afa-response-procedure.html>

KFRS changed their AFA response – to any premises type – in 2012, when they introduced call challenge to AFA calls (during the daytime; 6am to 6pm) and only deploying crews when there had been a confirmation of fire. This policy was extended to any time of day in 2013. The 2012 AFA attendance change was implemented based on the facts that AFAs represented a third of the total number of calls the KFRS received. Moreover, 98% of KFRS’s AFAs were false alarms. Since the beginning of the COVID-19 pandemic, the policy has changed to respond to all AFA calls from hospitals, hospices, and care homes⁷.

In a report published in 2015, Welsh Fire and Rescue Services (combining South Wales, North Wales, and Mid and West Wales FRSs) revealed that 40 per cent of all incidents in Wales were false alarms. Attending false alarms would cost around £3m per year to the Welsh FRS and around £29m to building owners or occupiers. AFAs represent the main false alarms cause, but only 5% of AFA calls required firefighting actions. This report resulted in North Wales Fire and Rescue Services not attending AFA calls unless they are combined with a 999 call reporting a fire⁸.

Impact on Attendance times

Generally speaking, most AFA false alarms happen in inner London where there are a greater number of fire stations and fire engines. This means that, on average, calls to AFA’s get a faster response than other incident types. A comparison of AFAs (at any location) and Primary Fire average first appliance attendance time are shown in the following table.

Average 1 st pump attendance	2018	2019	2020	2021	2022
AFA (all)	04:56	04:58	04:45	04:55	05:02
Primary fire	05:15	05:16	05:03	05:16	05:25
All incidents	05:14	05:13	05:02	05:11	05:19

Attending fewer AFA would likely see an increase in the reported London-wide average attendance times for fire engines as there would be fewer ‘faster’ AFA responses. There is however likely to be a small positive improvement by there being more fire engines available to respond to emergencies as fewer would be engaged in an AFA response at the time of another emergency call.

A rudimentary⁹ analyses of attendance times suggest that reported average first appliance attendance times would **increase by around 12 seconds if a full A10 non-attendance** policy was introduced. The LFB’s modelling consultants ORH could produce a more accurate estimate, including the positive offset, if required.

⁷ Fire alarms, Kent Fire and Rescue Services. <https://www.kent.fire-uk.org/fire-alarms>

⁸ Time for Action, a report exploring the impact of false alarms in Wales, Welsh Government. <https://gov.wales/sites/default/files/publications/2019-06/time-for-action.pdf>

⁹ Removing the A10 incidents stopped as an AFA from the attendance time calculation.

Calls to residential AFAs

This note focuses on calls to commercial AFAs as that is where most attention about attendance policies has been focused. A quick analysis of fire occurrence at calls identified as and AFA in a residential premises does show a slightly higher risk; at almost 2 per cent of attendances being recorded as a fire on arrival. And the risk of a call to a residential AFA actuation resulting in an uncontrollable fire is also slightly higher.

A case can therefore be made for introducing a more robust approach to call filtering for calls to residential AFA's and, with further analysis of property types and time of day, a custom non-attendance policy in specified situations.

<END>

Annex 1

"A" incident type codes

A1	Fire
A10	AFA Commercial Premises
A11	AFA at residential premises (no aerial)
A12	Person threatening to set fire to themselves or Siege situation
A1HR	Fire High Rise Buildings (6 floors +)
A2	Reduced Fire attendance including abandoned calls to PCB & electrical junction box in street
A3	Reduced Fire attendance involving Railway/Tramlink property
A4	Fire involving hazardous substance
A7	Fire on vessel accessible by land
A8	Fire All out
AFA	AFA actuating but no attendance by LFB

Consultation

Name/role	Method consulted
Insert names/or roles of those consulted, including any with the representative bodies.	Insert how they were consulted – meetings, away day, by email or by draft circulation of this report.
AC Paul McCourt, Central Operations & Establishment and Performance Team.	Draft copy of report sent by e-mail
Donna Peters, Community Engagement Manager.	Meeting scheduled 20 th September 2022
Milly Osbourne, Sustainable Development Team.	Teams meeting
Andrew Cross, Senior Organisational Effectiveness Manager Policy and Industrial Relations.	E-mail exchange
Thomas Davis, Team Manager – Contract, Commercial and Corporate Law.	E-mail and teams meeting

Appendix 2



AUTOMATIC FIRE ALARMS

Consultation on the proposed
change to LFB's response to
false alarm attendance



LONDON FIRE BRIGADE

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Background

Automatic Fire Alarms and False Alarms

An Automatic Fire Alarm (AFA) is a system that can detect a potential fire and alert occupants or an alarm company to call 999 without the need for anyone to manually activate an alarm. The London Fire Brigade (LFB) is called to all non-residential Automatic Fire Alarms (AFAs) in London.

- In 2022/23 AFAs made up 37% of all LFB incidents attended – 47,000 calls.
- Less than one per cent of calls from non-residential AFAs are ultimately recorded as fires – meaning 99% of calls are false alarms.

What does London Fire Brigade propose to do?

In line with many other fire and rescue services in the UK, LFB proposes to stop attending AFAs in non-residential buildings, such as office blocks or industrial estates, during the day, unless a call is also received from a person reporting a fire.

The Brigade will always respond to all 999 calls from members of the public reporting fires at any location across London. The Brigade will also continue to respond to automatic fire alarms from buildings that contain sleeping quarters (such as houses, flats, hospitals, hotels, and prisons) and buildings that store volumes of dangerous substances (COMAH sites), as well as buildings of substantial public significance (as considered exempt through LFB's annual assessment of risk).

This change will eliminate call outs to approximately 10,000 low-risk, low-impact non-residential AFAs per year (8 per cent of all call outs), which will allow firefighters to spend more time on protection work and operational training. It would also reduce the risk to the public through fewer 'blue light' emergency response runs.

This proposed change is in line with the Brigade's recently launched Community Risk Management Plan (CRMP), which sets out how LFB will prioritise their services according to risk, and includes a new target of 5% station time spent on protection work instead of AFAs. This will allow more time to work with high-risk premises and include additional fire safety

checks in homes and businesses, building premise familiarisation visits, and understanding, reducing and preparing for specific local risks, such as wildfires or flooding.

The change also allows LFB to significantly improve the operational training firefighters receive – predominantly delivered from their local stations. Each firefighter should be carrying out two hours of operational training per shift so that they can be ready to deal with real emergencies, with changing risks and new equipment. This is currently regularly disrupted by attending AFAs – particularly in central London.

LFB has stated that the change is not designed to deliver financial savings but rather to create capacity to better engage with and increase fire prevention in local communities, and to improve operational training.

Consultation

LFB ran a public consultation to hear the views of residents, organisations, businesses, community groups and LFB staff. The consultation ran from 13th September to 26th October 2023.

LFB asked TONIC, an independent social research organisation specialising in public consultations, to produce a summary of responses to the consultation.

For more information on TONIC see tonic.org.uk.

Respondents

261 responses were received to the consultation, with 115 (44%) from members of the public, 93 (36%) from London Fire Brigade staff, 34 (13%) on behalf of organisations, and 19 (7%) who preferred not to say.

Full details of respondents' demographic information, as well as a list of organisations, can be found in Appendix A.

Headline findings

Overall, respondents were generally supportive of the proposed change, with exactly half (50%) explicitly stating that they had no concerns regarding its implementation and felt it was a good and welcome idea. This compares with just under a third (30%) who explicitly stated that they felt the proposed change would increase risk and that LFB continue with its current policy of attending AFAs.

Among those respondents who voiced concerns, beyond fears that non-attendance would increase risk, the main ones were:

- i) That building staff such as keyholders, fire wardens and property managers were insufficiently trained to know how best to handle AFAs and false alarms without direct assistance from LFB; and
- ii) That the proposed change was not flexible or detailed enough to take into account differing circumstances between individual buildings, boroughs, and areas of the city – particularly mixed-use buildings and buildings which may not conform to LFB’s proposed schedule of attendance.

Respondents suggested ways that LFB should address the above concerns, as well as putting forward ideas and seeking clarification regarding the exempt buildings’ proposal, which some respondents felt was insufficiently detailed and described.

