

BOARD PAPER

Item Number	Item 4 – Paper 2
Title of Paper	Fire Standard Review Process
Decision or Information	For decision
Date of Meeting	8 th December 2021
Presented by	CPO
Attachments	Appendix A – Draft Review Process

Summary

The purpose of this paper is two-fold. Firstly, to explain the Periodic and Exceptional Review processes and to confirm that the Board is content with them. Appendix A includes a draft Flow Diagram.

Secondly, to confirm that the approach to review the Protection Fire Standard is appropriate.

Recommendations and Decisions

The Board is requested to:

- Note the contents of the paper;
- Consider and approve the Fire Standards Exceptional and Periodic Review Process; and
- Confirm it is content with the approach outlined for the review of the Protection Fire Standard.

Background

It is essential that Fire Standards remain current and relevant. Therefore, it is important that they are periodically reviewed. As set out in the Development Process, at the point of approval for each Fire Standard a periodic review date is set. The purpose of the periodic review is to assess the currency of the Standard's content and revise, as considered necessary. The current periodic review process takes into consideration:

- whether the benefits identified have been realised;
- other external influences on the sector or drivers for change that have or are likely to have an impact on the Fire Standard;
- feedback from HMICFRS based on its inspection findings; and
- feedback from services through the network of Single Points of Contact (SPOCs) in liaison with the NFCC implementation team.

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We have recognised that there may be instances where a Fire Standard will require an earlier review outside of the Periodic Review process. The need for an Exceptional Review process was highlighted through feedback received on the “To Achieve This Fire Standard” section of the published Protection standard.

Through discussions between the Fire Standards Team and the Protection Policy and Reform Unit (PPRU), who assisted in the development of the standard, it was agreed that certain wording in that standard was open to misinterpretation.

Exceptional Review Process

The Exceptional Review process could be initiated by a variety of differing sources, although it is expected the majority of these reviews would be initiated through feedback received from services to the Fire Standards Team.

Upon receiving this feedback, an Impact Assessment would be completed to determine whether a change is required and what effect this change may have on the service generally or on individual services.

Should a change be considered necessary as a result of the Impact Assessment, the proposed Exceptional Review process has s three varying change levels:

- Minor change
- Moderate change
- Major change

The definition of each of these is explained in the table below:

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Type of Change	Definition
Minor	<p>A small change to the Fire Standard. Examples of this could be:</p> <ul style="list-style-type: none"> • typo or missing punctuation; • broken web links; and/or • The addition of any new supporting guidance and/or legislation; <p>These changes do not change any fundamental meaning to the standard.</p>
Moderate	<p>A moderate change to the Fire Standard. Examples of this could be:</p> <ul style="list-style-type: none"> • A revision to language in the standard to provide clarification to readers; and/or • An additional benefit is suggested. <p>These changes do not change any fundamental meaning to the standard or how services achieve it.</p>
Major	<p>A major change to the Fire Standard. Examples of this could be a change that:</p> <ul style="list-style-type: none"> • alters the fundamental meaning of the agreed outcome of the standard, or the activities a service must do to achieve it; and/or • adds any new activities to what a service must do to achieve the standard. <p>These changes may have a fundamental change in the way services operate and will require engagement and consultation.</p>

It is proposed that:

Minor Change

1. Any minor change will be considered and approved by the Fire Standards and Strategy Support Manager.
2. The Fire Standards and Strategy Support Manager will present the change and rationale for the change to the Fire Standards Board Chairs (the Chairs).
3. Communications on this change will be made if required.

Moderate Change

1. Any moderate change will initially be considered by the Fire Standards and Strategy Support Manager.

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2. The Fire Standards and Strategy Support Manager will present the change and rationale for the change to the Fire Standards Board Chairs (the Chairs).
3. The Chairs will review and will decide whether to approve the change.
4. Should the Chairs not reach a decision about the change, they will put the issue to the Board.
5. If the Chairs have decided on the issue, the Board will be informed and, if appropriate, the Implementation Team.
6. Communications on this change will be made.

Major Change

1. The requirement for any major change with rationale will be presented to the Board for consideration and decision.
2. Should the Board approve, the Fire Standards Team will start the Fire Standards Development Process.

