

## HMFSI Inspection Report: Report into Fire Safety Enforcement by the SFRS 201718.

### Action Plan

<b>HMFSI Recommendation 1</b>	<b>Fire Safety Enforcement is not fully transparent for dutyholders or members of the public. The Scottish Regulators Strategic Code Of Practice requires the Scottish Fire and Rescue Service to publish clear risk assessment methodologies and risk ratings and review these regularly. We recommend that the Scottish Fire and Rescue Service does this. This should be part of a move by the Service to embrace an enforcement culture of transparency and accountability.</b>								
SFRS Current Position	Scoping work is currently being undertaken which will include a page on the SFRS internet to develop a specific information page to Dutyholders within the "For Businesses" section on how we deliver our enforcement activities. This will provide a rationale as to how we prioritise our audits and react to intelligence, and the Fire Safety Enforcement Policy Framework will be accessible via this page. Standardised templates have been created for Local Enforcement Delivery Plans and are being sent to service delivery areas to allow them to create a risk based plan for local enforcement. Plans will clearly lay out the process and methodology for audits in Relevant Premises by Fire Safety Enforcement teams. All plans will be accessible via the "For Businesses" section on the Scottish Fire and Rescue Service internet.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1.Fire Safety Enforcement Policy Framework detailing the methodologies to be published on the internet site. Work undertaken by Local Senior Officer areas with their Local Enforcement Delivery Plans will also be published here.	Aug 2019	GM C. Getty	Sep 2019	Red	Initial work on the internet site has been undertaken to establish a feedback area. This link has been printed on all correspondence for standard letters being issued by Fire Safety Enforcement teams. Feedback area now up and running with little response. LEDPs not yet published, though templates made available to LSO areas.	Prevention and Protection Directorate Management Team	ACO R Haggart / DACO A Perry	AM S Wood	

					<p>Further work ongoing with Comms to update internet site for framework publishing.</p> <p><b>19.03.19.</b> Review of design and structure discussed with ICT and a template being worked on. Areas requested further assistance with LEDPs which has been provided and some are now in for review. Will be published once agreed and checked by Info Governance and ICT have completed their upgrade of the internet site due for Aug 2019.</p> <p><b>22.08.19.</b> Still awaiting ICT redevelopment of internet site to complete. Currently awaiting access on new platform to house supporting guidance and campaign work. LEDPs received by Directorate and awaiting review.</p>				
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<b>HMFSI Recommendation 2</b>	<b>Produce fire safety audit guidance which is clear and understandable for dutyholders.</b>								
SFRS Current Position	Clear and understandable guidance on the Scottish Fire and Rescue Service audit process has been incorporated into the Local Enforcement Delivery Plans for Service Delivery Areas which will be published on the Scottish Fire and Rescue Service internet site and be scrutinised. Further guidance is also provided in a pre-audit letter sent to duty holders at the time an audit is confirmed.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Pre audit letter to be designed to detail process of audit and what to expect.	Feb 18	GM C. Getty	Mar 18	Complete	Pre audit letters developed, published and being sent to Dutyholders by Fire Safety Enforcement teams.	Prevention and Protection Directorate Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	
2. Local Enforcement Delivery Plans to incorporate audit methodology and be published by Local Senior Officers once created for the forthcoming year.	Aug 2019	GM C. Getty	Sep 2019	Red	A summarised and understandable version of our audit procedure to be published, including what we expect to see and examine during the audit process, and who we will need to speak with. LEDPs templates have been issued to LSOs and P&P Managers though none have been published by LSO areas. This template incorporated the clear	Prevention and Protection Directorate Management Team	ACO R Haggart / DACO A Perry	AM S Wood	

