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Business Fire Safety Activity – Engagement, Evaluation and Audit

**This document was produced by the National Fire Chiefs Council as CFOA in 2015.
This guidance has been rebranded. It has not been reviewed.**

CFOA Business Safety Group - Audit and Data Gathering Review
May

2015

Introduction

This document details the result of the audit and data gathering review undertaken during 2013/14 as part of a regular review of fire safety regulator process as required by CFOA Business Safety Group. This work is also included in a 'package' of changes in respect of the 2013 Focus on Enforcement. Fire and Rescue Services are encouraged to add this methodology to their Fire safety delivery processes beginning April 2015 with it becoming a fully operational method by April 2016. It is also expected the business process will be recognised and included in future Fire Safety Returns to DCLG.

The provision of 'General Fire Precautions' [GFP] in many premises is a requirement of the Regulatory Reform (Fire Safety) Order 2005 [FSO]. The enforcing authority for this aspect is normally the local Fire and Rescue Authority formed under powers delegated from the Fire and Rescue Services Act 2004.

The Fire Authorities have been responsible for ensuring that businesses and commercial operations have been complying with the FSO to ensure the safety of employees and the general public using buildings and business premises. The Government has previously issued guidance as required under article 50 of the FSO to set benchmark standards when assessing the safety requirements within premises.

Fire Authorities have been undertaking audits (to measure compliance against the prescribed requirements of the FSO) since the commencement of the FSO. The outcome has been achieved principally by a system of quantitative measurement as specified within the Chief Fire Officers Association [CFOA], Audit and Data gathering Form 2009. This form has collected information on the business and premises risk; and fire safety compliance. There have been three considerations within the structure of the form.

- Part A. Fire Services Emergency Cover [FSEC] premises risk data site assessment
- Part B. Compliance by Article against FSO Guidance
- Part C. Relative risk values for assessing action and targeting inspections programmes

The current process has been in place since 2009 and has proven to be a robust way of auditing premises to give measured outcomes for the purpose of taking enforcement action. It can however be a lengthy process where premises are actually complying with FSO requirements as it focuses on completion for data recording purposes to inform operational response and future targeting of audits.

The review group for CFOA has recommended that an alternative methodology can be beneficial to the regulator and those regulated as it has the potential to be less burdensome in approximately 70% of regulatory visits, primarily those where formal enforcement action is not necessary.

The Audit and Data Gathering Review working group identifies that an alternative methodology will provide benefits to business, the Fire and Rescue Services and others affected by the FSO. By including it within the 'toolbox' available to fire safety inspection teams it is believed that an approach which uses open engagement to measure the safety arrangements will ensure the development of good working relationships between both parties.

Consideration to data collection and data systems has been an important factor and the introduction of a new questionnaire should not provide a significant obstacle to adopting this methodology. FRS should still be able to collect Site Assessment data for the Fire Services Emergency Cover Toolkit and complete Part C of the CFOA 2009 audit form to provide relative risk value to inform future audit priorities if they still require this information. Fire and rescue services should not collect business information that serves no purpose.

The Principles of Good Regulation

The department for Business Innovation and Skills has set objectives for regulatory activity. These are recognised as best practice and should be considered when setting policy or undertaking regulatory work. These have been included within this methodology and a useful interpretation and measure of success for FRSs is tabled below.

Principle	How we will achieve this
Targeting	By the provision of intelligence based decision-making about where we undertake our regulatory activity (Not to be confused with risk based inspection planning already in place within most FRS).
Transparency	By openly sharing how we undertake our activities and consulting on how we intend to work, those who are regulated are able to understand why they have been approached.
Consistency	By providing a common way of working, guidance on assessment principles and outcome management the FRS will provide consistent services as a National network of Regulators’.
Proportionality	By providing a multi-tiered approach to compliance assessment and risk management the time spent during visits should be proportionate to the level of safety demonstrated and the needs of the regulated to make their business safe. Those deliberately avoiding compliance can expect more severe sanctions compared to those working towards a safe premises.
Accountability	By using pre-assessment principles and decision tools as part of an audit process an inspector will be able to explain in simple terms why a decision to visit was made and also how the outcomes of the visit translate into action by the FRS. This is underpinned by a common competency framework for Fire safety Regulators.

A [revised Regulators’ Code](#) was provided by the Government in 2013 with implementation in April 2014. This document is principal to good practice in regulatory delivery and the following extract outlines how it should be adopted.

“This Government is committed to reducing regulatory burdens and supporting compliant business growth through the development of an open and constructive relationship between regulators and those they regulate. 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.”

The additional short audit process has been developed within the six following key objectives from the Regulators’ Code;

- Regulators should carry out their activities in a way that supports those they regulate to comply and grow
- Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views
- Regulators should base their regulatory activities on risk
- Regulators should share information about compliance and risk
- Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply

- Regulators should ensure that their approach to their regulatory activities is transparent

The Short Audit methodology detailed within this document sets out to provide a process to assist inspectors and those they regulate to reap the benefits of open and transparent relationships with the overarching objective to safeguard the safety of people.

It should also be noted that the CFA 2009 audit and data gathering process remains an active part of the regulatory toolkit, it is recognised it has great value in some complex building arrangements or where enforcement is identified and a high level of detail is required to draft notices or provide information for prosecution considerations.

The Short Audit is not intended to provide a method for gathering enforcement information and hence an escalation process to change the method of interaction may become apparent during a visit. This will be associated with an observation of significant deficiencies or failures that place persons at risk of harm in case of fire.

The short audit is expected to provide a swift and simple process when visiting smaller and simple premises and those managed as part of a multi-national chain where management policies and arrangements are in place and also for follow-up visits on premises.

Pre-Audit Research and Targeting

To enable fire and rescue services to determine their inspection priorities they have already invested in fire safety data systems and the acquisition of premises information from inspections and visits. This is considered as valuable premises history, and provides a background on many aspects, such as previous fire safety history, design and building regulation, occupation and use.

The risk within buildings has been observed at times to be fluid and often a change in occupier, premises use or even the management team can cause a degradation of previously good safety. Given such variables, intelligence and new information is a valuable asset when making decisions about inspection priorities.

