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National Fire Chiefs Council

The professional voice of the UK Fire & Rescue Service

Preliminary Guidance Technical Note

Higher Risk Occupancies

Preliminary Guidance and Relative Priorities for Risk Based Inspection Programmes and other Protection Activities

Version 1.0

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PLEASE NOTE

This guidance is being published as a 'Preliminary Guidance Technical Note' whilst the various projects within the NFCC Community Risk Programme progress. This preliminary guidance will be subsumed into fuller guidance to replace current national guidance on Risk Based Inspection Programmes and Protection activities in due course.

Contents

The purpose of this non-statutory guidance is to support Fire and Rescue Services (FRSs) to achieve a broad commonality and consistency in Protection activities across the sector, particularly in relation to higher risk occupancies.

This guidance does not constitute legal advice. All parties' legal duties remain those specified by law, in particular the Regulatory Reform (Fire Safety) Order 2005. If any parties consider that difficulties arise in relation to compliance with their particular duties in any relevant legislation, they should take legal advice.

1. Summary

1.1. This preliminary guidance has been developed for Fire and Rescue Services (FRSs) to consider some key definitions for 'higher risk' occupancies and how they may be considered among the relative priorities of Risk Based Inspection Programmes (RBIPs) and other Protection activity. This guidance has been developed as a result of:

- Greater experience and understanding of weaknesses in the design and construction of the built environment, and increased potential for uncontrolled fire or smoke spread that may compromise complex or delayed evacuation strategies and firefighting tactics
- Feedback from Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) on the need for increased consistency and commonality of understanding of 'higher risk' and how this is reflected in RBIPs and other FRS functions.
- Consideration of survey results from Fire Services in May 2021 on current approaches taken to higher risk occupancies.

1.2. FRSs are asked to:

- Review the higher risk occupancies and principles outlined in this guidance and any major variance between these and their current Protection activities.
- Consider adjustments to their current Protection activities to support greater commonality between FRSs.

1.3. Sections 7 and 8 provide guidance on applying a range of 12-36 months for regular inspections or other activity for higher risk occupancies in order to monitor compliance and encourage Responsible Persons to maintain focus on their fire safety responsibilities.
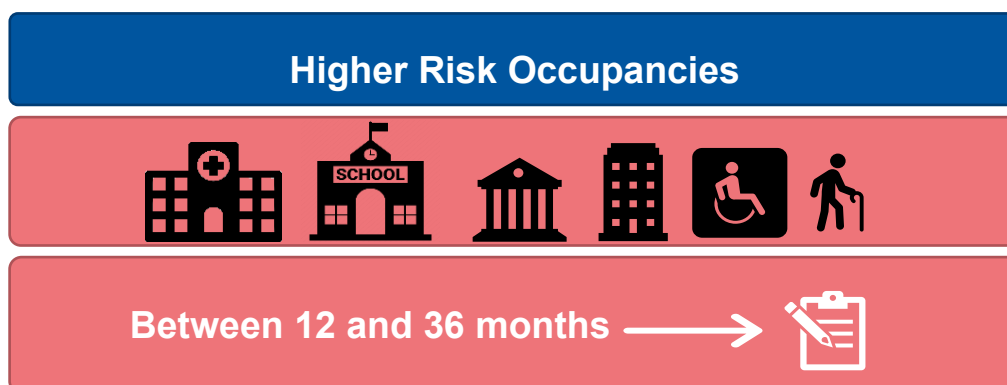
1.4. Section 9 provides guidance on adoption of strategies involving both specialist Protection and non-specialist staff that align with the recommendations in the NFCC Competency Framework for Fire Safety Regulators, and also the adoption of the CFOA short audit principles in reasonably safe premises (where residual risks are within tolerable limits) to increase the capacity of competent Protection officers to focus on higher risk occupancies.

1.5. Section 10 provides guidance on considering additional proactive interventions alongside inspection programmes, which may encourage compliance and reduce risk

in the higher life risk occupancies.