					<p>methodology for Dutyholders. 19/3/19 - Areas requested further assistance with LEDPs which has been provided and some are now in for review. Will be published once agreed, checked by Information Governance and published once ICT complete upgrade of internet site due Aug 19.</p> <p><b>22.08.19.</b> As with Rec. 1, awaiting access to develop the "For Businesses" Section of the revised internet.</p>				
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HMFSI Recommendation 3	Proactively make its fire safety audit procedure and guidance available on its website.								
SFRS Current Position	The Prevention and Protection Directorate is currently unable to access the Scottish Fire and Rescue website directly to make quick changes. A review of the business page for fire safety is being undertaken which will incorporate all appropriate and linked documents alongside the Local Enforcement Delivery Plans and Framework once a design has been agreed.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Redesign internet site pages for “For Businesses” and incorporate guidance in an information library.	Sep 2019	GM C. Getty	Oct 2019	Green	Some work has been undertaken to provide a feedback site for engagement with Dutyholders, however redesigning the internet pages requires support and resources commitment from the Communications Team. Communications team have again been approached for amendments to internet pages and awaiting resources to progress further. <b>18/10/18</b> FSE are developing a proposed template to suggest modified content on site and progress things with ICT. <b>19/3/19</b> ICT are in process of restructuring	Prevention and Protection Directorate Management Team	ACO R Haggart / DACO A Perry	AM S Wood	

					<p>internet site and have confirmed layout for Prevention &amp; Protection area. Content currently being confirmed in line with SFRS corporate look. Library area agreed. ICT have roll out of new site in May with an expected period for bugs and improvements lasting until July / Aug. P&amp;P will be able to have their section realigned and improved post this period around Aug/Sept.</p> <p><b>22.08.19.</b></p> <p>Still awaiting ICT to complete redevelopment of internet site</p>				
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<b>HMFSI Recommendation 4</b>	<b>Improve its written communication with duty holders in line with the Scottish Regulators Strategic Code of Practice requirement to communicate effectively. An objective of letter writing should be the understanding of dutyholders and the giving of feedback. The Service should also introduce changes to address the issues regarding letter content, listed in section 4.5 of the HMFSI report.</b>								
SFRS Current Position	The report recognises that Dutyholders were generally positive about their experience with Fire Safety Enforcement Officers and prior to the report's findings the Directorate issued "Common Paragraphs" to Fire Safety Enforcement Officers to assist in consistency with their letters and Notices and promote ease of understanding for recipients of those communications.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Plan training events for all Local Senior Officer areas, emphasising the need for clear communications and avoidance of additional information that may be supplementary to any audits put on letters following visits or other reason for contact. Where recommendations are made by Fire Safety Enforcement Officers, explanations of why they are made should be given.	Mar 2019	GM C. Getty	Apr 19	Complete	<p>Directorate personnel have been undertaking visits throughout Service Delivery Areas coinciding with LSO performance visits and providing support and training to Fire Safety Enforcement Officers.</p> <p>Additional review of letters being undertaken as a working group in conjunction with legal services and area engagement. Specific SDA visits are being arranged.</p> <p>19/3/19 – CPD training events underway and initial event in</p>	Prevention and Protection Directorate Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	

					<p>NSDA completed successfully. Directorate continue to support areas individually as required. Letters have been drafted and new templates ensure clarity between any requirements and recommendations made. Feedback site created and dutyholders informed.</p> <p><b>3/4/19</b></p> <p>CPD training events underway and initial event in NSDA completed successfully. Directorate continue to support areas individually as required. Letters have been drafted and new templates ensure clarity between any requirements and recommendations made. Feedback site created and dutyholders informed.</p>				
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2. FSE Directorate team to support local areas in production of further templates and give guidance where required.	Mar 18	GM C. Getty	Mar 18	Complete	Templates amended and distributed to areas. Further training and guidance will continue to be delivered at Service Delivery Area meetings.	Prevention and Protection Directorate Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	
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<b>HMFSI Recommendation 5</b>	<b>The priority and scheduling of fire safety audits is fragmented with different and conflicting statements and systems, and inconsistent practice at a local level. The Service should ensure that its national priority-setting is followed locally. And while PPED is a useful resource for recording fire safety audits, if it is to have any function as a scheduling tool it needs to be consistent with national policy, have the flexibility to be changed when policy changes, and contain a record of all known premises.</b>								
SFRS Current Position	<p>The means to schedule audits from PPED by risk remained an outstanding requirement for the system and is in the requirements for the forthcoming replacement system.</p> <p>The Fire Safety Enforcement Policy Framework has now been issued and makes requirements for Local Senior Officers to formulate Local Enforcement Delivery Plans for planning the year's audits in accordance with local risk.</p> <p>Significant work has been undertaken to address issues in having a complete database for all premises, but has been found to be unachievable. The system will incorporate Gazetteer data and local knowledge of Fire Safety Enforcement Officers to ensure that all known premises are available to be recorded within the system.</p> <p>Whilst the ability to start a premises record will be a functional requirement of the new system, a record for such premises can only be made once an officer has audited or made comment regards it. By promoting all premises for audits once downloaded onto the system would overload the work capabilities of offices and go against the principle of allocating resources according to risk.</p>								
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1. Ensure statement of requirements for new enforcement database system is reflected when user testing is carried out promoting audit workloads for officers according to risk. Current system has information relating to framework premises and audit dates that must be transferred to new system when operational.	Mar 2019	GM C. Getty	Apr 2019	Complete	<p>Policy Framework and template Local Enforcement Delivery Plans developed and distributed. Statement of Requirements completed for new PPED system.</p> <p>Development and roll out of new system due Aug 18.</p>	PPED Re-development P-5903 project – Project Board Members & Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO P Heath	AM Stuart Stevens	

