Community Protection Strategy

2021 - 2023



NORTHAMPTONSHIRE FIRE & RESCUE SERVICE

Making Northamptonshire Safer



Introduction

The Protection strategy identifies how the resources of the Community Protection department, within Northamptonshire Fire and Rescue Service (NFRS), will improve the safety, health and wellbeing of those who live, visit or work within the county and how it will contribute to the wider service and, where possible, partner agency objectives.

The strategy identifies key priority areas of activity that aim to reduce high or intolerable risks and thus make the community safer. For each area it will identify the why, how and intended impact of the work. These priorities support the high level objectives set out in the Community Risk Management Plan.

Our duties



The activity of the Fire Protection department significantly reduces the risk of fire in buildings where people live, work and visit. Preventing fires or reducing their impact will directly contribute to the safety of both the occupants and users of a premises and also the fire service staff who respond in the event of an emergency.

The Fire Services Act 2004 details the requirements for fire protection and includes the promotion of it within its area. Arrangements should be in place to provide information, publicity and encouragement in respect of the steps to be taken to prevent fires and death or injury by fire. Capability is also required to give advice, on request, about how to prevent fires and restrict the spread in buildings, and to other property, and the means of escape from buildings.

NFRS has a duty to enforce fire safety standards in the majority of non-residential and shared residential buildings in the county. This is imposed under The Regulatory Reform (Fire Safety) Order 2005, (FSO). We discharge this duty in a number of ways which are detailed later in this document but in summary;

- Proactively identifying buildings for inspection based on factors such as generic risk, previous inspection history, public safety. This is the Risk Based Inspection Program (RBIP).
- Providing a reactive response to concerns, raised by the public, partner agencies and fire staff, over the standards of fire safety.
- Ongoing targeted risk management (TRM), a review process to assess, plan and react to foreseen and emerging issues/changes to fire safety. This would encompass activity following relevant national and local incidents or changes to legislation.

The Fire Authority is a 'Responsible Authority' under the Licensing Act 2003 and its work directly supports the licensing objective of 'Public Safety'. In addition to this, NFRS recognise that contribution can be made to the further three primary objectives by having an understanding of the wider licensing remit.

The fire authority is a statutory consultee under Building Regulations for any premise which would be, when occupied, covered by the remit of the FSO.

As a regulatory authority the service recognises the requirements under better regulation and the aims to reduce regulatory burdens and to ensure that the regulation which remains is smarter, better targeted and less costly to business.

The Equality Duty places requirements upon public bodies and those carrying out public functions. It ensures that consideration is given to the needs of all individuals in their day to day work – in shaping policy, in delivering services, and in relation to their own employees.

The work of the protection team centres very much towards the physical attributes of buildings and the fire safety systems within them. Recognition and adherence to national guidance, formal industry standards, central NFFC guidance and standard audit processes combine to support a consistent application of fire standards.

Persons within the premises will present a number of protected characteristics and in many cases these will not directly impact the fire safety requirements or the action of the fire authority. However, it is important that our staff recognise our duty and ensure, where possible, we play our part in making society fairer by tackling discrimination and providing equality of opportunity for all.

The protection activity will assist in delivering the aims of the Equality Duty with a common area being in connection to persons with disabilities. Those individuals who will potentially require additional assistance to utilise and evacuate a premises. Our consideration and action can help to eliminate unlawful discrimination, advance equality of opportunity in use and occupation of a building and, through the review of fire procedures, foster good relations between people who share a protected characteristic and those who do not.

The application of fire safety precautions into physical buildings is always centred around life safety and as such our priority is always to people.



Fire protection delivery

Inter agency and partnership working

Primarily the fire protection duties are fulfilled and delivered by a core department of dedicated protection staff, who are trained and experienced in the field of fire safety.

Training, qualification and competence meet and in some cases exceed the requirements within the NFCC Competency Framework for fire safety regulators.

Link to information of team.

Within the Protection department there is an extensive amount of commercial experience outside of the fire sector, with previous careers in; retail, warehousing, manufacturing, engineering, service delivery, science and technology.

This breath of experience enhances our ability to apply the fire safety legislation proportionately in the context of the type of use a premises has and in recognition to the occupants within them.

So that we can effectively deliver our priorities, the Community Protection department has a flexible and resilient distribution of staff across our County, with hubs in Wellingborough, Northampton and Kettering.