To support the change respondents primarily suggested that LFB engage in a strong publicity campaign, as well as initiate training programmes for building staff.

There was also support from respondents for the issuance of fines and fees for repeat false alarm offenders and the suggestion that instead of blanket non-attendance LFB could dispatch smaller and/or fewer units to AFA calls, thereby keeping units available for other calls.

These ideas and suggestions are detailed in the report that follows, as well as tables showing how many respondents and which respondent types addressed the most commonly raised themes.

Summary of Consultation Responses

Question 1. Concerns regarding LFB’s new approach to attending AFAs

The most commonly raised concerns were:

Theme	Total	LFB	Pub	Org	All
No concern / support for the proposal	128	51%	51%	55%	50%
Building staff are not sufficiently trained	52	25%	17%	27%	20%
Increased risk and danger	51	15%	20%	21%	20%
LFB should always attend AFAs	43	7%	24%	6%	17%
Mixed-use buildings	19	10%	5%	9%	7%
Attendance times are not flexible enough	16	7%	4%	12%	6%
Specific districts should be exempt	15	9%	3%	9%	6%
Reduced interaction and learning	10	5%	3%	3%	4%

Note: The “total” given here (and in subsequent tables) refers to the number of respondents across all category types. The percentage figures illustrate the proportion of a particular respondent type mentioning each theme.

Differences among respondent types

Among those who had no concerns and expressed their support for the proposal, there was little variation by respondent type. Members of the public, however, were four times more likely to feel that LFB should always attend AFAs than members of LFB staff and organisations.

LFB staff and organisations were twice as likely as the public to flag mixed-use buildings as a particular concern, and three times more likely to suggest that specific districts should be exempt.

Organisations were almost twice as likely as LFB staff to suggest that the periods when non-attendance was suggested should be more flexible and customised, and three times more likely than members of the public.

Support for the proposal

Half of respondents (50%) who answered this question stated they had no concerns and felt that the proposal was a good idea and that its introduction would be a sensible and welcome change.

Not attending may increase danger and risk

Around 1 in 5 of those responding to this question felt that ceasing to attend all AFAs could cause an increase in risk and potential harm to both the people and property of London.

Around a quarter (24%) of the public felt that LFB should “always” attend AFAs in order to ensure that the small number of non-false alarms receive swift and proper attention. This was much lower for organisations and LFB staff and organisations (6% and 7% respectively).

“What happens when an AFA is triggered by an actual fire? How many buildings will be lost because of this? One is too many.” (Member of the Public)

“I have been to many AFAs that turned into fully developed fires, they would have been far worse if the arrival times were further delayed.” (LFB staff)

Within this group respondents, LFB staff in particular, also felt that not responding to all AFAs, and therefore potentially arriving later to the scene of a fire, could increase the risk and danger not only to buildings, businesses, and the public, but also to firefighters themselves.

“The non-attendance of fire crews to businesses will likely see unnecessary escalation of fire and greater potential of life risk to business owners, equally impacting responding fire crews who will be faced with a more developed fire and subsequently deteriorating conditions.” (Fire Brigades Union)

Missing useful opportunities and information

It was raised by a small number of respondents (4%) that not attending all AFAs would lead to LFB staff missing opportunities to interact with and instruct building staff and managers, as well as learning about specific buildings and systems. It was felt that these may prove useful in the event of a fire.

Concerns regarding insufficient training

A further consideration was the concern as to whether those who are responsible for the operation of AFAs – property managers, fire stewards, and alarm companies, among others – have been, or will be, sufficiently trained to ensure the proposed change does not lead to increased risk to lives and property. Specific areas of concern included that building staff may not investigate a potential fire thoroughly and/or that they may prematurely reset the AFA system. There was also the concern that building staff do not always understand their fire alarm panels.

“Having managed buildings before I find it frustrating that certain staff are not trained to understand the fire alarm panel [or] how to determine which detector has gone off, where the detector has activated, [and the] cause of the activation. When everything went from LFB Fire Risk Assessment to Self Assessment things like training were not checked on.” (Organisation)

Mixed-use buildings

7% of respondents were concerned that AFAs activating in mixed-use buildings (such as flats above shops) or in buildings with both offices and apartments may fail to be adequately attended due to the way address data may be stored and accessed by LFB Control. Occupied flats, for example, may be located in the same building as non-residential businesses, yet may possess different numbers or addresses. In these instances, some respondents felt there may be an increased risk to life; likewise residential buildings that are located in close proximity to non-residential buildings.

Times for non-attendance

Some respondents (6%) felt that a blanket proposal to cease attending AFAs at non-residential premises between 7am and 6pm was too rigid and may not suit all premises, especially where staff or responsible persons on site may arrive after or leave before these hours. They questioned whether the same policy would be in place on weekends, with some noting that while this would work for certain buildings it would not work for all buildings, therefore individualised protocols would need to be put in place for specific properties.

Central London different

A small number of respondents (4%), mainly LFB staff, suggested that buildings in central London, and especially in Westminster, Camden and City of London should be treated differently (e.g., for LFB to continue to respond to all AFAs).

“These Boroughs should be exempt from this proposal due to the number of AFAs that actually turn into Fires. On Soho's ground alone over the last 5 years 75 commercial AFAs have turned into fires. You have not taken into account the identified risks in the Borough Risk Management Plans.” (LFB staff)

Reduction in LFB’s public presence

Finally, a small number of responses expressed concern that a significant reduction in AFA attendance could reduce LFB’s presence within boroughs and communities. Some also had concerns that introducing a protocol of not attending AFAs could impact on the currently high levels of trust in LFB.

Question 2. Suggestions of ways to address concerns

The most commonly suggested ways to address concerns were:

Theme	Total	LFB	Pub	Org	All
Attend all AFAs	43	7%	24%	6%	17%
Send smaller response teams	19	11%	6%	0%	7%
Thorough training	52	25%	17%	27%	20%
Address mixed-use buildings	19	10%	5%	9%	7%
Employ flexible times	16	7%	4%	12%	6%
Exempt certain areas	15	9%	3%	9%	6%
Provide avenues to apply for exemptions	7	0%	3%	12%	3%
Publish list of exempted buildings	7	2%	1%	12%	3%

Differences among respondent types

In addition to the differences highlighted in response to Question 1, which were also present in responses to Question 2, LFB staff were almost twice as likely as members of the public to suggest sending a smaller team instead of ceasing to attend AFAs, while no organisations made this suggestion.

Organisations, however, were six times more likely to suggest ideas concerning building exemptions than either members of the public or LFB staff.

Attend all AFAs

The most common suggestion (from 17% of respondents to this question) for addressing concerns was to continue with current practice and attend all AFAs. This was seen as the safest, most reassuring and most risk-averse course of action. This was put forward by 24% of responses from members of the public, 7% of LFB staff and 6% of organisations.

Smaller response teams

Some felt that, rather than ceasing all attendance to AFAs, that a reduced service would be preferable. They felt that given the large number of false alarms, one vehicle or engine instead of up to five should suffice as an initial response.

Training, mixed-use buildings, and flexibility

Many other common suggestions for addressing concerns represented corresponding solutions to the issues raised in Question 1. This included:

- To ensure that LFB staff, property managers, keyholders, fire wardens and AFA companies were sufficiently and thoroughly trained so as to best manage the new system
- That a system cataloguing and addressing mixed-use buildings and residential buildings in close proximity to non-attended non-residential buildings was put in place
- That LFB should apply a flexible approach to both individual buildings and to particular boroughs and areas. Especially with regard to the times and days when AFAs would not be automatically attended without receiving an emergency call, given that not all non-residential buildings would always be occupied during the proposed hours

Exempt buildings

Other concerns were with regard to exempt buildings: how buildings were deemed exempt; whether a list of exempt buildings would be published; how a property company or building manager could apply for exempt status; whether all heritage buildings would be considered exempt; and whether heavily used public spaces such as transport hubs and venues would always be considered exempt.

