

INTEGRATED RISK MANAGEMENT PLAN 2015-19



PROTECTION EVIDENCE FOR SERVICE
REDESIGN CONSULTATION 2016

**ROYAL BERKSHIRE
FIRE AND RESCUE SERVICE**

Enabling people to lead safe and fulfilling lives



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Executive Summary

This document provides options and supporting information to enable decisions to be made on the way that RBFRS will fulfil its statutory obligations for the enforcement of fire safety legislation. In particular, with regard to the Regulatory Reform Fire Safety Order, Primary Authority Schemes, how to meet government expectations with regard to the 'Better Business for All Agenda' and, lastly, how to address the requirements of 'Regulators Code' in the application of our fire safety enforcement activities.

The scope of the document will include five key areas:

- Risk Based Inspection Programme.
- Better Business for All.
- Primary Authority Schemes.
- Regulators Code.
- Protection Structure within RBFRS.

Background information will be provided about all of the key areas so a wider understanding can be obtained by the reader about the subject matters within the IRMP report. A brief summary within each section area will highlight the performance expectations being placed on the service. The summary will be followed by a brief overview of how developed or underdeveloped the Service currently is in connection with these government expectations (duty to enforce the Fire Safety Order on a risk focused basis, 'Better Business for All', 'Primary Authority Schemes' and the 'Regulators Code').

The options section has covered five ways of working all different from each other. The options will take account of efficiency savings, influencing factors that are currently challenging our current method of managing fire risk in the built environment, how changes in structure/resources/focus will impact on IRMP, planned and anticipated economic and business growth in Berkshire over the next 5, 10, 15 years and compliance with statutory requirements, conformity to codes of practice and to high level government agendas. The options have also considered advantages and disadvantages against our Service's strategic commitments.

Option 1 considers reducing the number of audits undertaken and using a more thematic approach to our Protection service delivery. This would be more like the approach of some of our FRS neighbours. This option does present cost savings in the long term but the disadvantages of this alignment outweigh the advantages. This approach will not address the anticipated business growth in Berkshire over the next 5, 10, or 15 years. It does not fully support the Service's Integrated Risk Management Plan (IRMP) and could be seen as limited in how it promotes and supports strategic commitments 1 and 3.

Option 2 considers the expected economic and business growth within Berkshire over the next 5, 10, and 15 years, as well as the impact the increase in the number of premises coming under the Fire Safety Order (FSO) will have on our ability to enforce the order effectively and the effect it will have on our IRMP.

Executive Summary

This would involve more audits being undertaken. There are more advantages (fully supports IRMP, enforcement of the order is effectively aligned to business growth, fully supports strategic commitments 1 & 3) than disadvantages (increase in resources required) but a strong business case would have to be generated to increase staff numbers when public services are being asked to make substantial efficiency savings over the coming years.

Option 3 considers maintaining our current service provision and making no adjustments to accommodate any of the impacts facing Protection. The disadvantages of this approach far outweigh the limited advantages it offers. It is highly likely that we will be challenged about the effectiveness of our risk based inspection programme, what we are doing to support the 'Better Business for All' agenda and our adherence to the 'Regulators Code'. It is likely to suggest that we are demonstrating limited support for strategic commitments 1, 3 and 5.

Option 4 considers addressing the need to refocus our risk-based inspection programme but does not fully support the wider economic growth agenda. Although there are a similar number of advantages and disadvantages it is highly likely that we will be challenged about what we are doing to support the "Better Business for All" agenda and our adherence to the "Regulators Code". It is likely to suggest that we are demonstrating limited support for strategic commitments 3 and 5.

Option 5 considers addressing and supporting all of the focus areas highlighted in the IRMP project initiation document. The advantages are numerous and far outweigh the disadvantages. Adopting this option would allow us to demonstrate that we have a risk-based inspection programme that does fully focus on fire risk in the built environment as well as supporting the government's agenda in promoting and stimulating economic growth. In so doing, we will be adhering to the requirements of the Regulators Code. As it proposes to do this with our current level of resources it does not address the possible increase in staff numbers to accommodate the anticipated business expansion in Berkshire over the next 5, 10, and 15 years. The Service will still have time to fully consider this expansion and review its resource needs, so it will be in a position to determine how it will absorb the extra work an increased number of non-domestic premises will present.