An out-of-hours' duty rota is in place to ensure that specialist fire safety advice and the capacity to undertaken formal enforcement is available 24/7.

Operational staff are given input on the subject of fire protection and information on the departments role to allow them to undertake effective hazard spotting whilst engaged in their primary role. Hazard spotting may occur during or post incident, whilst attending a premises for familiarisation or whilst undertaking prevention activity and an understanding of protection contributes to intelligence lead activity.

We will develop and implement a process for crews to undertake Fire Protection checks at Houses in Multiple Occupation (HMO).

When we identify fire safety issues we take a proportional approach to putting things right, based on national guidance. Minor issues can be dealt with by education and information but serious issues, which potentially place lives at risk, are addressed using the formal enforcement powers under the FSO and ultimately could result in a prosecution.

The processes to undertake desktop audit activity was developed during the COVID pandemic to support officers in undertaking fire safety discussions remotely. The activity allowed for audits to be completed in part or full, utilising telephone, virtual meeting environments and remote documentation reviews. This practise will continue to be utilised, where appropriate, to allow officers to maximise efficiencies in their work.

The same methodology and technology can continue to be used to provide advice to premises which may be identified as low risk and not immediately warrant the additional time and resource required to physically attend the premises. The national framework for Fire and Rescue Services (FRSs) in England sets a clear objective for fire services to have strong partnership arrangements in place, that aid the delivery of a service and that meet the statutory duties and the requirements of the framework.

The protection team have good links with many of the regulators and agencies and an understanding of their legislative remit over commercial premises; Local Authorities, Police, Care Quality Commission, Ofsted, Building Control Bodies, Health and Safety Executive.

We have ensured a process is in place to both capture and identify: referrals with information of fire safety, inspection activity undertaken alongside partners and instances where we have identified and communicated intelligence to others regulators.

Where appropriate, work and communication will be undertaken to ensure that both our and partner objectives can be delivered better, providing an efficient and effective service also to assist partners achieve their requirement and objectives. This is commonly seen with respect to activity involving licensed premises, e.g. public houses, where we will consider joint messaging with the Police Licensing team.

NFRS are an active member within the region, working with protection colleagues in other fire services and NFCC centrally. This work focusses on sharing best practise, providing peer support and review, identify opportunities to collaborate and identify efficiencies and to receive updates from NFCC's Protection, Policy & Reform Unit.



Response to the county and national risk

To plan our Protection response to the premises risks within Northamptonshire we have reviewed our data to inform our delivery.

We have a record of approximately 25,000 premises within Northamptonshire where The Regulatory Reform (Fire Safety) Order 2005 applies.

We have considered the factors and premises attributes associated with each premises to allow us to plan the protection activity and response accordingly.



How we have broken down the premises within the county to plan our Protection delivery

1,721 premises are identified as being a higher risk or higher priority and are managed within our Risk Based Inspection Programme (RBIP). The plan will be delivered by the dedicated and competent fire protection officers.

There are over 3000 houses in multiple occupation (HMO) with the county which will be targeted by operational crews, undertaking protection checks.

Remaining premises will be targeted via media campaigns, self-help guidance and sampling inspections by fire protection officers.



Impacts to the view of risk

The judgement of risk must be seen as fluid. We recognise that whilst our broad understanding and determination of risk will underpin our medium term planning, we will monitor events that may create the need for a short term response. For example, major incidents and national findings all have the potential to require a review of risk.

The impact of the COVID pandemic is a good example of how a new view needed to be applied to our determination of risk and in March 2020 we undertook such a review.

From the review of the COVID impact, we highlighted a number of premises types which would have new or modified fire safety risks develop and as such we planned a reaction accordingly.

Care homes, waste sites and schools were three premises types that were seen or predicted to have an impact on their fire safety, due to the pandemic.

These three premises types would have fallen at different levels under our RBIP assessment of risk.

In reaction to this change the protection team reviewed the priorities and where resources were targeted and realign accordingly, on a temporary basis.

This review highlighted how we could see premises, which were broadly high, medium or low risk and separated from each other within the hierarchy, align when under a modified view of priority and /risk.

Specifically, for COVID, this change was in line with our broader service response to the COVID pandemic and developed as additional information was available or following the publication of government guidance.