The fire services emergency toolkit and IRMP guidance note 4 has provided a higher level of analytical benchmarking with the use of relative risk models based on societal risk. Those premises deemed to be at high societal risk have largely been under the scope of regulation for some time now and consequently should be reasonably compliant premises if maintenance of the fire safety arrangements has been undertaken.

Traditional risk based inspection programs have been driven by matters such as societal risk, fire safety history and operational attendances including the frequency of unwanted fire signals and automatic fire alarms (AFA) or fire incidents. These are represented by the two uppermost segments of the diagram below. As the influence of regulatory change affects Fire and Rescue Service decision-making processes the three additional segments are shown to illustrate other factors to be considered. The principles of good regulation must be considered at all times and therefore it is not only a matter of targeting where activity should be undertaken but also the most appropriate type of interaction with the business.

Targeting Interactions and inspection activity

The cyclic diagram below is illustrative of factors relevant to targeting how the fire and rescue service can be influenced when considering where to undertake regulatory work. The five individual factors can be considered in either a positive or negative way. Those which are positive (demonstrate a healthy management attitude, or record a good safety outcome) should be used to defer or cancel unnecessary visits. Where there is a tendency to negative outcomes or significant cause for concern a visit is probably necessary to influence improvement in fire safety. This may range from simple engagement to offer advice or in the most serious cases an approach which provides detailed records for enforcement purposes.



The fire and rescue service has to consider how it uses its resources most efficiently. To undertake an unnecessary safety visit is not only wasteful for the FRS but also creates an unnecessary burden for the premises occupier. Very detailed audit procedures can be time consuming especially in large or complex premises, even if safety from fire has been achieved; the result may do nothing to improve safety or reduce risk except provide an assurance to the responsible person.

The Influencing factors

- Fire and AFA history:** This will be relevant based on fire and rescue service policy. It is believed that a high frequency of unwanted or AFA signals indicates that the fire safety management within the building is poor or controls are inadequate, or even the fire alarm system has been incorrectly designed installed or maintained. This may promote a visit to take a look at the specific issues of the alarm and gather relevant information to correct deficiencies. It is also an accepted principle that a business experiencing a fire has a need for advice, guidance or a review of the prevention controls in the premises. Post incident work is a key aspect of risk reduction and supporting business to minimise risk to their undertaking.
- Fire Safety History:** This usually includes matters such as previous performance against the required fire safety standards, perceived risk and impact of fire at the premises, such as community value (i.e. hospitals) and factors such as societal risk derived from statistic and fire data. This is principally the outcomes of previous inspections undertaken by methods to determine levels of risk.
These forms of information have been widely used and incorporated into existing data-bases and risks based inspection programmes; and are a rich source for targeting inspections since the implementation of the FSO.
- Other Regulator Information:** Many local regulators have developed ways of sharing information about businesses; and it is expected over the coming years the quality of information and data sharing will improve. It should be a logical rationale that if a business strives towards, or shows good health and safety management a reasonable expectation is that they will also show a willingness to achieve safety in case of fire; conversely if they are neglectful in their

regulatory duties it is unlikely their premises or practices will be safe from fire. The BRDO is looking at ways regulators can share information and this is supportive of the drive to **“collect once, use many times”**.

- **PAS Inspection Plans:** Primary Authority Schemes are relatively new for fire safety, however this is expanding rapidly. The detail of inspection plans may influence how an inspector interacts with a business and the specific matters they evaluate. It should also be recognised that those businesses in the scheme have committed to invest in fire safety management across their business portfolio and may only need local interaction if other indicators promote a visit.
- **Business Self-Assessment:** Some fire and rescue services undertake surveys to gather information by means other than visits and this is a potential aspect of development for any regulator. Information is a valuable asset to any regulator and many businesses are happy to provide this on request. CFOA is looking at options following the demise of the fire gateway for self-assessment tools.

Fire and rescue services may also take approaches which tackle emerging trends in a business type or by geographic area which indicates a heightened risk of fire or likelihood of danger. It is also their function to reduce fires and the impact of fires within the community and dynamic response-driven work is considered necessary to prevent unnecessary losses within business and communities. For example this could be a seasonal activity or one driven by an increase in arson around a group of premises.

By careful targeting and using information and intelligence from all sources, a professional opinion can be gained of the need to visit, together with the most appropriate type of interaction to undertake.

There are four distinct approaches and activity methods that can be applied to measuring or improving fire safety and reducing risk in premises.

- Gather information or provide advice via remote methods (email, letters, leaflets, questionnaires, business surveys etc.)
- Specific risk reduction visits, seminars or site meetings to provide advice and information
- Simple evaluation visits (Short Audit) to ensure that fire safety management is in place and no significant risks to relevant people are present.
- Formal audits to gather data and ensure the safety of people and compliance across the full article requirements of the FSO.

This document does not suggest any adjustments to the existing 2009 Audit form and its processes, it does however provide an additional ‘tool’ in the form of a ‘short audit’ with the intention that it integrates with the 2009 audit form and expands the process. Neither does it specify the products nor how the first two approaches above are achieved, these are very much locally driven matters based on other products available via CFOA and the work of each fire and rescue service. Such activities do not rely on using enforcement officers and may use firefighters or specially trained engagement staff and therefore are considered to be an informal regulatory activity; or are undertaken to fulfil duties within section 6 of the Fire and Rescue Services Act 2004, to provide fire safety and prevention advice.

At the time of writing many fire and rescue services are investing in ways of effective engagement with business based on their own strategies and resources in response to their own Integrated Risk Management Plans.

CFOA will continue to drive its own initiatives and to support campaigns from the [Gov.UK Fire Kills](#) with the inclusion of themed weeks or activity to draw attention to and publicise certain matters, such as ‘Electrical Safety’ and ‘Business safety’ weeks.

The Short Audit

The Management of General Fire Precautions

Precise interpretation of the FSO is often considered complex for persons not familiar with reading legislation, however the descriptor for the meaning of "general fire precautions" can be used to provide a series of simple objectives for achieving safety in case of fire. The DCLG provides a descriptor of this within its FSO Enforcement Guidance Note: 1 (included below).

