

Protection Strategy

2021-25

1 July 2021 to 31 March 2025

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Foreword

As part of our three core strategies that will drive everything we do, and underpin our mission of delivering high quality and sustainable services to our communities, this strategy aims to give clarity and direction on how will deliver our Protection function. Protection is a legal responsibility and is an integral part of keeping our communities safe primarily in our commercial and public buildings. It would also be realistic to say that this is not the most visible part of the Service but following the Grenfell fire tragedy is one that has come to the fore in terms of public expectations.

Protection and the understanding of risk is an area that requires a specific and complex skill set, however our communities rightfully expect a high standard of knowledge and expertise in a wide range of protection matters throughout our organisation. It is no longer appropriate to have protection matters confined to one specialist department, as this should be a skill that is more widely distributed and understood in all corners of the Service.

The Response Strategy focuses on those times when things go wrong for our communities so that we can respond as quickly as possible and help save life and property whereas the Prevention Strategy is aimed at changing behaviours in society to prevent fires and other emergencies. Uniquely the Protection Strategy has a clear and unequivocal role in enforcement and if necessary, prosecution where statutory requirements are not met. We will of course always strive to encourage changes in attitudes and approaches to Fire Safety matters before we enforce, however this is not always possible.

Above all else we will endeavour to deliver this Protection Strategy as part of our Organisational Excellence programme and will invest in our staff to ensure they are competent and highly skilled so that a resilient and flexible model of delivery can be developed to meet the wide ranging breadth of challenges posed by heritage, legacy and complex new modern building construction across both our Counties.

Jon Pryce
Chief Fire Officer / Chief Executive

Our Purpose, Vision and Mission

Purpose

Why we are here

Keeping people safe from fire and other risks. Responding efficiently and effectively to incidents and emergencies.

Vision

What we want to do

Saving More Lives: Building on our successes to continue to make a difference, improve lives and help secure resilient communities.

Mission

What we do every day

As one professional team we will work hard every day to deliver high quality, sustainable services to our communities.

Who we are

Hereford & Worcester Fire and Rescue Service (HWFRS) receives nearly 10,000 emergency calls each year requesting assistance at a wide variety of incidents, including property and countryside fires, road traffic collisions, collapsed structures, water rescues, hazardous materials and animal rescues. We attend just over 6,500 incidents each year – more than 125 incidents every week across the counties of Herefordshire and Worcestershire.

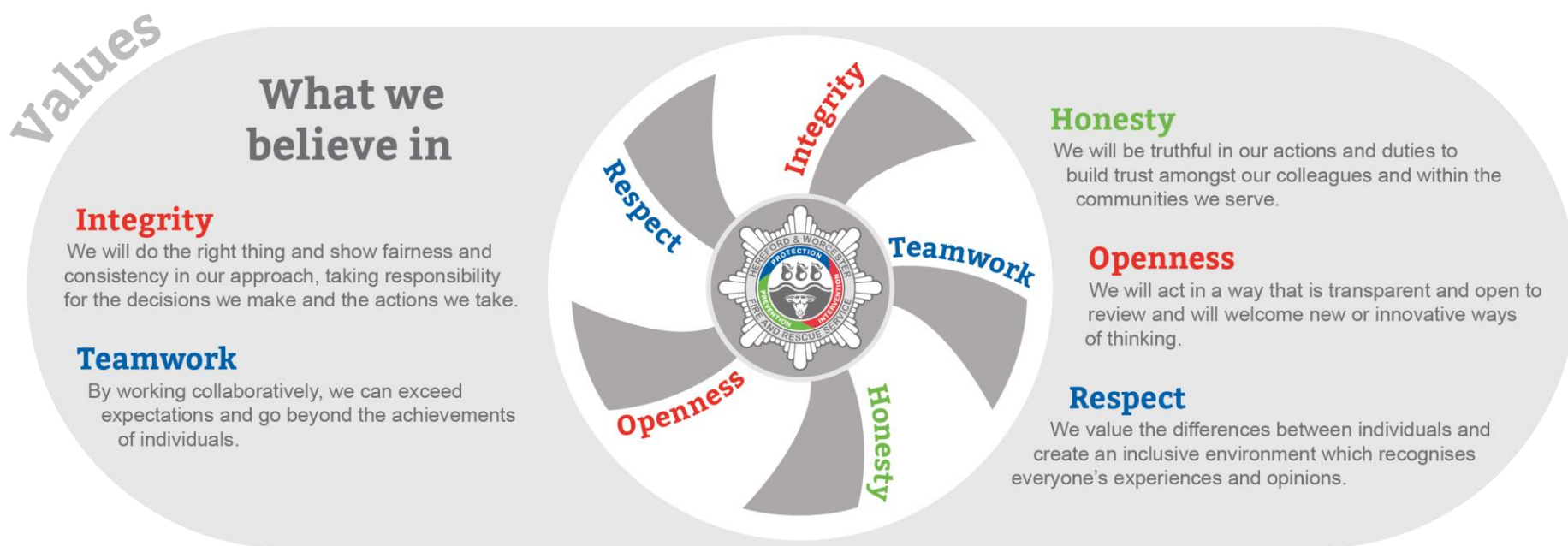
Our Protection capability consists of a specialist department made up of staff that are trained and experienced at understanding fire safety issues in a range of premises. They are supported by our operational crews who inspect and audit approximately 42,000 premises across our two counties.

