

HMICFRS Area for Improvement – Sign off and closure report

Area for improvement	Protecting the public through fire regulation
Pillar	Protection
Strategic Lead	Lee Brown
Project Lead	Lee Haggath

Area for Improvement action detail

AFI Ref: 3 - The brigade should assure itself that its risk-based inspection programme prioritises the highest risks and includes proportionate activity to reduce risk.

What has been completed?

(Summary of actions undertaken to deliver improvement)

The revised Risk Based Inspection Programme (RBIP) introduces a clear and structured three-tier Priority Programme model that aligns inspection activity to the levels of risk present across the built environment.

Priority Programme One focuses on premises with the highest societal risk, such as care homes, hospitals, high-rise residential buildings, and specialised housing.

Priority Programme Two addresses foreseeable and emerging risks including unlicensed HMOs, flats above shops, night-time economy premises, hotels, and guest houses.

Priority Programme Three covers low and very low risk premises such as offices, shops, and warehouses.

Structuring the RBIP in this way ensures that inspection activity is appropriately targeted and fully aligned to consequence-based risk in line with NFCC guidance.

Inspection cycles have also been revised to strengthen proportionality and ensure that workloads are achievable within existing resource levels. High societal risk premises within Priority Programme One will be audited every three years, foreseeable and emerging risks in Priority Programme Two every four years, and low-risk premises in Priority Programme Three will operate on a ten-year cycle.

These frequencies are consistent with the NFCC's national methodology and allow the Brigade to direct its efforts towards the highest-risk locations while maintaining statutory compliance. These revised cycles address HMICFRS concerns that the previous RBIP was unrealistic and insufficiently sensitive to differing levels of risk.

A critical improvement has been the redevelopment of the Risk-Based Inspection Tool (RBIT), which now provides a modernised, data-driven mechanism for prioritising premises. Enhancements include revised weighting, removal of outdated variables, the use of ten years of incident data with recency weighting, normalised scoring, updated banding, and automated quality assurance controls. The revised RBIT also introduces dynamic risk responsiveness, meaning

changes in building use, enforcement activity, incidents or other indicators automatically influence risk scores.

This ensures the Brigade applies a scientifically robust, consistent, and transparent prioritisation methodology, significantly strengthening its ability to evidence that it targets the highest-risk premises as required by HMICFRS.

It should be noted that the RBIP and the RBIT have both been assured by an independent consultant and will be further assured in 12 months following implementation to ensure that the programme is delivering against the risk.

CFB have also embedded a multi-tiered delivery model that aligns resources proportionately to risk. Fire Safety Inspectors focus on high-risk and complex inspections; Business Fire Safety Advisors lead on foreseeable and emerging risks; and Station-Based Advisors conduct lower-risk audits and screening checks as part of their routine duties.

A formal escalation pathway has been introduced so that premises displaying significant risk indicators, such as enforcement notices, prohibitions are automatically placed into Priority Programme One until compliance is achieved. This ensures that high-risk premises always receive the most competent oversight and that risk is managed effectively across all three programmes.

A structured Interventions Programme has also been established to complement formal inspections and provide proportionate, risk-reducing activity. This includes targeted thematic campaigns, joint inspections with partner agencies such as the Care Quality Commission (CQC), housing authorities and environmental health, business engagement and education, post-incident learning, remote compliance support, and multi-agency intelligence-led activity. By strengthening non-audit interventions, CFB ensures its protection activity extends beyond inspection alone and delivers tangible improvements in compliance and fire safety, which is central to meeting HMICFRS expectations for proportionate risk reduction.

The Brigade has further reinforced strategic assurance through a robust “Golden Thread” of governance. This clearly connects national guidance, the Community Risk Management Plan (CRMP), the RBIP, operational delivery, and performance oversight. Risk intelligence from inspections and interventions feeds directly back into the strategic assessment of risk, ensuring that decision-making, resource allocation and planning activities remain fully evidence-based and aligned to statutory duties. Regular reporting to the Executive Leadership Team, along with HMICFRS scrutiny, ensures continuous oversight and accountability.

A detailed capacity model has confirmed that the revised RBIP is deliverable within existing resource levels. By adjusting inspection frequencies, reallocating responsibilities to the Business Fire Safety Advisors based within the Protection Department (BFSA) and Station Based Auditors (SBA) based on various stations and watches across the Brigade, and adopting a three-year cycle for high-risk premises, the Brigade has resolved previous workload pressures that HMICFRS had identified as a barrier to effective delivery. This modelling demonstrates that the Brigade can complete Priority Programme One within capacity while fulfilling statutory obligations around enforcement, consultations, and other protection activities.

Prior to the implementation of the new RBIP, the Brigade had completed audits of all Very High and High Risk premises under the previous RBIP, with all such premises audited within the

required timescales. In addition, a new **Enforcement Procedure** (currently in draft) ensures that all premises subject to formal enforcement action receive a follow-up audit upon completion of that action.

At a recent ELT the changes to the RBIP were agreed and accepted and due to be implemented on April 1st 2026

Delivery outcomes

(What are the success factors)

Completion of the Priority One Programme within the three years.
 Completion of the Priority Two Programme within 4 years.
 Significant in roads from the SBA's regarding Programme Three over a 10 year period

Follow on actions?

(Action to be detailed with target dates and owners identified)

Action	Owner	Target date
Review of RBIP to measure success against the delivery outcomes stated above	Lee Haggath	1st May 2027
Review of the RBIP and RBIT by an external consultant to ensure that the risk rating methodology remains correct and also to measure the completion rate against the capacity of the department following the recent restructure. This will be completed by GTH Consulting as part of the package purchased for consultation on the new RBIT	Lee Haggath	1 st March 2027

Supporting Evidence - documents/links

[2nd Paper Proposal.docx](#)

Lessons learnt

Early engagement with the team was key to understanding their current issues with the RBIP and how we could come to a solution moving forward.

Early consideration of a third party to ensure the project and provide that external level of assurance that the changes were for the better and not just for change sake.

Current level of assurance	Substantial
Sign off and closure confirmed	Yes
Directorate sign off	Yes
Date	29 th April 2026
Executive Leadership Team sign off	Agreed
Date	5 th May 2026

Version Control – Governance and Assurance only		
Version No.	Name	Date
0.1	Nicola Tranter	November 2025