Meaning of "general fire precautions"

Article 4 sets out the main general fire precautions requirements with respect to **fire-fighting and fire detection, emergency routes and exits, and their maintenance, including measures to mitigate the effects of fire.**

The principles of reduction of risk remain and the overarching objective of the Order (FSO) is to ensure that relevant persons are safe from fire and enforcing authorities must act towards this objective.

The FSO by virtue of Article 5 describes 'Duties under this Order' and is intended to determine who is considered to have responsibility for ensuring fire safety measures are provided and managed, and most importantly the extent to which they should provide them to give protection to others.

Article 5 (5) states Articles 8 to 22 and any regulations made under article 24 **only require the taking or observance of general fire precautions in respect of relevant persons.**

It is important that "the taking or observance of general fire precautions" is implemented in a manner that provides adequate arrangements to protect relevant persons, this is not necessarily a requirement for 'gold plated' standards to comply with the guidance in support of the FSO. The provision of general fire precautions only needs to be adequate in the particular circumstances of each premises. For many smaller premises or those with very simple layouts the provision of costly solutions can be disproportionate to the risk presented. In such simple premises or where protection measures are already in place the most important factor is the on-going maintenance of protective arrangements to facilitate safe escape; and the management of preventative measures to minimise the likelihood of a fire occurring.

This tells us the investment in control measures should be proportionate to the risk to relevant persons, a matter of 'reasonably practicable' and management arrangements should ensure safe systems and procedures are maintained – the matter of sustainability and ownership of the duty of making the premises 'safe enough' for its intended purpose.

The Short Audit Process

The process provides a qualitative methodology to make an initial evaluation of what is being managed or done in premises to control risk and to ensure relevant persons are safe enough and able to escape in case of fire.

This measurement is achieved by inspectors satisfying themselves that safety in case of fire (in accordance with the requirement for GFPs) has been appropriately provided. The GFPs may be represented as a series of 'Key lines of enquiry' (KLOE) based on the general fire precautions descriptors (Article 4), which inspectors might ask when the provision of safety is not self-evident to the inspector.

To make best use of this methodology the knowledge and skill of a competent Fire Safety Officer (as defined by the Competency Framework for Business Fire Safety Regulators) is required to make a professional qualitative judgement on the adequacy of fire safety arrangements within the premises.

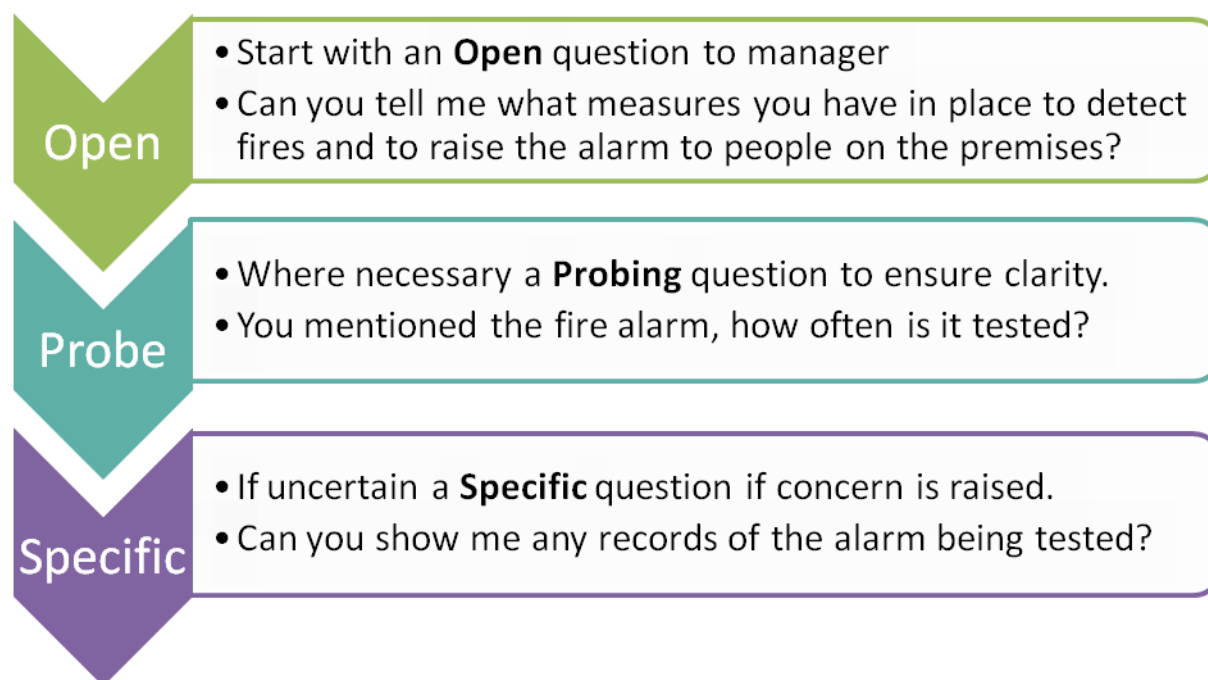
The principle is assessing the provision of general fire precautions through relevant responses from a person with managerial responsibility to a set of open question delivered by a competent inspector. The questions posed are intended to promote open conversation on the day to day management of fire

safety, something which it is quite possible to undertake as the inspector 'walks and talks' using what they see to validate what they are being told. This should enable an opinion to be formed about the suitability and sustainability of fire safety measures and management arrangements that deliver them. The KLOE questions below are intended to be the starting point of relevant enquiries. Good business managers should be able to respond to the questions in a positive way and demonstrate an understanding of the fire safety measures within their premises. It is the skill of the inspector to phrase the questions in a manner suitable for the needs of the visit. The use of plain language is preferable to allow the conversation to flow and an opinion to be arrived at.