Question 3. Other exemptions LFB could consider

The list of exemptions presented by LFB in the consultation documents was as follows:

- Private houses/dwellings
- Flats (including high-rise)
- Houses of multiple occupation
- Mobile/park homes
- Houseboats
- Hospitals
- Residential care homes/nursing homes/hospices
- Specialised housing premises (e.g., sheltered housing, extra care sheltered housing, supported living)
- Children's homes
- Student accommodation/halls of residence
- Residential boarding schools
- Hotels/motels/B&Bs and other guest accommodation
- Hostels
- Prisons/Youth Offender's institutions/other secure establishments
- High risk sites storing volumes of dangerous substances (COMAH sites)
- Buildings of substantial public significance, where exemption is considered appropriate through an annual assessment of risk

The most common suggestions for further exemptions were:

Theme	Total	LFB	Pub	Org	All
Mixed-use buildings	12	7%	3%	3%	5%
Transport	8	3%	3%	3%	3%
Listed and heritage buildings	5	2%	3%	0%	2%
Schools and nurseries	5	0%	3%	3%	2%

Note: A smaller number of respondents answered this question (68).

Mixed-use buildings

The most common suggestion for other exemptions was for residential properties housed within the same buildings as non-residential businesses, such as flats situated above shops or restaurants, or apartments contained within the same building as offices. It was suggested that some of these residential properties may be recorded as having a different address to the businesses they share a building with, and therefore may be negatively impacted by the proposed change.

In accordance with earlier questions, LFB staff were much more likely to raise concerns regarding mixed-use buildings than either members of the public or organisations.

Other suggestions

A number of other suggestions for exemptions not already designated by LFB were put forward by fewer than five respondents. These included:

- Transport hubs (particularly the tube network)
- Listed and heritage buildings
- Schools and nurseries
- Community buildings such as halls and food banks
- Telecommunication hubs
- Electrical supply buildings
- Buildings that provide a specific useful purpose for the running of the city (e.g., the Stock Exchange, the Bank of England, police headquarters and training centres)
- Buildings that used cladding
- Derelict and unoccupied buildings

- Storage and self-storage facilities
- Buildings containing significant amounts of lithium-ion batteries
- Multi-storey car parks connected to other buildings
- Buildings (and buildings that house collections and archives) as listed in the Department for Culture, Media and Sport’s guidance for the protection of cultural property in the event of armed conflict
- Gyms
- Theatres, cinemas, stadiums, and other venues
- Places with animals (such as shelters, stables, farms, and pet shops)
- Buildings that contain a basement
- Large complex buildings

Substantial public significance

Some respondents queried the term “substantial public significance”, feeling that this would have needed to be more explicitly explained and elaborated on for them to provide a fully informed answer.

Question 4. How LFB can support organisations to be ready for the change

The most common suggestions were:

Theme	Total	LFB	Pub	Org	All
Publicity	88	46%	23%	48%	34%
Training programmes	32	14%	10%	21%	12%
Check alarms	20	10%	7%	9%	8%

Differences among respondent types

LFB staff and organisations were twice as likely to suggest avenues for using publicity than members of the public, while organisations were much more likely to suggest providing training programmes for building managers and staff.

Publicity

Around a third of respondents to this question (34%) suggested that LFB should heavily and clearly publicise the change so that as many businesses,

property managers and owners, and members of the public were made aware that it had come into effect. Suggested avenues for publication included:

- Letters and emails to all AFA businesses, building owners and property management companies
- Social media
- Radio and television (local and national)
- In-person visits
- Pop-up information sessions and workshops
- Next Door app
- WhatsApp groups
- Workplace posters
- Door-to-door leaflet campaign
- Via the mayor's office and local councils
- Via residents' associations
- Posters and signs in fire stations and local shops

Training programmes

Some respondents (12%) felt that the best way LFB could support organisations would be through training programmes. They felt the training should ensure that building managers, fire wardens, keyholders and AFA staff, as well as anyone who would be directly involved in working with AFAs, thoroughly understood how to operate AFA panels, how to ascertain whether a fire was taking place, what the proper procedure should be, and how best to communicate with LFB.

“In 99% of commercial AFAs I attend the staff are not capable of dealing with an AFA on their own. You need to communicate to every organisation exactly what will happen and the consequences.” (LFB staff)

“There should be a training session to ensure all parties understand the new procedure/policy. A staff member may be too quick to reset a system or not investigate thoroughly enough, meaning that an early preventive intervention will be missed and may lead to crews arriving to more developed incidents.” (Member of the Public)

“Have allocated trained staff members in the place of work, per shift per floor, relating to the size of the building. A well-practiced routine will also give reassurance to visitors and vulnerable service users. Make it compulsory and provide evidence of approved training to be renewed every two years.” (Member of the Public)

“[Advise] on the following: how to read your addressable panel; how to operate the panel properly whilst finding the active detector; best advice to search for active detector; enhanced advice on safe ways to look for active sensors, like checking doors for heat, using backs of hands when touching, etc. Policy on two or more separate detectors in an area going off, or two different technology sensors going off. In the Intruder alarm world this scenario would be classed as a "Sequentially Confirmed Intruder" and get police response where a single detector would not. I would say if you are seeing multiple detectors activate that you call 999 rather than investigate as it may be a moving fire.” (Unidentified)

Other suggestions

Other suggestions put forward by fewer than five respondents for how best to support organisations were:

- Check building alarms to ensure they are working properly
- Ensure that a building’s keyholders are located within close proximity
- Introduce an advice line and dedicated webpage
- Issue guidance on how to reduce false alarms
- Produce amended risk assessment flowcharts
- Provide exemptions for buildings that have an excellent false alarm record

Question 5. Any other suggestions or comments

The most common suggestions and/or comments were:

Theme	Total	LFB	Pub	Org	All
No more to add / Support for proposed changes	75	32%	27%	36%	29%
Fines for repeat false alarm offenders	17	4%	5%	15%	7%
More information required	12	3%	6%	3%	5%
Seems to be a cost cutting exercise	9	1%	6%	0%	3%

Differences among respondent types

Organisations were three times more likely to suggest issuing fines for repeat false alarm offenders than either members of the public or members of LFB staff, while members of the public were much more likely than the other two respondent type groups to feel that the proposed change represented an exercise in cost cutting.

Support for the proposed change

The largest number of respondents (29%) stated they had no more to add and that they felt the proposed change was a sensible and, in some cases, overdue improvement to LFB procedure.

Fines for repeat false alarm offenders

7% suggested the introduction and enforcement of fines, fees and charges for buildings which repeatedly produce false alarms to encourage them to fix/upgrade their systems.

More information required

5% felt that there should be more detailed models and data so that respondents could be better informed. For example, how exactly the proposed change would map on to past data and what the positive and negative consequences of not attending non-residential AFAs would have been.

Cost cutting exercise

3% of respondents to this question stated that they felt the changes represented part of a current or future cost cutting exercise (despite an

explicit statement in the consultation document that this was not the case).

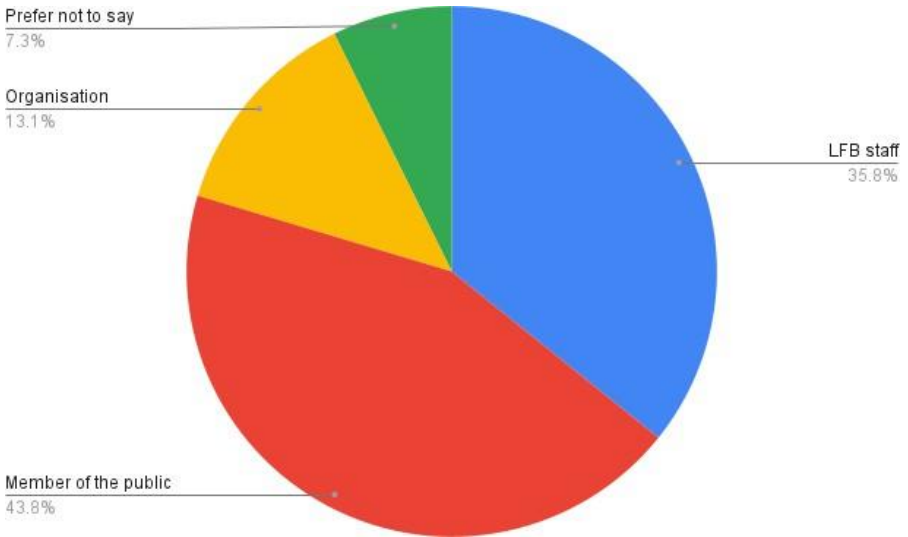
Other suggestions

Other additional feedback and suggestions put forward by fewer than five respondents were:

- Some suggested that the proposed change could be introduced as a trial, with ongoing results published quarterly and made available for review.
- Some felt that the proposed change could go further, and that fewer (or no) buildings should be exempt, and that the hours suggested for AFA non-attendance could be widened.
- It was suggested that a system could be implemented for reporting buildings in which people were sleeping illegally, so that LFB were aware that buildings designated non-residential were not always used as such.
- Some LFB staff felt that the proposed change would improve their work experience, with some stating that dealing with AFA calls and false alarms took up most of their time. Others, however, worried about having to field complaints from members of the public and alarm companies, and being put in the difficult position of having to explain why LFB were no longer responding to alarms.
- Some felt that not attending all AFAs would mean that the problem of faulty alarm systems prone to false alarms would be much less likely to be addressed.