Our Service is supported by our Fire Control team who answer emergency calls and deal with mobilising, communications and other activities and also our Support teams in our corporate areas such as ICT, HR & Development and Payroll, Operational Logistics and Finance.

Our core purpose, vision and mission are what drive and motivate our staff to make the communities of Herefordshire and Worcestershire safer. To do this effectively we need to ensure we understand and appreciate the diversity of the communities we serve and that we have a workforce that is inclusive and fully represents and understands those communities.

Our Values

How we carry out our core purpose is set out in **Our Values**. These are the guiding principles that are most important to us about the way we work. They help us to identify the right ways of working, acting and leading within our organisation and with the public and our partners; they also help us to make important decisions.



This strategy sets out our plan for the next four years and supports our overarching core purpose, vision, mission and Core Code of Ethics.

Introduction

In line with statutory responsibilities under the Fire and Rescue Service's Act 2004, the Regulatory Reform (Fire Safety) Order 2005, and the Fire and Rescue Services National Framework, HWFRS is committed to providing protection capabilities to ensure it promotes fire safety, delivers a risk based and intelligence led inspection programme and enforces fire safety compliance.

To achieve this protection capability, HWFRS will ensure our staff are suitably qualified and equipped to work with local businesses to support and advise them on meeting their fire safety requirements. Furthermore, where necessary, we will use our enforcement and regulatory powers to ensure their premises are safe.

Principles

The main principle behind HWFRS's **Protection Strategy** will be to reduce the risk of fire in commercial and other public premises where people live, work, shop and visit, whilst mitigating the impact of business disruption and the cost to the local economy and the environment. This will be achieved by ensuring premises comply with the Regulatory Reform (Fire Safety) Order 2005.

HWFRS's approach to protection will be data-driven, underpinned by our professional judgement, using local and national incident and enforcement trends to develop an understanding of risk in order to target our protection activity and resources appropriately. Additionally, we will utilise systems and national guidance to ensure that we provide efficient and sustainable services. This includes sharing information and intelligence about risks in the built environment with staff and partners to support our **Response Strategy** and continually improve public and firefighter safety.

Furthermore, to ensure we meet the requirements set out in the National Fire Chiefs Council's (NFCC) Competency Framework for Fire Safety Regulators, and deliver a high quality service, we are investing in fire safety training across our workforce. Additionally, we plan to drive professional organisational excellence through a programme of Continuing Professional Development and membership of professional bodies.

The core foundations in delivering this strategy are **Promoting Fire Safety, Increasing Compliance** and **Investigating and Enforcing**. In other words, we will promote fire safety through information and encouragement, carry out fire safety inspections, investigate the cause of fire and enforce compliance where breaches are found.

Promoting Fire Safety

We aim to reduce the number of deaths, injuries and the economic cost of fire by working with premises owners to ensure they understand their responsibilities under legislation and educate them about new and evolving risks. We will achieve this through advice and guidance, advising on statutory consultations and promoting fire safety initiatives such as the installation of sprinklers.

Advice and guidance

Our staff are specially trained to provide advice and guidance on fire safety and the requirements of the Regulatory Reform (Fire Safety) Order 2005. In addition, we will promote fire safety issues through our website, social media messaging and forums/presentations. We will prioritise our resources based on life risk, targeting the highest risk buildings including high rise residential buildings, complex premises and buildings providing sleeping accommodation. Furthermore, we provide guidance to businesses and sites of historic and local interest in order to reduce the economic cost of fire and support the local economy.