Protection Fire Standard

As a result of a service conducting a gap analysis using the Implementation Tool, feedback on the recently approved and published Protection Fire Standard was received. The service in question found it difficult to understand expectations in relation to point two of the “To Achieve This Fire Standard” section of the [Protection Fire Standard](#). The wording which is at issue is below:

“Carry out appropriate equality impact assessments with those responsible for keeping premises safe, to assist them in understanding how best to support vulnerable occupants, striving to ensure equality of safety provision”

The service said that this statement raised for them the following questions:

- “Fire Protection staff would not normally complete an Equality Impact Assessment (EIA) with a Responsible Person (RP), nor is an EIA a quick exercise to complete if done properly with thought, research and evidence;
- This is not a Fire Protection legislative requirement, and it may not be appropriate to initiate a joint approach to this issue;
- The RP may have their own EIA approach, if that is the case there may not be any value in adding to a process that is unfamiliar or misunderstood;
- The requirement to complete a fire risk assessment should consider vulnerable people as part of its completion, therefore this requirement could be duplicative of other assessments.”

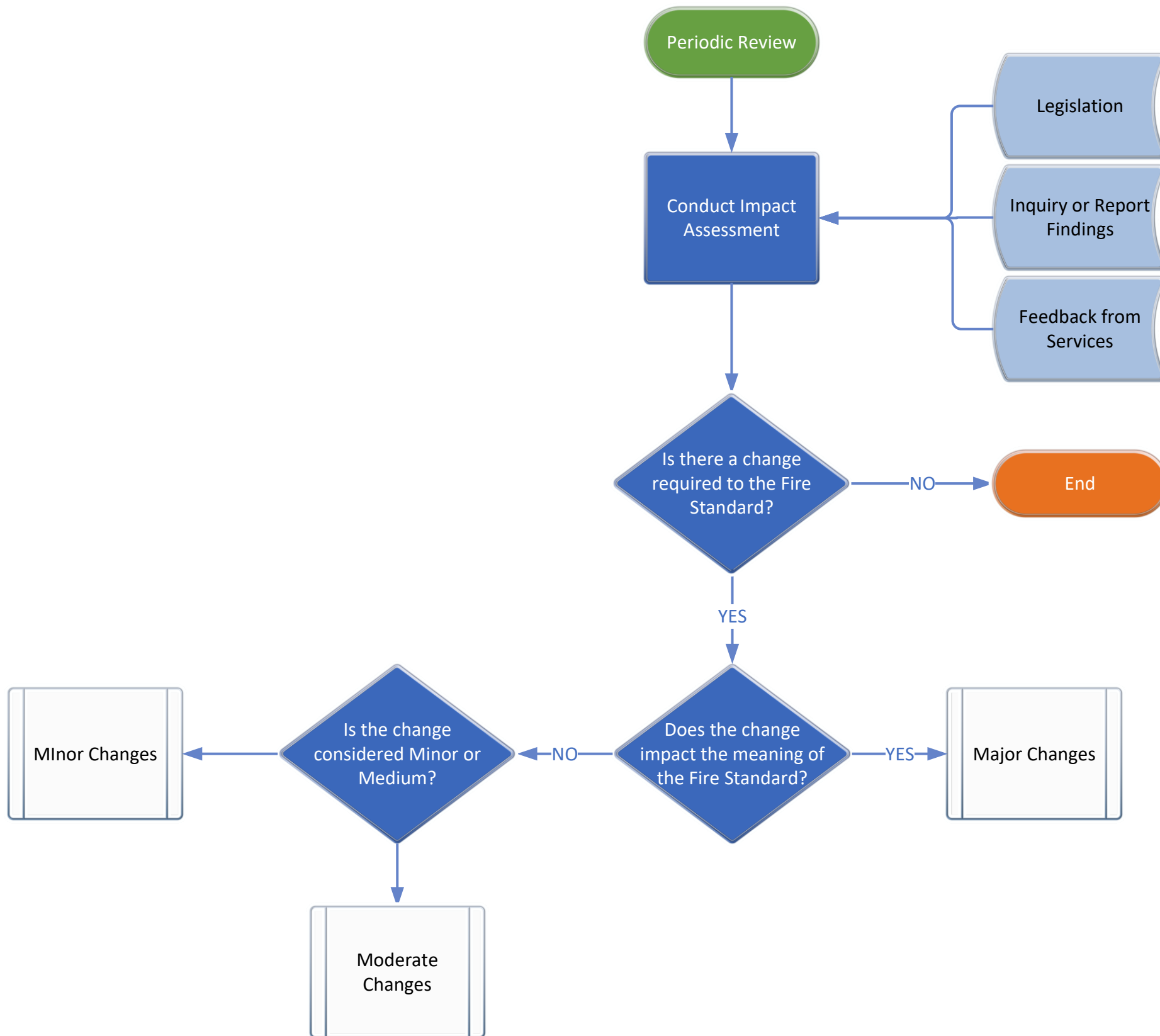
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NFCC PPRU has clarified that the current phrasing in the standard may not be appropriate, but the intention is to ensure that the needs of potentially vulnerable occupants of premises are taken into account when fire risk assessments are carried out.

