



Pete Murphy, Katarzyna Lakoma and Angela Toothill call for a comprehensive review of the integrated risk management plan process and outcomes

Do we need to review IRMPs?

The production, implementation and maintenance of up-to-date integrated risk management plans (IRMPs) has been a mandatory requirement for all fire and rescue authorities and services in the UK since they were introduced by the Fire and Rescue Services Act 2004. Every one of the five national frameworks for England assumes that IRMPs are both publically available and adequate to underpin or inform strategic decision making as well as operational service delivery.

Yet despite this strategic role in public protection and service delivery, there has been no suggestion by government or Her Majesty's Inspector for Constabulary and Fire and Rescue Services (HMICFRS) that they are considering systematically reviewing the content, currency nor fitness for purpose of the existing IRMPs.

In the new service inspections, HMICFRS are reviewing whether the activities and services provided by FRSs are based on risks identified in the IRMPs, and that their activities and services reflect the risks identified in their IRMPs. They are not, however, evaluating the IRMPs themselves.

The National Fire Chiefs Council (NFCC) is currently undertaking a national review of community risk methodologies underpinning IRMPs, but there is a growing realisation that we also need a fundamental and comprehensive review of the IRMP process and outcomes. We also need some idea of what is excellent or exemplary to help all services improve; and we need guidance and/or a manual to avoid all services 'reinventing the wheel'.

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Table 1: National Framework requirements of IRMPs

Reflect up to date risk analyses
Demonstrate how prevention, protection and response activities will best be used to prevent fires and other incidents and mitigate the impact of identified risks on its communities
Outline required service delivery outcomes
Set out its management strategy and risk-based programme for enforcing the provisions of the Regulatory Reform (Fire Safety) Order 2005
Cover at least a three-year time span and be reviewed and revised as often as it is necessary
Reflect effective consultation throughout its development and at all review stages with the community, and
Be easily accessible and publicly available.

We decided to look at three of these aspects:

- Whether the published IRMPs cover at least a three-year time period;
- Whether the plans are easily accessible and available to the public; and
- Whether the parts of the plan relating to protection and prevention are best used to prevent fires and other incidents.

We wanted to establish whether all FRSs in England comply with the requirement to publish their IRMPs on their websites and reassure the public that FRSs are aware of all of the risks to people and property in their areas and that appropriate action is being taken.

Secondly, we wanted to investigate whether all FRSs update their IRMPs to assess current and future risks to local communities in the long term.

Finally, we explored the parts of IRMPs relating to prevention and protection to assess their fit for purpose.

Previous studies strongly suggest that these might have been deprioritised as a result of continuing austerity and this has subsequently been supported by the recently published inspection reports (HMICFRS 2018).

Stage 1: Accessibility and Public Reporting

We examine all IRMPs in terms of the ease of access and availability to the public, and a reporting period of a minimum of three years. This generated five questions:

- a. Is the IRMP publically available on the FRS website?
- b. Is it a standalone document or does it incorporate the IRMP?
- c. Is the IRMP easily accessible?
- d. Does the IRMP cover at least a three-year time span?
- e. Is the latest reporting period available?

The results of the analysis for 43 FRSs, conducted in October 2018, found that 42 FRSs out of 43 FRSs provided an IRMP document on their websites. One did not provide an IRMP for the latest reporting period. Instead, the service provided a consultation on the content of the IRMP for the 2019-2022 period.

Out of the 42 FRSs that provided IRMPs, 30 provided standalone documents, whereas 12 FRSs provided IRMPs that are part of other documents. There is no template or standard format for IRMPs. Fifty per cent of metropolitan FRSs, 35 per cent of combined FRS and just over eight per cent of county FRSs provided their IRMPs as part of other documents. Interestingly, larger services tend to provide IRMPs that are integrated within other documents, whilst small services tend to publish their IRMPs as standalone reports.

In terms of ease of access, 37 IRMPs were discoverable through the search function on FRSs' websites while five others required a manual search for reports and publications.

Thirty nine IRMPs met statutory requirement of at least a three-year time period. FRSs tend to publish their IRMPs for three, four and five-year periods. Three provided IRMPs that do not cover minimum three-year reporting period, with two of them covering only one year. While 41 FRSs published their IRMPs for the latest reporting period (2018), one service provided an IRMP for the 2017 reporting period as their latest iteration.