Statutory consultations

HWFRS will respond to consultations and requests for advice, where the Fire Authority is a statutory consultee or has the expertise that can support public safety; this includes building regulations, licensing applications and the Safety Advisory Groups (SAG). Wherever possible we will endeavour to engage with local authorities to advise on how we can improve public safety, resilience and preparing for emergencies, all areas of the built environment. In each of these areas HWFRS aims to promote fire safety and provide guidance to authorities, premises owners, and event organisers to keep people safe from fire.

Sprinklers

We support the NFCC's stance that: "sprinklers are the most effective way to ensure that fires are suppressed or even extinguished before the fire service can arrive" and will work with local Building Control Bodies to promote their use in all high risk buildings. Furthermore, we will work alongside developers, local authorities, housing providers and landlords to support the installation of Automatic Fire Suppression Systems (AFSS) in building stock.

A number of headline objectives will be delivered to support the Protection Strategy:

- *We will provide fire safety advice and support to local businesses to help them meet their legislative requirements.*

- *We will continue to promote the introduction of sprinklers within all potentially high-risk commercial and residential premises.*

Increasing Compliance

To increase compliance against the Regulatory Reform (Fire Safety) Order 2005, we carry out fire safety audits. These audits are completed in accordance with national guidelines to ensure any advice provided is consistent and proportionate to the fire risk at the premises and to keep people safe. Our two main programmes are the Risk Based Inspection Programme (RBIP) and the Intelligence Led Inspection Programme (ILIP).

Risk Based Inspection Programme (RBIP)

RBIP is an annual pre-planned fire safety inspection programme based upon assessing the risk posed by generic types of premises and individual buildings and the current level of compliance with the requirements of the Fire Safety Order. We use externally verified data to calculate risk, including building type, size and location, maximum probable loss, and type of people who live or work in the building. The primary aim of this programme is to prevent death or serious injury in the event of a fire.

We use the NFCC fire safety audit forms (short and full audit) to check compliance with the Fire Safety Order. Our staff will actively work with the responsible person(s) to advise and assist with meeting the standard required. Where advice and guidance do not achieve compliance with the Fire Safety Order, or the risk of death or serious injury in the event of fire is high, we will enforce the requirements of the Fire Safety Order to ensure compliance and public safety. A guide to the Fire Safety Audit Process can be found [here](#).

Intelligence Led Inspection Programme (ILIP)

In addition to our Risk Based Inspection Programme, we also carry out an Intelligence Led Inspection Programme (ILIP). This is a fire safety inspection programme based upon local or national fire trends and local or national non-compliance trends linked to the Fire Safety Order. This programme also includes a sample percentage of audits of low risk premises supporting the overall number of inspections carried out by the RBIP. In recent years, this programme has consistently identified issues around non-compliance with the requirements of the Fire Safety Order. Therefore, we provide fire safety information and education advice to the responsible person before an ILIP commencing. As with the RBIP, the programme aims to prevent death or serious injury in the event of fire, and limit the economic cost of fire, by ensuring compliance with the Fire Safety Order.

To support this, we will gather trend data from:

- NFCC and national data sources
- Previous RBIP and ILIP findings

- The outcomes of national recommendations following inquiries, inquests and Coroner's Rule 43 findings
- The outcomes of local and national fire trends and fire investigation findings

Multi Agency Enforcement

As part of the ILIP, we carry out multi agency inspections based on information and intelligence shared between agencies including West Mercia Police, Local Authority Housing, Trading Standards and other Regulatory Services, Her Majesty's Revenue and Customs, Home Office Border Force and others.

A multi agency enforcement strategy provides an effective and efficient methodology for Enforcing Authorities working within Herefordshire and Worcestershire, allowing all agencies to access premises in a single visit, to ensure compliance with several pieces of UK legislation, protecting those who are considered to be at high risk and making premises safer for all. This approach also supports the disruption of serious and organised crime in our area.

We intend to mature and develop our ILIP, including multi agency enforcement wherever possible, to assist our understanding of risk and target our prevention and protection resources. Furthermore, we will use the data from these visits to target future inspection programmes (RBIP and ILIP) and track this through quarterly reporting and an annual action plan.

Reactive fire safety inspection

In addition to our audit programmes, we also respond to business fire safety complaints or concerns raised by members of the public and other agencies and, in the event of a fire occurring, by carrying out an inspection (post fire audit). In these circumstances, and where appropriate, we ensure compliance with the Fire Safety Order by issuing letters and notices to the responsible person. In the case of post fire audits the Service will identify and report on origin and cause and use this data to inform our Intelligence Led Inspection Programme and assessment of risk. We will also identify if the origin, cause or spread of fire was compounded by a failure to comply with the Fire Safety Order and in such cases take steps to enforce compliance.