Appendix A – Respondent Demographics

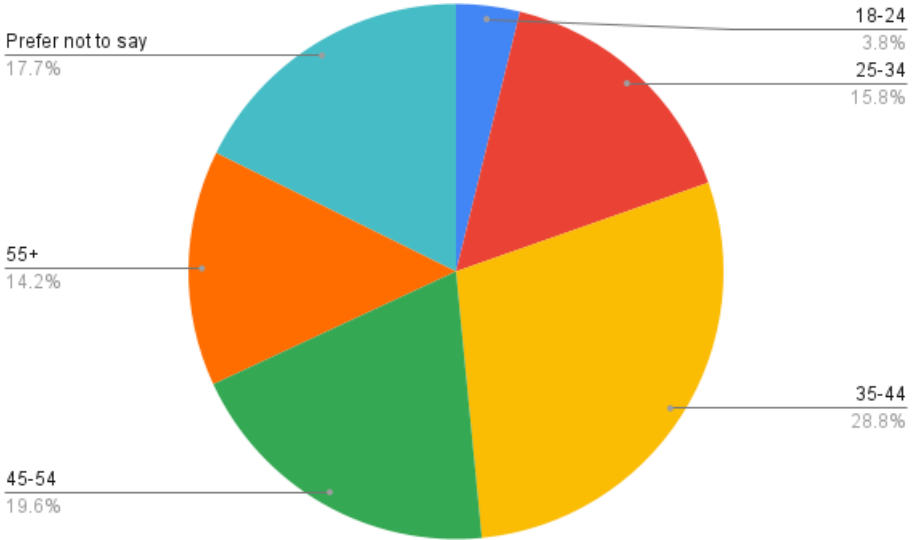
A1. Respondent type



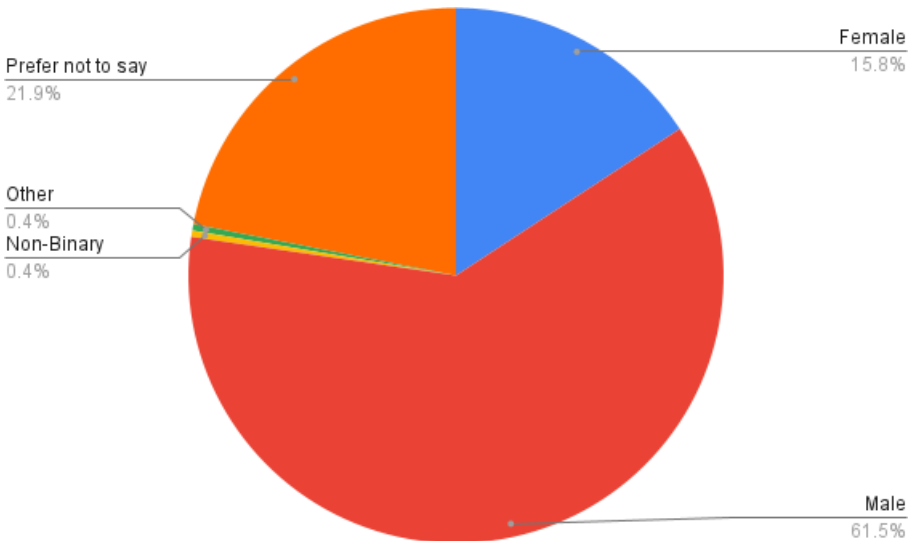
Of the 34 responses received from organisations, 15 indicated that their submission represented the official response for their organisation:

- Brandweer Midden en West Brabant
- Brunel University
- Chelsea Football club
- City of London Wholesale Markets
- Clarion Housing Group
- Enfield LGBT Network
- Fire Brigades Union
- Friends of Shepherds Bush Green CIC
- Hillingdon Council
- Historic Royal Palaces
- Institution of Mechanical Engineers
- Lancaster Court Residents Association
- St. George's Medical Centre
- Supreme Medical Centre
- Triple Star Fire and Security Limited