The overall conclusion from stage 1 was that FRSs clearly acknowledge the importance of IRMPs to service delivery and in practice acknowledge the need for its regular review and the public reporting of its contents. IRMPs remain a fundamental part of the service delivery process for FRSs in the UK in both theory and practice.

Stage 2: Protection and Prevention

As part of their inspections, HMICFRS are reviewing whether the activities provided by FRS are based on risks identified in the IRMPs and whether FRSs shift resources when the pattern of risk changes.

According to HMICFRS' summary report, protection work is too often under-resourced and not always as effective as it should be. This is reflected in the 42 per cent reduction in the number of fire safety audits being carried out annually over the last seven years. Another concern was the under-use of enforcement powers. FRSs tend to engage with businesses, which is an important part of protection work, but do not appear to use their legal powers as much as they should.

According to HMICFRS, FRSs should make sure all staff carrying out prevention work can provide a full range of prevention advice as part of the support to the community they serve. They consider dedicated or specialist prevention teams as being more competent than operational crews when carrying out prevention activities.

Fire and rescue services are criticised for failure to evaluate their protection and prevention activities and to establish the effects or benefits these activities are having on the public. Although HMICFRS find this to be a widespread inadequacy, recent research by Taylor et al (2019) demonstrates how Merseyside Fire and Rescue Service Fire Authority is attempting to measure the effectiveness of fire prevention.

Using data from FRSs, NHS and UK national statistics, their approach inter alia, focused on assessing four areas:

- The overall effectiveness of FRS provision;
- Fire incidents, injuries and facilities compared to spend per head;
- The effectiveness of fire prevention strategies; and
- The effectiveness of the targeting of fire prevention.

They were able to show clear positive patterns or trends in three of the four areas (overall effectiveness, per capita spend and the effectiveness of targeting). The only area they were not able to ascertain a clear trend or pattern was in the assessment of fire prevention strategies. This is, however, hugely encouraging and demonstrates that clear evaluation of protection and prevention is possible and practical.

We decided to explore whether protection and prevention activities:

- Were fit for purpose, and
- Whether they reflected other evidence suggesting disproportionate dis-investment in protection and prevention activities.

The second part of the project focused on the analysis of the six IRMPs (two county, two combined and two metropolitan services). These IRMPs were analysed in terms of protection and prevention activities.

The activities reported could essentially be differentiated into two categories. The first could be interpreted as being expressions of aims, objectives and/or outcomes, for the service. These by their nature tended to be medium or long-term in perspective. The

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Table 2

Protection - aims, objectives and outcomes	
Safeguarding the culture, heritage and environmental assets	Four out of six FRSs
Risk-based approach	One out of six FRSs
Environment - water pollution	One out of six FRSs
Environment - flooding	Two out of six FRSs
Environment - air quality	One out of six FRSs
Flu pandemic	One out of six FRSs
Protection - actions	
Working with businesses to help them thrive	Six out of six FRSs
Assessing high risk buildings	Four out of six FRSs
Securing legislative compliance (enforcement action)	Five out of six FRSs
Carrying out fire safety audits	Two out of six FRSs
Sprinkler systems encouragement	Three out of six FRSs
Business continuity planning	Three out of six FRSs
Prevention - aims, objectives and outcomes	
Reducing the number of people killed or injured in dwelling fires	Three out of six FRSs
Arson reduction	Three out of six FRSs
Reducing anti-social behaviour	Three out of six FRSs
Tackling the root causes of inequality	One out of six FRSs
Prevention - actions	
Carrying out home fire safety checks	Five out of six FRSs
Working in partnership	Four out of six FRSs
Providing fire safety education	Five out of six FRSs
Improving road safety	Five out of six FRSs
Engaging with young people	Five out of six FRSs
Business intelligence and data analysis	Two out of six FRSs
Free smoke alarms	Two out of six FRSs

second was identification of various 'actions.' These by their nature tended to be more short-term in focus and be input or output focused.

Table 2 lists the protection and prevention aims and activities from the sample of six FRSs.

It is worth reiterating that the second stage of analysis is only based on the publicly available IRMPs. It excludes other sources of information (internal reports or non-publicly available parts of the FRS websites and/or intranets) that were not available to the research team.

Protection Aims and Objectives

Most of the FRSs tend to engage in safeguarding the culture, heritage and environmental assets and three services aim to further safeguard against water pollution, flooding and poor air quality. It is clear that other aims are less critical for some FRSs. For instance, each service should have a risk-based inspection but only one service indicated that their protection approach is risk-based.

Two services did not provide any long-term aims, objectives and outcomes; one service provided only one. The majority had two or less long-term objectives in terms of protection. In this small sample, the services on average provided less than two aims, objectives and outcomes.

Protection Actions

Services tend to report a number of actions. All services for instance indicated that they work with businesses to help them thrive. Five out of six services use their enforcement action to statutorily comply with the provisions of the Regulatory Reform (Fire Safety) Order 2005 and four out of six services declared they assess high risk buildings. However, the most surprising aspect of the data is that only two services reported that they conduct fire safety audits, which examine premises and relevant documents to ascertain how the premises are being managed.

On average, a service provided between three and four protection activities. However, what stands out in the table is the relative diversity in the total number of actions undertaken by the FRSs, ie between two and six.

Based on our limited sample, there appears to be no great difference in the spread of protection activities provided by the different types of services, namely county, combined and metropolitan authorities.

Prevention Aims and Objectives

Only three out of six FRSs state that their aim is to reduce the number of people killed or injured in household fires. Similarly, three services declare that they aim to reduce arson incidents and anti-social behaviour. Only one service claims that it aims to tackle the root causes of inequality. On average, a service provided between one and two prevention aims, objectives and outcomes.

Prevention Actions

Fire and rescue services appeared to engage widely with communities, young people in particular, through providing fire safety education and improving road safety. A large proportion of services also claim they carry out home fire safety checks and most services declare that they work in partnerships with other sectors.

One FRS is only involved in three actions, which are not primary in terms of preventing people from fire (working in partnership, engaging with young people, and business intelligence and data analysis). All other services perform primary prevention actions (carrying out home fire safety checks, providing fire safety education and improving road safety) and on average, the services reported providing between four and five prevention activities in their IRMP.

Table 3

FRS	Total number of protection aims	Total number of protection actions	Total number of prevention aims	Total number of prevention actions	Total aims and actions
FRS 1	5	5	1	4	15/24
FRS 2	0	3	2	5	10/24
FRS 3	2	6	1	6	15/24
FRS 4	0	3	2	3	8/24
FRS 5	1	2	3	5	11/24
FRS 6	2	4	1	5	12/24

Table 3 summarises the second stage. The results suggest that IRMPs tend to include protection and prevention actions, rather than aims, objectives and outcomes. The results do not, however, show any apparent differentiation across either authority types (county, combined or metropolitan), or across different regions.

Conclusions

Integrated risk management plans remain a fundamental and significant part of modern FRS service delivery in both theory and practice. Almost all FRSs in England statutorily comply with the requirement to provide easily accessible IRMPs on their websites either as standalone or integrated documents and generally for a minimum three-year time span. Fire and rescue services acknowledge the importance of the IRMP to service delivery and acknowledge the need for its regular review and for the public reporting of its contents.

According to our findings, we can assume that most of the FRSs are aware of the risks to people and property in their areas in the long-term. Despite these encouraging results/assumptions, there may be a minority of FRSs that do not provide the documents that assess current and future risks to their local communities, and we would expect these to be identified in the ongoing inspection programme by HMICFRS.

The findings also suggest that English FRSs provide IRMPs that vary and possibly vary significantly. Fire and rescue services tend to use a variety of reporting periods (from one to nine years) and they also use different names to call their IRMPs. This reflects the absence of existing national guidance on templates or standard formats for IRMPs. The primary guidance available is the Fire and Rescue Services Act 2004 and the latest National Framework 2018.

There are clearly variations in IRMP reporting; and the question that this suggests is – are these variations

warranted by situation and circumstance, or are they unwarranted? If they are unwarranted, then how significant are these unwarranted variations and how can they be reduced?

In stage 2, we explored the parts of IRMPs relating to prevention and protection. FRSs provide varied levels of detail on prevention and protection activities in their IRMPs. In general terms, this supports both HMICFRS findings and earlier studies that suggest that data and information provided by FRSs needs to improve.

It is clear that protection and prevention activities do not command sufficient priority for some FRSs in the way that they should do. This correlates with underinvestment in these activities recently reported by HMICFRS.

Finally, however, it is important to re-emphasise that the second stage of our analysis is based on the activities identified in the IRMPs of six FRSs. Clearly this does not capture a complete national picture of how FRSs are performing. It does, however, add to evidence previously available (and supports calls by NFCC and others), for a systematic and comprehensive assessment of all IRMPs. Such a study would review their adequacy, establish whether they are fit for purpose, identify good practice and provide the evidence upon which a national benchmarking tool could be built.

References:

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