Enhancing our capability and extending business fire safety skills

HWFRS is investing in our fire safety department in order to ensure we are able to provide a high quality of service. This includes increasing the number of inspecting officers and providing them with the knowledge, skills and experience to carry out their roles to the highest standard. Furthermore, we are enhancing our capabilities by investing in fire engineering and other fire safety qualifications.

We intend to extend and embed fire safety knowledge across the Service to ensure a high quality and sustainable service to our communities by investing in an extensive training programme for our operational staff. This programme will enhance the understanding of operational firefighters in fire safety, thereby supporting the delivery of our protection services whilst also providing them with knowledge that will assist them when dealing with complex fires.

A number of headline objectives will be delivered to support the Protection Strategy:

- *We will carry out fire safety audits to ensure local businesses are complying with the requirements of the Regulatory Reform (Fire Safety) Order 2005.*
- *We will develop our common understanding of trends and issues and share these with our communities and the fire sector to reduce injury and death from fire in business premises.*
- *We will undertake appropriate levels of specialist training to ensure protection officers can continue to provide proportionate, efficient and effective business safety advice and carry out inspections.*
- *We will continue to extend business fire safety training across the Service to support firefighter safety and technical awareness.*

Investigating and Enforcing

Investigating the cause of fire

At every incident HWFRS attends we will carry out investigations to establish the fire's origin and its cause and we will use this data to both support criminal and civil court proceedings. Furthermore, we will analyse trends which will help to inform our guidance to business owners and develop our Intelligence Led Inspection Programme. Our Fire Investigation Officers will also support the post fire audit process which will seek to support business owners, who have had a fire, through education and, where appropriate, enforcement of compliance with the Fire Safety Order. Data on the cause of fire will be reported nationally and via our website.

We will also be investing in training for our staff to further enhance their understanding of the causes of fire and the signs of arson. This investment will include our specialist Fire Investigation Officers as well as front line crews and will be delivered in line with NFCC guidance.

Enforcement

When an unsafe situation is identified following a fire, or as part of an audit or inspection, which indicates a failure to meet the requirements of fire safety legislation, Hereford & Worcester Fire and Rescue Service is required to determine what action to take. The action will depend on the nature of the failure and will be based on the principles set out in the Authority's Enforcement Policy which is in accordance with the Regulators' Code 2014 and the regulatory principles required under the Legislative and Regulatory Reform Act 2006.

Inspecting officers may take enforcement action where there is an identified failure to comply with the legislation. The outcome of enforcement can include a notice of required action, the prohibiting of the use of all or part of a premises or prosecution. To provide transparency and consistency, enforcement action is also registered on a national database and statistics are annually produced for Her Majesty's Government on the number and type of enforcement actions that have occurred.

A number of headline objectives will be delivered to support the Protection Strategy:

- *We will investigate the cause of fire and use this to inform our education and inspection programmes.*
- *We will investigate fire safety concerns and take proportionate enforcement action.*

Legislative Requirements

There are a number of statutory functions and duties that we must carry out according to law (core legislation summarised below).

[The Fire and Rescue Services Act 2004](#)

This is the core legislation for all fire and rescue services and it details legal powers and responsibilities of Fire Authorities. Under Articles 25, 26 & 27 of the Regulatory Reform (Fire Safety) Order 2005, HWFRS is an enforcing authority for premises within its area and must enforce the provisions of the Order and, for that purpose, will appoint authorised inspectors.

[The Regulatory Reform \(Fire Safety\) Order 2005](#)

Part 2 section 6 - Fire safety

(1) A fire and rescue authority must make provision for the purpose of promoting fire safety in its area.

(2) In making provision under subsection (1) a fire and rescue authority must in particular, to the extent that it considers it reasonable to do so, make arrangements for -

- (a) The provision of information, publicity and encouragement in respect of the steps to be taken to prevent fires and death or injury by fire;
- (b) The giving of advice, on request, about -
 - (i) How to prevent fires and restrict their spread in buildings and other property;
 - (ii) The means of escape from buildings and other property in case of fire.

[National Framework Document](#)

The Framework document sets out the Government's priorities and objectives for the fire and rescue service. It states:

Fire and Rescue Authorities (2.3) 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.

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