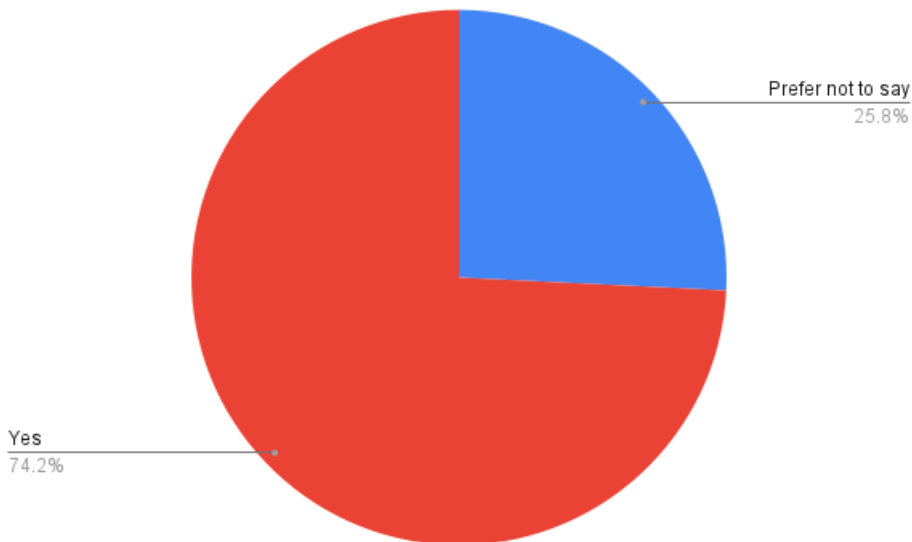
A2. Respondent age



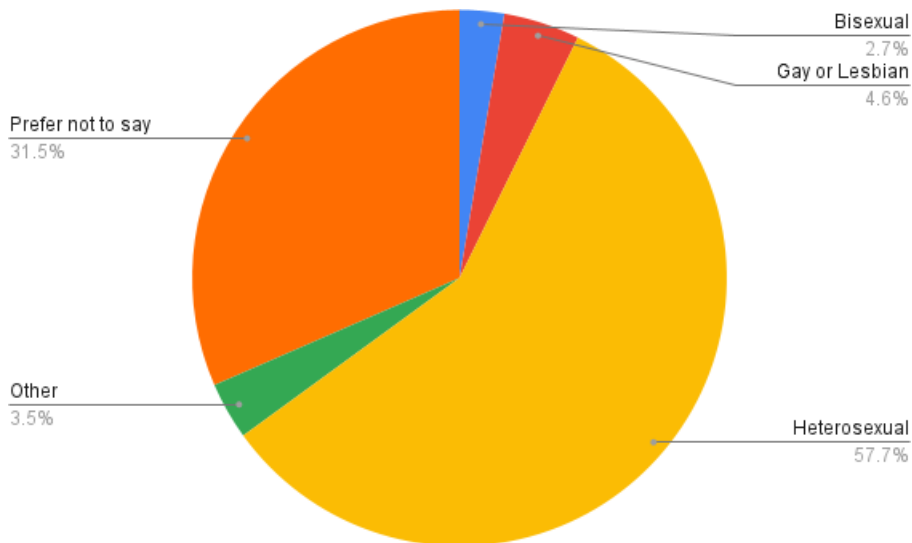
A3. Gender



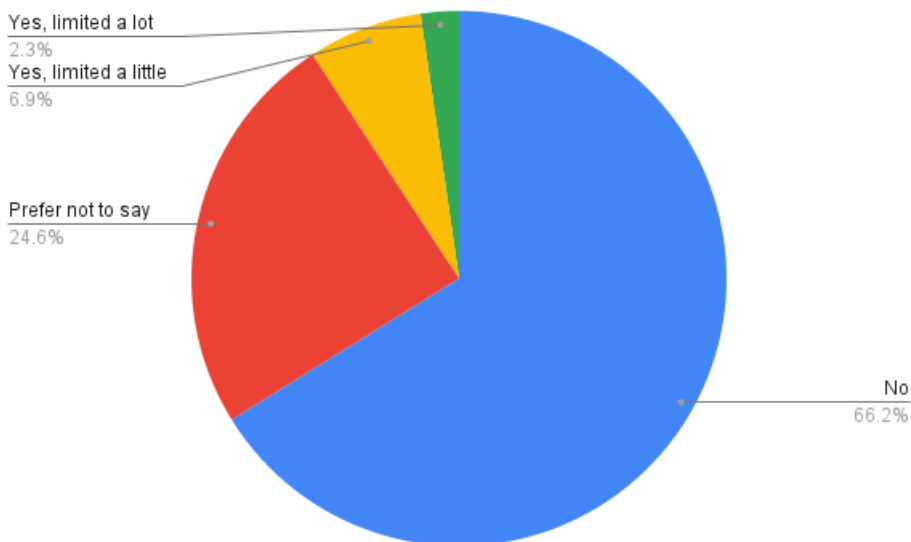
A4. Is your gender the same as registered at birth?



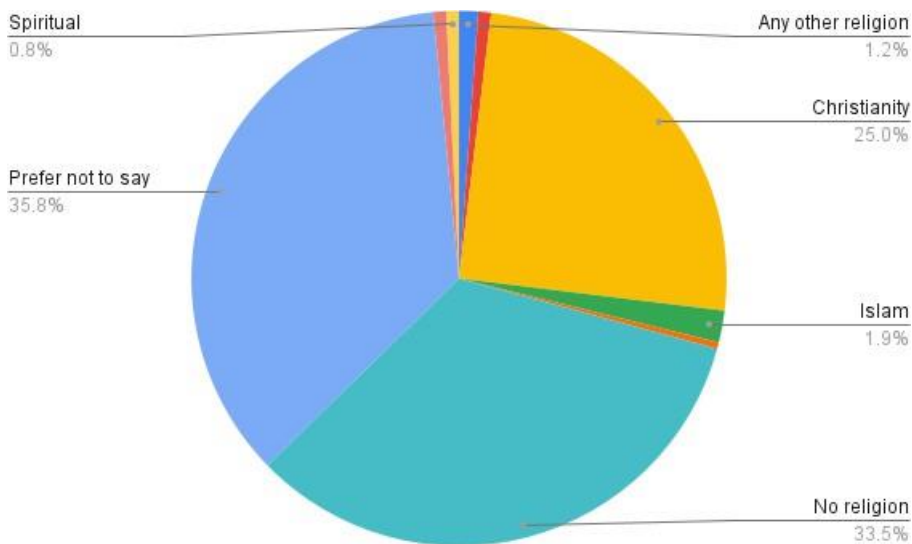
A5. Sexuality



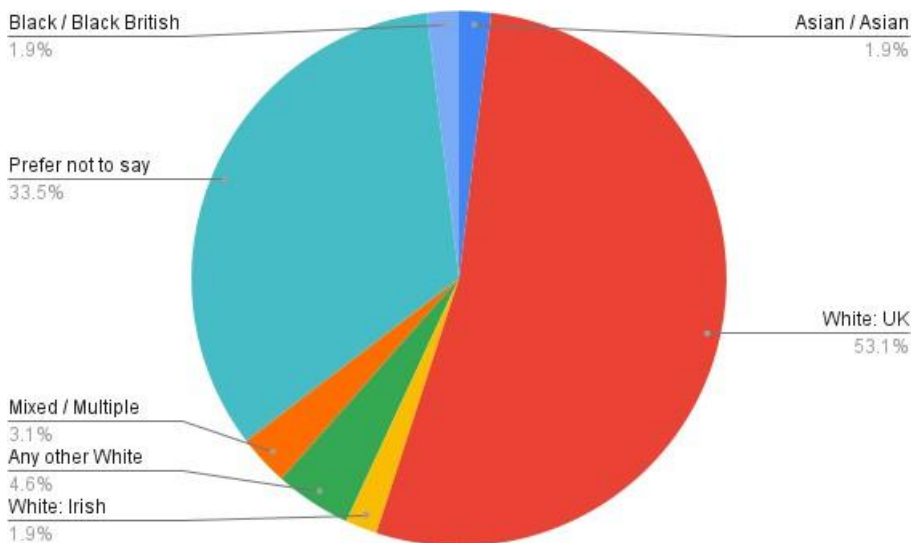
A6. Disability



A7. Religion



A8. Ethnicity



A9. Borough

Borough	Number	%
City of Westminster	13	5.0%
Bromley	10	3.8%
Ealing	10	3.8%
Tower Hamlets	10	3.8%
Hillingdon	9	3.5%
I do not live/work in London	9	3.5%
Lambeth	9	3.5%
Merton	9	3.5%
Southwark	9	3.5%
Camden	8	3.1%
Hammersmith and Fulham	8	3.1%
Havering	8	3.1%
Richmond	8	3.1%

City of London	7	2.7%
Barnet	6	2.3%
Bexley	6	2.3%
Newham	6	2.3%
Waltham Forest	6	2.3%
Croydon	5	1.9%
Redbridge	5	1.9%
Sutton	5	1.9%
Brent	4	1.5%
Enfield	4	1.5%
Hackney	4	1.5%
Haringey	4	1.5%
Harrow	4	1.5%
Hounslow	4	1.5%
Islington	4	1.5%
Barking and Dagenham	3	1.2%
Kensington and Chelsea	2	0.8%
Lewisham	2	0.8%
Greenwich	1	0.4%
Kingston	1	0.4%
Prefer not to say	57	22%

Equality Impact Assessment (EIA) Form

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.

Once you open the template please save it on your OneDrive or SharePoint site. Do not open the template, fill it in and then click Save as this will override the template on Hotwire.

NOTE – All boxes MUST be completed before the document will be reviewed.

1. What is the name of the policy, project, decision or activity?
A risk-based approach to the reduction of Unwanted Fire Signals from AFA

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

High		Medium	X	Low	
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2. Administration			
Name of EIA author	Robin Bradley		
Have you attended an EIA Workshop	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Department and Team	Policy and Strategy Group, Prevention & Protection.		
Date EIA created by author	01/06/2023		
Date EIA signed off by Inclusion Team			
Date Actions completed			
External publication	Are you happy for this EIA to be published externally?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

		If No state why:
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3. Aim and Purpose

What is the aim and purpose of the policy, project, decision or activity?

Automatic fire alarms are alarm systems that are designed to react automatically where heat or smoke is detected, to alert the occupants of a building of a potential fire situation.

We refer to AFAs that are responded to by the Fire Service as Unwanted Fire Signals (UWFS).

In 2019/20, 15,669 properties across London generated between 1-4 UwFS, resulting in 24,146 calls.

There is a low risk – less than 0.5 percent – of a call recognised as a commercial AFA actuation result in an uncontrollable fire.

The Brigade intends to change our response to automatic fire alarms to reduce the impact of unwanted fire signals on the London Fire Brigade resources. Reducing these impacts will provide opportunity for the Brigade to re-allocate resources to prevention, protection, and community focused activities. The mobilisation policy will be amended to incorporate ‘nil attendance’ to non-residential premises.