The important factor being one of assessing that adequate safety has been achieved, and should a fire occur that people are able to escape safely. Inspectors should not become diverted by the intricacies of individual articles. Whilst it is recognised that the RPs assessment of the risk from fire (FRA) has a bearing on safety it is equally important to ensure that the management actually present understands what is in place and how safe escape is achieved. The recorded information from the FRA should only be consulted if the suitability of the arrangements is in doubt; or to moderate any decision taken, this should only be necessary at the end of the visit. As soon as the inspector is of an opinion that the arrangements are safe further information gathering should not be necessary.

Where responses indicate that there is a poor understanding or management arrangements are inadequate; it will be necessary to probe further to establish what (if anything) is being done to prevent people being placed at risk. Potential follow-up questions are suggested in the table at the end of this document. These are not considered to be comprehensive; it should be the knowledge and skill of the inspector that 'drills down' to the specific underlying issues based on the occupancy, use and design of the premises.

The diagram below shows the principle of how the questions should be addressed. It is only necessary to go to the next layer below if the inspector is not satisfied by the response.



It is also important to note that observed fire safety deficiencies as the premises are 'walked' are likely to be a symptom of other underlying issues relating to premises management. The inspector should be searching for the cause of the deficiency which is normally linked to a failure in the duty to provide adequate fire safety management.

The evaluation process is also intended to minimise the time spent visiting compliant or safe premises and thus reduce the burden to business. Where there is valid concern about the fire safety standards and how people are not safeguarded by adequate safety arrangements or obvious matters of serious non-compliance the visit can be escalated to use the 2009 Audit process. In applying this approach businesses should receive fair and proportional treatment from inspectors, based on their demonstrable attitude to fire safety on their premises.

The short audit process is not based on numerical values to provide enforcement decisions but requires Fire Safety Inspectors to make the necessary decisions to determine the course of action (see matrix below). Neither is it intended to probe in detail Article by Article. If this is required the 2009 Audit and data gathering form and process should be used.

A simple matrix provides a consistent action or outcome from Inspectors decisions. The matrix relates to the risk to people in case of fire, where risk is a combination of 'preventative measures' (associated with the likelihood fire occurring) and 'protective measures' (associated with controlling the consequence of a fire when it occurs). The matrix thus has a similarity with many health and safety evaluation tools where the outcome is based on a combination of likelihood and consequence.

The outcomes of the matrix recognises that the provision of control measures, for example simple management actions to prevent fires adds value to the overall fire safety arrangements, and by equal measure an investment in protection measures will provide an acceptable degree of safety too. However the total neglect of any one element may leave an unacceptable degree of fire risk.

Inspectors only need to satisfy themselves that the risk to relevant persons is being managed to ensure adequate safety, it should not be an expectation that every potential risk from fire is removed, as the FSO informs us that articles 8-22 only require the taking or observance of general fire precautions in relation to relevant persons. This does not preclude the provision of additional advice on request; if the responsible person is seeking information on how they could reduce risk further to prevent fires or which measures they could invest in to protect their premises in a more resilient way. Every contact with responsible persons or duty holders should provide a benefit and where possible, business safety / business protection/better regulation advice should be made available.

Whilst it can be considered that it should be the objective of business to achieve an outcome within the 'green zone of the matrix by providing sustainable fire safety arrangements; a result which sits in the amber zone may not attract formal enforcement action but might instead receive useful advice on fire safety matters to assist the business to make improvements.

Where the outcome is within the red zone it should be clear to an inspector that the matter is likely to need resolution through a process of formal enforcement. To do this and to gather sufficient detail for the case, the 2009 Audit and Data Gathering Form process provides the necessary systems and measurement to validate such a decision. If in doubt the Inspector should escalate the visit to a '2009 audit' to assure they have arrived at the most appropriate decision to protect relevant persons.

The action key provides suggestion on the most likely action that should be taken based on the outcome of the decision matrix.

The Short Audit Questionnaire

Below are a set of open questions for the Inspector to use where necessary when initially evaluating the level of safety provided in a premises and assess if it is providing an adequate level of safety in case of fire. Acceptable safety solutions will vary according to the complexity of the premises and the nature of the risk (e.g. trade activity or the occupancy type or numbers). The DCLG Fire Risk Assessment Guides set high standards for each premises type. The arrangements should be considered in a proportionate way and only need to achieve an 'adequate' or 'safe enough' standard

The order and text of the questions is not fixed as the visit may naturally lead the inspector to ask in an alternative order or to use an alternative phrase.

Question 1

This question focuses on the risk of fire (ignition sources and combustible materials being under adequate control of the premises management). The principles of prevention are based on the avoidance of unnecessary sources of ignition and therefore the inspector should be observant; looking for evidence to provide reassurance that arrangements are in place. The type of ignition sources will be based on the nature of the business and any processes that go on there.

Q1. Please tell me how you manage and control ignition sources in your premises to reduce the risk of fire?
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Prompt-

How are fire hazards managed? (Combustibles: quantity and location).
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How the risk of ignition is controlled e.g. hot works, smoking materials, electrical checks?
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Note. This question is derived from Article 4. 1(a) descriptor
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"measures to reduce the risk of fire on the premises and the risk of the spread of fire on the premises "
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Question 2

This question focuses on the arrangements to prevent the spread of fire on the premises. This should require inspectors to consider matters such as construction being imperforate and fire doors or shutters being present and functional. In some open plan environments it may be that other forms of protection are available, this could be active systems such as sprinklers or smoke vents.

Q2. Please tell me what you have in place to control the spread of a potential fire in your premises?
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Prompt-

Is any fire compartmentation and separation appropriately maintained? (Structural elements, fire doors, ceilings, fire curtains etc.)

Are Sprinklers provided to control fire spread?

How is protection maintained and managed?

Note. This question is derived from Article 4. 1(a) descriptor
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"measures to reduce the risk of fire on the premises and the risk of the spread of fire on the premises"

Question 3

This question focuses on the most important matter of the adequacy of the means of evacuating in case of fire, put simply if there is an emergency are people able to get out of the premises. The adequacy will very much depend on the size of the premises and a consideration to risk areas and the likelihood of

rapid fire development. The DCLG Fire Risk Assessment guides provide standards for safe escape however their availability at 'all material times' should be confirmed by the manager in question 4 below.