<p>As a catch all, Local Senior Officer areas must identify all Policy Framework premises and ensure the system promotes them for audit.</p>					<p>SoR have been established and project more than half way completed. Expected roll out date now end of Dec 18.</p> <p>18/10/18 – Further update by ICT has led to a further delay in the project. Estimated time for release is March 2019. Major part of development has concluded and LSO areas are assisting with bug checking and testing of progress as we go.</p> <p><b>3/4/19</b> CPD training events underway and initial event in NSDA completed successfully. Directorate continue to support areas individually as required. Letters have been drafted and new templates ensure clarity between any requirements and recommendations</p>				
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					<p>made. Feedback site created and dutyholders informed.</p> <p>19/3/19 – New system designed in accordance with SoR and is on track for delivery and going live on 1<sup>st</sup> April to coincide with the new reporting year. All information will be transferred from current system and has been tested to facilitate such transfer.</p> <p>9/4/19 New PPED System is now live and operational for recording FSE activity. Information has been transferred successfully from the legacy system, and those still under a workflow stage that has yet to be completed on the old system will be transferred once completed.</p>				
2. Ensure Local Senior Officers take accountability for identifying local	Apr 18	GM C. Getty	Jul 18	Complete	Local Enforcement Delivery Plans	Prevention and Protection Directorate	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	

risk and incorporating Directorate guidance (Core Audit Activity) into the Local Enforcement Delivery Plans.					distributed for completion.  Should form part of local scrutiny for openness and transparency.	Management Team			
3. The methodology for the rescheduling of audits will be reviewed to determine whether there is a more appropriate means to prioritise risk. Following this review, the new PPED system will reflect any changes and resources within Fire Safety Enforcement reviewed to ensure sufficient personnel are available in the right places to address local risk. This risk based resourcing will be evidence led. (Linked to Recommendation 6).	Dec 2019	GM C. Getty	Mar 2020	Green	A recent review of the audit form has been undertaken to allow for further analysis of deficiencies found in premises. This will identify potential for risk scoring with specific failures. Research to be undertaken to determine how other services have adopted alternative methodologies.  As per Recommendation 6 - Contact has been made with performance data services to determine the adequacy of current statistical analysis of reporting by risk which will also form the review of this recommendation.	Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO A Perry	AM S Wood	

					<p>19/3/19 – Review of audit form will go live in April 19 thereafter will take time to reflect risk identification across the audit program. A number of FRS are undertaking similar projects surrounding risk review and currently no other FRS has a more proactive method of informing risk ratings. This work will continue to progress steadily as information is received and backed with evidence supportive of the risk posed in Scotland rather than the UK.</p> <p><b>22.08.19.</b> Reviewed 30/7/19 Audit form released alongside revised electronic database (PPED). Work now on hold pending further investigative work by SFRS and partners in other FRS. Further update due Dec 2019</p>				
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<b>HMFSI Recommendation 6</b>	<b>There is a disconnect between policy, the scheduling of fire safety audits and performance reporting and we recommend that Scottish Fire and Rescue Service uses the same system for both scheduling and reporting and that this should be based on relative risk scores using the categories and methodology used by the Scottish Fire and Rescue Service in the annual fire safety statistical bulletin: 'well below average', 'below average', 'average', 'above average', 'well above average'.</b>								
SFRS Current Position	The Directorate has for some time been aware of the antecedent Fire Safety Enforcement criteria risk bands and have been looking at options to change how we calculate and categorise risk. The previous bands for the purposes of grouping premises have worked and still continue to fit well within our delivery. The reporting of averaged out risk was a requirement set by the Scottish Government who up until recently, had ownership of how we reported. Whilst the Scottish Fire and Rescue Service have continued to consider our focus of audit activity for high and very high risk premises, there is scope to reclassify such premises as detailed within the report findings. This will undoubtedly have an impact on the Policy Framework and how we audit risk categories. VH, H, M and in cases of hospitals and prisons, L, all fall within above average and well above average categories. This would lead to a resourcing requirement to blanket audit these categories due to increased premises numbers and would not be considered as best value.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Scope the potential for categorising premises and risk bands and how risk is calculated. Any change to risk calculations will require extensive supporting evidence and a public consultation. Scope the possibility of reporting by risk levels as opposed to risk bands where considered to remain an appropriate way of categorising risk.	Dec 2019	GM C. Getty	Mar 2020	Green	Contact has been made with performance data services to determine the adequacy of current statistical analysis of reporting by risk.  This will also form the review of Recommendation 5.3 above.  18/10/18 – A number of FRS have yet to respond with regards their risk methodologies to consider against current requirements. <b>18/10/18</b>	Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO A Perry	AM S Wood	

					<p>A number of FRS have yet to respond with regards their risk methodologies to consider against current requirements.</p> <p><b>19/03/19</b> Risk categories can only be reviewed pending the outcome of the risk review process in 5.3.methodologies (As per previous recommendation).</p> <p><b>14/11/18</b> Briefing summary being prepared to inform findings of investigation into risk rating methodologies being utilised in other services.</p> <p><b>3/4/19</b> Work ongoing due to resourcing and competing work priorities.</p> <p><b>22.08.19.</b> Work on hold in line with action above. Next update due Dec 2019</p>				
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2. Research and determine the suitability of a new methodology for the programming of	Dec 2019	GM C. Getty	Mar 2020	Green	A recent review of the audit form has been undertaken to allow for further analysis of	Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO A Perry	AM S Wood	
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<p>further audits following an initial assessment. Current methodology is dated and utilises Fire Service Emergency Cover (FSEC) risk data which is no longer supported. This will require new scoring of audit form, calculation of data and evidence based risk information to feed in to an overall score for future audits.</p>					<p>deficiencies found in premises. This will identify potential for risk scoring with specific failures. Research to be undertaken to determine how other services have adopted alternative methodologies (As per previous recommendation).  <b>18/10/18</b>  A number of FRS have yet to respond with regards their risk methodologies to consider against current requirements.  <b>14/11/18</b>  Briefing summary being prepared to inform findings of investigation into risk rating methodologies being utilised in other services.  <b>3/4/19</b>  Work ongoing due to resourcing and competing work priorities.  <b>22.08.19.</b>  Work on hold in line with action above. Next update due Dec 2019</p>				
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<b>HMFSI Recommendation 7</b>	<b>There is a substantial amount of enforcement effort made in respect of premises which have relatively adequate fire safety measures and/or have low levels of relative risk. The Service should place less emphasis on auditing such premises.</b>								
SFRS Current Position	<p>The Policy Framework has highlighted how premises should be audited by risk and management compliance level. Whereas previously some areas audited hotels and HMOs annually irrespective of risk, the Fire Safety Enforcement Policy Framework has considered this and looked at an audit program based upon the risk perceived and previous audit outcomes.</p> <p>The HMO policy has also helped to address the auditing of lower risk premises where they have been previously visited. Local Enforcement Delivery Plans will allow for scrutiny of the proposed allocation of resources through Local Outcome Improvement Plans and where considered appropriate, by publicising the documents. The Directorate will also ensure that such plans reflect the higher risk premises or those demonstrated as having potential for increased risk such as events, or identified thematic type premises.</p>								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Ensure templates for Local Enforcement Delivery Plans are distributed and support areas in their formulation for the forthcoming year. Support Prevention and Protection Managers through Local Performance Meetings and Prevention & Protection Managers meetings with reports demonstrating the resultant risk from audits where Fire Safety Enforcement Officers are being deployed.	Apr 18	GM C. Getty	Jul 18	Complete	Local Enforcement Delivery Plan templates have been produced and disseminated to Local Senior Officer Areas. Support given to Prevention and Protection Managers with local support meetings available upon request.	Area Plans, Local Enforcement Delivery Plans and Prevention and Protection Directorate Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	

<b>HMFSI Recommendation 8</b>	<b>The Service should place less emphasis on quantity (the use of personal fire safety audit targets) and place more emphasis on quality of work and effectiveness.</b>								
SFRS Current Position	<p>Whilst figures have been intimated for audit targets, these have been set as a minimum number expected to address local risks in areas each year considering the number of officers in a particular area's structure. A drop in audit numbers by area, (not officer) may demonstrate that the risk identified for audit in the policy framework premises are not being achieved.</p> <p>The Directorate have continued as part of their training events and quality assurance processes, to promote detail and quality undertaking audits and demonstrate full reasoning for comments made. The targets intimated by the Directorate being equivalent to 2.7 audits per week should not be onerous on local areas considering that audits are their primary responsibility. The Directorate has little concern regards this recommendation however it will look to improve upon performance in conjunction with the Fire Safety Enforcement Policy Framework and Local Enforcement Delivery Plans.</p>								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Incorporate into training events the focus for quality of audit detail in the reports and look at ways that will allow more time to complete paperwork following audits such as mobile platforms.	Feb 2019	GM C. Getty	Mar 2019	Complete	<p>Feedback is given through quality assurance processes on audit quality. Guidance given to areas to reduce the number of lower risk audits and this has been assisted by the recent House Multiple Occupancy (HMO) auditing procedure.</p> <p>New PPE system being designed to account for mobile platforms when position exists to adopt, and number of</p>	Prevention and Protection Directorate Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	

					<p>consultations have been reduced with the Fire Engineering team taking formal Building Warrant consultations leaving more time for audit work.</p> <p>18/10/18 – PPED progress due to be rolled out in March 2019, at which point the Directorate will be able to scope out the potential for mobile platforms.</p> <p>19/3/19 – New PPED system will allow capability for mobile platforms. Slight work required by Directorate to facilitate this though system can facilitate this.</p>				
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<b>HMFSI Recommendation 9</b>	<b>We think the terminology used in the SFRS premises risk methodology needs to be changed to improve understanding and remove inconsistency. Specifically the Service should abandon the use of risk band names and generic premises names – both of these currently allow misinterpretation or misunderstanding.</b>								
SFRS Current Position	This recommendation is reflective of the comments in No.6. The review will look at the categorisation of premises though similar premises profiles such as Hotels where B&Bs attract the same scoring for rating risk, and have been combined to reduce administrative burden. This will be assessed and re-categorised where it will add benefit.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Scope the potential for categorising premises and risk bands and how risk is calculated. Any change to risk calculations will require extensive supporting evidence and a public consultation. Scope the possibility of reporting by risk levels as opposed to risk bands where considered to remain an appropriate way of categorising risk.	Dec 2019	GM C. Getty	Mar 2020	Green	This will form part of the review for the risk methodology of premises. The outcome of that review will also determine if benefit will be brought from the recategorisation of premises for the sole purposes of reporting. <b>14/11/18</b> Briefing summary being prepared to inform findings of investigation into risk rating methodologies being utilised in other services. <b>3/4/19</b> Resourcing within FSE have led to a delay in progressing this action further alongside	Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO A Perry	AM S Wood	

					<p>competing priorities. Scoping with other FRS have identified similar projects on the go and SFRS will liaise and form part of that partnership working to determine an appropriate and evidence based alternative to current systems.</p> <p><b>22.08.19.</b></p> <p>Work on hold in line with action above. Next update due Dec 19</p>				
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<b>HMFSI Recommendation 10</b>	<b>The Service should continue to move towards the conversion of uniformed enforcement posts to non-uniformed, and introduce career progression opportunity for non-uniformed staff.</b>								
SFRS Current Position	<p>It is not agreed that the service should be converting uniformed posts to non-uniformed posts however support the further blend of uniformed and non-uniformed where required. This will allow for geographical and resourcing challenges and continue to feed into the Operational Intelligence network by sharing detailed information with our crews, incident commanders, partners and where necessary, counter terrorism resources with details relating to relevant premises.</p> <p>Career progression is not available to non-uniformed personnel in the current structure within Prevention and Protection and Incident Command resourcing may create difficulties in changing this at Station Manager level and above. There is currently scope for any non-uniformed staff member to apply for subsequent non-uniformed posts at a higher grade where they are available and they have the necessary qualifications or skills to do so.</p>								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Determine where Local Senior Officer areas cannot fill their current structure within Fire Safety Enforcement and consider alternative options to expand upon the non-uniformed cadre of officers.	Mar 2019	GM C. Getty	Jun 2019	Complete	<p>An initial review to be undertaken, however a structure review will be required following assessment of local risk in conjunction with Recommendation 5:3.</p> <p>19/3/19 – A review has been undertaken and analysis of vacancies that can support delivery in areas. Local LSO areas are continuing to advertise like for like to maintain a</p>	Prevention and Protection Directorate Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	

					blend, though have increased the ratio of non uniformed to uniformed where attraction of posts have been difficult. This will remain dynamically reviewed and form part of the overall P&P review in the following year period, in line with competency and risk rating review.				
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HMFSI Recommendation 11	<b>Uniformed enforcement staff should maintain their operational competency within the relevance of their role map to add to the resilience of the Service and these staff should provide operational cover when needed.</b>								
SFRS Current Position	This has been previously identified prior to the report being drafted and raised through the Directorate Training Needs Analysis with Training and Employee Development. P & P are in discussions with TED regarding potential topics and course delivery and will be providing TED with a prioritised personnel list that is currently being compiled for those requiring training.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Confirm current position with Training and Employee Development. Look to develop a consistent policy and procedure for all non-operational uniformed staff to maintain their operational competence.	Dec 2018	GM C. Getty	Feb 2019	Complete	<p>Identified on Prevention and Protection Training Needs Analysis for the year 2018/19. Training and Employee Development have recognised this is not solely an enforcement issue.</p> <p>Initial meeting with Training Employee Development (TED) have scoped out a bespoke course for Fire Safety Enforcement (FSE) staff who are able to maintain Operational Competence. Collation of appropriate personnel to be</p>	Prevention and Protection Directorate Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	

					<p>considered underway and to be passed to TED.</p> <p>18/10/18 – Further meeting arranged with TED to ascertain progress in training opportunities.</p> <p>19/3/19 – TED have now issued courses to initial tranche of FSE staff and are continuing to design a course that will maintain operational capacity within FSE. TED are now progressing this action.</p>				
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<b>HMFSI Recommendation 12</b>	<b>The Scottish Fire and Rescue Service should look to create a guidance framework that would allow a more formal approach to continuing professional development and this should include Fire Safety Enforcement staff.</b>								
SFRS Current Position	Work is currently underway to facilitate Prevention and Protection training through the Scottish Fire and Rescue Service training environment. This includes practical and E-Learning to assist with Continuous Professional Development.								
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1. Enhance development of the E-Learning tool and communicate with Training and Employee Development regarding the provision of class based training. Prevention and Protection Directorate will lead on specific training events to assist with Continuous Professional Development and knowledge building in specialist subjects such as fact finding, evidence gathering and consistent forming of Notices.	Dec 2019	GM C. Getty	Mar 2019	Complete	There are currently 2 personnel trained in the new E-Learning packages that will assist with development of online modules. Support is being sought from legal services and other resources to assist in training delivery.  CPD event being arranged for N, E & W areas that will include Legal, FSE, and potentially BSD and an external provider on AFD systems. Program currently being designed for submission to IFE for formal recognition of CPD to officers.	Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO P Heath	AM Stuart Stevens	

18/10/18 –  
Envisaged that  
CPD event will be  
rolled out for late  
Jan

19/3/19 – First  
FSE CPD event  
delivered in the  
NSDA and further  
events arranged  
for East and  
West. A number  
of external CPD  
events have been  
offered to areas to  
attend in order to  
assist with their  
development. A  
national working  
group is  
underway looking  
at competence of  
FSE personnel  
that will form the  
basis of a career  
FSE development  
plan, though this  
is not expected to  
conclude until  
Dec 19.

Thereafter, staff  
will be expected  
to undertake  
further study to  
achieve a  
qualification and  
require to  
maintain their  
CPD as part of  
competence.

<b>HMFSI Recommendation 13</b>	<b>The Scottish Fire and Rescue Service approach to the promotion of non-domestic fire safety through work other than inspections has been modest in comparison to active enforcement audit work. We recommend that the Scottish Fire and Rescue Service considers a more proactive approach to the use of campaign and awareness activity.</b>								
SFERS Current Position	The Directorate has been in discussion with Corporate Communications in looking at a strategy to promote and highlight fire safety enforcement work.								
SFERS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Develop strategy on what is to be communicated and when. Further details to be provided on internet site as before and release communications on good news stories and actions taken by the service, such as those who have been prosecuted. Topics to include Unwanted Fire Alarm Signals, Fire Risk Assessments and an overview of Scottish Fire and Rescue Service enforcement and its delivery within communities.	Aug 2019	GM C. Getty	Sep 2019	Complete	Development work being sought through our communications team for enhanced promotion of activity within the internet, Active engagement with largest Unwanted Fire Alarm Signals resourcing (NHS) is managed with an embed officer on the advisory group. Communications development ongoing and progress slow through competing demands in this dept. Scope for an FSE twitter, facebook and Instagram feed being considered	Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO A Perry	AM S Wood	

					as are the review of the internet pages. 18/10/18 Ongoing and delayed due to other workloads 14/11/18 Ongoing work. 19/3/19 Social media feeds established and to start distributing non dom fire safety messages. Website still under review in accordance with above and engagement sessions already underway with sections including AirBnB, Scottish Association of Self Cateres and forum arranged for engaging with Colleges and Universities. Reviewed 21.07.19.				
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<b>HMFSI Recommendation 14</b>	<b>We think that there is a policy void which offers some risk to the Service. Accordingly the Service should strengthen and document its policy, and procedures where relevant, in respect of; the other legislation referred to in section 3; the determination of disputes; and Alterations Notices.</b>								
SFRS Current Position	Work is underway in the development of an Enforcement Procedure and whilst there is no publically available procedure for disputes and appeals, this will be developed alongside the enforcement procedure.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Develop and publish procedure detailing the Enforcement, including for Alterations Notices and appeals procedures for Scottish Fire and Rescue Service and the disputes procedure in accordance with the Fire (Scotland) Act.	Aug 2019	GM C. Getty	Oct 2019	Green	Initial draft has been completed with the enforcement procedure though requires a review prior to issuing for consultation. The disputes procedure can be published alongside information on the internet when this has been developed. Comms approached for expanding current "For Businesses" tab on internet to allow facilitation of such documents. OHPN procedure redrafted and new Notice prepared in conjunction with legal. Now incorporating into single document for complete	Prevention and Protection Directorate Management Team	ACO R. Haggart / DACO Ali Perry	AM Stephen Wood	

					<p>enforcement procedure to be ratified by Legal before sending out for consultation.</p> <p><b>18/10/18</b> This work is ongoing .</p> <p><b>14/11/18</b> Draft Audit Guidance now out for final consultation which will allow for further progress in the development of the Enforcement Procedure. Closing date 30<sup>th</sup> Nov.7/1/19. Responses received and have recently been collated. Standardisation to take place following all responses.</p> <p><b>3/4/19</b> New audit guidance and procedure being released to support release of new PPED system. Feedback from PF regards some potential prosecutions has led to further work being done on the</p>				
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					<p>Enforcement Procedure which has been drafted and seeking legal input. Review of formal Notices such as PN underway and a quality assurance procedure is being developed. The disputes and LEDPs guidance will be uploaded on to the internet upon the ICT review of the structure, due June 19.</p> <p><b>30/7/19</b> Still awaiting access to the internet site for revision of the "For Businesses" page that will hold a suite of guidance for Dutyholders. New audit and PPED system released and Enforcement Procedure remains in development alongside Legal Services.</p> <p><b>22/8/19</b> Enforcement Procedure remains in draft and awaiting review by Legal</p>				
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					and the Directorate prior to consultation.				
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HMFSI Recommendation 15	The Service should introduce a protocol explaining its relationships and involvement in fire safety in major sports grounds and ensure that its staff follow this protocol and work in line with the responsibilities in Part 3 of the 2005 Act.								
SFRS Current Position	Contact has been made through the Sports Ground Safety Authority and Football Safety Officers Association Scotland where a working group to look at all safety issues, including fire is due to be established.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Provide a consistent policy within Scottish Fire and Rescue Service for the support, if required, to Local Authorities in the inspection and adequacy of fire safety within sports grounds.	Oct 2019	GM C. Getty	Dec 2019	Green	Policy to be established and disseminated following consultation with local authorities on a consistent approach across Scotland. <b>18/10/18</b> An invitation has been sent to all Chief Executives from GCC Solicitor, Mairi Millar to attempt to establish a national safety advisory group for sports grounds. A draft MOU is being produced by GCC for the consideration of the SFRS and other local authority areas. <b>15/11/18</b> Meeting held with SFRS legal services to discuss potential	Prevention and Protection Directorate Management Team	ACO R Haggart/ DACO A Perry	AM S Wood	

					<p>MOU and to determine which areas of sports grounds SFRS are the enforcing authority for. 7/1/19. Dialogue ongoing.</p> <p><b>19/3/19</b></p> <p>Several meetings undertaken with Glasgow City Council on how to move forward with an agreement relating to enforcement at sports grounds. It has been conferred to Local Authorities that SFRS are not the enforcing authority under Part 3 of the FSA in relation to sports grounds and discussions are ongoing to support consistencies across this topic. Where an agreement can be reached with one Local Authority that lead on the national sports safety forum, then this can be extended for a national agreement in the</p>				
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					<p>future. The legal teams within Glasgow are currently looking at this and we have informed them of the potential requirement to demonstrate competence of their officers where they are required to enforce the FSA. This issue is now led by Local Authorities. 3/4/19 Meetings held with Glasgow City Council to determine a common approach. Thereafter this will be submitted to the national advisory group for agreement and consistent approach across Scotland. Competency may have an impact for their ability to enforce and could rely upon SFRS to assist. Work ongoing.</p> <p><b>30/7/19</b> MoU drafted by Glasgow City Council passed to</p>				
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					<p>SFRS for comment and a response made with several concerns about the adoption and resourcing of SFRS personnel to undertake this activity on behalf of the LAs. Discussions will continue to support LAs in this interim period pending a suitable resolution.</p> <p><b>22/8/19</b></p> <p>No further progress made at this time.</p>				
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<b>HMFSI Recommendation 16</b>	<b>The Service should maintain a capability and capacity for investigating and reporting to the Procurator Fiscal Service on serious blatant breaches where the enabling approach to enforcement has not worked. The Service should actively pursue relevant cases when they arise. The Scottish Fire and Rescue Service Board should actively monitor the Service's performance in this regard and should receive regular reports on the number and outcome of cases considered and referred for prosecution.</b>								
SFRS Current Position	Prior to the report being drafted, Scottish Fire and Rescue Service had reported to the Procurator Fiscal with regards to non-compliance of Notices. Since this plan has been formed, several Dutyholders have been found guilty of breaches in fire safety legislation brought about by Scottish Fire and Rescue Service and are currently considering another for referral to the Procurator Fiscal.								
SFRS Proposed Actions	Deadline for individual action	Lead Officer for each action	Overall Deadline	RAG status for performance against deadline	Evidence of performance	Where is this information being reported if out-with the PIF	Lead Officer for overall performance	PIF Lead	Cross Cutting Reference
1. Develop further relationships with the Procurator Fiscal and support areas in reporting those who have breached the legislation following consideration of the ScoP.	Dec 2018	GM C. Getty	Mar 2019	Complete	Directorate personnel are currently engaged with the Procurator Fiscal on two separate cases and have been involved in the early stages of reporting a further Dutyholder. Steps being established to enhance access to the reporting site of the fiscal since the change in legal representation within the service.	Prevention and Protection Directorate Management Team and the Service Delivery Management Team	ACO D. McGown/ DACO John Miller	AM Stuart Stevens	

Key for RAG status for overall performance against deadline

- Green (achieved or on track for completion by target date)
- Amber (approaching slippage for completion by target date)
- Red (behind schedule for completion by target date)
- Blue (Complete)