2. Background

2.1. FRSs have been regulating compliance with the [Regulatory Reform (Fire Safety) Order 2005](#) (the FSO) and previous fire safety legislation in existing premises for many years, and the primary tool for this has been the auditing regimes driven by RBIPs. National Guidance on the underpinning approach to risk and RBIPs was originally published in 2004 (updated by the Department for Communities and Local Government in 2009) within the Integrated Risk Management Planning (IRMP)[1] suite of material.

2.2. Recent surveys conducted in May 2021 and consultations have identified that many RBIP approaches are still in part based on the guidance, data and tools within that original guidance, and that much commonality still exists that aligns with that guidance. Survey responses from 37 FRSs have identified that 33 (89%) still use the national guidance mentioned above as the basis for their RBIPs and 24 (64%) supplement that with additional data and methodologies.

2.3. However, variations in methodologies were identified in the [2020 HMICFRS State of Fire and Rescue Annual Assessment](#) inspections as a potential weakness for the sector, particularly in relation to higher risk occupancies. The NFCC Community Risk Programme (CRP) projects outlined below are intended to provide the basis for updating the methodology, guidance, data and tools, thereby delivering greater consistency of approach in the future. These projects are underway and, although anticipated delivery of new guidance material is scheduled to commence in 2022, it is recognised that integrating the new guidance with existing approaches and systems will take some further time.

2.4. This preliminary guidance has been produced to support FRSs to consider their current approaches to Protection activities and RBIPs for the interim period until the work of the CRP is completed and integration in FRSs can take place.

2.5. It is also recognised that each FRS has a diverse mix of local built environments, community risks, and variable resourcing models for their Protection teams and activities. It is therefore important that this preliminary guidance should be principle-based rather than prescriptive. This will allow FRSs to consider how the guidance should be implemented to address local community risks and resourcing models, whilst reassuring the public of broad commonality and consistency across the sector, particularly in relation to higher risk occupancies.

3. Community Risk Programme Projects

3.1. The NFCC CRP is designed to enable the NFCC to achieve its strategic commitment

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[1] Revised IRMP Guidance Note 4: A Risk Based Approach to Managing a Fire Safety Inspection Programme

to assist FRSs.

3.2.   There are [three primary projects](#) ongoing within the CRP outlined in Figure 1 below, which include significant research into risk, influencing factors, data and digital sources, guidance, and tools. It is anticipated that these will update and align Community Risk Management Planning guidance and methodologies for Protection, Prevention and Response functions.

3.3.   These projects are being delivered using additional Government funding, will replace the outdated Government IRMP suites of guidance, and are anticipated to be delivered over an extended period from early 2022 onwards. An overview of these projects is provided below and more information is available on the [CRP page of the NFCC website](#).

Community Risk Programme
- Key Projects underpinning future RBIP methodologies
(for more information see https://www.nationalfirechiefs.org.uk/Projects**)**

Definition of Risk Project	**Community Risk Management Planning Project**	**Economic & Social Value of FRS Project**	**Data & Digital Programme**
1. Common Strategic Framework. 2. List of 'Hazards & Hazardous Events'. 3. List of influencing factors. 4. Model/methodology/algorithms to provide metrics, national criteria and descriptors for High/Medium/ Low Risk. 6. Specification for data & digital solution requirements. **Timescale - 2021/22**	1. Review of existing guidance. 4. New CRMP Guidance framework. **Timescale - 2021/22**	1. Establish the economic and social cost of risks. 2. Support risk management planning by evaluation and understanding of the financial impact and benefits of risk interventions. **Timescale - 2021**	1. Digital solution infrastructure 2. National data sourcing, interoperability and analysis 3. National consistency. **Timescale - 2022/3**

Figure 1

4.   Higher Risk Occupancies and Key Influencing Factors

4.1.   The objective of this preliminary guidance is to promote greater consistency in identification and approach to higher risk building and occupancy types. To achieve this, it will focus on those identified in the many consultation responses and working group submissions made to Government by both NFCC and individual FRSs over the last three years as part of the Fire Safety Act, Building Safety Bill and Grenfell Tower Inquiry considerations. These submissions expressed the professional judgement of NFCC and individual FRSs, and examples of the higher risk occupancies and influencing factors identified in those various submissions are summarised in Figure 2 below and discussed in more detail in Appendix A:

Occupancy Types	**Key Factors Influencing Potential Risk**
• Hospitals and hospices • Care and nursing homes	• Reliance on complex or specialised risk management.

- Specialised housing. For example: - Sheltered housing (multi occupied) - Supported living (multi occupied) - High rise residential blocks or other occupancies (in particular those with interim measures in place due to non-compliant external wall systems or compartmentation issues - Schools - Major entertainment and public assembly buildings - Secure facilities: - Prisons - Young offender institutions - Detention centres	- Reliance on complex or delayed evacuation strategies with critical staffing levels, training and competence. - Vulnerability of occupants and dependency on others for evacuation. - Sleeping and non-sleeping risks. - Building size and complexity, and the number of staircases and means of escape. - Quality of compartmentation and passive protection - Complex design and/or construction, such as engineered, timber frame, and modern methods of construction. - The composition of external wall systems. - Exceptional value to the community or society. - Complexity or delays in firefighting.

Figure 2

4.2. The principle reasons for these specific buildings/occupancies being identified as higher risk within these submissions is underpinned primarily by the potential for high 'societal risk' should a serious fire develop, which can be defined as a high societal impact either in terms of multiple fatalities, loss of critical community assets, or high economic or environmental impact. These impacts were attributed to the contributory key factors mentioned in Figure 2, such as complexity and delays in evacuation, vulnerability or dependency of the occupants, failures in building design or construction, and potential for delays in firefighting.

4.3. These same risk influencing factors are also reflected in the NFCC Competence Framework for Fire Safety Regulators within the Risk/Complexity Model in Appdx 7.

4.4. It is appropriate that NFCC and individual FRSs reconsider the relative priority for these buildings/occupancies within their RBIPs and other Protection activities, and FRSs should also ensure that the risks are identified and addressed in their Response arrangements as appropriate.

5. Other Parameters for Higher Risk Occupancies

5.1. For the purposes of this preliminary guidance, it is useful to interpret and clarify the main parameters of 'higher risk' to underpin the professional judgement expressed in the consultation responses. 'Higher Risk' can be expressed in a number of ways from the FRS Protection perspective, and these may be partly responsible for some of the variations in RBIP approaches.

5.2. The main parameters can be based on one or more of the following:

i. Societal life risk

The potential for multiple fatalities or injuries from uncontrolled fire or smoke development.

As mentioned above, this category already underpins the current IRMP guidance and the principles of 'societal life risk' (defined in the IRMP guidance as potential for five or more fatalities in any one incident) and the data calculations are included in the current 'relative risk' methodology. The IRMP guidance also suggests that this is key, noting:

> *'the inspection programmes allow each FRS to demonstrate it is delivering its enforcement responsibilities and focusing its resources on those premises that represent the greatest risk to life in the event of fire.'*

Calculating new metrics for the potential for life risk consequences on empirical data is complex due to the relative infrequency of such incidents and variable influencing factors involved. The data and statistical evidence base for these metrics will be completed in 2021/22 as part of the CRP projects mentioned above. However, some suggested contributory factors and occupancies for this category are discussed further below and in Appendix A.

ii. Likelihood of a fire occurring

Based on historical fire statistics and taking into account the severity of consequences of a fire.

This category is also reflected in the existing national IRMP guidance methodology, which identifies the 'relative risks' between occupancy types. It also includes the other reasons for assessing risk in buildings through inspection, such as strategic importance, potential loss of heritage, potential for environmental damage, and need to assess likely firefighting operations.

The existing national IRMP guidance is now limited in accuracy due to the age of the data, our improved understanding of design, build quality weaknesses within the built environment, and changes in the use of buildings that have increased complexity.

A brief study of current national fire statistics indicates that the majority of fires that occur in non-residential premises, involve retail/commercial, industrial, and other public buildings.

However, to accurately predict the likelihood of a fire occurring and relative levels of severity for any property type will require further analysis of the total numbers of property/occupancy types across the UK, national fire data, and other evidence. This will not be available until the CRP projects are further advanced.

iii. Likelihood of non-compliance with fire safety regulations and standards

Taking into account any past enforcement action and historic enforcement statistics.