Q3. Please tell me how people can evacuate the premises in the event of a fire emergency in your premises?

Prompt-

Are the escape routes appropriate for the numbers that may need to use them?
Are all people able to use the escape routes (consider disability and occupancy type)
Are escape routes provided with signs and lighting appropriate for the type of use?
Is there an emergency evacuation plan in place?

Note. This question is derived from Article 4. 1(b) descriptor
"measures in relation to the means of escape from the premises"

Question 4

This question builds on question 3. It seeks to confirm that the available escape routes are available whenever they will be required 'all material times'. The response from the responsible manager should address the issues of ensuring they remain accessible by day to day management procedures, such as opening up, housekeeping requirements and any protective features function as intended.

Q4. Please tell me how you ensure persons can use the escape routes and final exits safely?

Prompt –

Are the escape routes provided with adequate protection? (Ventilation etc.)
Are escape routes and exits accessible at all times? (Locks and fastenings)
Are escape routes maintained and managed? (Signs and obstructions)

Note. This question is derived from Article 4. 1(c) descriptor
"measures for securing that, at all material times, the means of escape can be safely and effectively used"

Question 5

This question is a means to ensure that the manager acknowledges the need for any first aid firefighting equipment, commonly fire extinguishers. It should also allow them to explain any company policies on their use and levels of expectation placed on people to use them. It can of course include fixed systems such as suppression systems in server rooms or foam systems over cooking facilities, the fire risks will determine the need for any specific requirements.

Q5. Tell me what equipment you have in the premises for extinguishing small fires?

Prompt –

Are there suitable fire extinguishers? (Type and number)
Are automatic suppression systems required?
Are firefighting measures maintained and managed?

Note. This question is derived from Article 4. 1(d) descriptor
"measures in relation to the means for fighting fires on the premises"

Question 6

This question focuses on the important matter of how an alarm of fire is raised, not all premises will have or require an automatic system. The inspector will need to satisfy themselves that the arrangements in place are adequate to alert any persons on the premises. The adequacy of manual systems will also

require confirmation that people who use the building (employees) are familiar with the arrangements for alerting others if discovering a fire. The manager should be able to confirm the procedure but it may require confirmation that the arrangements are shared and understood.

Q6. Please tell me what arrangements you have in place to detect fires and raise the alarm to those people on your premises?

Prompt –
Are manual fire alarm arrangements and routines adequate?
Are automatic fire alarm systems appropriate?
Is the fire detection and alarm system maintained and managed?

Note. This question is derived from Article 4. 1(e) descriptor “measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises”

Question 7

This question has a relationship with many other aspects, in particular how to raise the alarm in case of fire, responding to emergencies and ensuring escape routes are maintained clear and available. The manager should be able to provide useful dialogue on induction and refresher training and how the duty to provide adequate training is fulfilled; this can be easily validated by an employee if doubt of the adequacy exists.

Q7. Please tell me what instruction and training or guidance on procedures to follow in an emergency you or the company provide for employees?

Prompt –
Are evacuation procedures and roles and responsibilities established?
Are appropriate people trained in the use of extinguishers and manual fire alarms?
Is there an appropriate level of hazard management and reporting?
Is instruction provided initially and refreshed?

Note. This question is derived from Article 4. 1(f)i) descriptor “measures relating to the instruction and training of employees”

Question 8

This question seeks to ensure that any fire in the premises remains small. If fires are likely to be large or require major resources to tackle, operational crews should be informed, operational plans should be established etc. Much information should have been gathered during the conversations for the questions above. If however mitigation measures are not clear, reference to documents may assist. However if the evaluation visit has already demonstrated that adequate fire safety arrangements are in place to mitigate fire, the additional task of checking documents may not be necessary.

Q8. Please tell me what management procedures you have in place to mitigate the effects of fires in your premises?

Prompt-
Fire-fighting interventions or containment procedures required of staff in case of fire?
Are tests and checks to fire safety measures regularly undertaken?
Are the general fire precautions planned, organised, controlled, monitored and reviewed?
Is there a fire risk assessment with an action plan available?

Note. This question is derived from Article 4. 1(f)ii) descriptor “measures to mitigate the effects of the fire”

Decision Matrix and Further Action

Having undertaken the short audit evaluation with a person holding a management responsibility (may not be the responsible person as defined by the Order) the inspector will need to arrive at a decision and to determine what action to take if any.

In making this decision it is necessary to consider the objective of providing adequate fire safety measures to safeguard the safety of people on the premises, are people considered to be 'safe enough'?

Remembering that adequate does not require a 'gold plated' standard and the FSO only requires the taking of measures 'where necessary' should also be practicable; and only be necessary where people are considered at risk.

How question responses influence outcomes on the decision matrix	
Preventative measures – reducing the likelihood of harm occurring to a person	Protective measures – physical arrangements facilitating safe escape
Control of ignition sources	Means of escape provision and protection
Employee instruction and training	Means of detection and warning
Arrangements for evacuation	Provision of firefighting equipment
Management procedures	Containment or control of fire spread

The matrix below provides a simple measurement to indicate an outcome based on the inspectors impression of the arrangements based on observations and commentary.

Decision matrix: General fire precautions		Preventative measures reducing the risk of a fire (Likelihood)		
		Good	Tolerable	Poor
Protective measures facilitating safe escape (Consequence)	Good			
	Tolerable			
	Poor			

Good – People are not likely to be exposed to a risk of harm in case of fire. The measures taken by the responsible person has demonstrated they have sustainable arrangements in place; and that preventative or protective measures provided on the premises are well managed and maintained.

Tolerable – People may be exposed to a low risk of a minor harm in case of fire. Some minor improvements to the preventative or protective arrangements on the premises are necessary. Measures taken by the responsible person are adequate to keep people safe but they are unable to demonstrate these are managed or maintained in a sustainable manner.

Poor – People are at high risk of injury or harm in case of fire. The responsible person is unable to demonstrate that adequate preventative or protective arrangements are provided on the premises or significant deficiencies have been observed.

