

Gap analysis for Rule 43 and review of PN 800

1. PN 800 Information gathering/contingency plans gives a good level of detail on the process of identifying premises that require 7(2)(d) inspections, a process for risk assessing the premises, identifying the frequency of inspections and training events. It also gives guidance on completing the Operational Risk Database (ORD) and the level and type of detail required. That said OP recommends that PN 800 is reviewed with consideration given to the following headings:
 - a. Specific reference to section 7(2)(d) of the Fire and Rescue services act 2004 and the legislative drivers for this policy.
 - b. Specific reference to the link between ORD and MDT and making data on ORD relevant for Mobile Data Terminals (MDT).
 - c. Review the policy to ensure accuracy and rationalise where appropriate.
 - d. Ensure that the policy is searchable on Hotwire as 7(2)(d) policy, this may be as simple as changing the title.
 - e. Crews remaining vigilant during other duties on their stations ground to identify premises that might require 7(2)(d).
2. The review of PN 800 should be supported by the creation of a training package for station based personnel. PN 800 is reasonably comprehensive however it is also a quite a complicated policy and station based staff would benefit from a training package to provide guidance to watch officers on how to complete 7(2)(d) inspections. The package should consider the following:
 - a. Understanding the premises risk analysis process.
 - b. How to use station staff to gather the correct information.
 - c. Providing guidance to crews on specific information they should be gathering during 7(2)(d) inspections
 - d. Completion of the ORD and the connection between the ORD and MDT.
3. The value and profile of information held on the ORD/MDT should be raised by including it in incident command simulations. Currently while fire survival guidance calls feature frequently in incident command exercises little if any information is ever available to incident commanders via the MDT system. The incident management team (IMT) should be asked to introduce relevant MDT information to incident command exercises and incident command assessments. Consideration should also be made to introducing MDT information during Vector based training sessions.
4. Review the links between operational staff and fire safety inspecting officers to ensure that lines of communication between the two are fit for purpose and the exchange of important premises information is happening as it should be.
5. Recognising that blanket direction is hard to give in relation to 7(2)(d) inspections since the geographical make up of the 33 boroughs and 112 station grounds is very different across the capital. Some stations, such as Westminster, would find it very difficult to add four 7(2)(d) inspections every year to every residential high rise on their stations ground.

6. Review the process for ensuring that risk critical information is available to crews in the form of underwrites and enhanced PDA for specific short term risks both 9 to 5 and out of hours. (i.e. The identification of a defective dry rising main during an evening HFSV) Is the current special arrangement area process robust enough and does it provide sufficient detail to attending crews on elevated risks or reasons for enhanced attendances?
7. Consideration should be made to encouraging a more proactive approach from control, for example notifying incident commanders that MDT information for a specific address exists and is available. This will require control to have access the ORD/MDT system.