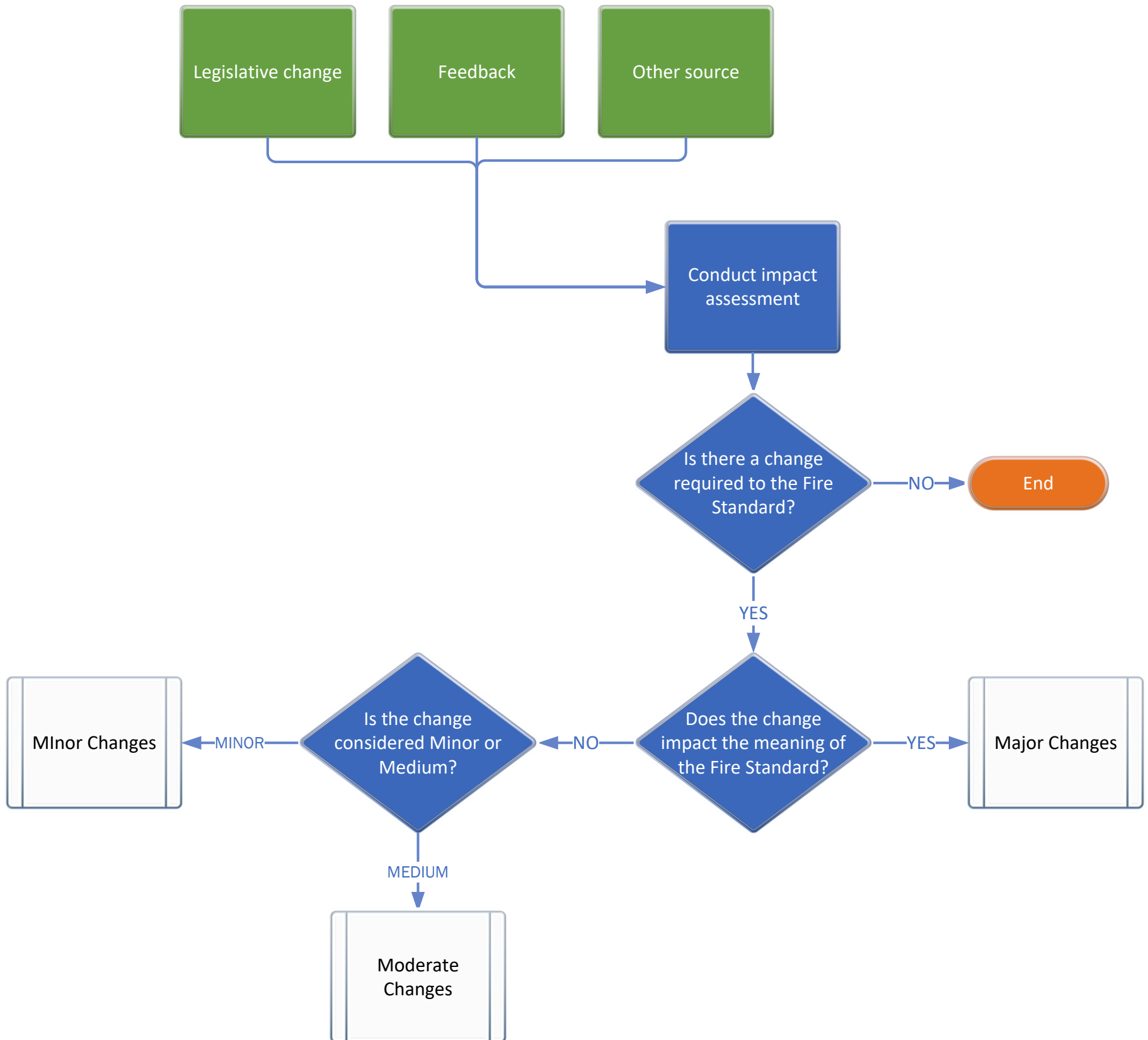
We have communicated to services that we intend to review and revise the standard to clarify the point, and PPRU will be developing some guidelines for services aiming to help them interpret the Fire Standard appropriately and now aim to clarify this aspect in those guidelines.

Considering the Exceptional Review Process outlined in this paper, an impact assessment is underway. The expectation is that any change required would fall into the moderate category as detailed above. As this is the first instance of a change being considered to be made to a published standard, the Board is being consulted as a proof of concept of the Exceptional Review process.

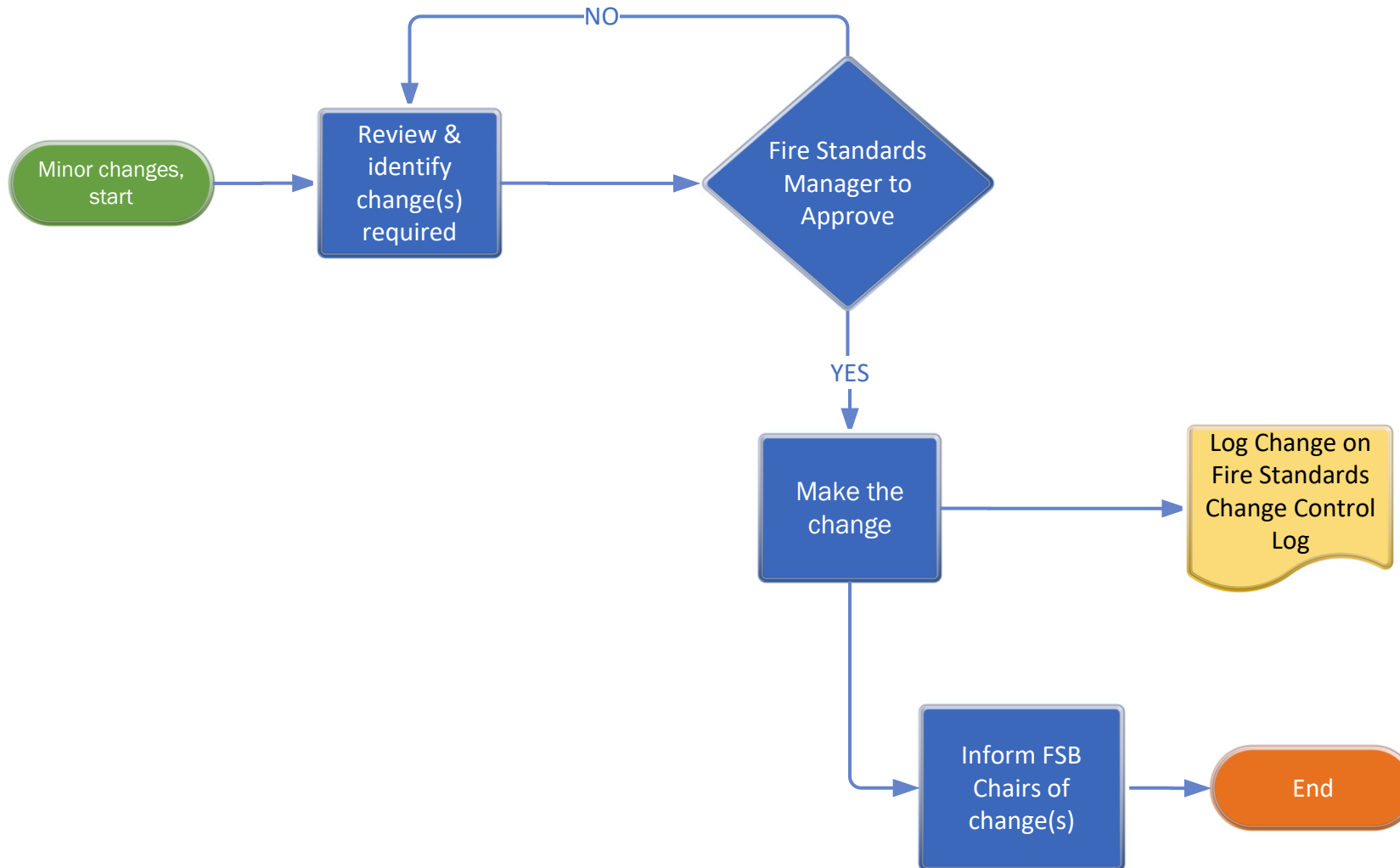
APPENDIX A – DRAFT REVIEW PROCESS



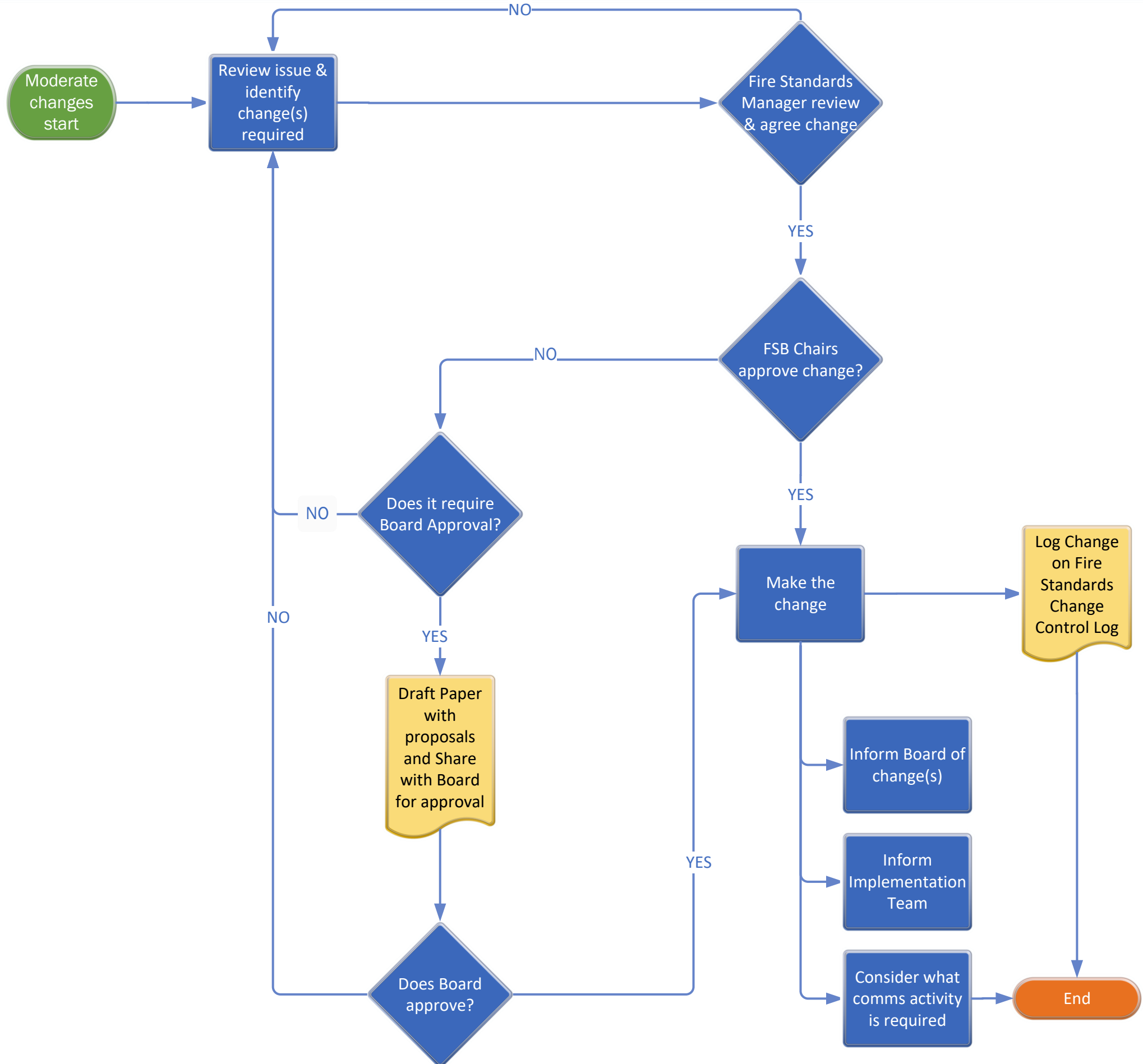
Fire Standards maintenance – Exceptional Review



Minor changes



Moderate Changes



Major changes

Fire Standards Team