Introduction

Royal Berkshire Fire and Rescue Service (RBFRS) is required to demonstrate that it is addressing and reducing risk to the public through its Integrated Risk Management Plan (IRMP). The Service does this by continually challenging all aspects of its service delivery to ensure that the approach is balanced and is working in the areas that it is needed the most and does provide the best value for money. It is currently challenging some aspects of service delivery within the Prevention, Protection and Response functions. All functions have provided options for change that will alter the service we deliver to the public of Berkshire. These key areas have been captured in a project initiation document with all the key areas being exposed to scrutiny and challenge via a wider consultation agenda involving internal and external stakeholders. The Protection function has five key project areas, which if adopted, will alter the service we deliver to the public.

The first four project objectives under the project initiation document focus on:

- Our risk-based inspection programme.
- The Better Business for All agenda.
- Primary Authority schemes.
- Working more closely with other regulators in support of the 'Regulators Code'.

The primary focus of these four objectives is the review of our current risk-based inspection programme. A number of influencing factors strongly suggest we should refresh our focus on fire risk in the built environment.

The other three main project objectives - Better Business for All, Primary Authority Schemes and the Regulators Code – can all be described as factors which will impact on our current risk-based inspection programme. However, they are being treated as separate project objectives as each could change the service we deliver to the public in their own right.

Fire and Rescue Services enforcing fire safety legislation now have to take account of Primary Authority Schemes and may form these schemes themselves with key businesses. The Regulators Code and the Better Business for All agenda are being heavily supported by central government. This means these areas do significantly influence the way RBFRS will carry out our statutory duty to enforce the Fire Safety Order (FSO). Above all, the Service must demonstrate that it is focusing its resources where they are being used to best effect and that they are providing excellent value for money.

Item number 5 of the project objectives will need to be considered in how it could support any agreed new ways of working. A change in structure and re-focusing of risks will ultimately change where and how the protection function will be delivered. Whilst there is evidence to support considering a change in our approach to enforcing the Fire Safety Order, the options considered must take account of our Service's strategic commitments to ensure any new ways of working do fully support the commitments made by the Fire Authority to the public of Berkshire.

Background

Risk-based inspection programme

Fire and Rescue Authorities (FRA's) have a statutory duty to enforce the Fire Safety Order in all non-domestic premises in their area, except those limited number of cases falling under the HSE, the Crown Premises Inspection Group of the Chief Fire and Rescue Adviser or Local Authorities.

The Fire and Rescue Service National Framework 2008-11 required each FRA to have a management strategy and a risk based inspection programme to enforce the provisions of the Fire Safety Order. This was needed to meet government expectations and was needed to satisfy the requirements of each FRA's IRMP.

The fire safety inspection programme should enable an FRA to show that it is meeting its enforcement responsibilities in respect of the Fire Safety Order. The Order makes a risk assessment approach central to determining the necessary level of fire precautions in all premises other than a single private dwelling. The statutory responsibility for ensuring an adequate level of fire safety lies with the 'responsible person' for individual premises – usually the employer, owner or occupier.

The development of a fire safety inspection programme allowed each FRA to demonstrate that it was delivering its enforcement responsibilities and focusing its resources on those premises that presented the greatest risk to life in the event of fire. This involved prioritising inspections and enforcement action according to the level of risk within individual premises.

The principal aim of the approach was to reduce the risk and impact of fire on the community, to safeguard firefighters, heritage and the environment, reduce the loss of life, injuries and reduce commercial, economic and social costs. Consequently, our statutory duty to enforce fire safety legislation and promote fire safety is based upon risk, thereby providing value for money.

Premises which posed the greatest risk would be audited and inspected more frequently. Those considered to be lower risk would be sampled primarily in response to other drivers such as concerns raised by members of the public, following fire incidents or occasionally on a random basis. This would enable any FRS to verify their classification and to confirm that the responsible persons across all premises categories were discharging their statutory legislative responsibilities.

For a more detailed insight into risk ratings and inspection frequencies, please contact RBFRS's Group Manager Protection.

Background

For an FRA to show it is enforcing the Fire Safety Order effectively within relevant risk premises, a comprehensive risk-based inspection programme should be in place. It should be based on known national and local risk but is flexible enough to absorb emerging information. This evidence will also be pivotal to providing robust evidence to support effective integrated risk management planning.

Our current approach follows the Department for Communities and Local Government (DCLG) best practice contained within their Integrated Risk Management Guidance Note 4. The programme is based on an assessment of the risk posed by generic types of premises and individual buildings. It supports the authority's IRMP through the reduction of risk in non-domestic premises through the application of the Fire Safety Order, the collation of site specific information to inform and update the authority's risk profile and the collection of essential risk data for firefighting purposes.

As well as utilising this risk management model, it has also been accepted that other factors may influence/change elements of our risk-based inspection programme – a history of fires in specific premises types at a local level, operational site visits, relevant information from other regulators and professional judgement are examples.

In our current risk-based inspection programme policy it is accepted that over time it may be necessary to make adjustments to more accurately reflect local risks and intelligence. We have now reached that point.

A revised draft risk-based inspection programme matrix was produced in 2015, which highlighted a whole host of external and internal influencing factors which will have a bearing on how RBFRS manages fire risk in the built environment. Three of those influencing factors were supported by a statutory duty, codes of practice and high level government agendas (Primary Authority Schemes, the Regulators Code and Better Business for All). Addressing these three areas of influence will have an impact on how RBFRS delivers its Protection services to the public.

The options matrix within this report will show the advantages and disadvantages of maintaining our current approach to managing risk in the built environment and managing risk in the built environment after taking account of all of the identified internal and external influencing factors that have an impact on how we enforce the Fire Safety Order.

Better Business for All

The Government's number one priority over the past few years has been economic recovery and bringing the country out of recession. Economic recovery is dependent on private sector growth. To create the conditions for growth, not only do the regulations need reviewing but there also needs to be consideration of the way in which regulation is enforced.

Better Business for All is a partnership approach to creating the conditions to support growth. Better Business for All (BBfA) brings together regulators and businesses in an area. It has been piloted through the Local Enterprise Partnerships (LEPs) of Leicester & Leicestershire and Greater Birmingham & Solihull. The Government is now keen for the approach to be adopted in other areas.

Background

Whilst it may not be possible to change the regulations themselves, we can influence how regulation is enforced locally to create the conditions to support business growth.

Through developing a new relationship between regulatory services and businesses, Better Business for All aims to reduce both real, and perceived, regulatory barriers to business growth. The key objectives of the programme are:

- Providing advice and support to businesses.
- Increasing the business awareness of regulatory officers.
- Effective coordination across regulatory services.
- Simplifying the local regulatory system and processes.
- Establishing an ongoing partnership between regulatory services and local businesses.

The delivery of regulation is about the way in which inspections, visits, advice and enforcement are carried out as well as the attitudes, approach, competency and actions of officers.

How a regulatory officer interacts with a business and the quality of the relationship that develops plays a part in determining whether a business decides to expand and grow. If expanding, or even in some cases continuing in business, proves to be too difficult due to the perceived regulatory barriers, then regulatory services can have a negative impact on growth. However, if regulatory services are seen to be encouraging expansion and are solution-focused in providing advice, this can genuinely support the local economy as well as continue to protect its citizens.

In summary, the Government is committed to promoting business and economic growth and wants to ensure that regulators only enforce regulations where appropriate. They want to ensure that existing compliant and new businesses are fully supported through an effective programme of guidance, advice and partnership working so those businesses can flourish and grow. This will be particularly important in Berkshire. It has the highest Gross Value Added (GVA) anywhere in England outside of London (source: Berkshire Growth Partnership website). This means it has a major role to play in the delivery of economic growth for the country. This role will be increased due to major infrastructure projects such as Crossrail and the potential for an additional runway to be provided at Heathrow Airport.

RBFRS have discussed the merits of working with business under the 'Better Business for All' agenda with three of the six unitaries in the county (Slough, Reading and Bracknell). It is clear that the three unitaries concerned are keen to progress this working relationship. We now intend to meet with the remaining unitaries (Newbury, Wokingham and Windsor & Maidenhead).

The Better Business for All agenda is aimed at small (low to medium risk business). These types of premises will come under the requirements of the Fire Safety Order and these premises will form part of our existing or refreshed risk-based inspection programme.

These types of premises are unlikely to be audited on a regular basis by our existing fire safety inspecting officers as they will not fall under the category of high life risk premises. There is scope to use existing station-based staff/managers to carry out this function at a local unitary level.

Background

Our Service has an excellent opportunity to support this government agenda. Doing this will support local and national economic growth. It will allow our staff to educate large sections of the of business community on fire prevention and fire safety compliance. It will support/increase the number of audits we carry out in low to medium risk premises within our existing or refreshed risk-based inspection programme.

Primary Authority Scheme (PAS)

In 2008, the Regulatory Enforcement and Sanctions Act introduced the primary authority scheme (PAS). Although there were existing voluntary partnership schemes, such as the local authority partnership schemes (LAPS), there were no requirement for other local authority regulators to abide by any of the outcomes from any partnership agreements.

The PAS was developed as a partnership scheme based in law, with statutory guidelines, designed to create business investment in growth by developing confidence that regulators in different local authority areas would not place conflicting or inconsistent demands on its resources and hence increase the financial burden on its business.

To assist in achieving this aim the scheme included a variety of tools, such as:

Assured advice – advice provided by the regulator to the business accepted on a national basis by enforcers of the same regulations.

Inspection plans – a plan agreed between the regulator and business, designed to co-ordinate inspection activity between Fire and Rescue Services (FRSs) where a Fire and Rescue Service (FRS) has identified a premise for inspection under their locally agreed risk based inspection programme. It cannot be used to direct an FRS to undertake and inspection.

Enforcement referral – providing the ability for the partner regulator to block proposed enforcement action that is not consistent with advice that had been provided.

The PAS is a statutory scheme available to businesses with a presence in more than one local authority area. The businesses can enter into a legal partnership with a single local authority to secure greater co-ordination of regulatory and enforcement activities. It applies to a range of regulators.

When the schemes were first introduced, fire safety legislation was not included. However, this has now changed and the Primary Authority Scheme (PAS) was extended to incorporate fire safety legislation, specifically the Fire Safety Order.

In summary, Primary Authority Schemes have been extended to incorporate the Fire Safety Order (FSO) to enable businesses to partner up with a Fire and Rescue Service so they can obtain regulatory advice from a single point of contact. This reduces the burden imposed by conflicting

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advice from many of the same regulators in other areas, when the business had premises that spanned many geographical boundaries.

Papers were submitted to the RBFRS Corporate Management Team (CMT) and to the Fire Authority recommending that RBFRS chooses to become involved in the scheme. During 2014/15, RBFRS entered into three of these partnerships. These are with the Radian Housing Group, Universities' Partnership Programme (UPP) and Ramsey Healthcare. All three partnerships are still active and are working well.

The initial take up of partnerships across FRSs up and down the country was slow but it is now beginning to gather pace and a great number of partnerships are logged with the Better Regulation Delivery Office (BRDO). One item of note is that many FRSs were reticent to partner up with businesses that had a sleeping risk connected with the business function. The underlying concern was that businesses with a sleeping risk were likely to be more complicated and the issue of giving advice, either general or assured advice, could lead to uncomfortable challenges from other FRSs about regulation and compliance in connection with the Fire Safety Order. All three of RBFRS's PAS partners have a sleeping risk as part of their core business. They are happy with the partnership arrangements in place and the advice we have given them.

The consideration of Primary Authority Schemes (PAS) under IRMP is not about whether we should or should not become an active partner under the scheme: we are already an active partner. It is about assessing, reporting on and adjusting the potential risks posed in premises, in Berkshire, coming under the Fire Safety Order (FSO), when fire safety standards in those buildings are being determined by other FRSs. Through assessing risk, we may need to challenge the fire safety standards set by other FRSs and work with them to ensure a safe level of compliance exists in premises occupied and visited by the people Berkshire. Where other FRSs have Primary Authority Scheme partnerships involving businesses with premises in Berkshire, the fire safety standards they set could impact on communities in Berkshire and how RBFRS carries out its statutory duties in enforcing the Fire Safety Order.

The Regulators' Code (working with other regulatory partners)

In the Autumn Statement of 2012, the Government announced that it would introduce a package of measures to improve the way regulation is delivered at the frontline. The Government was committed to reducing regulatory burdens and to supporting the growth of compliant businesses through the development of an open and constructive relationship between regulators and those they regulate. This is a continuation of the implementation of the findings of the [Hampton Review 2005](#) (Reducing administrative burdens: effective inspection and enforcement).