Action Key:	Good arrangements in place in place to protect persons in case of fire	Adequate arrangements in place in case of fire	Inadequate arrangements likely to result in harm in case of fire
Outcome			
Action	No further action, on site advice and education probably adequate	Informal action, advise on 'fire safety matters' improvements in writing	Formal action, Use 2009 audit process and expect to serve notice

Outcome table: to take forward to Part C. for data and relative risk data values

Decision matrix: General fire precautions		Preventative measures reducing the risk of a fire (Likelihood)		
		Good	Tolerable	Poor
Protective measures facilitating safe escape (Consequence)	Good	-2	-1	0
	Tolerable	-1	0	1*
	Poor	0	1*	2*

Database Management Note: The numerical additions to the shaded boxes shown within the decision matrix provide outcome values in a consistent fashion with Part B of the 2009 Audit and data methodology. These can be carried forward to part C in order to inform the final calculation to satisfy the calculations to provide a 'relative risk' value.

Important Note: 1* and 2* are shown for completeness or for calculating an interim value, however if the outcome is either of these values the short audit should have been escalated to a more detailed audit and therefore the numerical outcome would be derived from the 2009 methodology.

Service Policy Note: This table with numerical values may be inserted as content to the decision matrix on the previous page.

Look up tables for information

GFP Definitions	Key Lines of Enquiry for Inspectors and secondary questions.
4(1)(a) Measures to reduce the risk of fire on the premises ...	<p>[1] Are ignition sources adequately managed and controlled in the premises to reduce the risk of fire?</p> <ul style="list-style-type: none"> • Are appropriate measures in place to reduce the risk of fire? • Are fire hazards managed? (combustibles: quantity and location) • Is the risk of ignition controlled?
... and the risk of the spread of fire on the premises	<p>[2] Are adequate measures in place to control the spread of a potential fire in the premises?</p> <ul style="list-style-type: none"> • Is compartmentation and separation appropriate? (structural elements, fire doors, fire curtains etc.) • Are Sprinklers provided to control fire spread? • Is protection is maintained and managed?
4(1)(b) Measures in relation to the means of escape from the premises	<p>[3] Can persons evacuate the premises safely in the event of a fire emergency in the premises?</p> <ul style="list-style-type: none"> • Are the means of escape appropriate for the premises design and risks? • Appropriate for the occupancy type and numbers? • Are escape routes provided with signs and lighting appropriate for the type of use? • Is there an emergency evacuation plan in place?
4(1)(c) Measures for securing that, at all material times, the means of escape can be safely and effectively used	<p>[4] Can persons use the escape routes and final exits safely?</p> <ul style="list-style-type: none"> • Can the means of escape on the premises be used at any time when it may be needed? • Is the protection to escape routes appropriate? • Are escape routes and exits accessible at all times? (lighting, signage, door fittings) • Are escape routes maintained and managed?
4(1)(d) Measures in relation to the means for fighting fires on the premises	<p>[5] Is there adequate equipment in the premises for extinguishing small fires?</p> <ul style="list-style-type: none"> • Are there adequate firefighting measures in place? • Is there a provision of suitable fire extinguishers? • Are automatic suppression and ventilation systems required? • Are firefighting measures maintained and managed?
4(1)(e) Measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises	<p>[6] Are adequate arrangements in place to detect fires and raise the alarm to those people on the premises?</p> <ul style="list-style-type: none"> • Is there appropriate fire detection and warning? • Are manual systems and routines adequate? • Are automatic fire alarm systems appropriate? • Are detection and alarms maintained and managed?
4(1)(f)(i) Measures in relation to the arrangements for action to be taken in the event of fire on the premises, including – measures relating to the instruction and training of employees	<p>[7] Are adequate instructions or guidance on procedures to follow in an emergency provided for employees?</p> <ul style="list-style-type: none"> • Do relevant persons receive appropriate instruction and guidance in emergency procedures? • Are evacuation procedures and roles and responsibilities established? • Are appropriate people trained in the use of extinguishers and manual fire alarms? • Is there an appropriate level of hazard management and reporting? • Is instruction provided initially and refreshed?

GFP Definitions	Key Lines of Enquiry for Inspectors and secondary questions.
4(1)(f)(ii) Measures in relation to the arrangements for action to be taken in the event of fire on the premises, including – measures to mitigate the effects of the fire	<p>[8] Are adequate management procedures in place to mitigate the effects of fires in the premises?</p> <ul style="list-style-type: none"> • Are suitable management processes and procedures in place? • Is there a fire risk assessment available that identifies the significant findings and action plan to address matters? • Are fire precautions planned, organised, controlled, monitored and reviewed?

How general fire precautions incorporate other articles

The operative parts of the FSO; articles 8-22 (and regulations made under article 24) are the means by which General Fire Precautions are satisfied. The General Fire Precautions provide an overview of the safety that will be delivered if 8-22 are complied with.

The table below shows how specific articles are sub-ordinate to key lines of enquiry based on the GFP descriptors.

GFP	Articles falling into the scope of respective GFP
4(1)(a) Measures to reduce the risk of fire on the premises ...	<p>A9 – Risk assessment A10 (Schedule 1, Part 3) – Principles of prevention to be applied A11 – Fire safety arrangements A17 – Maintenance A19 – Provision of information to employees A20 – Provision of information to employers and the self-employed from outside undertakings A21 – Training A22 – Cooperation and coordination</p>
... and the risk of the spread of fire on the premises	<p>A9 – Risk assessment A10 (Schedule 1, Part 3) – Principles of prevention to be applied A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A14 – Emergency routes and exits A17 – Maintenance A22 – Cooperation and coordination A37 – Fire-fighters switches for luminous tube signs etc.</p>
4(1)(b) Measures in relation to the means of escape from the premises	<p>A9 – Risk assessment A11 – Fire safety arrangements A14 – Emergency routes and exits A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees A21 – Training</p>
4(1)(c) Measures for securing that, at all material times, the means of escape can be safely and effectively used	<p>A9 – Risk assessment A11 – Fire safety arrangements A14 – Emergency routes and exits A15 – Procedures for serious and imminent danger and for danger areas A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees A21 – Training [A23 – General duties of employees at work] [A38 – Maintenance of measures provided for protection of fire-fighters]</p>