Most FRSs also focus resources on this category as it is a statutory duty for FRSs. National statistics indicate a high proportion of enforcement action is taken against shops and licensed premises (possibly due to failures in separation between the commercial element and living/sleeping accommodation above them rather than just risks within the retail parts themselves), and also houses converted to flats, and other types of sleeping accommodation such as HMOs, hotels and guest houses.

Although some of these occupancies are less clearly in the primary categories of higher societal risk it is recognised that they may, in general, experience lower standards of fire safety management, higher relative risk scores and rates of enforcement. Many of these, particularly larger premises with greater numbers of occupiers, are likely to remain a priority for existing inspection programmes for most authorities.

Again, to accurately identify property/occupancy types most likely to have failures in fire safety arrangements, and therefore potential risk, will require detailed analysis of the total numbers of all property/occupancy types across the UK by the CRP Projects, as well as the numbers of historic inspections completed on each.

5.3.   To help provide direction and priorities for Protection activity, the Home Office published the [Fire and Rescue National Framework for England](#), which outlines a number of requirements that set direction on how these three relative categories of 'higher risk' may be prioritised:

'2.4: 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.'

5.4.   It is evident that the life safety risk is a key priority. Fortunately, uncontrolled fires with multiple fatalities are very infrequent in the UK with Summerland, Bradford Football Stadium, Rosepark Care Home, and Grenfell Tower being most notable in recent decades.

5.5.   However, other severe fires continue to occur, with fires such as Newgrange Care Home, Beechmere Extra Care Sheltered Flats, the Cube, Croft Care Home, Worcester Park, and Barking residential flats all being very significant. These and many other fires in schools, hospitals and multi occupied residential buildings have been challenging for FRSs, and in many cases could have resulted in more fatalities and injuries had the circumstances been slightly different.

5.6.   These incidents have also all demonstrated that the societal impact consequences of a fire in these occupancies can be potentially catastrophic, either in terms of life risk, loss of critical community assets, or economic/environmental impact. We also know from many fire investigations and inquiries that those most vulnerable to fire are those who are least likely to be able to escape from the building, should a fire occur. Furthermore, poor standards of building design, non-compliance with Building

Regulations and standards of construction, and poor management can compromise evacuation, firefighting, and rescue operations.

5.7. The duties for keeping occupants safe within premises lies with the Responsible Persons within legislation and any appointed Fire Risk Assessors, and the Secretary of State has the duty to ensure appropriate guidance is available to assist Responsible Persons to discharge their duties. The challenge for Responsible Persons and their appointed Fire Risk Assessors is to establish and maintain very high standards within a complex risk management regime. This will include applying appropriate prevention and protection arrangements, effective emergency/evacuation plans, and staff preparedness in order to reduce the likelihood of a fire and prevent potential catastrophic outcomes.

5.8. The challenge for FRSs, apart from the statutory duty to enforce legislation in accordance with the Regulators Code, is to consider whether more can be done to support Responsible Persons to realise and remember that they have responsibility for a higher risk building, and to better understand the implications and control measures required for that risk. This will support Responsible Persons to maintain the safety of their occupants and anticipate the needs of the FRS responders.

5.9. On balance, although all three of the parameters for higher risk outlined in paragraph 5.2 above will continue to be relevant, it is evident that the relative priority for Protection activities remains on those occupancies with the higher potential for societal life risk. Primary examples of these occupancies are outlined in Figure 1 and Appendix A.

6. Operational Response and Firefighter Safety

6.1. FRSs have the increasingly significant challenge of ensuring an effective operational response and tactical approach should a fire occur in a higher risk occupancy. The current Fit for the Future proposal being considered by NFCC, the National Employers and Local Government Association also identifies and highlights this specific issue:

> 'It is consequence management that has been starkly criticised by the Part 1 Grenfell Tower Inquiry report. Irrespective of the likelihood of a fire like Grenfell Tower occurring, there is a clear, stated expectation that the fire and rescue service should be able to foresee and respond to it in a flexible, coordinated and effective way.'

and:

> 'the Grenfell Tower Fire Inquiry Phase 1 report focuses heavily on the issues of staff competence and training. The recommendations focus on competence of staff working with high risk, high-rise buildings. The implications of this are, however, much wider. The expectations in the report can be more broadly applied to other buildings as the fundamental issue is about recognising, assessing and responding to risks.'

