

Fire risk management, the cultural shift moving organisations from passenger to pilot



Tom Gilbert considers why large organisations are undertaking Fire risk assessment programmes without first defining their organisational fire risk management strategy and the benefits to be gained from doing so.

During my recent attendance at the CIH Manchester conference a number of housing and facilities professionals spoke to me about the problems they were encountering with fire safety management within their (and their clients) organisations. None of these queries related to fire risk assessment (FRA) suitability or the poor delivery of large programmes of FRA's (I've written on this subject before) Instead, organisations are generally happy with the quality and the way in which FRA's are being delivered by their assessors. Interestingly though, despite their confidence in their FRA's suitability and sufficiency, FRA's still seem to fall short of delivering what they actually want and need, which is a more holistic and strategic approach to the recommendations highlighted within the reports.

On the face of it there still appears to be a lack of organisational engagement with PAS7:2013 'fire risk management system – strategy' despite its place as national guidance on how a fire risk management system should be designed. This indicates that the document is yet to be fully understood by organisations, both in its application and the benefits that it brings.

There is no doubt that the fire risk assessment is the corner stone of fire safety legislation in the United Kingdom, unfortunately for large organisations

the FRA should rarely be the start or end point in achieving corporate assurance or compliance with regard to Fire safety, a fact that unfortunately, most organisations are unaware of.

The way that this issue tends to manifest itself is that organisations receive huge amounts of actions from the FRA programme and simply do not know where to begin when it comes to remedying the issues identified. The time, effort and money required to make it all right is simply astronomical and as such organisations are asking;

1. Do we really need to do everything that the FRA identified? (maybe there is an alternative solution or perhaps the issue is tolerable with no additional controls when viewed corporately)
2. If we don't do everything now, which premises and which actions do we need to address first?
3. In prioritising premises in our portfolio, which buildings are high risk, which are medium risk and which are low risk?

Fortunately, the answers are simple but requires a cultural shift internally. On the assumption that all the questions above are asked by organisations post FRA programme, I simply propose that organisations ask the questions BEFORE embarking on the FRA programme.

To go one step further; I firmly believe that all organisations with large housing portfolios can predict with relative ease the outcomes of the Fire risk assessments before they are undertaken, which enables advanced planning of how it will respond to those issues strategically. The most likely issues to affect a housing portfolio post FRA which require capital investment and planning are;

1. Flat entrance door/communal door upgrades
2. Compartmentation problems

If they are predictable, it is reasonable to suggest that organisations can pre-empt vast swathes of actions before they are identified, implement its approach to remedying them prior to undertaking the assessments, and, as a result, the fire risk assessor can tailor the fire risk assessments and the action plans to reflect organisational approach to these issues in the wider context of the fire risk management strategy.

Wouldn't it be wonderful to receive an action plan with recommendations and timescales bespoke to your organisational risk management strategy rather than just the fire risk assessor's immovable opinion based on the fire industry norm?

To demonstrate this practically (I stress that this is not necessarily an appropriate solution to your organisation and also that the recommendation is probably not valid) let's take a pretty simple and standardised recommendation we have all seen over and over again.

Recommendation	Risk Rating	Timescale
The flat entrance doors in the building do not have intumescent strips and cold smoke seals, there are one inch stops which mitigate this issue but the organisation should seek to upgrade the doors. Due to the age of the doors it is recommended that the doors are replaced rather than upgraded.	Low Risk	12 months

If a large organisation with say 5000 flat entrance doors received the above recommendations in every risk assessment it commissioned and needed to replace each and every door (cost of circa £500 per door) could an organisation realistically, within a year, commit £2.5million to replace doors in a capital investment programme? Could it then procure the work required and then logistically replace 5000 fire doors? All within 12 months? The answer is of course categorically no, and as a result the organisation would find itself failing to meet the recommendation of its assessments simply because the timescales and capital expenditure were unrealistic for the organisation that commissioned them.

What if the organisation pre-empted the action and committed funds to the programme over 5 years? Would that be more appropriate for the organisation? On the assumption that an organisation recorded its 5 yearly door replacement programme in its fire risk management strategy, the assessor would then be able to deliver a more tailored holistic judgement to

what they find by paying particular attention to the organisations ethos, size and undertaking (known as its 'organisational context') and the way it has committed to dealing with these types of actions.

As a result the recommendation above changes to the following;

Recommendation	Risk Rating	Timescale
<p>The flat entrance doors do not have intumescent strips and cold smoke seals, it is recommended that these doors are upgraded, there are one inch stops which mitigate this issue but due to the age of the doors the organisation should seek to replace them.</p> <p>The RP has a fire door strategy which forms part of the larger organisational fire risk management strategy, which clearly defines its approach to fire door works across its portfolio. This building is identified as a low risk building within the RPs portfolio. Due to the type of building, the type of issue identified it is felt that no additional mitigation is required in the interim of the doors replacement. This requirement is to be considered during each subsequent fire risk assessment review.</p>	Low Risk	Within 5 years and in accordance with the fire door replacement programme.

The above is a worked example which demonstrates how organisations who have considered the outcomes of fire risk assessments can make strategic decisions about how it 'treats' the risks and these decisions can be reflected within individual FRA's. This enables a more sensible approach to risk management whilst maintaining corporate compliance with its own internal KPI's and with the regulatory reform (fire safety) order 2005.



Does the fire risk assessor understand how big your organisation is? Do they understand the implications of the timescales they set within action plans? Are they achievable? Is the capital investment required to remedy the identified issue across a large portfolio realistic and does it deliver value for money in the context of the cost to risk analysis? If the answer to any of these questions is no, you need to reconsider your approach to fire risk management.

The last issue to consider is one of risk tolerance or risk aversion. Is your risk assessor risk averse? (i.e. are they belt and braces in their recommendations) Are they more risk averse than your organisation? If the answer to either is yes, then your resultant FRA actions will cost more than you would like. If they are more tolerant of risk than your organisation, they may be accepting risk (on the basis of higher risk tolerance) that your organisation doesn't want to take.

It should be clear to see the benefit to be gained by communicating to assessors how governance of fire risk is dealt with at an organizational level. Assessors will better understand how to communicate the findings of the assessments to stakeholders within the organization, and the relevant duty-holders who are charged with addressing them. By approaching fire risk management in a top down approach the organization will minimize the amount of duplication within the FRA findings, especially on matters of established organizational policy and procedure.

The ultimate goal should be to create a cultural shift for organisations to drive their own fire risk management regime rather being led by its assessors. Documenting your organisations Fire risk management strategy delivers value for money, opportunity for improvement, leads to best practise and most importantly tailors the resultant actions not just to the risk in the buildings but considers your portfolio holistically and the organisations approach to fire risk management.

Isn't it about time we all worked more strategically?

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