A public consultation will seek the views of those who may be reasonably impacted by proposals to not attend false alarms at non-residential premises, on three options for this change in policy.

These options take a risk-based approach to the type of buildings we may no longer attend without confirmation of a fire or signs of a fire. They present different levels of exempt buildings ranging from commercial premises where people sleep, and exceptionally important political or cultural buildings.

By adopting a risk-based approach to AFA attendance, we aim to significantly reduce the impact of UwFS from automatic fire alarms thereby allowing our resources to be deployed more effectively and efficiently to protect the highest life risk within the communities we serve.

We will regularly review the impact of our position.

The proposed options within the consultation will include:

Between the hours of 07:00-18:00:

1. We will not attend automatic fire alarms at non-residential premises
2. We will not attend false alarms at non-residential premises, however;

- Premises containing a sleeping risk will continue to receive an emergency response. (See sleeping risk exemptions on next slide)

3. We will not attend automatic fire alarms at non-residential premises, however;

- Premises containing a sleeping risk will continue to receive an emergency response. (See sleeping risk exemptions)
- Grade I and II* listed buildings will continue to receive an emergency response
- High risk sites storing volumes of dangerous substances will continue to receive an emergency response (see exemptions listed on next slide).

These options will not apply to residential premises as these contain the highest life risk in the case of fire and will continue to receive an emergency response. Residential premises include people’s houses, flats/maisonettes (including those above shops) as well as Houses in Multiple Occupation (HMOs).

London has one of the most diverse built environments. In addition to providing an emergency response to residential / domestic premises, we have identified other building types where a fire would also pose a high risk to life, culture, or the infrastructure of London. As part of our proposals, options 2 and 3 would “exempt” these additional types of building from non-attendance, meaning they would still receive an emergency response following the triggering of the alarm, even if there was no confirmation of an actual fire occurring.

Sleeping risk exemptions:

This includes the following premises where Londoners, visitors, and tourists sleep:

- Residential care homes / children’s homes.
- Specialised housing premises (e.g., sheltered housing, retirement homes etc.).
- Student accommodation / halls of residence.
- Boarding schools.
- Hotels/Motels and other guest accommodation.
- Hostels (e.g., homeless, rehabilitation).
- Hospitals.
- Prisons / Young offenders’ units.
- Monasteries / Convents
- Military barracks

Other exemptions - option 3 only:

Sites licenced under the Control of Major Accident Hazards (COMAH) Regulations 2015:

	<ul style="list-style-type: none"> This is because there is potential for major accidents at these sites from dangerous substances, which could have a significant impact on the surrounding area. As such, early intervention to an incident at these sites is important. <p>Grade I and II* listed buildings:</p> <ul style="list-style-type: none"> Grade I listed buildings are of “exceptional interest” (around 2% of all listed premises). There are 490 known Grade I listed buildings in London. These include Buckingham Palace, St Pauls Cathedral, Westminster Abbey, and the Houses of Parliament. Grade II* listed buildings are of “particular importance” or more than special interest (around 4%). There are 1,244 known Grade II* listed buildings in London. These include the Tate Gallery, Hackney Empire, and Burlington House (home to the Royal Academy). <p>Hours:</p> <p>The hours where the ‘nil-attendance’ policy will be applied were chosen as they are typical working hours, where staff can be expected on site. They also avoid our change of watch system, and will help reduce the times firefighters are mobilised to non-emergencies at the end of their shift.</p>
<p>Who is affected by this work (all staff, specific department, wider communities?)</p>	<p>Building owners, landlords, occupants, and property insurers for premises included within the ‘nil attendance’ policy. Firefighters, control room operators and London’s wider communities.</p>
<p>What other policies/documents are relevant to this EIA?</p>	<p>HMICFRS Effectiveness, efficiencies and people reports - London Fire Brigade 2018-2019 and 2020-2021. PN 539- Emergency call management PN 412- Mobilising policy GN 54 - False alarms caused by automatic fire & smoke detection CRMP-2023-2029 Sustainable Development Strategy Risk Based Intervention Programme report</p>

4. Equality considerations: the EIA must be based on evidence and information.

What consultation and engagement has taken place to support you to predict the equality impacts of this work?

Consultation must take place with ESGs (including RB ESGs), Learning Support and affected groups.

5. Cultural consideration: the EIA must consider how the work improves the culture of the organisation

How does this piece of work contribute to improving the culture of the

This proposal will enable LFB staff to work in a more efficient and effective way through the reduction of



LONDON FIRE BRIGADE

organisation? How does this piece of work improve staff divides? Can you provide evidence?

attendance to UWFS. Time will be freed up which can be utilised on training, community safety work etc which will improve staff satisfaction. Control, Fire Stations and Prevention & Protection will work together to support this piece of work.

4. Wellbeing considerations

How will this piece of work impact the physical and mental wellbeing of staff and communities in London?

The consultation should have a positive effect on the mental wellbeing of staff as outlined above. It will also have a positive impact on communities as it will free up time for more community safety activities. There may be a negative impact on the wellbeing of responsible persons for businesses initially as they get used to the new system.

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?
<i>Example: Age</i>	<i>Adverse</i>	<i>Moving this service online will adversely affect older people, who are least likely to have access to a computer or smart phone and may not be able to use the new service.</i>	<i>GLA Datastore: X% of the London community are aged 70 or over. GLA data shows that only 10% of those over the age of 70 have regular access to a computer or smart phone.</i>
Age (younger, older or particular age group)	Positive	By using our resources on prevention, protection and engagement activities provides greater opportunity to enhance our	LFB data shows that older people are more likely to be victims of fire and rescue service incidents and are particularly vulnerable to fires, with 85 per cent of fatal fires involving someone over the age of 50 and 65 per cent of fatal fires involving someone over the age of 65. The number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than younger age groups. Therefore, there will be a growing need for infrastructure that supports an ageing population.

		<p>service to London’s communities. The policy proposals being consulted on include exclusion of premises where older people or younger children sleep. This ensures those who may be vulnerable due to age are not negatively impacted by this policy. By not attending unwanted fire signals, we can make our services more people centred and flexible to needs of our communities. This will contribute to ensuring that the most vulnerable in society and those who have specific needs can access our services by freeing up capacity to help support those who</p>	<p>London Data Store 2019:</p> <ul style="list-style-type: none"> • 12% of Londoners are 65+. • 68% are 16-64 and • 20% are 0-15. • 45% of fires deaths are in the over 40 years bracket. (LFB FIRE FACTS Fire deaths in Greater London 2019). <p>As part of this impact assessment process, we have considered the potential impact on persons both young and old who use specific types of premises daily. These premises include schools, colleges, nurseries, and care homes. The policy is expected to result in improved maintenance of automatic fire alarm (AFA) systems within these types of premises which should lead to a reduction in false alarms. This will in turn result in fewer interruptions to the day-to-day activities at each premises otherwise caused by UwFS.</p> <p>The reduction in UwFS attendances will enable LFB staff to devote more resources to risk-based intervention programmes such as “new approach” Home Fire Safety Visits (HFSV) and other activities focussed on the most vulnerable age groups within our communities.</p> <p>Our data shows: Day care – 54 UWFS (Adult supervision especially when children asleep. Statutory adult to child ratios in early years framework to safeguard children but can be used as part of Fire Risk Assessment to ensure staff can enact emergency plan). Primary school – 1497 (6.6%) this is a high number and % so not excluded. RRO ensures risk-based approach to fire safety and protection against fire. Nursery – 243 (1.1%) covered by early years as above. Secondary School – 1025 ((4.55%) – High in proportion of AFA to fires (only 219 in England in 2020/21) which is why not excluded despite being a community asset – RRO covers fire risks and our position statement on sprinklers supports them in schools for property protection. Our data does show a slight decrease in AFA levels during July & Dec (Holidays) which feeds into thoughts that most AFAs are caused by human intervention.</p>
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		<p>are at most risk of being a victim of fire or other risk.</p>	<p>Schools tend to have robust fire risk assessments and emergency evacuation plans in place, as well as many staff which support evacuation. It is anticipated that the impact on schools will be negligible.</p> <p>In addition, the reduced fleet carbon emissions from unnecessary journeys will improve environmental conditions, particularly impacting on children who live in areas where there is less clean air.</p>
<p>Disability (physical, sensory, mental health, learning disability, long term illness, hidden)</p>	<p>Positive</p>	<p><i>This risk-based approach to the policy proposals excludes premises where disabled persons sleep, include purpose-built blocks of flats that have been shown to disproportionately impact the means of escape for disabled people.</i></p> <p><i>The strategy of re-purposing firefighter resources from AFA attendance to prevention, protection and engagement activities, will provide opportunity</i></p>	<p>From the London Data Store: as of 2019, 18% of London’s population are disabled under the Equality Act 2010.</p> <p>LFB’s data shows that disability and poor mental health and mobility issues and taking prescription drugs increase your vulnerability to fire. People with disability are also likely to be poorer and as such have risk factors associated with deprivation. LFB’s data shows that if you are poor, you are more likely to have a fire.</p> <p>As part of this impact assessment process, we have considered the potential impact on disabled persons including those with mobility issues, hearing / visual impairments, and those with neuro disabilities. Where egress from specific types of premises involves use of lifts, there is a potential for an AFA to affect the lift’s operability which may in turn result in persons unable to evacuate a premise as quickly as able-bodied persons. The policy is expected to result in improved maintenance of automatic fire alarm (AFA) systems within buildings containing lifts thereby leading to a reduction in false alarms. However, there is an expectation for the Responsible Person for these premises to formulate a permanent Personal Emergency Evacuation Plan (PEEP) for any person who has:</p> <ul style="list-style-type: none"> • Mobility impairments • Sight impairments • Hearing impairments • Cognitive impairments <p>The aim of a PEEP is to provide people who cannot get themselves out of a building unaided with the necessary information and assistance to be able to manage their escape to a place of safety and to ensure that the correct level of assistance is always available.</p>