GFP	Articles falling into the scope of respective GFP
4(1)(d) Measures in relation to the means for fighting fires on the premises	A9 – Risk assessment A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees; A21 – Training [A23 – General duties of employees at work] [A38 – Maintenance of measures provided for protection of fire-fighters]
4(1)(e) Measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises	A9 – Risk assessment A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A17 – Maintenance A18 – Safety assistance A19 – Provision of information to employees; A21 – Training
4(1)(f)(i) Measures in relation to the arrangements for action to be taken in the event of fire on the premises, including – measures relating to the instruction and training of employees	A9 – Risk assessment A10 (Schedule 1, Part 3) – Principles of prevention to be applied A11 – Fire safety arrangements A19 – Provision of information to employees A20 – Provision of information to employers and the self-employed from outside undertakings A21 – Training [A23 – General duties of employees at work]
4(1)(f)(ii) Measures in relation to the arrangements for action to be taken in the event of fire on the premises, including – measures to mitigate the effects of the fire	A9 – Risk assessment A10 – Principles of prevention to be applied A11 – Fire safety arrangements A13 – Fire-fighting and fire detection A14 – Emergency routes and exits A15 – Procedures for serious and imminent danger and for danger areas A17 – Maintenance A22 – Cooperation and coordination A38 – Maintenance of measures provided for protection of fire-fighters

Notes on Articles table for inspectors:

Article 12 (Elimination or reduction of risks from dangerous substances) and Article 16 (Additional emergency measures in relation to dangerous substances) have been omitted from the table because they relate to Special requirements or Process Fire Precautions and unless they are relevant to GFP are therefore matters for regulation by the HSE. For the sake of completeness, Article 12 and Article 16 sit sub-ordinate to Article 4(1)(3)(b) – the use or storage of any dangerous substance.

The inclusion of Article 23 (General duties of employees at work) has also been included for completeness. Although Article 23 does not fall under the duties imposed on responsible persons (and duty holders) under Article 5, an offence may be committed, if it is not complied with.

Article 8 (Duty to take general fire precautions) is not listed because it is represented by the list of General Fire Precautions (4(1)(a) to 4(1)(f)(ii).

Article 24 (Power to make regulations about fire precautions) is not listed because the regulations made so far (Sub-Surface Regulations and Employee Capability Regulations) are appropriate to existing General Fire Precautions and any others are, as yet, unknown.

Templates for Inspector use

The two templates for inspector visits included below illustrate how an FRS may wish to simply record the information if using a paper format. It is recognised these could be used in an electronic device to gather information and therefore would appear very different.

The important factor behind providing a consistent process for the FRS will be in the method employed by inspectors/auditors.

The first template illustrates how the open evaluation method can be used in a short audit where just the basic fire safety information is required to form an opinion without excessive data gathering.

The second template also fulfils the requirement of the first example and has the additional function of collecting data to meet the requirements of Part C where FRS wish to use this outcome within their inspection planning arrangements.

Note: the two templates do not include full data gathering for FSEC purposes.

Short Audit Questionnaire - Record of Visit

Audit Date		Time audit commenced					
Premises ID No.		No. Of Occupiers					
Parent/child record indicator		Parent Premises ID No.					
Site Record Indicator		Site record ID No.					
Building / Unit No.		UPRN No.					
Property Name							
Road (address line 1)							
Address line 2							
Locality							
Town							
Post Code		Grid Reference	<table border="1"> <tr> <td>Easting</td> <td>Northing</td> </tr> <tr> <td></td> <td></td> </tr> </table>	Easting	Northing		
Easting	Northing						
Name of Occupier							
Registered address of occupier		Post Code					
		Tel No.					
Responsible Person	Name		Position				
	Tel No.						
	Email		Mob No.				
Person Providing Information	Name		Position				
	Tel No.						
	Email		Mob. No.				

Part B: Fire Safety Short Audit

Fire safety measures for the inspector to evaluate		Good	Tolerable	Poor
<p><i>NOTE: The questions below are phrased for the inspector to answer from their opinions based on what they hear and observe. Not to be confused with the open question technique required when talking to the business representative.</i></p>				
1	<p>Are ignition sources adequately managed and controlled in the premises to reduce the risk of fire? <i>Consider – work activities, hot works, electrical safety, heating, smoking etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
2	<p>Are adequate measures in place to control the spread of a potential fire in the premises? <i>Consider – building conditions, stored goods, highly flammable materials, wall coverings etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
3	<p>Can persons evacuate the premises safely in the event of a fire emergency in the premises? <i>Consider – signage, lighting, emergency evacuation plan, exits unobstructed and easy to use etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
4	<p>Can persons use the escape routes and final exits safely? <i>Consider – , adequate routes (size/number), travel distance smoke travel, adequately protected and maintained etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
5	<p>Is there adequate equipment in the premises for extinguishing small fires? <i>Consider – extinguisher type, location, number, accessible, working order etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				

6	Are adequate arrangements in place to detect fires and raise the alarm to those people on the premises? <i>Consider – detection type, sounder locations, adequacy of automatic or manual systems, working order (panel healthy) etc.</i>	Good	Tolerable	Poor
Comment:				
7	Are adequate instructions or guidance on procedures to follow in an emergency provided for employees? <i>Consider – initial and refresher training, emergency procedures, emergency notices, calling the fire service etc.</i>	Good	Tolerable	Poor
Comment:				
8	Are adequate management procedures in place to mitigate the effects of fires in the premises? <i>Consider – managed system of safety checks and maintenance, consideration to arson, risk assessment and action plan where necessary etc.</i>	Good	Tolerable	Poor
Comment:				
Are sufficient precautions in place to safeguard the safety of relevant persons in case of fire? <i>Circle the appropriate yes/no outcome</i>		Yes	No	

Audit Outcome (from Decision matrix)		Recommended Action (from Action Key)	
Date of audit		Time audit completed	
Inspector name		Service Number	

Short Audit - Data Gathering and Audit Record

NOTE: This form of the template is for use where FSEC information is not required but values for database calculation of relative risk is required.