6.2. FRSs cannot be expected to fully mitigate fire events beyond the expectations of the Building Regulations and may not be able to provide a safety net where buildings are

inherently unsafe. However, it is recognised that many FRSs have recently increased their operational response and adjusted their tactical approaches to high rise residential buildings. In particular, this has been to account for structural defects, external wall systems, and changes to evacuation strategies.

6.3.   FRSs now have greater experience and understanding of weaknesses in the design and construction of the built environment, and the increased potential for uncontrolled fire and smoke spread to compromise complex evacuation strategies. The impact of these factors on firefighting tactics is also recognised and it is therefore appropriate to consider the other higher risk occupancy types of any height identified in this paper for similar adjustments to tactical approaches.

7.   Purpose of Regular Inspection Activity

7.1.   It is recognised that, even with a primary focus on the higher risk occupancies outlined in Appendix A, there will always be a limit to the number of premises that can be inspected each year irrespective of the resources available to most FRSs. Regular inspections of **all** these occupancies will only be achievable for most FRSs by applying a programme that spans across a number of years.

7.2.   Expectations for the frequency of regular inspections for any occupancy type are not currently included in the current IRMP national guidance, and this allows for variations between FRSs for any given occupancy type. This variation was raised as a concern by HMICFRS, but this is partly a product of the 'relative risk rating' methodologies within the current IRMP guidance methodology and other locally developed metrics being applied to individual buildings, rather than an occupancy type. An example of this variation would be a small 'cottage hospital' dealing with day visitor outpatients versus a major teaching hospital with wards, theatres and intensive care units. Both are classified as hospitals, but the risks and potential consequences are very different in each premises.

7.3.   These methodologies allow individual occupancies to be rated between very low and very high risk depending on a wide range of factors and, therefore, these ratings subsequently lead to variations in the frequency of regular inspections to similar occupancy types.

7.4.   However, consideration of the primary objectives and value of regular inspections may help to achieve further consistency. The primary objectives are not defined in detail within IRMP national guidance, although they can be broadly defined as:

> To provide opportunities for the FRS to monitor compliance, identify failures in Protection and management arrangements, and reduce risk through enforcement action as part of their statutory duty to enforce the FSO.

> To proactively support and encourage Responsible Persons and/or property managers through periodic inspections to recognise that they are responsible for a higher risk building, understand the implications and control measures required for that risk, and maintain their focus on their responsibilities for fire safety arrangements and their occupants.

7.5.   There has been no analysis or studies to determine what frequency periods for

inspections are optimal to achieve these purposes based on any empirical national data. Such a determination would be difficult to achieve given the wide variations in Protection and management arrangements within occupancies and difficulty in analysis of the re-occurrence of failures over time.

7.6.   However, it is reasonable to anticipate that the greatest influencing factor on reduced fire safety standards and increased risks within occupancies over time are from high turnover in management or staff. This can lead to deterioration in fire risk management, emergency planning, and evacuation due to lower levels of experience, training, and competence. Similarly, changes to the structure or use of buildings, wear and tear, or lack of maintenance over a given time period are also influencing factors. Any of these factors can generate increased risk, particularly in higher risk occupancies with complex risk management and delayed evacuation strategies.

8.   Frequency of Regular Inspection Activity

8.1.   Survey responses from 37 FRSs in May 2021 indicate that the majority (25 FRSs – 81%) reported maximum inspection frequencies of either 12 months, 24 months or 36 months, depending on the occupancy type. 12 FRSs (38%) use a standard 36-month maximum period across most of their higher risk occupancy types. Some FRSs also reduce the standard frequency for a period following non-compliance and increase it again following demonstration or evidence from the Responsible Person that standards are being maintained. A small number of FRSs also alternate between an audit inspection by Protection staff and a fire safety 'check' by Operational Staff or Advisors for some occupancies.

8.2.   Allowing for the all the variations produced by the relative risk methodologies mentioned above, this range of 12-36 months already demonstrates a degree of consistency in application across most FRSs. It therefore provides a reasonable professional judgement and expectation on the range of frequencies that FRSs should apply to monitor compliance and encourage Responsible Persons to maintain focus on their fire safety responsibilities. The frequency can be adjusted within this range dependent upon specific building/occupancy attributes, protection, enforcement history, management arrangements, and risk control factors.
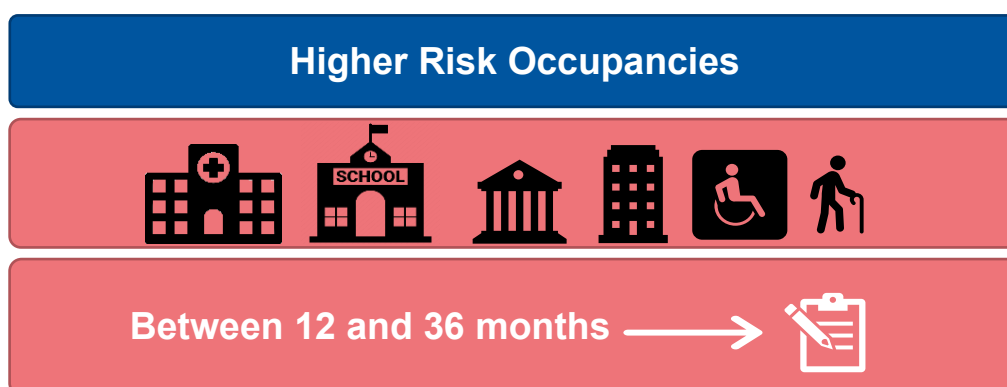
8.3.   With respect to high rise residential buildings, FRSs should also note that all high rise residential buildings over 18m in height or 7 or more storeys, whichever is reached first, will be in scope of future regulation under the new Building Safety Regulator. This regulation is currently planned to include a 'Safety Case' inspection regime on a

5-year cycle but NFCC would recommend that FRSs maintain the 12-36 month frequency until the overlap in regimes becomes clearer.

8.4. Some occupancies may also have safety quality assurance systems (for example BS 9997 compliant systems) in place that bring an extra level of scrutiny to their fire risk management arrangements. Others may have agreements or protocols that provide a degree of additional oversight on fire safety, such as primary authority arrangements, memoranda of understanding (MOUs), or concordats. It is also recognised that some local authorities operate as landlords, building operators and regulators, and as such their risk management approaches may have similar extra levels of scrutiny applied to their safety regimes. These additional levels of internal scrutiny may provide justification for increasing the period between inspections or other interventions by the FRS within the range mentioned above, even for higher risk occupancies.

8.5. FRSs may have only a limited number of occupancies with higher societal life risk, and they may have capacity to increase the frequency of inspections to these occupancies given the increased understanding of risk factors. Alternatively, FRSs may apply resources to those other medium risk occupancies with increased likelihood of fire, such as retail, commercial, and industrial, or those occupancy types with an increased likelihood of non-compliance, such as shops with dwellings above, licensed premises, guest houses/hotels, and other sleeping accommodation.

9. Current Strategies for Audit Inspections and 'Fire Safety Checks'

9.1. A blended approach to audit inspections by specialist Protection staff and 'fire safety checks' by Operational/non specialist staff reflects current Community Risk Management Planning practice in most FRSs. Similarly, the use of a variety of methods and approaches, such as desktop/remote appraisals, short audits, and full audits, provides greater resource flexibility and maximises capacity.

9.2. Survey responses from 37 FRSs in May 2021 identified that 21 (57%) FRSs had strategies that involved both Protection and non-Protection staff in either full audit inspections or more limited fire safety checks of businesses or multi occupied residential premises. Many other FRSs mentioned that they were in the process of developing and qualifying Operational or other staff in line with the NFCC Competency Framework for Fire Safety Regulators to enable them to expand their inspection programmes.

9.3. The survey also identified that 26 (70%) FRSs had adopted the principles of the short audit approach outlined in the CFOA Fire Safety Guidance Notes and Audit. This approach is designed to reduce the time spent by competent Protection officers in reasonably safe premises where residual risks are within tolerable limits in order to enable them to spend more time on higher risk premises. Although the short audit approach is less likely to be appropriate for complex and higher risk occupancies, adoption is recommended for simple and lower risk occupancies in order to provide a valuable tool for those FRSs not yet making use of it.

9.4. The survey also identified that 25 (68%) of FRSs had recently adopted, as a result of Covid restrictions, a desktop appraisal process completed by telephone and/or email.

These varied in approach, some were purely advisory in nature whereas others had some regulatory intention and included questions about fire safety arrangements and checks on Fire Risk Assessments or other related documents. Some FRSs use these appraisals purely as a sifting or triaging exercise to determine whether a physical inspection is likely to be required and its priority. Some FRSs also had similar processes delivered by both Protection and Operational staff.

9.5.   However, feedback from FRSs about the value and efficacy of these desktop appraisals has been varied and very little formal evaluation has been carried out to date. Anecdotal evidence was provided by some FRSs that indicated a limited commitment to continuing with them when Covid restrictions are lifted due to the resource implications and difficulties in gathering accurate information on which to base evaluation decisions. Further research will be carried out on these approaches and relative value before recommendations and guidance are produced to supplement information provided specifically for the Covid period.

10. Relative Value of Inspections and Other Proactive Interventions

10.1. FRSs have been regulating compliance in existing non-domestic buildings for many decades, and the primary tool for this work has been the auditing regimes driven by FRS RBIPs. However, despite the principles of the FSO legislation imposing duties for self-compliance by Responsible Persons, the national statistics and experiences of FRSs demonstrate continuing levels of non-compliance and the need for enforcement action.

10.2. This is particularly concerning in higher risk occupancies with life risk factors. It may therefore be appropriate to consider the relative value of audits as the primary tool for reducing risk if they are evidently only having a temporary impact on fire safety understanding and compliance among building managers and Responsible Persons.

10.3. As mentioned in paragraph 5.8 above it may be important to also support and educate managers and Responsible Persons to understand that they have responsibility for a higher risk occupancy, why that is the case, and the critical importance of raising and maintaining standards. A periodic audit, including regulatory action if needed, may not be the most effective way to raise standards if the audit only focuses on specific individual failures in compliance within a building or its management arrangements.

10.4. FRSs may therefore wish to consider whether applying resources to additional proactive interventions could be more effective at encouraging compliance and reducing risk, particularly in the higher life risk occupancies. Examples of some interventions already delivered by FRSs are provided below:

Primary authority schemes and MOUs with larger organisations operating higher risk occupancies with the objective of supporting those organisations to improve their strategic oversight and policy driven standards for fire safety.

Collaboration directly with higher risk sector stakeholders and other regulators in order to train their staff in basic principles of fire safety, so that they can

identify signs of risk or failure and address these issues or make referrals to the local FRS. Examples of these collaborations are with Local Authority Care and Housing Commissioners and Contract Managers, Care Quality Commission Inspectors, OFSTED, NHS, and Trading Standards and Environmental Health officers. Some of these organisations will already be covered by MOUs, protocols or concordats with NFCC and/or other regulators.

Training workshops and seminars directly for groups of managers from private sector organisations operating higher risk occupancies, such as care home operators, care providers companies, housing providers, and trade associations.

Arson reduction and security initiatives for schools.

Fire safety promotional material targeted at specific sectors.

Letters and themed guidance to operators, managers, and residents of specific occupancies.

10.5. The NFCC website and Protection and Prevention groups on Workplace provide forums for sharing best practice examples of alternative proactive interventions. Similarly, the NFCC Virtual Learning Environment hosted by LABC may have useful material that can be used to inform stakeholders and partners, and NFCC would encourage FRSs to consider these approaches if they have not already done so.

Appendix A – Examples of Higher Risk occupancies and Key Risk Influencing Factors

A.1. This appendix outlines the key risk influencing factors which help to categorise types of occupancies as higher risk, and can be split into three main categories:

High societal life risk

A.2. This category can be further broken down into the following factors:

  i   Complex or delayed evacuations strategies – evacuation strategies that result in some or all occupiers remaining in the building (or parts of the building) during a fire incident at least for the initial stages, and potentially for an extended period.

  ii   Vulnerability and dependency of residents – where many occupiers will be vulnerable and/or dependent on others. This could include reduced levels of mobility and slower movement, dependency on support to evacuate, a reduced ability to respond to an alarm sounding or fire, increased vulnerability to the effects of fire and/or smoke, or to injury from emergency evacuation or rescue handling.

A.3. In these cases, the safety of occupiers will also be critically dependent on effective risk management, emergency/evacuation plans, sufficient staffing numbers, and the decision making, response and actions of staff.

Occupancy Examples
- Hospitals and hospices   - Care and nursing homes   - Sheltered and Extra Care Sheltered housing (Multi occupied)   - Supported living (Multi occupied)   - Hostels for vulnerable or dependent residents   - Residential boarding schools and schools for vulnerable/dependent pupils.   - Secure Facilities, (although regulatory responsibility sits with other agencies)   - Prisons   - Young offender institutions   - Detention centres

A.4. Further consideration should also be given to occupancies which have complex evacuation strategies combined with a high number or density of occupants. In these cases, the potential for panic and injuries through falls and crushing is heightened, meaning there may be delays in movement, and encouragement and direction by staff may be needed to facilitate evacuation.

Occupancy Examples
- Major entertainment and public assembly buildings   - Residential blocks or other occupancies with interim measures in place due to non-compliant external wall systems or compartmentation issues

Major community or economic loss

A.5.   This category takes into account occupancy types where a fire may result in the partial or total loss of a critical community asset, or major disruption and financial loss to communities, society or the economy.

Occupancy Examples
- Hospitals   - Care and nursing homes   - Residential blocks   - Sheltered Housing and Supported living   - Schools (all types)   - Major historic or listed buildings with either architecture or contents comprising valuable heritage assets.   - Major public and government buildings   - Major national infrastructure   - Major transport hubs   - Major retail centres   - Major industrial complexes

Major impact on the environment or surrounding community assets

A.6.   This category is primarily concerned with occupancy types which could have a substantial negative impact on the environment or community in the event of a fire due to their close proximity to sensitive environmental receptors, such as rivers, lakes and other bodies of water, or critical community assets, such as hospitals, housing, and transport infrastructure.

Occupancy Examples
- COMAH sites   - Major hazardous materials storage sites

Appendix B – Glossary of Relevant Legislation and Guides

Document Title	Purpose	Link
2020 HMICFRS State of Fire and Rescue Annual Assessment	Sets out the assessment of FRS efficiency and effectiveness in England	https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/state-of-fire-and-rescue-2020-single-page-format.pdf
CFOA Fire Safety Guidance Notes and Audit	CFOA Guidance on the Audit process, including Short Audits.	http://www.cfoa.org.uk/21272
Fire and Rescue National Framework for England	Sets out Government priorities and objectives for FRSs	https://www.gov.uk/government/publications/fire-and-rescue-national-framework-for-england--2
Fire and Rescue Services Act 2004	Copy of the legislation	https://www.legislation.gov.uk/ukpga/2004/21/contents
IRMP Guidance Note 4: A Risk Based Approach to Managing a Fire Safety Inspection Programme	Guidance on RBIPs – please note this document has now been archived	https://webarchive.nationalarchives.gov.uk/ukgwa/20120919132719/http:/www.communities.gov.uk/documents/fire/pdf/IRMPguidancente4
NFCC Competence Framework for Fire Safety Regulators	Outlines for qualification and maintenance of competency	https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Protection/Competence_Framework_2020_pdf_march_2020.pdf
Regulators' Code	Lists provisions of the code	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/913510/14-705-regulators-code.pdf
Regulatory Reform (Fire Safety) Order 2005	Copy of the legislation	https://www.legislation.gov.uk/uksi/2005/1541/contents/made