		<i>to offer more of a service to individuals specific needs,</i>	It is essential that the LFB work closely with people who are disabled as their views and opinions are an important element in ensuring our work is focussed on all members of the community.
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Neutral	By changing the way, the Brigade use the services normally directed at AFA response, will allow a more flexible approach that meets the needs of the community through increase prevention, protection and engagement activities.	Research carried out in 2012 on the acceptability of gender identity questions in surveys provided an indicative estimate that 1 per cent of the UK population identify as trans. The 2021 census showed that London was the English region with the highest percentage of people who said their gender identity was different from their sex registered at birth (0.91%). London also had higher proportions of people identifying as transgender men (0.16%) and trans women (0.16%) when compared with the rest of England and Wales. There is no detailed data held by the Brigade in relation to gender reassignment and their vulnerability to incidents which the fire and rescue service would be expected to attend and therefore, a details assessment of the impacts to this protected characteristic has not been made.
Marriage / Civil Partnership (married as well as same-sex couples)	Neutral	All LFB prevention, protection and engagement services will be enhanced as part of this policy proposal, and as such the impact on married couples or people in civil partnerships will be positive.	LFB's data shows that being in a marriage or civil partnership generally decreases your risk from fire. As such those people who live alone and especially older people who live alone often have more risk factors making them more vulnerable to fire. This is one of the risk factors within the new HFSV approach for targeting our activities.

<p>Pregnancy and Maternity</p>	<p>Positive</p>	<p>Non Attendance policy will have a positive effect on pregnant individuals by indirectly improving standards in the maintenance and upkeep of automatic fire alarm systems leading to less false alarms and evacuations which could cause stress. It should be noted that commercial premises with sleeping risk, such as hotels, will continue to receive a 24 hour response to an AFA.</p>	<p>Though no LFB data specifically relates to pregnancy or maternity risk factors associated with pregnancy and maternity such as reduced mobility and prescription drugs are known to increase an individual’s risk to fire.</p> <p>As part of this impact assessment process, we have considered the potential impact on people who are pregnant or in a period of maternity. Persons demonstrating these protected characteristics may not be able to evacuate premises as quickly as others. The policy is expected to result in improved maintenance of automatic fire alarm (AFA) systems within buildings thereby leading to a reduction in false alarms and potentially unnecessary evacuations. It should be noted that commercial premises with sleeping risk, such as hotels, will continue to receive a 24-hour response to an AFA.</p>
<p>Race (including nationality, colour, national and/or ethnic origins)</p>	<p>Adverse</p>	<p>Local intelligence shows that some of the local black and minority ethnic (BAME) business groups may be less likely to contact public services. They may be also less likely to understand the legislation and guidance provided to them.</p>	<p>57 per cent of Londoners are white British, white Irish or other white ethnicity, with the remaining 43 per cent having a black, Asian or minority ethnicity (BAME).</p> <p>LFB’s data shows that race does not have an impact on an individual’s vulnerability to fire. The proportion of each category of race is relative to the size of that category’s population in London. Though other risk factors such as economic deprivation and employment may be present in specific ethnic groups.</p> <p>The 2011 census show that 1 in 10 London residents had migrated to the UK within the previous 5 years.</p>

		<p>A considerable number of minority business groups work at night (fast food restaurants etc). The proposal is for nil attendance to end at 18:00 therefore these businesses will not be impacted.</p>	<p>78% of London’s population is made up people from the United Kingdom. Therefore, up to 22% may not speak English as a second language if at all.</p> <p>Top 10 represented nationalities (Other than UK non-English speaking) in order in London and main dispersion areas:</p> <ol style="list-style-type: none"> 1. Romania – Northwest and Northeast 2. Poland – Northwest and Southeast 3. Italy – All, particularly Westminster, Kensington & Chelsea, Hammersmith & Fulham 4. India – West and Northwest, Hounslow. Northeast – Redbridge 5. France – All 6. Portugal – Outer London, Brent, and Lambeth 7. Spain – All 8. Lithuania – Outer, Greenwich 9. Bulgaria – Haringey and Newham 10. Germany – All <p>To mitigate the impact to minority groups we are implementing a Risk Based Intervention Programme for premises covered by the Regulatory Reform (Fire Safety) Order which encourages pre-inspection activity and a proactive approach to business engagement and education rather than enforcement. This includes Fire Safety checks and business engagement activity carried out by local Borough Commanders and Fire Stations which is addressed within the Borough Risk Management Plans.</p> <p>LFB will work to ensure education and engagement is done in an accessible way, including offering translated resources, advice and guidance to support knowledge and understanding of BAME business owners, managers and other responsible persons.</p>
<p>Religion or Belief (people of any religion, or no religion, or people who follow a</p>	<p>Neutral</p>	<p>The non-attendance policy may impact on religion/belief due to the proposed non-attendance to</p>	<p>In 2022/23 there were 195 AFAs to places of worship. The highest proportion of these (23%) were due to a faulty system.</p>

