

GLOUCESTERSHIRE FIRE AND RESCUE SERVICE

FIRE SAFETY AUDIT AND DATA GATHERING GUIDANCE NOTES FOR INSPECTORS

Gloucestershire Fire & Rescue Service

Subject: REGULATORY REFORM (FIRE SAFETY) ORDER 2005 AUDIT PROCEDURES

INTRODUCTION

The Regulatory Reform (Fire Safety) Order 2005 “The Order” introduced in 2006 replaces the two major pieces of fire safety legislation, the Fire Precautions Act 1971 and the Fire Precautions (Workplace) Regulations 1997 as amended. The Order also consolidates the fire safety provisions of other legislation (Management Regulations and Dangerous Substances and Explosive Atmosphere Regulations) under one simplified set of goal-based requirements.

The Order builds on the 1997 Regulations in that it applies not only to persons at work, but to all persons lawfully on the premises and those not on the premises but in its vicinity who may be affected by a fire on the premises. As with the 1997 Regulations, risk assessment is the basis for compliance and the responsible person, in the circumstances defined by the Order, is held liable in the case of any breach.

The Order applies to all premises except those listed in Article 6(1) (a)-(g) 6(2).

Gloucestershire Fire and Rescue Service has responsibility for the enforcement of the provisions of “The Order” in premises within its area subject to the exceptions detailed in Article 25(b)-(e) using inspectors appointed under Article 26(1).

DEFINITIONS

The main definitions used in this directive are listed below, the full list can be found by referring to Article 2 of The Order.

“**relevant person**” means;

- any person (including any responsible person) who is or may be lawfully on the premises. and
- persons in the immediate vicinity of the premises who are at risk from a fire on the premises.

Note - But this does not include a fire fighter carrying out his/her duties in relation to the functions of a fire and rescue authority insofar as they relate to fire-fighting, road traffic accidents and other emergencies.

“**premises**” includes any place and, in particular includes;

- any workplace;
- any vehicle, vessel, aircraft or hovercraft
- any installation on land (including the foreshore and other land intermittently covered by water), and any other installation (whether floating, or resting on the seabed or the subsoil thereof, or resting on other land covered with water or the subsoil thereof); and
- any tent or movable structure.

Responsible Person

The process of enforcement can only be taken forward by dealing with the responsible person and in this respect “**responsible person**” means;

- in relation to a workplace the employer, if the workplace is to any extent under his/her control;
- in relation to any premises other than a workplace
- the person who has control of the premises (as occupier or otherwise) in connection with the carrying on by him of a trade, business or other undertaking (for profit or not);

or

- the owner, where the person in control of the premises does not have control in connection with the carrying on by that person of a trade, business or other undertaking.

Inspectors will need to use their powers to identify the responsible person(s) in respect of premises. In premises constituting a workplace, this would normally be the employer, but enquiries about responsibility can be made of the following:

- The employer
- The general manager
- The health and safety manager
- A nominated agent of the employer or other person having control.
- The owner in respect of matters outside the employer’s control.

Note: *Those individuals at (b), (c) and (d) should only be dealt with in the absence of the employer, and where responsibility for fire safety forms part of their contractual duties. The owner in (e) can be dealt with once it is established that certain parts of the workplace (generally common parts) are outside the employer’s control.*

In the case of premises in multiple occupation, the employer is under an obligation to comply with the Order, insofar as his/her control extends. Where a person other than the employer exercises control (such as in the common parts of multi-occupied premises) legal responsibility rests on such persons. The inspector must use his/her powers under the Order to ascertain who has control, and therefore an obligation to comply with the Order. In some cases an informal approach to the employer/owner may prove to be the most appropriate. However, where there is no transparency, investigation may require the examination of documents, such as leases and contracts under the powers in Article 27.

“**workplace**” means any premises or part of premises, not being domestic premises, used for the purposes of an employer’s undertaking and which are made available to an employee of the employer as a place of work and includes;

- any place within the premises to which such employee has access while at work; and
- any room, lobby, corridor, staircase, road, or other place;
- used as a means of access to or exit from that place of work; or

where facilities are provided for use in connection with that place of work, other than a public road.

Risk Based Inspection Programme

The development and management of a Risk Based Inspection Programme will provide important data to assist in the development and evaluation of the Service's Integrated Risk Management Plan (IRMP). This will enable The Service to fulfil its duty to manage the fire risk in the community.

The final decision on the level of enforcement to be taken following an inspection and assessment of risk in any premises will embody the principles, expectations and methodology of the Enforcement Concordat and satisfy the Enforcement Management Model (EMM) produced by the Health and Safety Executive (HSE), which is considered national best practice.

There are three principle areas that will enable G.F.R.S. to manage the fire risk in the community. These are:

- ***Fire Prevention (Community Safety)***
- ***Fire Protection (Fire Safety Enforcement)***
- ***Fire Intervention (Operational Response)***

The integrated approach recognises that activity in one or more of these areas has the potential to reduce the risk in the community. However in situations where it may not always be possible to reduce the risk to an acceptable level using Statutory or Community Fire Safety initiatives, the information gathered will be used to provide an appropriate level of fire cover (**Fire Intervention**)

Determining The Level Of Risk

The Risk Based Inspection Programme forms part of the Service's overall integrated approach to fire risk management by prioritising the inspection of premises. It will initially be necessary to determine the level of risk in the premises in question. This will be determined by the carrying out of an audit, which will, on completion apply a **risk rating**. The risk to individual persons will be of concern to inspectors carrying out the audit, however it will be the potential for the loss of life or serious injury that will have a major influence on the level of risk determined.

The findings of the audit process and any **risk rating** applied to a premises, will be stored within the Fire Safety Data Base. This will not only be influenced by life safety considerations but also the potential loss or risk to the community, at a local or national level.

