

HMFSI FIRE SAFETY ENFORCEMENT - ACTION PLAN PROGRESS

Updated	Next Update
Sep-22	Dec-22

HMFI Recommendation	Action Ref	Action Description	Action Owner	Due Date	Revised Due Date	Status	Progress Update Commentary	% Complete	Completion Date	RAG	Evidence
6. There is a disconnect between policy, the scheduling of fire safety audits and performance reporting and we recommend that Scottish Fire and Rescue Service uses the same system for both scheduling and reporting and that this should be based on relative risk scores using the categories and methodology used by the Scottish Fire and Rescue Service in the annual fire safety statistical bulletin.	6.2	Participate in the extensive review of FRS inspection programmes and associated activities to develop a bespoke Risk Based Inspection Programme (RBIP) and implement the outcome of a review of the SFRS Risk Rating Methodology (RRM) with the aim of simplifying the categories of levels of risk to align with the rest of the country.	GC Steven Corrigan (previously GM C. Getty)	Mar-20	Dec-23	In Progress	15 June 2022: The NFCC are reviewing how FRSs design their risk based inspection programmes. They aim to develop best practice, framework guidance which should be subject to consultation by the end of the year and published in 2023. It is recognised that current longstanding guidance and frameworks may benefit from a review to take account of weaknesses in the built environment and changing risk. To develop the new framework guidance, two workshops took place in Birmingham over April and May 2022 involving several English FRSs, as well as NIFRS and SFRS. The last workshop is scheduled in for June 22. The first workshop focused on the principles, frameworks and codes which underpin Protection activity. The second examined the different Risk Based Inspection Programmes (RBIPs) currently in use and the key elements for a standardised "blueprint" model. The third workshop will review the effectiveness of protection activity (audits, short audits, checks by ops crews etc) and its contribution to Community Risk Management Plans. This action has been given a red RAG status due to the slip in timescales. 21 September 2022 Update and Pathway to Green: SFRS attended a further National Fire Chiefs Council (NFCC) workshop in June. Further discussion was held around Risk Based Inspection Programme (RBIP) models, relevancy of Fire Service Emergency Cover model (FSEC) codes, risk levels, impact of fire frequency and the weighting provided to scores on the audit form. Meeting arranged with Business Intelligence to look at our current approach and identify how fire frequencies used by the FSEC model can be updated to reflect modern fire frequencies. This information will assist in our new approach and will supplement the NFCC RBIP guidance which is due for consultation in October 2022. This action has been given a red RAG status due to the slip in original timescales. Progress has been made and will continue to be made following the consultation process and introduction of Risk Based Inspection Programme guidance from the NFCC. This is a substantial piece of work tied into the NFCC process and new database with a predicted revised due date of December 2023.	30%		Red	Briefing note from 3 NFCC RBIP Meetings
1. Fire Safety Enforcement is not fully transparent for duty holders or members of the public. The Scottish Regulators Strategic Code Of Practice requires the Scottish Fire and Rescue Service to publish clear risk assessment methodologies and risk ratings and review these regularly.	1.1	Fire Safety Enforcement Policy Framework detailing the methodologies to be published on the internet site. Work undertaken by Local Senior Officer areas with their Local Enforcement Delivery Plans will also be published here.	GM C. Getty	Sep-19	Apr-21	Complete		100%	Jun-21	✓	https://hub.firescotland.gov.uk/news/fire-protection-framework-for-scotland-7854/ https://www.firescotland.gov.uk/your-safety-for-businesses/fire-safety-audits.aspx
2. Produce fire safety audit guidance which is clear and understandable for duty holders.	2.2	Local Enforcement Delivery Plans to incorporate audit methodology and be published by Local Senior Officers once created for the forthcoming year.	GM C. Getty	Sep-19		Complete		100%	Apr-20	✓	LEDP template detailing audit guidance and methodology has been produced and being used by LSO areas to plan forthcoming audit activity. In addition, a pre audit letter has been created and should be issued prior to audits explaining full audit process to Duty holders.
3. Proactively make its fire safety audit procedure and guidance available on the SFRS website.	3.1	Redesign internet site pages for "For Businesses" and incorporate guidance in an information library.	GM C. Getty	Oct-19		Complete		100%	Jan-21	✓	Local Enforcement Delivery Plan Template The SFRS internet site has been updated with guidance and Local Enforcement Delivery Plans for each Local Senior Officer area. This will be kept under review and additional guidance issued as necessary to maintain transparency. This action is now complete and the RAG status has moved from Amber to Green.
4. SFRS to improve its written communication with duty holders in line with the Scottish Regulators Strategic Code of Practice requirement to communicate effectively. The Service should also introduce changes to address the issues regarding letter content, listed in section 4.5 of the HMFSI report.	4.1	Plan training events for all Local Senior Officer areas, emphasising the need for clear communications and avoidance of additional information that may be supplementary to any audits put on letters following visits or other reason for contact. Where recommendations are made by Fire Safety Enforcement Officers, explanations of why they are made should be given.	GM C. Getty	Apr-19		Complete		100%		✓	Training event carried out. P&P Directorates provides support as required. Letters have been drafted and new templates ensure clarity between any requirements and recommendations made. Feedback site created and duty holders informed.
4. SFRS to improve its written communication with duty holders in line with the Scottish Regulators Strategic Code of Practice requirement to communicate effectively. The Service should also introduce changes to address the issues regarding letter content, listed in section 4.5 of the HMFSI report.	4.2	FSE Directorate team to support local areas in production of further templates and give guidance where required	GM C. Getty	Mar-18		Complete		100%		✓	Templates amended and distributed to areas. Further training and guidance will continue to be delivered at Service Delivery Area meetings.