The Regulators' Code provides a flexible, principles-based framework for regulatory delivery that supports and enables regulators to design their service and enforcement policies in a manner that best suits the needs of businesses and other regulated entities.

Regulators **must** have regard to the Code when developing policies and operational procedures that guide their regulatory activities. Regulators must equally have regard to the Code when setting standards or giving guidance which will guide the regulatory activities of other regulators. If a

Background

regulator concludes, on the basis of material evidence, that a specific provision of the Code is either not applicable or is outweighed by another relevant consideration, the regulator is not bound to follow that provision, but should record that decision and the reasons for it. The main drivers of the code are that regulators should:

- Carry out their activities in a way that supports those they regulate to comply and grow.
- Provide simple and straightforward ways to engage with those they regulate and hear their views.
- Base their regulatory activities on risk.
- Share information about compliance and risk.
- Ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply.
- Ensure that their approach to their regulatory activities is transparent.

The Government is committed to making sure the Regulators' Code is effective. They want people to challenge regulators who they believe are not acting in accordance with their published policies and standards. The Government will monitor published policies and standards of regulators subject to the Regulators' Code, and will challenge regulators where there is evidence that policies and standards are not in line with the Code or are not followed.

In summary, the Government is committed to reducing regulatory burden wherever it can. It expects all regulators in an area to work together to achieve this. The Code requires a regulator to have clear and transparent policies that demonstrate it is enforcing only where appropriate and to a level that is fully justified.

Our current risk-based inspection programme focuses primarily on sleeping risks in the built environment. Certain premise types such as hospitals and care homes still do warrant the level of compliance confirmation sought by RBFRS. We have now obtained enough evidence to confirm that the current level of compliance confirmation sought by RBFRS in other premise types, such as the large hotel chains, is over burdensome and in contradiction with regulation code requirements.

There is also a strong argument to confirm that to manage fire risk in the built environment effectively where a sleeping risk is present, we should be working more closely with other regulators such as immigration officers, housing officers/departments and the police. Whilst this is currently being done on an ad-hoc basis, the Regulators' Code directs us to have more robust intelligence sharing and joint working protocols in place. These approaches will also influence and have a direct impact on our risk-based inspection programme.

From April 2016, all FRSs have been strongly encouraged to use a short audit form to assess compliance against the Fire Safety Order in business premises that have a strong record of compliance. The aim is to reduce the regulatory impact longer audits would have on those

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businesses so those businesses are not hampered by over-burdensome regulation and can prosper and grow.

Whilst we can demonstrate that we are complying with some aspects of the Code, we can do more. We should be able to provide evidence to confirm we have established a deliberate strategy embracing business needs, interfacing with other regulators, making best use of resources and providing the best value for money. To fully comply with the Code, we need to re-focus our current risk-based inspection programme and change our service to the public.

General information

RBFRS is one of three FRSs within the Thames Valley area. The others are Buckinghamshire FRS (like RBFRS this overseen by a Combined Fire Authority) and Oxfordshire FRS (part of Oxfordshire County Council). Buckinghamshire has a population of approximately 522,000 people and Oxfordshire has a population of approximately 666,000 people. Royal Berkshire has a population of 915,000 people. All 3 FRS areas contain high profile heritage buildings and a large number of businesses of national and international importance.

Berkshire has a higher concentration of business settlement when compared to Buckinghamshire and Oxfordshire. The UK's largest business park is located in Slough. The information technology industry has a large presence and profile in Reading, Slough, Bracknell and Newbury and this area of work is continually developing and growing to support new businesses and new ways of working. Business growth in this area alone, within Berkshire, will impact on our Service's ability to carry out its statutory function of enforcing the Fire Safety Order in the years ahead.

Oxfordshire and Buckinghamshire FRSs address fire safety enforcement by responding to concerns raised by members of the public and after fires have occurred. In addition they carry out risk-based audits of themes or types of buildings that are thought to present specific risks. Both FRSs have 10/11 full time Fire Safety Inspecting Officers compared to RBFRS's 16 full time posts. Oxfordshire carries out approximately 450 audits per year and Buckinghamshire carries out 1400. Neither FRS completes full audits on all high risk sleeping premises where the occupants are unfamiliar with the premises.

RBFRS has a risk-based inspection programme which covers all of the risk premises in the FSEC groups A (sleeping unfamiliar), B (sleeping familiar), C (public unfamiliar) and D (workplace familiar). Whilst RBFRS does not have the resources to comprehensively assess groups C and D for compliance against the Order (this is assessed through responding to concerns raised by members of the public or through post fire audits), it is successful at assessing for compliance within the FSEC categories A and B.

Fire safety legislation is designed so that fire safety in premises is managed effectively by the responsible person. Whilst the level of compliance with and the successful enforcement of, the Fire Safety Order cannot be measured simply from the number of audits completed in an FRS service area, carefully targeted regulation is one way of assessing and ensuring adequate fire safety standards in relevant buildings. It is the only way a service can satisfy itself that fire safety standards

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in high risk premises are being adequately maintained for the public and relevant persons in its service area.

Thematic audits of risk premises in a service area will ensure quality audits are being carried out irrespective of the number of audits being completed but the combination of thematic and a minimum number of planned audits, across the whole range of risk premises (derived by evidence) within a specified period of time, will ensure a service can demonstrate it is carrying out its statutory function to enforce the Fire Safety Order. It will also provide further robust evidence to confirm it is managing fire risk in the built environment very effectively, thereby fully supporting its overall Integrated Risk Management Plan (IRMP).

In summary, an effective risk based inspection programme is required to evidence that a service is carrying out its statutory duty to enforce the Fire Safety Order and to demonstrate through IRMP, that it is effectively managing fire risk in the built environment.

Advantages and Disadvantages Options Matrix



Option	Advantages	Disadvantages
<p>Option 1 – Reduce the number of audits undertaken and carry out thematic work rather than a full risk-based inspection programme.</p>	<p>Reduction in costs. Premises subject to audits would be those who were most likely to be high risk or non-compliant.</p>	<p>Fewer premises audited and so poorer understanding of fire safety compliance levels across Berkshire.</p> <p>Does not take account of the size, number and complexity of business premises in Berkshire.</p> <p>This approach would provide some limited evidence that the service is carrying out its statutory duty to enforce the fire safety order but it is unlikely to provide robust evidence to support that it is effectively managing fire risk in the built environment given the level of risk in Berkshire now or proposed.</p> <p>It is anticipated that there will be steady business growth in Berkshire in the next 5, 10 and 15 years meaning more business premises in the service area. A reduction in the number of business premises audited is contrary to this anticipated business growth.</p> <p>A reduction in capacity and levels of expertise is likely to be long term as once savings are made it will be extremely difficult to increase staff numbers again, if required.</p> <p>This approach could be seen as being of limited success in supporting and promoting Strategic Commitment 1 (we will educate people on how to prevent fires and other emergencies and what to do when they happen) and Strategic Commitment 3 (we will ensure appropriate fire safety standards in buildings).</p>

Advantages and Disadvantages Options Matrix



Option	Advantages	Disadvantages
<p>Option 2 – Scope the impact the expected business and economic growth over the next 5, 10, and 15 years within Berkshire will have on our statutory duty to enforce the FSO and plan to increase the number of audits undertaken.</p> <p>Fully adopt all the IRMP focus areas.</p>	<p>This approach will ensure that we are collecting robust evidence to support evidence under IRMP which demonstrates that we are effectively managing fire risk in the built environment.</p> <p>This approach will effectively demonstrate that the Service is forecasting the number of resources it will need to ensure it is carrying out its statutory obligation to enforce the fire safety order and will be in a strong position to support the continued business growth in its service area.</p> <p>Scope to use current partnerships to influence prevention messages and sprinklers as all our existing partners have a portfolio of sleeping risks within Berkshire and wider areas.</p> <p>This approach could be seen as fully supporting and promoting Strategic Commitment 1 (we will educate people on how to prevent fires and other emergencies and what to do when they happen) and Strategic Commitment 3 (we will ensure appropriate fire safety standards in buildings).</p>	<p>A strong business case will need to be produced to increase resources in Protection under the current fiscal pressures.</p> <p>Under IRMP an increase in resources required for Protection could have a detrimental impact on resources in Prevention and Response.</p> <p>Difficult to resource much additional work due to limited availability of trained staff.</p> <p>Need to be very careful to make best use of resources and to provide value for money.</p>

Advantages and Disadvantages Options Matrix

Option	Advantages	Disadvantages
<p>Option 3 – make no changes (do nothing).</p>	<p>No impact on our current Protection IT system which we use to store and analyse Protection audit data.</p> <p>No change management needed.</p>	<p>Any internal or external review/assessment of our current service approach to managing fire risk in the built environment under the Fire Safety Order will identify significant challenge areas. One challenge area would be the applicability of our current risk based inspection audit regime against some high risk premises.</p> <p>Other challenge areas will be what evidence we have to support the ‘Regulators Code’, the governments “Better Business for All” agenda and the impact ‘Primary Authority Schemes’ is having on fire risk in the built environment within our service area.</p> <p>This could be seen as a limiting approach in supporting and promoting Strategic Commitment one (we will educate people on how to prevent fires and other emergencies and what to do when they happen), Strategic Commitment three (we will ensure appropriate fire safety standards in buildings) and Strategic Commitment five (we will ensure that Royal Berkshire Fire and Rescue Service provides good value for money).</p> <p>Failure to make best use of resources.</p> <p>Failure to reduce risk in the community and to support economic growth.</p>

Advantages and Disadvantages Options Matrix

Option	Advantages	Disadvantages
<p>Option 4 – refresh risk-based inspection programme only taking account of the influencing factors that determine that there is significant value in establishing a change in focused audit. This approach will not fully embed the better business for all agenda and will not support working with all regulatory bodies as per the requirements of the ‘Regulators’ Code’.</p>	<p>Limited impact on our current Protection IT system which we use to store and analyse Protection audit data.</p> <p>Would provide greater focus on high risk premises and better use of resources.</p>	<p>Any internal/external review/assessment of this service approach is likely to challenge what evidence we have to support adherence to the ‘Regulators Code’, the governments ‘Better Business for All’ agenda and consideration of the impact ‘Primary Authority Schemes’ is having on fire risk in the built environment within our service area.</p> <p>This approach could be seen as a limiting approach in supporting Strategic Commitment three (we will ensure appropriate fire safety standards in buildings) and Strategic Commitment five (we will ensure that Royal Berkshire Fire and Rescue Service provides good value for money).</p>

Advantages and Disadvantages Options Matrix

Option	Advantages	Disadvantages
<p>Option 5 - Completely adopt and support a programme of change that will allow us to demonstrate and evidence that RBFRS is meeting the needs of all the IRMP focus areas making the best use of available resources.</p>	<p>It will ensure our risk-based inspection programme is relevant and focused on risk premises across the whole service area. The refocused/refreshed inspection programme will ensure we reduce burdens on business where appropriate thus allowing us to fully focus our risk audits on selected existing risk premises and in risk premises, which up to this point, were out of scope.</p> <p>It will ensure that the Service can demonstrate that it is supporting the Government's 'Better Business for All' agenda by giving guidance, advice and support to small/medium sized low risk premises in all unitary areas.</p> <p>It will demonstrate that the Service is fully engaged with Primary Authority Schemes as an active participant and is fully addressing other FRS's decisions about fire safety standards in risk premises, in our service area. This scheme will have a direct impact on our risk-based inspection programme. Adopting this option will enable us to fully embed the whole ethos of Primary Authority Schemes in the way in which we as a service manage fire risk in the built environment.</p> <p>By having robust and effective partnership agreements/Memoranda of Understanding (MOU's) in place we will ensure we are addressing fire risk in premises where there is overlapping legislation (Houses in multiple occupation HMO's) and we will be able to demonstrate that we are addressing the needs of the 'Regulators Code'.</p> <p>By adopting all of the key areas within this option we will</p>	<p>Not as much scope to achieve cost savings.</p> <p>This approach will mean less audits carried out in compliant businesses. This would not be popular with some of them and may result in adverse feedback. This would need to be managed carefully.</p> <p>It would mean more work to improve standards in non-compliant businesses. This would mean fewer audits could be conducted using the available resources.</p> <p>It would not be popular with the businesses that were not compliant and could result in adverse feedback that would need to be managed. This could be deemed to be showing the success of the enforcement regime.</p>