When determining the risk presented by a particular premises the following factors will be considered. The following list is not an exhaustive list and each area must be assessed on an individual basis using all relevant factors:

- Type
- Type of structure
- Use
- Nature of occupants
- Furniture, fittings and surface finishes
- Processes undertaken/materials stored
- Potential sources of fire (accidental or deliberate)
- Potential fire spread internal and external
- Structural fire protection
- Compliance with parts B1-B5 of Approved Document B

- Fire precautions provided
- Standard of fire safety management
- Location
- Access
- Water supplies
- Operational needs
- Safety of fire-fighters
- Environmental impact of any fire

Professional judgement will be required as part of the overall process and an initial estimation of the levels of risk, for most occupancy types, can be undertaken according to variations in the following:

- The provision of active and/or passive fire safety systems
- The level of fire safety management provided, or
- The size and undertaking of the workplace

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As increasingly sophisticated community risk models are developed to support the IRMP, the audit process for a premises must be reviewed and made compatible across all areas that impact on fire service activity, particularly a correlation between the levels of risk for a Fire Safety Inspection Programme and the statistical information that supports Fire Prevention and intervention initiatives.

In order to demonstrate that the Fire Authority is meeting its legislative responsibilities it is critical that at every stage the processes by which the levels of risk and the resulting inspection activity have been determined are reasonable, are recorded, transparent and auditable.

Risk Assessment Principles

The employer, either as part of a general review of health and safety risks or as a specific exercise, should assess the risk from fire in the workplace. The following checks should be included:

- That a fire can be detected in a reasonable time and those relevant persons can be warned,
- Those relevant persons who may be in the workplace can get out safely,
- That reasonable fire-fighting equipment is provided,
- Those relevant persons in the premises know what to do if there is a fire,
- That all fire safety equipment is checked and maintained at the required time periods, and to a satisfactory standard.

Where an employer employs 5 or more people (whether or not they are at work in the workplace at any one time, or at separate workplaces), he/she must keep a written record of the risk assessment and fire policies in respect of each workplace. The record should include all the identified significant findings and the measures taken to deal with them. The requirement for a written record depends on the number of people employed, whether they are licensed, have an alterations notice on the premises, not **where** they work.

The Audit Process

The process for carrying out the fire safety inspection of premises is determined by the level of risk presented by those workplaces regardless of what other

legislation might apply to them. The risk-based audit will form the basis of the inspections.

There is guidance to our fire safety inspectors that gives general guidance on the level of acceptable risk for a workplace, but this risk level can be varied according to local circumstances such as:

- Historical information on the workplace concerned
- A visit to a workplace under Fire and Rescue Services Act 2004
- Reports on fires attended
- Local trends or socio-economic factors
- Fire risk assessments by or on behalf of responsible persons or other bodies such as HSE, local authorities and Environment Agency

Time-based inspections will be the outcome of any audit, but within each year a few premises will be randomly sampled based on resources available. It must be recognised that the rating that initiates a timed re-inspection will move at the discretion of fire safety management when considering the resources available.

The risk-rating represent levels of risk and are a guide to overall priorities for inspection. They **cannot** be used to dictate the enforcement action to be taken.

Audit Principles

The following paragraphs are provided to give **guidance** on audit principles to those inspectors who may be unfamiliar with this type of inspection.

The process of audit is designed to allow the inspector to determine if the process or procedure, subject to the audit, is in practice a true reflection of theory. It is the system, process or procedure that is subject to audit and not the people within that system, process or procedure.

*For example, the audit of staff training procedures will look at the sequence of events, detailed in writing, being performed in reality. If the procedure states that **all staff** will receive comprehensive fire safety training on a quarterly basis, the inspector will expect to see evidence that this is true.*

The efficiency with which the task is completed may be of relevance but is not what the inspector is looking for. Only if the task is not carried out will reasons be looked for.

The fire safety inspector will start by looking at a system and frequency for review, to ensure it is actually in place. Following this each element of the system will then be checked, including the review process.

The important factors to be considered are:

- Establish that a system exists (policy or procedure)
- Check each element (hazard identification, risk assessment, control measures, review)
- Only check samples (select particular components of each element)
- Check by observation and communication (look and listen for evidence, talk to persons)
- Identify deficiencies (in the areas selected for audit)
- Address deficiencies

Conducting The Audit

Prior to the Inspection

Time must be taken to prepare for the audit. If the premises are known, then careful research of the last inspection should be undertaken. Particular attention must be given to all factors that will affect the overall risk rating of the premises, these will include not only life risks but also those to facilitate IRMP, compliance with parts B1-B5 of the current Building Regulations, fire-fighter safety and the effect of any fire in the premises on the environment as they will need to be recorded in Part A and Section 1.

The occupier should be contacted by telephone and an appointment made giving sufficient notice. The occupier will be referred to the relevant guidance document (Fire Safety, Risk assessment Guidance) and informed of the nature and duration of the audit in addition to the documentation that the inspector will require to examine. A note of the telephone number of the contact is to be made and left on the premises file and the inspector's desk diary or schedule.

NOTE: - Where an appointment cannot be kept, for whatever reason, the occupier will be informed by either the inspector or a third party where this is not possible.

In circumstances where an occupier refuses an inspector entry or becomes abusive or aggressive, inspectors will confirm their powers under the relevant legislation. Where the occupier continues to be obstructive the audit will be terminated, and the occupier informed that if the obstruction continues they could face prosecution. A contemporaneous note is to be made of all events and actions in the notebook and a note placed on the premises file.

Person Responsible for Fire Safety at a Single Occupancy Premises

The inspector's initial objective is to identify the employer(s) responsible or a person delegated the responsibility by the employer (hereafter referred to as the person(s) responsible).

Person Responsible for Fire Safety in Multi-Occupied Premises

In multi-occupied premises the first point of contact should normally be the building manager (owner and/or agent) who will normally have responsibility for the building overall, and in particular the common parts and common fire safety systems. During the initial contact with this person GFRS staff should tell that person that we wish to see a copy of his risk assessment and also a copy of all of the different occupiers (as he should have looked at these to make his overarching assessment).

It is vitally important to note that Fire Safety responsibilities in a multi occupied building extend beyond the part(s) of the premises they occupy to a place of ultimate safety. This will include (as a minimum) shared responsibility for the common parts within the multi-occupied building.

In multi-occupied premises person(s) responsible for FS have a responsibility to co-operate with each other and any other person who has control overall of the premises to ensure adequate fire safety measures are in place. It is not acceptable for person(s) responsible for FS in multi-occupied premises to simply tolerate inadequacies in the common parts of the premises on the basis that a third party has principal control.

Employers Fire Safety Management Plan (or equivalent)

Every person(s) responsible for FS shall make arrangements as appropriate, having regard to the nature of their activities and the size of their undertaking, for the effective planning, organisation, control, monitoring and review of the preventive and protective measures. (Preventive and protective measures mean the measures identified in the risk assessment (significant findings) the responsible person needs to make to comply with the regulations and prohibitions imposed upon him/her by or under The Regulatory reform (Fire Safety) Order, this shall be recorded where 5 or more employees are employed). In order to develop and maintain the safety of the building and that of employees and other relevant persons, the building management team should have formulated and documented a suitable and sufficient fire safety strategy.

This strategy may include a **fire safety manual** in which technical specifications for all aspects of the workplace are included i.e.

- A fire safety policy statement appropriate to the building configuration, location, occupation and use. The fire safety policy statement should include general safety issues related to the use of the building and the aims and objectives of the proposed management system and its methodology.
- Fire safety specification for the workplace including plans where appropriate.
- Safety management structure.
- Continuing control and audit procedures.
- Actions to be taken in a fire emergency.
- Fire drills.
- Housekeeping.
- Planned maintenance procedures.
- Staff training.
- Security.
- Record Keeping.

In order to maintain the effectiveness of the fire safety strategy, it will be essential that staff are informed of these procedures and trained where necessary, also regular and effective testing and maintenance procedures are to be conducted and evidence of this is documented.

Reviewing the Risk Assessment

At some point in the workplace fire safety audit an examination of the fire safety risk assessment and emergency plan is necessary. These documents underpin the rationale for the fire safety strategies within the workplace. The inspector must use **professional judgement** to form an initial view regarding the safety case presented and decide to what extent these matters will require verification.

Past experience has shown that there are a considerable number who are unaware of their responsibility to carry out a fire risk assessment. However, even where there is no risk assessment available most person(s) responsible for FS do have a general, if incomplete or imprecise, understanding of their responsibilities for fire safety in the workplace. In many cases they may have taken some action to meet these obligations.

In the absence of a written fire risk assessment, the inspector must establish what, if any, control measures are in place.

This process will enable the inspector to gauge the extent of the person(s) responsible for FS understanding of their responsibilities and provide an opportunity to **educate** and **inform**. Understanding and acceptance of responsibility should be seen as one of the primary purposes of the fire safety audit.

Emergency Plan

The responsible person should ensure that:

- Relevant persons on the premises know what to do if there is a fire,
- The premises can be safely evacuated,
- There is a written plan where five or more people are employed, and
- The written plan is available for inspection by the fire authority.

In drawing up the emergency plan, the employer should take the results of their risk assessment into account. If the premises are in a building, which is shared with other employers or occupiers, the emergency plan should be drawn up in consultation with those employers and the owner(s) or other people who have any control over any part of the building.

Documentation

A range of documentation will support any effective management system. The inspector will inspect available documents to obtain evidence that effective systems are in place.

In addition to the written risk assessment this evidence should include the emergency plan, service records, staff training records, fire drill records and the company policies and procedures relating to fire.

The inspection of documents need not be exhaustive; the inspector should record those documents seen, including the date of each document. The aim is to establish the current position, raise management awareness and assist in forming a view about how detailed the physical inspection of the workplace will need to be.

Verification of Standards

Verification is completed by a physical inspection of some or all of the workplace to check compliance with the Regulations. The extent of the inspection will be dictated by the initial perception of the inspecting officer, for example in a clearly well managed large, moderate risk industrial premises the inspection may not extend to the whole site, whereas in a smaller premises involving sleeping risk it is likely to be comprehensive. The inspection **must always** include the **risk critical constituent** and **may** include a **sample constituent**.

Risk Critical Constituent

The fire safety audit will include a physical inspection of at least one of the following parts of the building.

- Common parts and fire safety systems of multi-occupied premises
- Final exits
- Protected/external staircases
- External routes

- Areas licensed for public entertainment

NB - Where major deficiencies are found in the sampled risk critical elements a full inspection of all risk critical elements is to be made.

Sample Constituent

The selection of the sample constituent will follow when the risk critical constituent has taken place. By this stage the inspector will have enough information to form a comprehensive view regarding the standard of the workplace and must now exercise professional judgement to decide the extent of the additional sample constituent to be inspected. When making this decision inspector should include areas that appear to be, the greatest risk. In a single occupied building no further verification may be necessary. When considering the sample to be inspected, inspectors should take into account any relevant history on the premises file. Particular account should be taken of records that indicate a higher level of risk in a certain area of the premises.

Where areas of high fire risk are noted during the risk critical constituent the inspector may wish to include these in the sample constituent e.g. industrial kitchen, spray booth, highly flammable store, vulnerable occupants etc. Multi-storey single occupied premises, where the risk profile is uniform, the recommended approach is to randomly sample enough floors to satisfy the professional judgement of the inspector

In multi-occupied buildings a different approach is required. Multi-occupied buildings will contain a number of individual premises, and as such a number of person(s) responsible for FS

When carrying out a verification inspection, an audit of the premises or areas with the highest risk should be sampled but **all** individual premises are to be visited in order to assess, educate and inform the person(s) responsible for FS. Part A of the form will be completed for each occupier.

If in the professional judgement of the inspector, there remain areas of concern following the sampling and verification process, a full inspection should be carried out.

Risk Rating

The relative life risk score is obtained using the frequencies of fires in buildings taken from FDR data. A [Risk Level Calculator](#) is available within our current fire safety software system which will determine this risk level when the enforcement administrators input the information

Educating and Informing

Educating and Informing responsible persons and others about their duties under the Regulations is a fundamental part of the enforcement regime of Gloucestershire Fire and Rescue Service.

Educating and informing serves two purposes:

- To provide an initial level of enforcement activity where a premises gives no immediate cause for concern but no risk assessment has been completed.

- To provide an efficient method for dealing with a predictable need, i.e. lack of knowledge concerning responsibilities under the Regulations.

After The Audit

When the audit has been completed, the overall **Compliance Level** from the form will be compared with G.F.R.S.'s proposed enforcement level (appendix 1), which will offer the range of enforcement options to be considered.

A meeting with the responsible person is to be held where possible, to discuss the areas of non-compliance, and the possible enforcement options available.

Just as important as enforcement action, encouragement should also be given for compliance. If appropriate, observations should also be made to encourage the process of continual improvement.

The inspector should use the completed form as basis to prepare additional reports or considering the appropriate enforcement action. When all work on the file is completed the form shall be retained on the file for future reference and quality assurance purposes.

The Audit Form

The form is a two part form used not only for the audit of fire safety provisions within a premises but also as a vehicle for the collection of operational data required for inclusion in the Integrated Risk Management Plan (IRMP) and to populate the ODPM risk predictive software FSEC

Fire safety inspectors will complete parts A & B of the form when carrying out a fire safety audit of premises.

The purpose of the audit is to ensure a responsible person is in compliance with fire precautions legislation. As an auditor, it is better to think of yourself as someone who can help a responsible person, rather than someone who is looking for faults, as it should be remembered that the Fire Safety Audit process embodies the expectations and principles of the Enforcement Concordat

Completing The Form

Part A, Part B Articles 8, 9, 10, 11, 13, 14, 15, 17, 18 & 21 are **mandatory** and will be completed on every occasion. The inspector will use professional judgement to decide which, if any, of articles 12, 16, 19, 20, 22, 23, 29, 37 & 38 of the form will be completed during the sample constituent of the audit. (*Except for premises such as village halls, etc. where it is obvious that the building is small and no risk is present. In this case only Part A will be completed and a risk rating of 1 or 2 (dependant on risk) will be used to populate the re-inspection frequency*).

Part A of the form gathers information for use with IRMP. For the avoidance of doubt a description of the more complex items is covered below

Premises ID

UPRN Number

Stands for "Unique property reference number" you can ignore this section

Occupancy Profile

Specifically, the risk assessment is based on the maximum number of people in the most highly occupied compartment during weekdays and weekends in order to identify the maximum number of people who may be affected by an uncontrolled fire within 30 minutes of ignition, assuming no evacuation. The number of persons at risk may be all of the occupants, or only a fraction of all the people in the building. This requires a judgement of the proportion of the building through which the fire and/or smoke may spread within 30 minutes. The estimate should include the effect of fire or smoke stop doors but ignore the action of active fire suppression and smoke control systems such as alarms, sprinklers and shutters.

For example, the number of persons at risk may be confined to those located in the compartment of origin, if it is thought that fire and smoke may be contained in this area by fire doors, walls, etc., for the first 30 minutes. However if it is thought that fire may spread rapidly through the building or into MOE, the maximum probable loss of life may include all occupants.

The occupancy pattern for a school might be

| Weekdays | | Weekends | |
|----------------|------|----------------|----|
| 00:00 to 04:00 | 0 | 00:00 to 04:00 | 0 |
| 04:00 to 08:00 | 10 | 04:00 to 08:00 | 0 |
| 08:00 to 12:00 | 1400 | 08:00 to 12:00 | 40 |
| 12:00 to 16:00 | 800 | 12:00 to 16:00 | 40 |
| 16:00 to 20:00 | 30 | 16:00 to 20:00 | 0 |
| 20:00 to 24:00 | 0 | 20:00 to 24:00 | 0 |

Some staff in staff room

Classroom full of pupils involved in after school activities

Sports hall occupied every Saturday during term time

All pupils in assembly hall at 09:00 for morning assembly

Occupants of dining hall at lunchtime

You should also note that:

HMOs of three or more storeys, including bedsits, tenements and houses converted to flats, should be assumed to have no less than 20 to 50 occupants for all time periods. They can have more, but should never have any less.

Pubs and licensed premises should be assumed to have at least 20 to 50 persons present during one or more time period(s).

All certificated premises (hotels, hostels, care homes, hospitals, etc), should be assumed to have at least 20 to 50 persons present during one or more time period(s).

For shop units located within a shopping mall, the maximum loss of life needs to have regard for the possibility of fire / smoke spread into the wider structure, i.e. from the shop unit into the shopping centre.

Occupancy Type

VO Number - Taken from appendix 2 (VO Codes)

FSEC Group - Taken from table 1 below

The various occupancy types are shown in Table 1

| Occupancy Type | FSEC Code |
|-----------------------------------|------------------|
| Hospital | A |
| Care Home | B |
| HMO, Tenement. | C |
| Purpose -built Flats >= 4 storeys | D |
| Hostel | E |
| Hotel | F |
| House converted to Flat | G |
| Other Sleeping Accommodation | H |
| Further Education | J |
| Public Building | K |
| Licensed Premise | L |
| School | M |
| Shop | N |
| Other Premises Open to the Public | P |
| Factory or Warehouse | R |
| Office | S |
| Other Workplace | T |

Description of Occupants

This question asks about the predominant type of occupant living in, working in or visiting the building. Are the people more or less vulnerable than the type of person you would expect to find in this type of premises? For example, in an ordinary care home you would expect a normal mix of ambulant and non-ambulant elderly residents. However if the majority of the residents were bedridden, the occupants would be classed as atypically vulnerable.

In an ordinary school you would expect a normal mix of ambulant and non-ambulant children. However if it were a school for the blind the occupants would be atypically vulnerable. On the other hand if it was a sports academy school the occupants might be considered atypically mobile.

Sole Supplier

Examples include unique centres for the manufacture of specific articles in the UK such as Vickers Defence or the treatment of a particular disease available only at certain hospitals.

Exceptional value

You should include details of properties with a value close to or exceeding £100,000,000. This approximates to the rebuilding and restocking of a large shopping mall such as the Eastgate Centre or Regent Arcade.

Heritage Risk

You should provide details here of whether the building being assessed is of national or international significance. There are no hard and fast rules, but if the building is listed on the National Monuments Record maintained by English Heritage, it could be considered a heritage risk. English Heritage has web sites that might prove useful.

Community Loss

If the building was being assessed is a significant loss (high numbers employed, school where no viable alternative can be used); it should be identified in this section

Environmental Risk

You will need to establish whether the building or its contents pose a risk to the environment in the event of a fire. Hazards might include radiation or chemical risk or materials that may produce large volumes of hydrocarbon smoke such as tyres or foam products.

Property Loss

This requires a judgement of the proportion of the building through which the fire may spread within 30 minutes. The estimate should include the effect of fire or smoke stop doors but ignore the action of active fire suppression and smoke control systems such as alarms, sprinklers and shutters and human intervention and state whether it is likely to:

- Be confined to the room of origin;
- Be confined to the compartment of origin;
- Be confined to the floor of origin;
- Be confined to the building of origin; or
- Spread to adjacent buildings.

When dealing with room, compartment, floor or building of origin you should provide an estimate of the damage to within 50 square meters. For fires involving adjacent buildings you should record one of the following:

- Less than 500m².
- 500m² to 999m².
- 1,000m² to 9,999m².
- 10,000m² to 100,000m².
- Over 100,000m².

Fire-fighter Risk

You will need to establish whether the building, or its contents, could pose a risk to fire fighters. Hazards might include:

- Building construction that could lead to rapid structural collapse of floors, walls and or ceilings.
- Contents, e.g., hazardous chemical storage.
- Processes, e.g., foundry work, gas or vapours under pressure.
- Internal layout, e.g., large complex internal layout with or without restricted points of entry.

Premises Features

Firefighting Facilities

These are features that support firefighting within the premises

Smoke control systems

You would select 'yes' if the building has a modern automatic smoke control system provided in means of escape and/or common areas to either extract smoke from the area, or maintain positive pressure in means of escape. You also need to indicate what type of system it is, natural or mechanical.

Sprinklers

Does the building have an operable sprinkler system? You should estimate an approximate percentage of coverage e.g. if only one floor of a two storey building is sprinklered you would state that sprinklers protect 50% of the building. You also need to indicate what type of system it is, a life system can normally be identified by its dual water supplies.

Building Features That May Assist Fire Spread

Need to ask occupier about voids, ducts, false ceilings, etc. and indicate the type of hazard that it is in the boxes provided.

AFA Present

Is the AFA system remotely monitored?

Fire warning system

Your aim here is to establish whether or not the 'standard' of the fire warning system installed in particular premises is:

- Adequate,
- Less than adequate, i.e., the occupants of the building are at greater risk than those in a similar building which has a standard system,
- More than adequate, i.e., the occupants of the building are at less risk than those in a similar building, which has a standard system.

In most cases the fire warning system will be 'standard'. However you may get occasions when the fire warning system is above or below standard. You should consider the circumstances as to why a higher standard of fire warning system has been installed. It may be that it compensates for a deficiency in another fire protection measure, such as a tortuous means of escape. If this were the case you would probably treat it as 'standard' because it does not make the building any safer than a standard installation.

Building Size

Refer to Appendix A in the **audit** form

Height Of Building

Does not include basements and a building with a ground, 1st and 2nd floor has 3 storeys. If your premises has a range of differing height buildings use the most common height for this section

Basements

Number of **levels** of basements in premises

2 Bottom Rows

Which are, No Storeys in height and No of levels of basement and Number of basements where appropriate **are for Multi-occupied premises only**

Part B

Each of the remaining sections of the form is divided into five areas.

- The Article number and brief description
- Some of the wording from the legislation
- Areas of consideration, which are a prompt for inspectors
- Deficiencies, which is a free text box for inspectors to make notes
- Compliance level for the section, which needs to be ticked appropriately.

The **deficiencies** area will form supporting evidence to your contemporaneous note for use in any legal proceedings, which may follow. Items identified in this section will be used also for inclusion in a report or discussion with the responsible person on completion of the audit.

The inspector must exercise professional judgement to decide the level of compliance in any given section during the audit, based on certain areas for consideration. The list of **areas of considerations** for each section is not exhaustive, and is intended as an aid for the inspector when considering the compliance level.

There may be further items that the inspector will wish to take into consideration when making a determination of the compliance level in a particular section.

Each section of the form used will be given a numerical value of 1, 3, 5 or N/A (where appropriate).

N/A = Not Applicable

1 = Fully compliant.

3 = Partially compliant.

5 = Non-compliant.

The level of compliance for each relevant section is indicated by placing a tick in the appropriate box in the **compliance level** area at the end of that section.

Note –If the not applicable option in these mandatory sections are ticked then it must be remembered that when we collate the risk level **that this section and any other sections not used are ignored.**

Correct and accurate completion of the form will enable the inspector to better assess the risk rating for the workplace and decide the level of enforcement applicable (if any) when the audit is complete. In general, any non-compliance will be addressed through the appropriate enforcement strategy as detailed in G.F.R.S.enforcement policy (appendix 1).

Each inspector will adopt his or her own style when conducting an audit. However the form and its methodology shall be used on **every** occasion a fire safety audit is carried out to ensure a consistent approach across the service.

On completion of the audit the numerical values for each section are to be totalled and the result entered into page 11 **results of audit**.

To ensure we are compatible with the Enforcement Management Model (EMM), the line manager will use GFRS's EMM document for all audits that require a enforcement notice (or greater) to be served

The meaning of various articles that form Part B of the audit form are outlined below

Article 8

Article 8 is one of the few inclusions in the order that did not form part of the WPRregs, Man Regs or DSEAR. It was inserted to cover specific 2 areas, firstly to cover the safety of relevant people as the previously mentioned legislation was written in the main for employees not relevant people.and secondly as a coverall for any fire safety matter that was not specifically covered within the order. If you review the wording of article 4 (which article 8 "general fire precautions" refers to) you will see that any fire safety matter can be included in this section. However officers must remember that Article 8 can only be used if there is no specific section in the order dealing with this issue.

Article 9

This section deals with the production of a fire risk assessment and clearly states that the wider issues such as dangerous substances and young people have to be considered. There is a need to record the findings if you employ 5 or more employees, are licensed or have an alterations notice.and it must be update as necessary.

Article 10

This article states that where the responsible person implements any control measures to deal with any findings uncovered by his risk assessment, these controls must be in accordance with the hierarchical list detailed in Part 3 of Schedule 1which clearly states that wherever possible the first line of defense must be to avoid the risk and the last line of defense is to give instruction.

Article 11

This article states that the responsible person must create policies that plan, organise, control, monitor and review (HSG 65) any findings from his risk assessment. The depth/size of these policies should be commensurate with the size and risk presented by the premises and if you employ 5 or more employees, are licensed or have an alterations notice these must be recorded.

Article 12

This article states that risk from dangerous substances to people must be reduced, eliminated, replaced, mitigate the effects and store, handle and transport it safely. It must be remembered that all of these points only apply where the dangerous substance affects the "General Fire Precautions".

Article 13

This article covers what the responsible person needs to consider with regard to fire fighting and fire detecting systems.

Article 14

This article covers what the responsible person needs to consider with regard to emergency routes and exits.

Article 15

This article covers what the responsible person needs to consider with regard to evacuation from the premises.

Article 16

This article states that the responsible person has to consider the following issues that can help deal with an accident, incident or emergency involving dangerous substances. These are information about emergency arrangements, hazards posed, consideration of warning devices, additional escape facilities, liaison with emergency services, actions necessary, PPE, equipment, etc. It must be remembered that all of these points only apply where the dangerous substance affects the "General Fire Precautions".

Article 17

This article covers what the responsible person needs to consider with regard to maintenance of fire safety provisions to satisfy this order

Article 18

This article covers what the responsible person needs to consider with regard to appointing people to assist him with his responsibilities under the order

Article 19

This article covers what the responsible person needs to consider with regard to informing his employees about risks present, findings from the risk assessment, the identity and responsibility of people who have duties to perform under the order and dangerous substances.

Article 20

This article covers what the responsible person needs to consider with regard to informing employers and the self employed from outside undertakings who are present on his premises about risks present, findings from the risk assessment and the identity and responsibility of people who have duties to perform under the order.

Article 21

This article covers what the responsible person needs to consider with regard to training

Article 22

This article covers what the responsible persons needs to consider with regard to co-operation and co-ordination

Article 23

This article covers what the employee needs to consider with regard to their responsibilities

Article 29

This article covers whether an alterations notices (which is a notice GFRS can serve on the responsible person at a premises) has been served and whether it is being complied with.

Article 37

This article covers whether a fire fighters switch or luminous discharge tube has been fitted and is in accordance with the regulations

Article 38

This article covers whether firefighter provisions are being maintained

COMPLETING THE FORM

Part A and mandatory sections shall be completed on every occasion:

STEPS

Complete the details in all parts of Section A of the form

Carry out on site audit of the premises.

Complete all applicable articles in Part B

Enter the **Compliance Level** for each section used by placing a tick in the relevant box

0 (not applicable) -1 (compliant) – 3 (partially compliant) – 5 (Non-compliant) at the end of each section or part

Determine the **Compliance Level** for the premises; placing the relevant numbers in the boxes and using the following calculation carry this out:

TOTAL POINTS DIVIDED BY NUMBER OF SECTIONS USED = COMPLIANCE LEVEL

Enter the **Compliance Level** for the premises in the appropriate box in page 11 (**Results Of Audit**)

Determine the expected level of enforcement by applying the **Compliance Level** (1 - 5) to G.F.R.S.'s enforcement policy (Appendix 1).

Where the indicated enforcement requires an **Enforcement Notice**, the Fire Safety Line Manager will be consulted who will apply the EMM document before the inspector creates any notice

Compile any reports and Notices as necessary.

Complete the Job Card with new Risk Rating and return to support staff for processing.

Appendix 1

Enforcement Activity Recommended

Enforcement will generally result in the following five areas of activity dependant on the severity of the contraventions.

This will be determined:

Compliance level 1

Talk to employer & a note for file, no follow up.

Compliance level 2

Talk to employer or letter of non-compliance detailing deficiencies, no follow up.

Compliance level 3

Talk to employer & letter of non-compliance or issue an enforcement notice, detail deficiencies, follow up as required.

1. Follow up satisfactory; no further action.
2. Follow up unsatisfactory; issue enforcement notice if a letter of non-compliance initially served or in line with 3 below if enforcement notice in force.
3. Time expired, extension of time or prosecution.

Compliance level 4

As level 3 but serve an enforcement notice and reduce time to put right within the scope of due diligence (minimum 21 days from serving the notice).