5. The priority and scheduling of fire safety audits is fragmented with different and conflicting statements and systems, and inconsistent practice at a local level. The Service should ensure that its national priority-setting is followed locally. And while PPED is a useful resource for recording fire safety audits, if it is to have any function as a scheduling tool it needs to be consistent with national policy, have the flexibility to be changed when policy changes, and contain a record of all known premises.	5.1	1. Ensure statement of requirements for new enforcement database system is reflected when user testing is carried out promoting audit workloads for officers according to risk. Current system has information relating to framework premises and audit dates that must be transferred to new system when operational. As a catch all, Local Senior Officer areas must identify all Policy Framework premises and ensure the system promotes them for audit.	GM C. Getty	Apr-19	Complete		100%	✓	New PPED System is now live and operational for recording FSE activity. Information has been transferred successfully from the legacy system.
5. The Service should ensure that its national priority-setting is followed locally. If PPED is to have any function as a scheduling tool it needs to be consistent with national policy, have the flexibility to be changed when policy changes, and contain a record of all known premises.	5.2	Ensure Local Senior Officers take accountability for identifying local risk and incorporating Directorate guidance (Core Audit Activity) into the Local Enforcement Delivery Plans.	GM C. Getty	Jul-18	Complete		100%	✓	Policy Framework and template Local Enforcement Delivery Plans developed and distributed. Statement of Requirements completed for new PPED system.
5. The Service should ensure that its national priority-setting is followed locally. If PPED is to have any function as a scheduling tool it needs to be consistent with national policy, have the flexibility to be changed when policy changes, and contain a record of all known premises.	5.3	The methodology for the rescheduling of audits will be reviewed to determine whether there is a more appropriate means to prioritise risk. Following this review, the new PPED system will reflect any changes and resources within Fire Safety Enforcement reviewed to ensure sufficient personnel are available in the right places to address local risk. This risk based resourcing will be evidence led. (Linked to Recommendation 6).	GM C. Getty	Mar-20	Complete		100%	Jun-20	✓ PPED 2 system (Access restricted to users only) SFRS Gazetteer Reporting tool training document supporting local development of LEDPs.
6. There is a disconnect between policy, the scheduling of fire safety audits and performance reporting and we recommend that Scottish Fire and Rescue Service uses the same system for both scheduling and reporting and that this should be based on relative risk scores using the categories and methodology used by the Scottish Fire and Rescue Service in the annual fire safety statistical bulletin.	6.1	Scope the potential for categorising premises and risk bands and how risk is calculated. Any change to risk calculations will require extensive supporting evidence and a public consultation. Scope the possibility of reporting by risk levels exposed to risk bands where considered to remain an appropriate way of categorising risk.	GM C. Getty	Mar-20	Complete		100%	Apr-20	✓ Statistical performance reporting by PDS due to be released for 2020. (Email from PDS confirming the action has been resolved) LEDP Template and completed delivery plans. Release of PPED2 system in April 2019.
7. There is a substantial amount of enforcement effort made in respect of premises which have relatively adequate fire safety measures and/or have low levels of relative risk. The Service should place less emphasis on auditing such premises.	7.1	Ensure templates for Local Enforcement Delivery Plans are distributed and support areas in their formulation for the forthcoming year. Support Prevention and Protection Managers through Local Performance Meetings and Prevention & Protection Managers meetings with reports demonstrating the resultant risk from audits where Fire Safety Enforcement Officers are being deployed.	GM C. Getty	Jul-18	Complete		100%	✓	Local Enforcement Delivery Plan templates have been produced and disseminated to Local Senior Officer Areas. Support given to Prevention and Protection Managers with local support meetings available upon request.
8. The Service should place less emphasis on quantity (the use of personal fire safety audit targets) and place more emphasis on quality of work and effectiveness.	8.1	Incorporate into training events the focus for quality of audit detail in the reports and look at ways that will allow more time to complete paperwork following audits such as mobile platforms.	GM C. Getty	Mar-19	Complete		100%	✓	Guidance given to areas to reduce the number of lower risk audits and this has been assisted by the recent House Multiple Occupancy (HMO) auditing procedure. New PPED system will allow capability for mobile platforms.
9. The terminology used in the SFRS premises risk methodology needs to be changed to improve understanding and remove inconsistency. Specifically the Service should abandon the use of risk band names and generic premises names – both of these currently allow misinterpretation or misunderstanding.	9.1	Scope the potential for categorising premises and risk bands and how risk is calculated. Any change to risk calculations will require extensive supporting evidence and a public consultation. Scope the possibility of reporting by risk levels as opposed to risk bands where considered to remain an appropriate way of categorising risk.	GM C. Getty	Mar-20	Void				This action was merged with 6.2 in March 2022, the new action descriptions states: Participate in the extensive review of FRS inspection programmes and associated activities to develop a bespoke Risk Based Inspection Programme (RBIP) and implement the outcome of a review of the SFRS Risk Rating Methodology (RRM) with the aim of simplifying the categories of levels of risk to align with the rest of the country. As such this action has been marked as void.
10. The Service should continue to move towards the conversion of uniformed enforcement posts to non-uniformed, and introduce career progression opportunity for non-uniformed staff.	10.1	Determine where Local Senior Officer areas cannot fill their current structure within Fire Safety Enforcement and consider alternative options to expand upon the non-uniformed cadre of officers.	GM C. Getty	Jun-19	Complete		100%	✓	A review has been undertaken and analysis of vacancies that can support delivery in areas. Local LSO areas are continuing to advertise like for like to maintain a blend, though have increased the ratio of non-uniformed to uniformed where attraction of posts have been difficult. This will remain dynamically reviewed and form part of the overall P&P review in the following year period, in line with competency and risk rating review.