Advantages and Disadvantages Options Matrix



	<p>ensure that we have a fully refreshed and re-focused risk-based inspection programme which accounts for all of the current subtle and significant influencing factors which will have an impact on fire risk in the built environment in the service area. It will ensure we are legally compliant regarding Primary Authority Schemes and will also ensure that we are fully addressing the requirements of the 'Regulators Code' and we are fully supporting the government's high level 'Better Business for All' agenda. The Service will be able to provide robust evidence under IRMP which confirms it is managing fire risk across premises which present the highest fire risk to communities and the public at large.</p> <p>Partnerships element of PAS will be carried out on a cost recovery basis. Scope to use current partnerships to influence prevention messages and sprinklers as all our existing partners have a portfolio of sleeping risks within Berkshire and wider areas.</p> <p>This approach could be seen as fully supporting and promoting Strategic Commitment one (we will educate people on how to prevent fires and other emergencies and what to do when they happen) and Strategic Commitment three (we will ensure appropriate fire safety standards in buildings).</p>	
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EQUALITY Impact Assessment CHECKLIST

Name of activity / change/ project	Risk Based Inspection Programme
Directorate/department	Protection
Name of department head/policy owner/project lead	Mark Gaskarth
Name(s) of person(s) completing this assessment	David Sharp
Date of commencement of assessment	18 th October 2016

1. What is/are the aims/purpose of the activity or change you are assessing?

Addressing and reducing risk to the public through focusing on the fire risk in the built environment.

2. Who is/will be affected by the activity/change, and how? Consider members of the public, RBFPS employees, partner organisations etc

Those responsible for the management of fire safety may be inspected more frequently than before.

3. What information is already available that tells you what impact the activity has/will have on people? Consider quantitative and qualitative data, consultation, research, complaints etc. What does this information tell you?

Equality Impact Assessment

Current legislation is self compliance and the Regulatory reform (Fire Safety) Order 2005 (FSO) applies to all targeted premises. There will be a positive impact ensuring fire safety compliance and reducing the risk to the public.

4. Does the activity/change have the *potential* to impact differently on people in different groups?

Assessment of impact on groups in **bold** is a legal requirement. Assessment of impact on groups in *italics* is not a legal requirement, but is RBFRS policy and will help to ensure that your activity or change does not have unintended consequences.

	Yes, No, or Not Sure?	If Yes, how?
People of different ages	Yes	Positive impact reducing risk.
Disabled people	Yes	Positive impact reducing risk.
People of different ethnic or national backgrounds	Yes	Positive impact reducing risk.
People of different faiths or beliefs	Yes	Positive impact reducing risk.
Men and women	Yes	Positive impact reducing risk.
Pregnant women and new mothers	Yes	Positive impact reducing risk.
Straight, gay, lesbian and bisexual people	Yes	Positive impact reducing risk.
Transgender people	Yes	Positive impact reducing risk.
<i>People living in different family circumstances</i>	Yes	Positive impact reducing risk.
<i>People in different social circumstances</i>	Yes	Positive impact reducing risk.
<i>Different employee groups</i>	Yes	Positive impact reducing risk.
<i>Other</i>		

Equality Impact Assessment

6. What further research or consultation is needed to check the impact/potential impact of the activity/change on different groups? If needed, how will you gather additional information, and from whom?

None

7. Following your research, taking into account all the information that you now have, is there any evidence that the activity or change is impacting/will impact differently or disproportionately on some groups of people?

No

8. What amendments will you make/have been made to the activity/change as a result of the information you have? If a negative effect has been identified, how could it be/has it been lessened?

None

9. After these amendments (if any) have been made, is/will there still be a negative impact on any group?

Yes

No

If No, go to section 11

If Yes, please explain:

10. Can continuing the activity, or implementing the proposed change, without further amendment, be justified legally? If so, how?

11. How can you ensure that any positive or neutral impact is maintained?

Via the risk based inspection programme and Regulators Code of Practice.

12. How will you monitor the impact of the activity in future?

Scorecard and customer satisfaction surveys.

13. When will the activity/change next be reviewed, and by whom?

The activity will be continually reviewed by Group Manager Chris Bunyan and Area Manager Mark Gaskarth.

All the actions should be transferred to project action plans or documented as appropriate in departmental service plans