Targeted Risk Management (TRM) is within this strategy and is our mechanism to undertake these ongoing reviews of risk and, where required, plan activity to mitigate or reduce the emerging risk within the short term.



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Risk based inspection programme

Use of operational personal for protection delivery

The protection department operates a risk based inspection programme (RBIP) which has been designed to proactively target resource at premises which present themselves as a higher risk.

Premises which are deemed to be generally low risk to life maybe prioritised due to an unacceptable potential loss of the building or its geographical location within the county. We have developed a three year RBIP that directs a large proportion of our day to day work and is flexible to work alongside our targeted risk management activity.

In order to ensure the most effective use of our resources, NFRS considers what factors would deem a premises to be at a higher risk of fire, then uses these factors to develop it's inspection plan.

Generally, premises that have a sleeping risk; e.g. Hospitals, care homes, hotels and Houses of Multiple Occupation (HMO) remaining as the priorities for inspections.

This assessment and planning took into account: changes to legislation, learning from national and local incidents and intelligence, both of which can have an impact on where and when inspections should be concentrated.

Premises which are deemed to be generally low risk to life maybe prioritised due to an unacceptable potential loss of the building or its geographical location within the county.

A good example are historical premises, they may offer a low risk to life but a higher risk to a responding fire crew, present a significant irreplaceable loss to the county's heritage portfolio and commonly will sit in the rural areas of the county.

Overall the plan will allow the authority to discharge its legislative duty and target premises that are of higher risk and monitor and/or reduce the residual risk they present. The RBIP includes a focus, by the protection team, towards Houses in Multiple Occupation (HMO). Since the introduction of the FSO in 2006 NFRS have actively worked to reduce the risk in this type of premises which includes working in collaboration with local authorities.



HMOs present themselves as a high risk premises in comparisons to dwellings occupied by single families NFRS are increasing the protection activity within the sector.

Our experience has shown that the HMOs with lower levels of compliance and that require us to take formal action to reduce unacceptable risks to persons, are premises we have not been involved with previously. These are HMOs that are unknown to NFRS and are highlighted through intelligence from members of the public, crews attending an incident or via concerned residents. These are the premises that our experienced fire protection officers will be focused towards.

Operation crews are being provided training, by protection officers, to enable them to undertake fire protection checks with HMOs. Their activity will target known HMOs that have previously been inspected by the protection team.

This will provide evidence of the ongoing compliance of premises, after our formal inspection activity, and will allow crews to identify deficiencies that could, if they remained unchecked, develop to create a detrimentally impact to the safety of residents.

Guidance to landlords is published on our website, click here.



Targeted risk management

The protection team have historically responded to new or emerging risks within the fire sector; changes in legislation or following a national/ local incident of note.

A good example is the protection activity following the Grenfell Tower incident. Whilst our local activity was in reaction to an incident, it was delivered under a planned methodology with predetermined outcomes identified from the audits of high-rise residential premises in the county.

This same review process was employed at the very early stages of the COVID pandemic, to assess, plan and react to foreseen and emerging issues/changes to fire safety.

The initial reassessment of risk with the sector focused our resources towards establishments that provided care to individuals.

Evacuation strategies for these premises are led by and rely significantly on the staffing structure within the premises. Any impact to staff capabilities or increase in staff absence would in turn effect their fire safety arrangements.

Using the learning from our COVID response we have developed this activity to: formalise the process when establishing and planning targeted delivery, ensure coding is available within our data management system to enable suitable reporting, to support tracking and evaluation, and to capture findings from the activity to support the future reviews of the RBIP.

Crowded places is a term which is becoming more commonly used, due to a number of emergency incidents within the UK and the world. For many years, activity in relation to these areas has been a core part of the protection role, with work focused within; sports grounds, premises which offer assembly and recreation e.g. pubs and clubs, and large scale events e.g. music concerts and town fairs.

Crowded places

Information to inform a venues safe capacity, the number of people within a premises, is within fire safety guidance, which we can use to assess venues and, if required, use our powers to enforce or control. Whilst primarily this is under the FSO it is often in support of the wider licensing objectives. This can be by the fire authority exercising its ability to call or assist at licensing reviews.

The Head of Community Protection also manages the Police licensing team. As such the opportunity to work together and provide cross department promotion or intelligence gathering is on-going.

Counter Terrorism is an emerging issue that has affected the UK and we have proactively included training to the inspection team to provide an understanding of the subject and assist them in identifying and considering issues in their day to day work.

There is a clear link between our powers around premises capacity and the potential impact of a terrorist incident. If a premises can effectively manage a number of people within a fire situation then the same procedures and management will aid in the event of a terrorist event, either within or in the vicinity of a premises.

To aid premises in the assessment of risk and the occupancy capacity of their venue, guidance and tools have been collated and designed, click here.

Unwanted Fire Signals (UFS)

Building a

A UFS is defined as a signal transmitted by an Automatic Fire Alarm (AFA) system that is reporting a fire where in fact no fire has occurred.

Our UFS policy recognises that key to the effective performance of automatic fire detection and fire alarm systems is the design, installation, commissioning, certification, acceptance and maintenance processes. Third party verification of the fire alarm system by a competent person is strongly recommended and this is fully supported by NFRS.

The policy has successfully reduced the number of calls to and emergency responses by the Service over the period of time it has been in place. The FPOs actively assist in a further reduction by issuing advice to premises management to help reduce or eliminate issues that a premises is experiencing.

This activity has the direct effect of allowing emergency response resources to be ready to respond to real incidents and not drawing them away to avoidable false alarms.

Click here to view policy.

The fire authority is a statutory consultee under Building Regulations for any premise which would be, when occupied, covered by the remit of the FSO. This provides an opportunity for the protection team to both comment and offer advice on developments with the aim to have safer buildings for the occupants and the fire service.

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in place.

better community

Whilst the fire authority is not a statutory consultee under the planning regulations we will actively meet with developers to help improve intended designs and proposals.

A pre-planning guide has been produced to ensure the availability of information to ensure that planners, designers and develops can understand our requirements.

Click here to view our guide.

To create an ongoing improvement in fire safety standards and reduce the risk within the county we will continue to promote the inclusion of automatic fire suppression systems within building designs.

Our position statement is published online, click here.

Operational intelligence



Provision of informal advice and self help tools

Due to the core protection activity, i.e. access to physical buildings, fire strategies and design plans the team are able to identify issues and risks that a responding fire crew could find in an emergency These items are considered by the FPO and, where appropriate, conveyed to the risk intelligence team and/or crews to contribute to our priority of keeping firefighters safe in the event of an emergency.

FPOs have access to site specific risk intelligence plans and as such officers can review these as part of their legislative inspections and provide comments or updates as appropriate. We actively attend local forums, landlord and commercial, to provide information and promote fire safety. It is important that the protection team are both visible to and accessible by partner agencies and members of the public and hold a reputation of trust.

We have seen the benefits of responsible persons proactively making contact with us for advice or assistance. These instances provide us the opportunity to; improve their fire safety compliance, help identify practical measures or arrangements and, in some cases, find solutions that provide significant financial savings.

This clearly contributes to risk reduction and promotes ongoing compliance.

The team have developed and collated guidance and tools to assist responsible persons in both identifying their duties and taking steps to assess their risk and achieve legislative compliance.

We will continue to develop self help information and guidance that can be efficiently absorbed by responsible persons and can contribute to the effective understanding and application of fire safety.

Link to webpages for commercial premises

Link to webpages for landlords



Training and development



Development our risk intelligence

To ensure that FPO's are competent to meet the need of the role and their duties we will ensure required development and relevant continuous professional development (CPD) is identified and delivered. The primary focus for training and development will be to prepare the team and wider service for the introduction and enactment of the Fire Safety Act and Building Safety Bill. Capturing relevant information within our activity is a key objective as it will increase our ability to consider risk within county and respond accordingly.



Building details will be one factor that we will aim to develop of internal data system to allow an increase level of detail e.g. the recording of construction type.

Risk comparison with our partner agencies will be a further area for development, with aim to seek current risk intelligence but also instigate a mechanism to seek 3rd party risk rating at the time of our audits. One example is for FPOs to capture the Care Quality Commission (CQC) rating of residential care premises at the time of our fire safety audit.

This will allow analysis to occur and, if they exist, identify trends.

Evaluation

We will continually aim to review the impact of our activity, identify trends within our data, and instigate changes or developments that will provide continual improvement.

Reduction of risk with our community, successful formal and informal activity to achieve compliance and design and development of safe buildings will be primary objectives for evaluation.







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