11. Uniformed enforcement staff should maintain their operational competency within the relevance of their role map to add to the resilience of the Service and these staff should provide operational cover when needed.	11.1	Confirm current position with Training and Employee Development. Look to develop a consistent policy and procedure for all non-operational uniformed staff to maintain their operational competence.	GM C. Getty	Feb-19		Complete		100%		✓	Training have now issued courses to initial tranche of FSE staff and are continuing to design courses that will maintain operational capacity within FSE.
12. The Scottish Fire and Rescue Service should look to create a guidance framework that would allow a more formal approach to continuing professional development and this should include Fire Safety Enforcement staff.	12.1	Enhance development of the E-Learning tool and communicate with Training and Employee Development regarding the provision of class based training. Prevention and Protection Directorate will lead on specific training events to assist with Continuous Professional Development and knowledge building in specialist subjects such as fact finding, evidence gathering and consistent forming of Notices.	GM C. Getty	Mar-19		Complete		100%		✓	FSE CPD events delivered. A number of external CPD events offered to assist with staff development. Staff expected to undertake further study to achieve a qualification and to maintain their CPD and competence.
13. The Scottish Fire and Rescue Service approach to the promotion of non-domestic fire safety through work other than inspections has been modest in comparison to active enforcement audit work. We recommend that the Scottish Fire and Rescue Service considers a more proactive approach to the use of campaign and awareness activity.	13.1	Develop strategy on what is to be communicated and when. Further details to be provided on internet site as before and release communications on good news stories and actions taken by the service, such as those who have been prosecuted. Topics to include Unwanted Fire Alarm Signals, Fire Risk Assessments and an overview of Scottish Fire and Rescue Service enforcement and its delivery within communities.	GM C. Getty	Sep-19		Complete		100%		✓	Social media feeds established. Engagement sessions held with sectors including AirBnB, Scottish Association of Self Caterers and Colleges and Universities.
14. There is a policy void which offers some risk to the Service. The Service should strengthen and document its policy, and procedures where relevant, in respect of; the other legislation referred to in section 3; the determination of disputes; and Alterations Notices.	14.1	Develop and publish procedure detailing the Enforcement, including for Alterations Notices and appeals procedures for Scottish Fire and Rescue Service and the disputes procedure in accordance with the Fire (Scotland) Act.	GM C. Getty	Oct-19	Nov-21	Complete		100%		✓	Consultation with LSOs, legal services and FMT. Procedure document live and available on iHub from 14 January 2022.
15. The Service should introduce a protocol explaining its relationships and involvement in fire safety in major sports grounds and ensure that its staff follow this protocol and work in line with the responsibilities in Part 3 of the 2005 Act.	15.1	Provide a consistent policy within Scottish Fire and Rescue Service for the support, if required, to Local Authorities in the inspection and adequacy of fire safety within sports grounds.	GM C. Getty	Dec-19	Dec-21	Complete		100%	Jun-21	✓	MoU between SFRS and Glasgow City Council with respect to Fire Safety Matters at Designated Sports Grounds and Regulated Stands within the City of Glasgow
16. The Service should maintain a capability and capacity for investigating and reporting to the Procurator Fiscal Service on serious blatant breaches where the enabling approach to enforcement has not worked. The Service should actively pursue relevant cases when they arise. The Scottish Fire and Rescue Service Board should actively monitor the Service's performance in this regard and should receive regular reports on the number and outcome of cases considered and referred for prosecution.	16.1	Develop further relationships with the Procurator Fiscal and support areas in reporting those who have breached the legislation following consideration of the ScoP.	GM C. Getty	Mar-19		Complete		100%		✓	Directorate personnel are engaged with the Procurator Fiscal (PF). Enhanced access to the reporting site of the PF established.