Compliance level 5

Prohibition and most likely prosecution as major contraventions will most likely have been carried out.

Appendix 2: Primary Description, VO Code and FSEC Type

| PRIMARY DESCRIPTION | VO Code |
|---|---------|
| Residential (Dwellings) | |
| Single Private Dwelling | R1 |
| Self-Catering Holiday Unit | CH1 |
| Flats Or Maisonettes Up To 3 Floors Purpose Built | R2 |
| Flats Or Maisonettes 4 Floors And Over Purpose Built | R3 |
| Time Share Complex | CC7 |
| Houses Converted To Flats Up To 2 Floors | R4 |
| Houses Converted To Flats 3 Floors And Over | R5 |
| Hostel | MR |
| HMO (Purpose Built Flatlets) | R6 |
| HMO (Converted to Flatlets) | R7 |
| HMO (Other) | R8 |
| Camping Site | CC |
| Caravan Park | CC1 |
| Chalet Park | CC5 |
| Caravan And Chalet Park | CC6 |
| Gypsy Caravan Site | CC8 |
| Residential (Institutional) | |
| Hospital | MH2 |
| Hospital (Private) | MH3 |
| (Care) Home For Older People (Over 65) | MR1 |
| (Care) Home For Adult Placements | MR2 |
| (Care) Home For Adults Aged 18-65 | MR3 |
| Adult Placement Schemes | MR4 |
| Domiciliary Care | MR5 |
| Children's Homes | MR6 |
| Adoption Homes | MR7 |
| Residential Family Centres | MR8 |
| Foster Homes | MR9 |
| Boarding Schools | MR10 |
| Halls of Residence | MR11 |
| Accommodation For Students Under 18 By Further Education Colleges | MR12 |
| Childminders (Nursery and Sleeping) | MR13 |
| Police Station (With Cells) | MP |
| Prison (With Cells) | MP2 |
| Hotel | CH |
| Guest House (Up to 6 Guests) | CH2 |
| Motel | CH3 |
| Holiday Centre/Hotel (FPA Cert) | CC2 |
| Holiday Centre/Licensed (FPA Cert) | CC2 |
| Holiday Centre/Other Sleeping Accommodation (FPA Cert) | CC2 |
| Fire Station (With Sleeping Accom) | MS1 |
| Ambulance Station (With Sleeping Accom) | MS2 |
| Royal Palaces, Other Crown With Sleeping Accommodation | TX |
| Offices | |
| Office (FPA Cert) | CO |
| Office (Non Cert) | CO |
| Computer Centre (FPA Cert) | CO1 |
| Computer Centre (Non Cert) | CO1 |
| Offices (Local Govt)/Open to the Public (FPA Cert) | ML |
| Offices (Local Govt)/Open to The Public (Non Cert) | ML |
| Offices (Local Govt)/Not Open to the Public (FPA Cert) | ML1 |
| Offices (Local Govt)/Not Open to the Public (Non Cert) | ML1 |
| Forces Careers Office (FPA Cert) | TD1 |
| Forces Careers Office (Non Cert) | TD1 |
| Police Station (No Cells) (FPA Cert) | MP |
| Police Station (No Cells) (Non Cert) | MP |
| Bank (FPA Cert) | CS1 |
| Bank (Non Cert) | CS1 |
| Shops And Commercial | |
| Shop Not Listed Below (FPA Cert) | CS |
| Shop Not Listed Below (Non Cert) | CS |

| | |
|--|------|
| Shop Not Listed Below (Other) | CS |
| Petrol Filling Station | CG |
| Car Showroom (FPA Cert) | CG3 |
| Car Showroom (Non Cert) | CG3 |
| Market (Indoor) (FPA Cert) | CM1 |
| Market (Indoor) (Non Cert) | CM1 |
| Licensed – Restaurant (FPA Cert) | CR |
| Licensed – Restaurant (Non Cert) | CR |
| Unlicensed- Restaurant (FPA Cert) | CR3 |
| Unlicensed- Restaurant (Non Cert) | CR3 |
| Licensed – Café (FPA Cert) | CR1 |
| Licensed – Café (Non Cert) | CR1 |
| Unlicensed –Café (FPA Cert) | CR4 |
| Unlicensed –Café (Non Cert) | CR4 |
| Food Court (FPA Cert) | CR2 |
| Food Court (Non Cert) | CR2 |
| Betting Shop (FPA Cert) | CS2 |
| Betting Shop (Non Cert) | CS2 |
| Hairdressing Salon (FPA Cert) | CS3 |
| Hairdressing Salon (Non Cert) | CS3 |
| Kiosk/Shop (FPA Cert) | CS4 |
| Kiosk/Shop (Non Cert) | CS4 |
| Kiosk/Office (FPA Cert) | CS41 |
| Kiosk/Office (Non Cert) | CS41 |
| Laundrette (FPA Cert) | CS5 |
| Laundrette (Non Cert) | CS5 |
| Post Office (FPA Cert) | CS6 |
| Post Office (Non Cert) | CS6 |
| Showroom (FPA Cert) | CS7 |
| Showroom (Non Cert) | CS7 |
| Hypermarket (FPA Cert) | CS8 |
| Hypermarket (Non Cert) | CS8 |
| Superstore (FPA Cert) | CS9 |
| Superstore (Non Cert) | CS9 |
| Shopping Centre (FPA Cert) | CS |
| Assembly & Recreation | |
| Public House | CL |
| Wine Bar | CL1 |
| Club (Social) (Licensed) | CL2 |
| Club Social) (Unlicensed) | CL21 |
| Club House (Licensed) | LC1 |
| Club House (Unlicensed) | LC11 |
| Cinema | LT |
| Bingo Hall/Licensed | LT2 |
| Bingo Hall/Non Licensed | LT2 |
| Theatre | LT3 |
| Night Club | PL1 |
| Casino | PL2 |
| School | EL |
| School (Private) | EP |
| Day Nursery | EN1 |
| College (Public) | EL1 |
| College (Private) | EP1 |
| University | EU |
| Other Education, Training And Cult. | EX |
| Library (FPA Cert) | EM |
| Library (Non Cert) | EM |
| Museum | EM1 |
| Community Centre | LC |
| Leisure Centre | LC2 |
| Hall | LC3 |
| Sports Centre | LI |
| Stadium | LI1 |
| Sports Ground (Designated Sports Ground) | LS |
| Sports Ground (Non Designated) | LS11 |
| Sports Ground (Regulated Stands) | LS12 |
| Sports Ground (Non Regulated) | LS13 |

| | |
|---|------|
| Football Ground (Non Designated) | LS5 |
| Swimming Pool | LS6 |
| Tennis Centre | LS7 |
| Amusement Arcade | LT1 |
| Crematorium (FPA Cert) | MC1 |
| Crematorium (Non Cert) | MC1 |
| Place Of Worship | AR2 |
| Surgery (Doctors, Dentists Or Vets) | MH |
| Health Centre | MH1 |
| Law Court (FPA Cert) | MP1 |
| Law Court (Non Cert) | MP1 |
| Bus Station (FPA Cert) | NT |
| Bus Station (Non Cert) | NT |
| Auxiliary Defence Establishment | TD2 |
| Railway Station (FPA Cert) | AR3 |
| Railway Station (Non Cert) | AR3 |
| Sub-Surface Railway Station (FPA Cert) | AR4 |
| Sub-Surface Railway Station (Non Cert) | AR4 |
| Airport Or Ferry Terminal (FPA Cert) | AR5 |
| Airport Or Ferry Terminal (Non Cert) | AR5 |
| Industrial | |
| Vehicle Repair (FPA Cert) | CG1 |
| Vehicle Repair (Non Cert) | CG1 |
| Garage (FPA Cert) | CG2 |
| Garage (Non Cert) | CG2 |
| Factory (FPA Cert) | IF |
| Factory (Non Cert) | IF |
| Mill (FPA Cert) | IF1 |
| Mill (Non Cert) | IF1 |
| Works (FPA Cert) | IF2 |
| Works (Non Cert) | IF2 |
| Workshop (FPA Cert) | IF3 |
| Workshop (Non Cert) | IF3 |
| Brickworks (Structures Only) (FPA Cert) | IM2 |
| Brickworks (Structures Only) (Non Cert) | IM2 |
| Concrete Batching Plant (Structures Only) (FPA Cert) | IM3 |
| Concrete Batching Plant (Structures Only) (Non Cert) | IM3 |
| Other Industrial Mineral (Structures Only) (FPA Cert) | IMX |
| Other Industrial Mineral (Structures Only) (Non Cert) | IMX |
| Industrial Miscellaneous (Structures Only) (FPA Cert) | IX |
| Industrial Miscellaneous (Structures Only) (Non Cert) | IX |
| Sewage Treatment Works Structure) (FPA Cert) | NW |
| Sewage Treatment Works Structure) (Non Cert) | NW |
| Storage & Other Non-Residential | |
| Retail Warehouse (FPA Cert) | CS10 |
| Retail Warehouse (Non Cert) | CS10 |
| Warehouse (Unknown Use) | CW |
| Storage Depot/Factory Or Warehouse | CW2 |
| Storage Depot/Other Workplace | CW2 |
| Store (Unknown Use) | CW3 |
| Explosive Or Highly Flammables Store (E28a) | S1 |
| Explosive Or Highly Flammables Store (E29) | S2 |
| Explosive Or Highly Flammables Store (E29a) | S3 |
| Public Car Park (Covered Or Multi Storey) | CP |
| Private Car Park (Covered Or Multi Storey) | CP2 |
| Other Commercial Premises (Unknown Use) | CX |
| Business Unit (Unknown Use) | IF4 |
| Laboratories/Research Establishment | OC1 |
| Animal Boarding Or Breeding Establishment | OC2 |
| Fire Station (No Sleeping Accom) (FPA Cert) | MS1 |
| Fire Station (No Sleeping Accom) (Non Cert) | MS1 |
| Ambulance Station (No Sleeping Accom) (FPA Cert) | MS2 |
| Ambulance Station (No Sleeping Accom) (Non Cert) | MS2 |
| Railway Premises (Not Stations) (FPA Cert) | OC3 |
| Railway Premises (Not Stations) (Non Cert) | OC3 |

| | |
|---------------------------------------|-----|
| Vacant Or Unoccupied Premises | OC4 |
| Outdoor Workplace/Event | |
| Market (Outdoor)/Public Or Trade | CM |
| Storage Land/Used By Public Or Trade | CW1 |
| Dock Hereditament | FD |
| Electricity Hereditament | FE |
| Quarry | IM |
| Tipping Site/Public Or Trade | IM4 |
| Spoil Heap Workings | IM5 |
| Golf Course | LS2 |
| Marina | LS3 |
| Amusement Park | LT4 |
| Other Leisure | LX |
| Cemetery | MC |
| Mooring | NT1 |
| Wharf | NT3 |
| Mine | IM1 |
| Road Haulage | CG4 |
| Transport System Tunnel Or Bridge etc | OW1 |
| Outdoor Public Event | OP1 |
| Remaining Valuation Codes | |
| Advertising Right | CA |
| Advertising Station | CA1 |
| Caravan And Pitch | CC3 |
| Caravan Pitch | CC4 |
| Car Parking Space | CP1 |
| Peat Fields (Structures Only) | IM6 |
| Beach Hut | LH1 |
| Sporting Right | LS1 |
| Playing Field | LS4 |
| Communication Station | MT1 |
| Public Telephone Kiosk | MT2 |
| Other Communication | MTX |
| Other Miscellaneous | MX |
| Other Non-Formula | NX |

