



Essex Police, Fire and Crime Commissioner Fire and Rescue Authority

Decision Report

Report reference number: 024-23

Government security classification: Not protectively marked

Title of report: Amended Risk Based Inspection Programme

Area of county / stakeholders affected: Service-wide

Report by: T/Group Manager Dave Bond

Date of report: 10th May 2023

Enquiries to: T/Group Manager Dave Bond

1. Purpose of the report

The Service Leadership Team approved the proposed changes to the Risk Based Inspection Programme on 18th April 2023. The reasons for the proposed changes are detailed within this report.

It is recognised that this is a significant change though to our previously agreed strategy, so this report is to present our recommendations and justification to the PFCC for approval.

2. Recommendations

To implement our 2023/24 Risk Based Inspection Programme (RBIP) which outlines our approach to visiting and understanding the risk at our premises across Essex, with a responsibility to be compliant with the Regulatory Reform (Fire Safety) Order ("the Order"). This will be achieved by:

- Auditing all our Very High-Risk Premises by 31st December 2025 (within three years).
- Auditing all our High-Risk Premises by 31st December 2027 (within five years).
- Carrying out FSO40 visits at all our Medium Risk Premises over a six-year period.
- Engaging with our Low-Risk Premises through business engagement and education.

3. Benefits of the proposal

The service's CFRMIS lead has assured the Protection Department that a full data refresh concluded in December 2022 and the number of premises aligned to address based premium codes in Essex that fall within our RBIP has risen from 33,738 (when the current RBIP 2020-2024 was published) to 88,236 (as of January 2023). As from 1st January 2023 the new RBIP and Power BI dashboard reflects:

The number of Very High-Risk Premises has risen from 1,114 to 1,870.

The number of High-Risk Premises has risen from 2,639 to 7,906.

The service has recognised that the number of premises within Essex that fall under the Order has changed significantly from the data refresh. This means the commitments within the RBIP 2020-2024 are no longer a reporting Key Performance Indicator.

This paper accompanies an up-to-date version of the service's RBIP for the year 2023/24, for agreement by the PFCC. This received SLT's approval on 18th April 2023. The 2023/24 RBIP recommends a service approach to managing the risk at premises within Essex that fall under the Order by categorising them in the following way:

- Very High Risk
- High Risk
- Medium Risk
- Low Risk

The commitment within the 2023/24 RBIP will be reviewed annually, and data will be refreshed six-weekly with the local authorities. As part of the CRMP implementation, the Area Manager (Protection) will work with CRMP Project Board to review and revisit the way in which commercial risk is categorised across Essex. There is not expected to be significant change, however it is recommended that, once this work is complete, the RBIP is refreshed to ensure the commitments made are still appropriate to the risk.

4. Background and proposal

Within our previous RBIP 2020-2024, there was a commitment to visit all our Very High (VH) Risk premises every 12 months, and all our High (H) Risk premises every 24 months. This approach was made based on there being 1,114 Very High Risk classified properties and 2,639 High Risk classified premises. This would require the Inspecting Officers within Protection to carry out 2,433.5 audits per year to meet the commitment within the previous RBIP.

The service's review of the data shows that, as of January 2023, we now have 1,870 VH Risk premises, and 7,906 H Risk premises. To meet the commitment within the previous RBIP would require the Inspecting Officers to carry out 5,823 audits per year, which is over 3,000 more audits annually.

The reason for this shift in data is the way in which data is being reported through CFRMIS and the data refresh transition to addressed based premium coding. This is to ensure a single data set of premises is being classified without constantly changing the service's target. An example of this shift in data is that the historical RBIP data suggested that there were 33,738 premises that fell into either the Very High, High, Medium or Low Risk classification. A review of the data from July to December 2022 identified that this figure is now 88,236.

The number of inspecting officers within the Protection Department allows us to meet our audit commitments within the RBIP at our VHs and Hs and builds in the capacity to respond to any non-compliances identified at M and L risk premises.

The RBIP recognises that we require 17.5 competent fire safety officers to complete our VH and H commitment. Our budget was for 21 Fire Safety Officers in 2022/23, with this increasing to 22.6 in 2023/24, which will allow us to build in resilience to the department too, once fully established. Our active work around the recruitment and the retention of our fire safety officers is being heavily supported by the new Campaigns and Partnership Manager role within Corporate Communications.

As well as reviewing our commitment to auditing our VH and H risk premises, there has also been a review of the allocation of FSO40s being distributed to operational crews. The increase in medium risk premises has resulted in a move from a four-year rotation of FSO40s at these premises being completed, to a six-year completion rate. This move allows us to manage the allocation to Watches more closely, builds in resilience to our targets, and allows us to monitor the additional workloads being placed on the SDPs and on the Fire Safety Officers from referrals from the FSO40s more closely.

The 2020-2024 RBIP also references our business engagement work, and a Business Engagement Strategy has been developed to capture the workstreams being picked up within our Business Engagement Team.

5. Embedding the RBIP 2023/24

Our move to inspecting our VH risk premises within the time frame set out above is consistent with NFCC guidance that suggests our highest risk premises should be audited within a 12- to 36-month period.