Short Audit Date			Time	
Premises ID No.			No. Of Occupiers	
Parent/child record indicator			Parent Premises ID No.	
Site Record Indicator			Site record ID No.	
Building / Unit No.			UPRN No.	
Property Name				
Road (address line 1)				
Address line 2				
Locality				
Town				
Post Code			Grid Reference	Easting
				Northing
Name of Occupier				
Registered address of occupier			Post Code	
			Tel No.	
Responsible Person	Name		Position	
	Tel No.			
	Email		Mob No.	
Person Providing Information	Name		Position	
	Tel No.			
	Email		Mob. No.	

Part A values for Part C calculations

Description of occupants Predominant type	Untypically mobile for this type of occupancy				-2		
	Average mobility for this type of occupancy				0		
	Untypically vulnerable for this type of occupancy				2		
Smoke Control Is there an extract or positive pressure smoke control system covering the means of escape and/or common areas?	Yes		No		If Yes tick below		
	-2		0		Natural extract		
					Mech. Extract		
					Both		
					Basement		
				Pressurised			
Sprinklers Is there an operational sprinkler system? Percentage of coverage Tick relevant box	100%		-20		If premises sprinklered	Tick below	
	90%		-7				
	80%		-4.2		Life Safety		
	70%		-3				
	60%		-2.33		Property protection		
	50%		-1.9				
	40%		-1.6				
	30%		-1.3				
	20%		-1.23				
	10%		-1.1				
No System		0					
Fire Spread Building features which may assist fire spread? If yes tick one or more	Yes		No		Tick one or more boxes		
	0.1		0		Atrium		
					Unprotected voids		
					Unprotected ducts		
					Surface spread of flame		
				Other			
Fire alarm/warning system					Tick relevant box		
	More than adequate					-2	
	Adequate					0	
Less than adequate					2		
Building size - typical for occupancy Tick relevant box	Extremely small	Very small	small	Medium (average)	large	Very large	Extremely large
	-5	-3	-2	0	2	3	5

Part B: Fire Safety Short Audit

Fire safety measures for the inspector to evaluate		Good	Tolerable	Poor
<p><i>NOTE: The questions below are phrased for the inspector to answer from their opinions based on what they hear and observe. Not to be confused with the open question technique required when talking to the business representative.</i></p>				
1	<p>Are ignition sources adequately managed and controlled in the premises to reduce the risk of fire? <i>Consider – work activities, hot works, electrical safety, heating, smoking etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
2	<p>Are adequate measures in place to control the spread of a potential fire in the premises? <i>Consider – building conditions, stored goods, highly flammable materials, wall coverings etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
3	<p>Can persons evacuate the premises safely in the event of a fire emergency in the premises? <i>Consider – signage, lighting, emergency evacuation plan, exits unobstructed and easy to use etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
4	<p>Can persons use the escape routes and final exits safely? <i>Consider – , adequate routes (size/number), travel distance smoke travel, adequately protected and maintained etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				
5	<p>Is there adequate equipment in the premises for extinguishing small fires? <i>Consider – extinguisher type, location, number, accessible, working order etc.</i></p>	Good	Tolerable	Poor
<p><i>Comment:</i></p>				

6	Are adequate arrangements in place to detect fires and raise the alarm to those people on the premises? <i>Consider – detection type, sounder locations, adequacy of automatic or manual systems, working order (panel healthy) etc.</i>	Good	Tolerable	Poor
Comment:				
7	Are adequate instructions or guidance on procedures to follow in an emergency provided for employees? <i>Consider – initial and refresher training, emergency procedures, emergency notices, calling the fire service etc.</i>	Good	Tolerable	Poor
Comment:				
8	Are adequate management procedures in place to mitigate the effects of fires in the premises? <i>Consider – managed system of safety checks and maintenance, consideration to arson, risk assessment and action plan where necessary etc.</i>	Good	Tolerable	Poor
Comment:				
Are sufficient precautions in place to safeguard the safety of relevant persons in case of fire? <i>Circle the appropriate yes/no outcome</i>		Yes	No	

Audit Outcome (from Decision matrix)		Recommended Action (from Action Key)	
Date of audit		Time audit completed	
Inspector name		Service Number	

PART C: CALCULATION OF RELATIVE RISK LEVEL

Short Audit Outcome	Expected Outcome equal to full audit procedure	Description of management	Tick relevant Box	score
Equivalent to Part B Score	1	Well above average/Broadly compliant		-2
	2	Above average/minor low risk deficiencies		-1
	3	Average/some deficiencies low risk of harm		0
	4	Below Average/possible enforcement people are at risk of harm	Use 2009 audit form	+1
	5	Well below average/highly likely to require enforcement people are at risk of harm	Use 2009 audit form	+2
Part C				
History of Fires	None			0
	Yes, One or more in last three years			0.2
Unwanted fire signals	None			0
	Yes, One or more in last three years			0.1
Known Fire setting activity in the area	None			0
	Yes, One or more in last three years			0.1
Features which may assist fire spread	Bring forward from Part A			
	None			0
	Some			0.1
Fire loading which may assist with fire spread	Lower than average for occupancy			-0.2
	Average for the occupancy			0
	Higher than average for the occupancy			0.2
Access for firefighting	Better than average for occupancy			-0.1
	Average for the occupancy			0
	Poorer than average for the occupancy			0.1
Water supplies for firefighting	Better than average for occupancy			-0.1
	Average for the occupancy			0
	Poorer than average for the occupancy			0.1
Total number of people on premises at peak time	Less than 20			-0.1
	Between 20 and 100			0
	More than 100			0.1
Calculate or auto calculate(Sub Total A)				

Brought forward from Part A			
Field/element Brought forward from part A		Assessed value/score	
Building size			
Description of Occupants			
Fire warning system			
Smoke Control System			
Operational sprinkler system			
	Subtotal B		
Life risk score	A+B from above		
Relative risk rating	(2 to 8)		
Risk Level	VL to VH		

Signature of Inspector	Date:
Signature of Fire safety Manager	Date: