



**Cumbria Fire
and Rescue
Service**

**Protection
Strategy
2022/23**



Foreword

Cumbria Fire and Rescue Service (CFRS) strive to be the most effective and efficient Fire and Rescue Service in the United Kingdom. Delivering services aligned to the broader **Cumbria County Council (CCC) Plan**, our own **Integrated Risk Management Plan (IRMP) 2019-23** and our **strategic annual Plans on a Page**.

During our recent inspection by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) CFRS was rated as good in how effective we are as a Fire and Rescue Service at keeping people safe and secure from fire and other risks.

This Protection Strategy has been developed to set out how we will deliver this commitment.

This Strategy provides an outline of the CFRS approach to protecting the built environment and the people that visit, live and work within it. This strategy outlines how CFRS will carry out its statutory duty to enforce compliance with fire safety law. This is the foundation of our future planning and it is with this core purpose in mind that we have developed the CFRS Fire Protection Strategy.

Our Fire Protection role is to work proactively towards reducing the impact of fire in commercial premises and target those that pose the greatest risk to life, property, environment and to the nation's heritage. This Protection Strategy outlines how CFRS will support businesses and other employers to meet their legal requirements, enhance safety and subsequently support economic growth. The strategy is built around the legislative framework provided by the Regulatory Reform (Fire Safety) Order 2005, the Health and Safety at Work Act and the Fire and Rescue Services Act.

In 2020 we encountered Covid 19 and the challenges this pandemic placed upon the nation. Although we are overcoming this global pandemic we have needed to adapt our activities to meet the challenge of delivering our Protection function in this environment which has the potential to last well into the longevity of this strategy document.

All our Protection activities derive from a common purpose to make 'Cumbria a safer community to live, work and visit.'



Key Drivers

There are a number of reasons why our key strategies are so important and drive our business and our approach.

Our four core strategies are a vital pillar in our planning framework and each supports the Council Plan and CFRS IRMP 2019-23. The IRMP sets out how we will deliver our services through effective Prevention, Protection and Response arrangements, using our key asset, our staff. Each of the three areas, along with our 'People and Workforce Development' Strategy contain a number of key priorities and related aims.

Legislative Requirements

There are a number of statutory functions and duties that we must carry out according to law. The core legislation is 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. A key element of the Act is that it makes the production of a National Framework document by the Secretary of State mandatory. Fire Authorities must have regard to the Framework in carrying out their functions.

National Framework Document

Under section 21 of the Fire and Rescue Services Act 2004 ("the 2004 Act"), the Secretary of State must prepare a Fire and Rescue National Framework. The Framework:

- Must set out priorities and objectives for fire and rescue authorities in connection with the discharge of their functions;
- May contain guidance to fire and rescue authorities in connection with the discharge of any of their functions; and
- May contain any other matter relating to fire and rescue authorities or their functions that the Secretary of State considers appropriate.

In setting out priorities and objectives for fire and rescue authorities in England, the requirements are best calculated to promote public safety and the economy, efficiency and effectiveness of fire and rescue authorities. The Framework sets out high level expectations; it does not prescribe operational matters which are best determined locally by fire and rescue authorities and their staff

Key objectives for CFRS in terms of our Fire Protection and Enforcement activity are:

- Reducing the risk in buildings by meeting the requirements of the Regulatory Reform (Fire Safety) Order 2005
- Arrangements for working with the business community across Cumbria for delivering risk- based Protection activity.
- Arrangements for safeguarding the culture, heritage and environmental assets in Cumbria
- Reduce the commercial, economic and social impact of fires in non-residential premises
- Working with the business community in order to reduce the number of Unwanted Fire Signals (UwFS)

Regulatory Reform (Fire Safety) Order 2005

CFRS has a statutory duty to enforce the Regulatory Reform (Fire Safety) Order 2005, which came into force on the 1st October 2006.

Since the enactment of the Regulatory Reform (Fire Safety) Order, we have a statutory duty for fire safety enforcement in all premises other than single private dwellings. It enables us to ensure those buildings that provide public access, public assets, and places of work are safe from fire and other types of incident. Our fire safety work within the non-domestic environment engages and educates those with responsibility for the design, ownership and management of premises. This will ensure the occupiers, employees, clients and customers are safer in the event of fire

Using our risk-based approach to target those most at risk, we will undertake fire safety audits prioritising resources towards premises on the basis of highest risk, thereby ensuring that our resources are targeted where they can be most effective, we will ensure we have the greatest impact with the resources available. By consulting with other regulatory services and taking a collaborative approach we will ensure appropriate solutions to protect the public using commercial premises.

Grenfell Tower

The tragic events on the 14th June 2017 where 72 people lost their lives in the Grenfell Tower fire must never be repeated again and the forthcoming changes in legislation and building requirements will help pave the pathway for future improvements and reform to Fire Protection in the built environment.

Since June 2017 CFRS is continuing to provide reassurance to residents of Cumbria, this has included:

- A review of the residential buildings in Cumbria over 18 metres high (Sand Aire House and Blackhall Croft in Kendal and Shaddon Mill in Carlisle). None of which were found to have Aluminium Composite Material (ACM) cladding.
- Additional Fire Safety Audits of other blocks of flats and commercial buildings under the 18 metres metre threshold have been undertaken to ensure fire safety standards are being adhered to and that any cladding identified provides no risk to members of the public.
- CFRS also continues to respond to actions from Central Government including data requests and contributing to national Workstreams in response to the outcomes of the Independent Review of Building Regulations and Fire Safety Final report.
- Over the coming months CFRS will have to ensure it is prepared and adopts the principles of the newly introduced Fire Safety Act 2021 Bill and the proposed Building Safety Bill along with any amendments to the Regulatory Reform (Fire Safety) Order 2005 to ensure our delivery of Protection activities meets required expected standards.



Sand Aire House, Kendal

Building Risk Review (BRR)

The BRR is a national effort, led by the Government, to make high-rise residential buildings (HRRBs) safer, and provide a better understanding of HRRBs across the country. It has come as a direct result of the Grenfell Tower disaster and is now in its second phase.

The first phase of the programme focused on ACM cladding. This saw CFRS and other Fire Services across the country, work with building owners to identify buildings with ACM cladding and report back to the Government the remediation steps they had taken to increase the safety in any identified buildings.

The second phase, which began in October 2020, involves the inspection of all HRRBs that are over 18 metres high or have six or more storeys. The target is for all buildings in Cumbria within this criteria to have been inspected by the end of December 2021.

Fire Protection Fire Standard

The introduction of **Fire Standards** mark an important milestone for Fire and Rescue Services within England. They will be used by HMICFRS as the basis of future inspection judgements and they will bring a measurable level of expectation of approach across the country, which is welcome. Not only will they enhance the professionalism of our services; they will help drive continuous improvement in our sector which is at the heart of the National Fire Chiefs Councils (NFCC) strategy. Importantly they will give assurance to our local communities.

This Fire Standard is intended as an overarching framework for CFRS delivery of Fire Protection and we will ensure as a service that the activities and behaviours detailed within the Protection standard are replicated in the way we deliver our Fire Protection function.

Key Objectives

To ensure the Protection priorities are fully serviced, a suite of Fire Protection objectives have been developed:

Objective 1: Reduction of Risk

We intend to reduce risk in buildings by targeting our resources to deliver information, education and legislative enforcement to help make the community a safer place. As such we will continue with our risk-based approach to Fire Safety inspections and audits in line with our risk-based Inspection programme.

Fire Safety Audits



Onsite assessment of the installed fire safety equipment within a building against regulations.

Our targeted risk-based inspection programme (RBIP) uses the latest data and intelligence to shape the information that supports the allocation of our resources. This approach has two benefits:

- It will ensure effective use of resources and prevent overburdening businesses with unnecessary regulation;
- It will ensure that our activities help to support business.

We are committed to providing the best possible service to our communities by appropriate and proportionate regulation. We are, however, also committed to using our enforcement and regulatory powers where necessary to ensure public safety. This enables us to make sure those buildings that provide public access and places of work are safe from fire and other types of incident.

In 2018 CFRS introduced a new RBIP which identified 2240 high risk premises. These high risk premises were prioritised for audit over a three year period resulting in our Protection team visiting these buildings and ensuring the requirements of the Regulatory Reform (Fire Safety) Order 2005 were being adhered to and taking formal actions when matters of non-compliance were identified. As a result of this proactive targeted work the recently refreshed 2021 RBIP has identified 1550 high risk premises a reduction in risk of 36% confirming the importance of proactive auditing.

We also recognise the importance of providing businesses with the right information and advice to support them in being compliant. Such an approach will enable them to make informed decisions around fire safety matters and to safeguard people, reduce community risk and reduce the potential of large financial loss.

Objective 2: Working and Supporting the Business Community

The impact of fire is far reaching, affecting not only those directly involved but also the local economy and local communities who rely on those buildings for housing, work, education, leisure or community support.

According to Government statistics the average cost of a fire in commercial premises is £43,800. Over 60% of businesses that experience a serious fire either never re-open or fail within twelve months. The additional burden that this places on people's lives and on the economic strength of Cumbria is incalculable. Our focus will be on reducing this burden as far as is possible.



We recognise the need to make sure that all buildings are safe both for the public and our Firefighters in the event of a fire or other emergency occurring. That is why the core purpose of CFRS is “to protect and improve the quality of life of the people in Cumbria.

Poor fire safety standards can lead to serious risks / hazards to persons occupying the premises should they become involved in fire. CFRS aim to reduce this risk to the community of Cumbria by not only carrying out inspections and audits but by providing advice to those who ask. Our fire safety Inspectors and Advisors are mindful of the need to achieve ‘compliance’ rather than simply discharging the acknowledged ‘duty to enforce’.

A competent and transparent service offering timely and accessible advice to those willing to comply is more likely to result in a safer and more prosperous community, as opposed to the rigid application of hard enforcement measures.

This does not preclude the need, where necessary, for each Responsible Person to ensure a competent person carries out a risk assessment. This is especially pertinent where specialist or professional advice may be required. The enforcement sanctions we use still continue to be subjected to the principles set out within the Enforcement Management Model (EMM).

Objective 3: Protect Cumbria's unique heritage

Government guidance in relation to IRMP's on the protection of Heritage Buildings and structures notes that:

"Whilst Fire and Rescue Authorities have a legal responsibility to ensure that effective arrangements are in place to deal with an incident that could adversely affect the rich heritage of our country through both planning and response, a moral responsibility also exists to ensure that the quality of life of the public is improved through the concept of sustainable development".

There is a growing expectation that Fire and Rescue Services will develop an understanding of heritage buildings in their area and develop appropriate prevention, protection and response strategies. In 2017 The Lake District was awarded Unesco World Heritage status. CFRS has identified all significant heritage sites in the county and mapped these to each individual operational station and over the duration of this Strategy the Service will use this intelligence to ensure that our heritage is protected to the best effect. Protecting historical buildings from fire is often more complex, the level of protection should be high without destroying the historical value and appearance.

CFRS cares for its cultural heritage and wants to protect it. We need to be vigilant to the danger from fire in these historical buildings and not to underestimate the possibility of a fire. In order to protect the vast amount of heritage within Cumbria we will work in partnership with owners, responsible persons and other stakeholders such as English Heritage to reduce and minimise the impact of fires and other emergencies that have the potential to seriously damage or completely destroy these important structures.

CFRS will provide additional support and guidance to Heritage premises and continue to improve engagement to ensure that these premises can comply with the requirements of the Regulatory Reform (Fire Safety) Order 2005 without adversely affecting the nature of these premises including supporting the development of salvage plans to ensure our 'past' is available for future generations to enjoy.



Objective 4: Reduce the impact of Fires in Non-Residential Premises

Since the introduction of The Regulatory Reform (Fire Safety) Order 2005 CFRS has completed compliance audits of known high, medium and low risk premises throughout County. This has been achieved through our RBIP to drive proactive inspections of premises, influenced by matters such as societal risk, fire safety history and operational attendances (including frequency of unwanted fire signals and automatic fire alarms (AFA) and fire incidents.

This activity is supplemented by an intelligence led approach to auditing and inspecting premises, using information received from a range of sources including partners, complaints, other CFRS operational crews and staff. Professional judgement and a combination of these inputs along with other distinct parameters inform our inspection planning and determine the frequency of inspections based upon risk.

In April 2019 CFRS Introduced the concept of Operational Business Engagements (OBE) concentrating resource to our low risk business premises. These engagements are delivered by our Operational personnel following a period of training and mentor support. The concept is built upon these crews asking a number of questions of the Responsible Person around their responsibilities under The Regulatory Reform (Fire Safety) Order 2005 following a set proforma and culminates in an inspection of the means of escape routes to confirm compliance. This approach has made a significant contribution to our levels of engagement within the business community and we are enhancing this provision further by training our personnel who coordinate the OBE to a Level 3 certificate in Fire Safety which will provide them with additional Knowledge and understanding within the Fire Protection environment.

CFRS enforce the provisions of the Regulatory Reform (Fire Safety) Order 2005 in accordance with the principles of better regulation set out in the Statutory Code of Compliance for Regulators, and the Enforcement Concordat. The Fire Safety structure within CFRS has both Fire Inspectors and Fire Safety Officers who conduct inspections of low, medium and high risk premises throughout the County, in addition to conducting post-fire audits where appropriate.



CFRS risk based approach to inspecting and auditing premises is based on Communities and Local Government Integrated Risk Management Plan Guidance Note 4, which is informed by its Fire Risk Management Database and takes account of our Risk Model. The determination of risk is based upon the following:

- The use to which the premises is put
- The historical incidence of fire in each premises type
- Historical rates of fire deaths and injuries in each premises type
- The Fire Safety provisions within the premises
- The extent to which those provisions are maintained
- The standard and history of fire safety management by those responsible within the premises.

The relative risk rating produced from completion of our National Fire Chiefs Council (NFCC) Audit form dictates the levels of outcome and enforcement where necessary and also dictates the frequency for future audits.

Objective 5: Further reduce Unwanted Fire Signals (False Alarms)

The current policy for dealing with Unwanted Fire Signals (UwFS) within CFRS is based upon the Call Challenge procedure from within North West Fire Control (NWFC). UwFS are an unnecessary use of resources; the results of attending such incidents can divert a vital emergency response from attending real emergencies and each blue light vehicle movement increases the risk to pedestrians, road users and Firefighters. It also affects the valuable time that crews are available to complete important community safety work within Cumbria.

In 2018 CFRS changed the procedure for responding to UwFS in that we will not respond to non-sleeping risk premises, unless the caller reasonably believes a fire has broken out. Industrial sites which are licensed under COMAH Regulations and selected other Heritage and special risk sites are excluded due to the risk they possess. All calls to sleeping risk premises will receive a Pre-Determined Attendance (PDA) of 1 appliance at all times.

This change in response has seen a **64%** reduction in UwFS calls which has provided the opportunity to use this time more effectively across other Protection, Prevention and Training activities.

Although this reduction of 64% is a great success we must nevertheless continue to reduce response to UwFS that occur generally as a result of automatic fire alarm activations; persistent offenders are dealt with by our newly appointed Business Fire Safety Advisors who will identify such persistent offenders and work with the Responsible Person of these premises in order to eliminate such UwFS.



Conclusion

The aim of CFRS is to protect and improve the quality of lives of the people in Cumbria. CFRS will strive to be a Fire and Rescue Service that works with residents, businesses, communities and other organisations to deliver the best services possible within the available resources.

To achieve this outcome through our CFRS Protection Strategy we aim to influence and regulate the built environment to protect people, property and the environment from harm. If we are successful, the outcomes will be:

- Fewer emergency calls
- Fewer deaths and injuries from fires and other emergencies
- Less crime and disorder
- Less property damage and economic loss
- Less damage to the environment
- More business resilience and economic growth
- Our heritage preserved
- High public satisfaction with our services.





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