Protection currently has an active “cause for concern” in place from HMICFRS, with the main reason for this being our inability to demonstrate that we were able to meet the commitments within the previous RBIP. The proposed change in approach was presented to HMICFRS during their reinspection in January 2023, and their feedback was positive. Their letter back following the reinspection praised the work that had been done and the progress that had been made but recognised that there had not yet been the time to embed the changes and for the results to be demonstrated, so the “cause for concern” remained in place at that time.

The updated RBIP and the Business Engagement Strategy, along with a supporting SLT paper were submitted to SLT on April 18th and received its approval.

6. Strategic priorities

Current commitments within the Fire and Rescue Plan include a commitment to ensure we have a systematic, transparent, well targeted, and effective fire safety inspection regime.

7. Operational implications

There are no new operational implications arising from this decision report.

8. Financial implications

The Protection Department has consistently been revising its structure and budget. This has primarily been due to vacancies within the department as well as a decrease in Grey Book personnel and an increase in Green Book personnel.

The focus has been to align to risk needs and build a resilient structure utilising the FTE budget within Protection and the Uplift Grant. It is the ambition of the GM Protection to re-focus these

savings into additional, new posts that will allow us to work proactively in specific fields, such as rural commercial risk, in the future.

9. Legal implications

None

10. Staffing implications

None

11. Equality and Diversity implications

The actions being taken will not have a disproportionate impact on individuals with protected characteristics (as defined within the Equality Act 2010), when compared to all other individuals and will not disadvantage people with protected characteristics.

Race	N	Religion or belief	N
Sex	N	Gender reassignment	N
Age	N	Pregnancy & maternity	N
Disability	N	Marriage and Civil Partnership	N
Sexual orientation	N		

The Core Code of Ethics Fire Standard has been fully considered and incorporated into the proposals outlined in this paper.

12. Risks

It needs to be accepted that there may be some months that the targets within the RBIP are not met for several reasons including, but not limited to:

- Increased enforcement activity – The resources and time required when enforcement activity is undertaken increase drastically, and in some cases can add 50-100 hours of work per case.
- Decrease in staff levels – The recruitment and retention of personnel within Protection is a national challenge. Competent personnel leaving will have an impact on the achievement of our monthly targets. Once we are at capacity then we will be able to absorb this, but currently we are still working on building our Fire Safety Officer numbers to the levels we want.
- Property classifications – The total number of premises that fall within the different categories within the RBIP can change on a six-weekly basis, when the new data is refreshed.
- National incidents – Incidents such as the Grenfell Tower fire result in a redirection of activity by Protection to meet the immediate needs to address public safety and reassure the public.
- Alleged fire risks – From members of the public, or through non-compliance returns from FSO40s.

Whereas the points above may result in a drop in audit numbers for a month or two, a PowerBI dashboard has been created by the Performance & Data Department that allows us to monitor progress against our commitments within the RBIP and ensure that resources remain sufficient for the commitment within the RBIP to remain on track for completion within the timeframes set out within the RBIP. The PowerBI dashboard consists of dynamic targets that will adapt to capture any monthly reduction in audit numbers, so this is picked up in following months. These

targets will also allow us to react quickly should we need to support our Fire Safety Officers with competent personnel from other areas of Protection.

13. Governance Boards

The new RBIP received SLT approval on 18th April 2023 and was considered at the PFCC's Strategic Board on 8th June 2023.

14. Background papers

- Appendix A – Risk Based Inspection Programme 2023-2024
- Business Engagement Strategy 2023-2024

Decision Process (024-23)

Step 1A - Chief Fire Officer Comments

(The Chief Fire Officer is asked in their capacity as the Head of Paid Service to comment on the proposal.)

.....I support this recommendation

Sign: 

Date:.....8/6/23.....

Step 1B – Consultation with representative bodies

(The Chief Fire Officer is to set out the consultation that has been undertaken with the representative bodies)

N/A

Step 2 - Statutory Officer Review

The report will be reviewed by the Essex Police, Fire and Crime Commissioner Fire and Rescue Authority’s (“the Commissioner’s”) Monitoring Officer and Chief Finance Officer prior to review and sign off by the Commissioner or their Deputy.

Monitoring Officer Sign: 

Print: P. Brent-Isherwood

Date: 30 June 2023

Chief Finance Officer Sign: 

Print:Neil Cross.....

Date: ... 8/6/23

Step 3 - Publication

Is the report for publication? **YES**

If 'NO', please give reasons for non-publication (Where relevant, cite the security classification of the document(s). State 'none' if applicable)

None

If the report is not for publication, the Monitoring Officer will decide if and how the public can be informed of the decision.

Step 4 - Redaction

If the report is for publication, is redaction required:

- 1 Of Decision Sheet **NO**
- 2 Of Appendix **NO**

If 'YES', please provide details of required redaction:

N/A

Date redaction carried out:

If redaction is required, the Chief Finance Officer or the Monitoring Officer are to sign off that redaction has been completed.

Sign: Print:

Date signed:

Step 5 - Decision by the Police, Fire and Crime Commissioner or Deputy Police, Fire and Crime Commissioner

I agree the recommendations to this report:

Sign:  (PFCC)

Print: Roger Hirst Date signed: 04/07/2023

I do not agree the recommendations to this report:

Sign: (PFCC / DPFCC)

Print: Date signed: