

Definition of Risk Protection Risk Methodology

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Contents

Roles, Responsibilities and Review	2
Risk Based Inspection Programme (RBIP)	2
Purpose	2
Strategic Aims	2
Introduction	3
Fire and Rescue National Framework for England 2018	4
National Fire Chief's Council (NFCC) Guidance	4
Fire Standards Board	4
RBIP Methodology	5
CFRMIS Relative Risk Rating	5
Experian Data	6
CFRMIS/RRR and Experian Data Combined	6
Inspection Frequency	7
Performance Reporting	7
Review cycle of RBIP	7
Intelligence Led Inspection Programme	8
Thematic Inspection Programmes	8
Concerns	8
Post Fire Inspections	8
Enforcement (Prohibition Notices)	8
Activity with other Enforcing Authorities – Including Agency Liaison (MATES)	9
Agency Liaison	9
Multi-Agency Targeted Enforcement Strategy (MATES)	9
Housing	9
Applying RBIP methodology	9
High Rise Residential Buildings & Lower Height Residential Buildings with Risk	10
Safety Advisory Group	10
Unwanted Fire Signals (UwFS)	11
Sharing risk with Response and Fire Control	11
Significant Cases	11

Version 1

Original document draft

Version 2

Management amendments

Version 3

Alignment to latest legislation, strategy and guidance

Roles, Responsibilities and Review

The **Group Commander of Protection** is responsible for ensuring this Protection Risk Methodology is implemented across the Service.

The **Protection Station Commanders** will be responsible for the day to day delivery of this methodology.

The **Protection Station Commanders** will review this methodology annually, when new legislation arises, or as and when organisational needs require.

Risk Based Inspection Programme (RBIP)

Purpose

This methodology outlines the Service's approach to defining a 'High Risk Premises' for the purposes of fulfilling the statutory function of enforcing the Regulatory Reform (Fire Safety) Order, 2005. It details the Service's methodology for its Risk Based Inspection Programme and the Service's expectations for completion of inspections against this framework.

HWFRS will have a RBIP that accurately identifies the highest risk, non-domestic premises within Hereford & Worcester so the Service can prioritise the expertise of the Fire Safety Inspectors, prioritising resources to the level of risk.

Strategic Aims

The Protection Strategy 2025-30 sets out the focus of our work over the next 5 years, in the following 3 core areas:

Promoting Fire Safety

Providing fire safety advice and guidance to businesses and members of the public in line with the Regulatory Reform (Fire Safety) Order 2005.



Increasing Compliance

Carry out risk and intelligence based Fire Safety inspection; and respond to Statutory Consultations.



Investigating and Enforcing

Investigating the cause of the fire; and taking proportionate enforcement action, including prosecution, where appropriate.



Risk Based Inspection Programme (RBIP) continued



Introduction

The Service discharges its statutory functions under the Regulatory Reform (Fire Safety) Order 2005 (RRFSO) and aims to achieve this through the implementation of a risk-based inspection programme (RBIP). The RBIP highlights those non-domestic premises which present the greatest risk of death, serious injury, loss or damage through fire. The Service prioritises its resources to inspections at those premises which present the greatest risk, whilst also responding to causes for concern from the public and partner agencies and undertaking inspections in premises that have had a fire.

The Service complies with the Enforcement Management Model (EMM). This is a decision rationale that helps inspectors to make enforcement decisions in line with the Health and Safety Executive's (HSE's) Enforcement

Policy Statement (EPS). The EPS sets out the principles that inspectors should apply when determining what enforcement action to take in response to breaches of health and safety legislation. Fundamental to this is the principle that enforcement action should be proportional to the health and safety risks and the seriousness of the breach.

The Service is committed to reducing regulatory burdens and supporting compliant business growth through an open and constructive relationship between the Service and those we regulate. The Better Regulation Delivery Office has produced the Regulators' Code which 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 bodies.

Risk Based Inspection Programme (RBIP) continued

Fire and Rescue National Framework for England 2018

The National Framework Document 2018 sets out the Government's priorities and objectives for Fire and Rescue Authorities in England. The framework provides the overall strategic direction to local fire and rescue authorities.

The National Framework document contains three key paragraphs in relation to National FRS's responsibilities to deliver a RBIP:

Fire and Rescue Authorities must make provision for promoting fire safety, including fire prevention, and have a locally determined risk-based inspection programme in place for enforcing compliance with the provisions of the Regulatory Reform (Fire Safety) Order 2005 in premises to which it applies.

We expect Fire and Rescue Authorities to target their fire safety, prevention and protection resources on: those individuals or households who are at greatest risk from fire in the home; those most likely to engage in arson or deliberate fire setting; and on those non-domestic premises where the life safety risk is greatest. Consideration could also be given to non-domestic premises which are at risk from fire in order to mitigate loss to economic wellbeing.

To identify those at greatest risk from fire, we expect Fire and Rescue Authorities to work closely with other organisations in the public and voluntary sector, as well as with the police and ambulance services.

National Fire Chief's Council (NFCC) Guidance

The NFCC Community Risk Programme projects are intended to provide the basis for updating the methodology, guidance, data and tools – thereby delivering greater consistency of approach in the future. They are currently working on a technical note guidance document

called 'Reducing the Impact of Fire Across the Built Environment', which we will consider in our risk methodology when published.

NFCC recommend that Fire and Rescue Services should consider relevant information, including (but not limited to) frequency of AFA visits, fire incidents, information shared by other regulators, outcomes of previous fire safety visits / previous compliance or safety records, Primary Authority information, etc. Based on this intelligence gathered, determine if a site visit is warranted.

Fire Standards Board

National professional Standards are a key component of continuous improvement in any sector. They form a point of focus, against which performance can be measured and further improvement or new requirements be identified. As part of the reforms for fire and rescue services in England, the Fire Standards Board is committed to the introduction of Standards. The intention being to help drive continual improvement across the services alongside the re-introduction of inspection arrangements.

The mission for the new Fire Standards Board is to oversee the development and maintenance of a suite of professional Standards that set out "what good looks like".

The Fire Standards Board and Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) are collectively engaged in continuously improving the performance of fire and rescue services in England for the communities they serve. Having professional Standards available allows evidence to be gathered by bodies responsible for third party assurance, provided in England by HMICFRS.

The Service have reviewed the Protection Fire Standard and aligned to its best practice guidance.

Risk Based Inspection Programme (RBIP) continued

RBIP Methodology

HWFRS define high risk premises as:

- A product score of 0.04 from the combined CFRMIS/Experian data set
- The top 99th percentile of Experian data
- The very high and high risk premises from CFRMIS data

Fire and Rescue Services have been regulating compliance with the Fire Safety Order and previous Fire Safety Legislation in existing non-domestic buildings for many years and the primary tool for this has been the inspecting regimes driven by Risk Based Inspection Programmes (RBIPs). Guidance on the underpinning approach to risk and RBIPs was originally published in 2004 (updated by CLG in 2009) within the Integrated Risk Management Planning (IRMP) suite of material.

Before this revision of the RBIP, the annual RBIP was planned primarily on the basis of reducing the risk to life. This meant that pre-programmed Protection activities were not, as a rule, driven by the risk from fire from other categories of harm. The use of Experian data to include the premises type and sector combined with other variables will generate an incident risk score to predict the likelihood of fire.

The Service will review the Experian data that it uses to identify these premises on an annual basis to ensure that the RBIP is current and accurate.

BASIC DEFINITION OF RISK (RBIP) =

Severity (of hazard)
CFRMIS 'Life Risk' Score



Likelihood (of occurrence)
Experian 'Predicted had Fire' Score



CFRMIS Relative Risk Rating

A 'Relative Risk Rating' (RRR) is calculated using Part C of the fire safety audit form that has been generated following a fire safety inspection and processed through the Service's Management Information System (CFRMIS). Part C of the audit form is used to bring together numerical values from the previous parts.

Relative risk is the comparison made between different types of buildings across the 17 FSEC (Fire Services Emergency Cover) model. From the data collected, and professional judgments made by the inspecting officer, a determination can be made as to the risk of a fire occurring, the risk to persons and the potential impact on the community.

There are a series of other questions, relating to unwanted fire signals, local fire setting and sprinkler provision among others where a numerical value is either entered or automatically brought forward from other parts (see below).

Finally, a relative life risk score is generated (in accordance with FSEC) to produce a risk level between, "very low" and "very high" for each FSEC category.



Risk Based Inspection Programme (RBIP) continued

Experian Data

Experian's 'Incident Risk Score' model is used to support the identification of new 'risk' premises and supplements the methodology for prioritisation of high-risk premises for fire safety inspection. These premises are defined by three common areas of risk in commercial premises:

- The presence of a large number of people.
- The presence of material or stock which could be flammable.
- Places where food is being cooked .

The premises type and sector are combined with these variables to generate an incident risk score.

The Incident risk score model profiles businesses against this risk and assigns them a risk percentile score out of 100 and identifies which premises within Hereford & Worcester are most at risk of a fire.

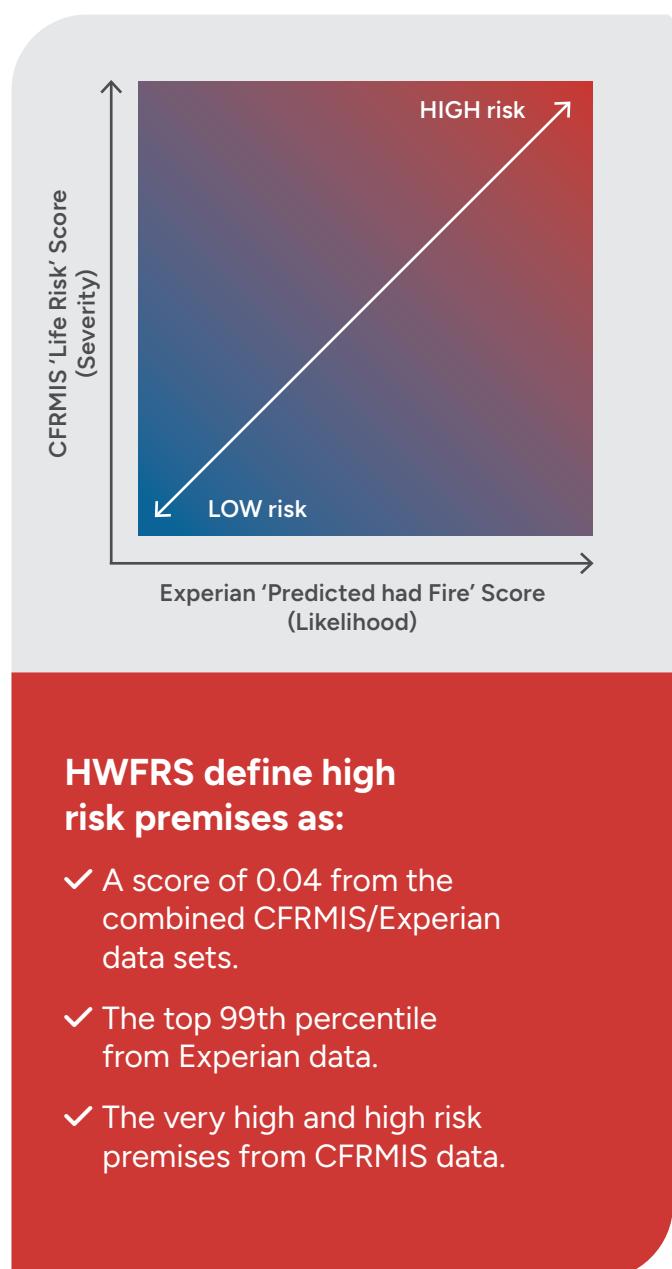
CFRMIS/RRR and Experian Data Combined

By multiplying the RRR and the Experian Data we can identify those premises in Hereford & Worcester that are most at risk of a fire and combine this with the highest risk to persons and the potential impact on the community.

The premises will be listed from highest to lowest product score. These premises should be inspected in numerical risk order wherever possible having due regard to this being mutually convenient with the responsible person at the premises.

This is based on capturing the top 5% of risk from likelihood data. Where CFRMIS determines a premise has a High-Risk Level but Experian denotes it in the bottom 95%, these premises will still be classified as High Risk regardless of the Experian data score.

Outcomes of fire safety inspection activity will be recorded in the Service's premises database. Future re-inspections will be based on the weighting from the RBIP methodology, considering any previous inspection outcomes and the compliance levels found. The RBIP list of premises to be inspected may be moderated depending on the professional assessment of risk by the Protection Management team, based on previous interactions, business type and approach from the Responsible Person.



Risk Based Inspection Programme (RBIP) continued

Inspection Frequency

- Premises defined as high-risk will be inspected on a three-yearly rotation.
- Once these have had an inspection, the RBIP will be inspected in numerical risk order.

If premises are no longer classed as high risk by either a reduction in the relative risk rating, or Experian score they may not be included in the three-year frequency applied to high risk premises.

The RBIP will be allocated on an annual basis to competent Fire Safety Inspecting Officers (Level 4 diploma). They will be allocated based on the risk-based methodology, factoring in geographical location of inspectors.

The RBIP methodology will be utilised to generate a list of premises with lower relative risk ratings for Business Fire Safety Inspections; predominantly including offices, shops, food outlets and factories.

Business Fire Safety Inspections on lower risk premises from the RBIP will be carried out by trained Level 3 operational personnel.

Performance Reporting

Performance reporting against the risk-based inspection programme will be reported to the Senior Leadership Board through the performance reports.

Review cycle of RBIP

The RBIP will be subject to an annual review, which will coincide with the assessment of Risk to inform the RBIP for the next year.

In addition to the annual review, the Protection team will need to constantly review information provided through the Home Office and NFCC in relation to fire safety legislation and enforcement guidance.



Intelligence Led Inspection Programme

Thematic Inspection Programmes

From time to time, it is acknowledged that incidents or occurrences locally, nationally or even internationally will raise awareness of issues that may have an impact on premises and therefore the safety of persons within Hereford & Worcester.

In such circumstances, consideration will be given to the implementation of a thematic inspection programme in order to ensure that the risk in those premises is reduced to an acceptable level.

Thematic inspections have been implemented within Hereford & Worcester in recent years, e.g. High-Rise Residential Buildings (HRRB) following Grenfell.

Concerns

Concerns of an alleged fire risk typically occur when a member of the public or an employee of an agency observe what they believe is a fire risk in the community and report it to us. We respond to complaints which allege unacceptably high fire risk as a priority by with a follow up visit from a suitably qualified member of the Protection Team.

Concerns will be dealt with on a risk-based approach, depending on severity and credibility of the information passed and will be actioned within 5 working days of receipt.

Details of the complaint will be recorded on the Service's Management Information System (CFRMIS) with resulting actions and outcomes documented.

Intelligence Led Inspection Programme continued

Post Fire Inspections

We will conduct an inspection of all relevant non-domestic premises after a primary fire. This includes findings from Fire Investigations in commercial premises which have resulted in death or serious injury. Details of an incident will be reviewed, and a risk-based action apportioned with concerns from attending crews triggering a complaint response, if the post fire return indicates no concerns a response in line with general inspecting timelines.

As a fire has occurred it is highly possible that the responsible person has failed to comply with the requirements of Regulatory Reform (Fire Safety) Order 2005 and where that is not the case, we feel it is important to offer advice to reduce the risk of further fires occurring. Post fire inspections will be carried out by a suitably qualified member of the Protection Team.

Enforcement (Prohibition Notices)

There are occasions when premises are identified, either by members of the public or HWFRS personnel, as not complying with Fire Safety Legislation.

The outcome from this investigation may cause the officer to be of the opinion that the use of the premises involves, or will involve, a risk in case of fire so serious that the use of the premises ought to be prohibited or restricted and that the risk cannot be remedied immediately. In this situation, HWFRS may need to issue a Prohibition Notice, either prohibiting or restricting the use of all or part of the premises.

These premises will be subject to follow up visits, inspections and further action in line with our Enforcement procedures.

Activity with other Enforcing Authorities – Including Agency Liaison (MATES)

Agency Liaison

We will continue to work with Partners and other agencies to share information and intelligence with the ultimate aim of improving our services and developing safety arrangements and compliance. By doing this we can direct resources in an intelligence-led manner thus reducing the burden or impact on businesses, fostering better agency relationships and supporting the business sector.

It is important to develop our understanding of partner agencies priorities and areas of focus to allow our activities to support their aim and objectives.



Multi-Agency Targeted Enforcement Strategy (MATES)

Schemes like MATES can be especially effective in tackling modern day slavery, child sexual exploitation and money laundering. We will continue to engage with operations like this in order to carry out enforcement activities where it is believed such activity will reduce the risks to relevant persons, improve legal compliance and assist with the detection and disruption of crime.

Intelligence Led Inspection Programme continued

Housing

As both HWFRS and the local Housing Authorities have enforcement powers affecting the housing sector it is essential that we work effectively together sharing information where appropriate to identify and manage associated risks. HWFRS have a Housing Protocol in place with all local authorities across Herefordshire and Worcestershire.



Applying RBIP methodology

Where appropriate the product score from the RBIP can be used to assess suitability of response to these activities, for example MATES activity can be assessed against fire history and likelihood of fire.



High Rise Residential Buildings & Lower Height Residential Buildings with Risk

Although not featured in our RBIP, a great deal of scrutiny has been and continues to be given to High Rise Residential Buildings, (HRRBs) following the Grenfell Tower incident. Following the investigation carried out by Dame Judith Hackitt, the subsequent Report submitted and the Government's commitment to implement all of the 52 recommendations.

Following the incident on 14 June 2017 HWFRS carried out a review of all of our high-rise buildings (definition of high rise being more than 6 floors or 18m).

The Service have implemented the recommendations from both Grenfell Tower Inquiries. In addition, the Service has also implemented the requirements of new legislation, including:

Fire Safety Act 2021 – Responsible Persons of multi-occupied residential buildings must manage and reduce the risk of fire for the structure, external walls of the building including cladding, balconies, windows and entrance doors to individual properties that open onto a common part.

Building Safety Act 2022 – The Act makes provision to give residents and homeowners more rights, powers and protections, including a toolkit of measures that will allow those responsible for building safety defects to be held to account.

HWFRS have eleven HRRBs as per the current definition. HWFRS remain committed to continuing to support the safety arrangements within the HRRBs, offering support and advice and regular engagement.

Intelligence Led Inspection Programme continued

Safety Advisory Group

Safety Advisory Groups (SAGs) provide a forum for discussing and advising on public safety at an event. They aim to help organisers with the planning and management of an event and to encourage cooperation and coordination between all relevant agencies. They are non-statutory bodies and so do not have legal powers or responsibilities and are not empowered to approve or prohibit events from taking place. Event organisers and others involved in the running of an event retain the principal legal duties for ensuring public safety.

It is recognised that Herefordshire & Worcestershire are counties with a large number of events covering a broad range of activities where the Regulatory Reform (Fire Safety) Order 2005 applies. It is important that such events are run safely and with due regard to the legislation which HWFRS is obliged to enforce. Experience has shown that an effective way to deal with such events and activities is to engage with organisers as early as possible. As a result, we will continue to carry out engagement with event organisers, via the Safety Advisory Group and other specific pre-planning activities.

SAGs are attended by local operational managers, with the support of Fire Safety Officers.

Unwanted Fire Signals (UwFS)

An Unwanted Fire Signal (UwFS) is defined as a signal transmitted by an Automatic Fire Detection (AFD) System reporting a fire where, upon arrival of the Fire Service, it is found that a fire has not occurred.

Hereford & Worcester fire and Rescue Service are committed to reducing the impact and burden of UwFS type calls on the Service

recognising that the potential increase in capacity of the response crews and offering resilience in the response framework.

Hereford & Worcester Fire and Rescue Service actively review all poorly performing premises. Where a premise generates three or more false alarms in a single month, a competent Fire Safety Inspector will engage with the premises to reduce further unwanted fire signals.



Sharing risk with Response and Fire Control

Any enforcement action taken against a premises is communicated to Fire Control to be shared with operational crews. The information is provided via a temporary action notice on the 'turn out' sheet that is sent to fire crews when they are mobilised to that particular premises and removed when the enforcement is withdrawn.

Significant Cases

Where cases require formal action, this will be escalated to appropriately competent staff with Level 4 Diploma (or above) in fire safety and legal training to APCIL Level 7, this will be managed to compliance or further action in line with enforcement and prosecution procedures.

Follow up to significant cases will be carried out by the case lead or suitably qualified officer.



Further Information

For further information please visit www.hwfire.org.uk