<p>particular belief (not political)</p>		<p>religious buildings which includes churches, mosques and non-traditional places of worship etc. There is no sleeping risk in these premises types and so the risk is limited. The nil attendance policy is designed to improve the standard of fire alarms systems installed in premises and ensure the Responsible person is maintaining systems to the correct standard therefore although we will not be attending, indirectly the standards should improve and therefore risk will be reduced.</p>	<p>The risk matrix within the CRMP shows that incidents in places of worship occur on average about once a month and result in one casualty every 10-25 incidents.</p> <p>It is noted that some areas of London hold higher numbers of a particular religious group, for example Barnet has the highest Jewish community numbers and New Malden the highest Korean population. The views of each person are equally valued and that for proportion of views purposes it may be necessary to direct engagement in highest populated areas, this is not to suggest that the views are of lesser or more value. Nearly half of London’s residents, 48 per cent, give their religion as Christian.</p> <p>Muslims account for 14 per cent and all other religions total 12 per cent. People stating no religion make up the remaining 26 per cent. The proportion of Londoners who are Muslims or who have no religion has increased in recent years, while the proportion who are Christian has declined.</p> <p>Local intelligence shows that premises originally intended for office use that have been converted to religious premises can sometimes have a lower standard of fire safety management and can exceed permitted occupancy levels, however LFB do not have the data to support this position. LFB are working to improve the standard of data collection around enforcement activity in order to inform groups that are in need of additional advice and support.</p> <p>It would be prudent to include faith leaders in these conversations to get their views and opinions. Some members of the Orthodox Jewish community are generally discouraged from using electrical devices on the day of Sabbath which could impact their ability to answer their phone due to this religious practice.</p> <p>This may mean that some Jewish residents / business owners may not answer calls from remote monitoring centres to ascertain whether or not an alarm signal is in fact a confirmed fire or not. This would ultimately end up as an UwFS since the remote monitoring centre would default to calling the Brigade as we cannot confirm if there is a fire at the premises.</p>
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Sex (men and women)	Neutral	All LFB prevention, protection and engagement services will be enhanced as part of this policy proposal, and as such the impact on sex will be positive.	<p>LFB’s data shows that men are 16 per cent more likely to be victims of fire than women with men making up 58 per cent of fire victims over the last 20 years. Men and women are relatively evenly distributed across London.</p> <p>Women are more likely to be impacted by the risk of Arson in domestic premises, this is a targeted community safety activity and by freeing up fire station time due to nil attendance at AFAs, this will create further opportunities to engage with domestic violence organisations and provide HFSVs to these individuals, leading to a reduced risk.</p>
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral	<p>By changing the way, the Brigade use the services normally directed at AFA response, will allow a more flexible approach that meets the needs of the community through increase prevention, protection and engagement activities.</p> <p>All materials relating to the policy will be free of straight bias language, unless specifically referring to straight people.</p>	<p>Two per cent of adult Londoners identify as gay or lesbian, higher than the UK rate of 1.3 per cent. A further 0.6 per cent identify as bisexual and 0.6 per cent as other sexual identities.</p> <p>Reducing straight bias and increasing visibility of lesbians, gay men, and bisexual persons. Lesbians, gay men, and bisexual men and women often feel ignored by the general media, which take the straight orientation of their readers for granted. Unless an author is referring specifically to straight people, writing should be free of straight bias.</p> <p>There is no detailed data held by the Brigade in relation to sexual orientation and their vulnerability to incidents which the fire and rescue service would be expected to attend and therefore, a details assessment of the impacts to this protected characteristic has not been made.</p>

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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, parents, 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.	
<p>Carers are not a protected characteristic under the Public Sector Equality duty, however we need to consider the potential impact on this group to ensure that there is no associative discrimination. The definition of carers by Carers UK is that ‘carers look after family, partners or friends in need of help because they are ill, frail or have a disability. The care they provide is unpaid. This includes adults looking after other adults, parent carers looking after disabled children and young carers under 18 years of age’. Adopting a nil attendance policy will free up fire station time to carry out more community safety activity with carers, meaning there will be a positive impact on this group.</p> <p>The cost of living crisis, along with the impacts of the pandemic have negatively affected businesses and therefore potentially their ability to maintain their buildings adequately, including their fire alarm systems. There is no data to support this, however this is being monitored. Consultation is ongoing with relevant departments, the Equality Support Groups and Representative bodies to minimise the impact on any underrepresented staff groups.</p>	

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)	
How does this work help LFB to:	
Eliminate discrimination?	Engagement is a key element of ensuring we eliminate discrimination through accommodating the views of the community and key stakeholders. We will take positive action from this engagement to direct decision making and in the delivery of our services. This work contributes to the Risk Based Intervention Programme (RBIP) which enables LFB to target our resources to the most vulnerable in the community.
Advance equality of opportunity between different groups?	Through adopting the nil attendance policy and supporting the RBIP, we will be working to address accessibility of information which will improve equality of opportunity.

<p>Foster good relations between different groups?</p>	<p>Engaging with the community and working with different groups will improve the work that the LFB carry out. By being open and transparent with our aims and objectives and giving the community the opportunity to have an opinion and express their views, the community will help us to drive forward change and will have a positive impact on the wellbeing and safety of the people of London.</p>
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<p>8. Mitigating and justifying impacts</p>		
<p>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?</p>		
<p>Characteristic with potential adverse impact (e.g. age, disability)</p>	<p>Action being taken to mitigate or justify</p>	<p>Lead person responsible for action</p>
<p>Race</p>	<p>Engagement with local businesses via the Borough Risk Management Plans and Team plans will be targeted at any communities identified as particularly at risk, this could include businesses those where the RP is BAME or those where English is a second language. We are working to ensure that our advice and support is accessible through our website, literature and the use of translation services. We will use the expertise of the Community Engagement Team to support this work.</p>	<p>Robin Bradley</p>

9. Follow up, actions and evaluation

Where the Inclusion Team or other stakeholders have recommended actions in order to demonstrate due regard, these must be recorded here and delivered in accordance with time scales. Additionally, what is the organisational learning in relation to this piece of work in regards to the Equality Act 2010.		
Action recommended and person responsible for delivery	Target date Action to be completed by	Date action completed
Review of literature and website to ensure accessibility standards are met	January 2024	
Local business engagement through the consultation process	September 2023	
Lessons learnt and evaluation		

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.

Document Control

Signed (lead for EIA / action plan)	Robin Bradley	Date	27/6/23
Sign off by Inclusion Team		Date	
Stored by			
Links			
External publication	Are you happy for this EIA to be published externally?	Yes <input type="checkbox"/>	No <input type="checkbox"/> If No state why:

Appendix 04

Implementation Plan – High Level Overview

Unwanted Fire Signals – Non-attendance to AFAs in Commercial Buildings – 07:00 – 20:30 hours

If the proposal to provide delegated authority to implement the recommendations in the “Unwanted Fire Call Signals (AFA) - Post Consultation Recommendations” paper is approved, the following key elements will be undertaken in order to deliver the required outcomes:

- Liaise with the Portfolio Management Office (PMO) and develop a ‘Project light’ plan, including relevant roles (project lead/manager).
- Consider timing/phasing of the implementation with existing projects to ensure consideration is given to sequencing change (recommendation by Director of Transformation). (Note* - The timeframe for this plan cannot be confirmed until this element has been undertaken).
- Map out any further internal governance steps and stakeholders, including liaison with Change Group. It is noted that the proposals may result in the need for various internal governance boards to be consulted/involved e.g. mobilising governance board, Change Group.
- Identify any costs (noting that a by-product of the implementation is expected financial savings). The potential costs of implementation are not considered to present any significant budgetary problems, as it is anticipated that any associated cost will not be high and will likely be covered by draw-down from the Government Grant funding allocated to improvements in the field of Protection.
- Work with Protection and Communications colleagues to ensure that a comms plan to inform and support businesses prior to go-live is developed – expected transition period circa 2-3 months (Initial liaison with Comms has already started). This should include ensuring that highlighting the responsibility under the Fire Safety Order, for AFA maintenance and for employee training is included as part of the communication plan (and support for businesses) for the roll out of the policy change.
- Create a working group to amend the relevant policies and procedures. It is noted that there will need to be particular focus to involve the LFB Control & Mobilising department in this work, as there are some identified issues to be worked through prior to implementation.
- Identify and implement any training requirements e.g. Control triage processes.
- Undertake a feasibility study with regards to a process for standardised local exemptions to be made, based on local assessment of risk.

- Design review point e.g. 1 year from implementation date, in order to assess any learning or further changes that may be required.

Other points to be considered in the implementation plan are as follows

- Consider how the issue of residential property within mixed use premises is addressed.
- Explore additions and amendments to the call filtering process.
- Explore the potential for any automated method of identifying exempt premises, listed or heritage buildings or those buildings that contain any form of residential element or sleeping risk.
- Explore the possibility of underwrites being added to addresses, so that Control staff can automatically see that individually exempt buildings require an emergency response.
- Explore the potential for new policy/procedure linked to PN 800/7.2.d visits and Borough Risk Management Plans, to give Borough Commanders the responsibility to ensure local risks are assessed and as appropriate, to apply for consideration of specific premises to have bespoke exemption from the proposals in this report.
- Confirm that major national heritage premises, e.g. museums, national attractions and galleries, have a Premises Risk Assessment recorded as per PN 800 and are as per policy, visited by local watches in line with policy.