



**GREATER
MANCHESTER**
FIRE AND RESCUE SERVICE

Protection Strategy

2022 - 2025

1. Introduction

This document is Greater Manchester Fire and Rescue Service's Protection Strategy. It sets out how we will develop and deliver our wide ranging functions to improve building safety and reduce the risks to our communities and our firefighters.

The delivery of this strategy enables Greater Manchester Fire and Rescue Service (GMFRS) to meet its statutory duties as an enforcing authority for the Regulatory Reform (Fire Safety) Order 2005 and the Health and Safety at Work Act 1974. In addition to our regulatory role we have statutory duties under the Fire and Rescue Services Act and the power to investigate the cause, origin and development of fires.

This strategy sets out how we will continue to support the GMFRS mission and vision through our protection functions. The core purpose underpinning our protection work is *"to ensure the safety of the public and firefighters by identifying, investigating and reducing risk. We will work with others to identify risks and develop solutions to improve safety through engagement, advice and enforcement"*.

This Protection Strategy supports the Fire Plan for Greater Manchester (2021 -25), which identifies six priorities for the Service.

1. Provide a fast, safe and effective response
2. Help people reduce the risks of fire and other emergencies
3. Help protect the built environment
4. Use resources sustainably and deliver the most value
5. Develop a culture of excellence, equality and inclusivity
6. Integrate our services in every locality, with those of partner agencies

The strategy covers the period 2022 - 25 and primarily supports the delivery of Priorities 1, 2 and 3 of the Fire Plan and embedding a culture of excellence, equality and inclusivity.

The effective delivery of our Protection functions is essential to supporting the safety of communities, minimising risk and harm from fire, and ensuring the safety of our firefighters.

The built environment in Greater Manchester is complex and evolving, with significant development planned to increase the number of homes through the GM Places for Everyone strategy; increase commercial development to support our growing economy; and improve the transport infrastructure.

As the landscape across Greater Manchester evolves, the legislative framework that ensures the safety of people from fire is also changing. The Building Safety Bill aims to improve the regulation of high rise residential buildings, and changes to the Fire Safety Order will affect all business across Greater Manchester.

Our protection functions are focussed on reducing the risk of fire and reducing the risk to people from fire. We will reduce the risk of fire by influencing the design and construction of new buildings; identifying the causes of fire; and sharing advice on fire prevention. We will reduce the risk to our communities by ensuring our regulatory activity is focussed on risk and our resources are targeted where we can achieve the maximum impact.

GMFRS is committed to developing our teams in line with national competency requirements and ensuring they have the skills, knowledge and expertise to deliver our services effectively and identify opportunities for continuous improvement.

This protection strategy is built on a series of commitments to our communities and our partners which will be detailed throughout this document.

2. Analysing and assessing risk

The Fire Plan commits to continually improving how we respond to risk and demand to ensure we have the right resources available, in the right place, at the right time, and in the right numbers.

GMFRS prepares an annual Strategic Assessment of Risk (SAoR) to support our risk planning processes to ensure we keep risk under review and identify emerging risks.

We commit to supporting the annual Strategic Assessment of Risk by identifying emerging risks in the built environment.



Our Fire Safety Regulators and Fire Engineers are involved in consultations for new developments and support a range of NFCC working groups. Through this work we are able to monitor and identify emerging risks related to the design and construction of buildings and the changing profile of buildings in Greater Manchester. This information is key to our identification and understanding of building risks.



We commit to ensuring that knowledge of risks relating to building construction is made available to our Firefighters through training and sharing knowledge and information about building risks.

GMFRS has regard for the principles of the Regulators Code in planning and delivering our regulatory functions. This requires us to prioritise risk within our area and allocate our resources to effectively address that risk.

We have developed risk based inspection programmes for premises regulated under the Fire Safety Order, petroleum sites and premises where a licence to store explosives is issued. These programmes are used to prioritise buildings for proactive inspections. The information that informs the risk profiling is gathered through a number of means but primarily comprehensive information about a premises is gathered through site visits which are resource intensive. To increase

the information we can utilise, we will develop improved systems for capturing risk information and create a platform for building owners to proactively provide information about their buildings.

We commit to partnership working to improve information sharing relating to building risk and the development of digital solutions for capturing building risk information.



As part of our focus on risk we will regularly review our risk based inspection programmes against the outcomes of our inspections, emerging themes and trends. Through our fire investigation work we will analyse where fires occur and the causes of fire, using this information to inform evaluation of our risk profiling.



3. Supporting compliance

GMFRS believes that the majority of businesses and those who operate regulated premises want to ensure the safety of the public and their employees. We are committed to supporting businesses to comply and grow, carrying out our functions in a way that supports compliance.

We will ensure clear guidance and information is available to support self-compliance through a variety of means. This will include improving the information available on our website, delivering face to face events for those responsible for high risk premises and sharing learning from incidents.

We commit to improving our business engagement to offer information in a range of ways which are inclusive and easily accessible.



We will actively target advice and information where there is evidence of high levels of non-compliance to support improvements in the management of fire safety.

We commit to thematic targeting of advice and information aligned to our risk based inspection programmes.



GMFRS has a number of Primary Authority Partnerships that have been developed through the GM Centre of Regulatory Excellence. We recognise the value and benefits of Primary Authority Partnerships as a way of supporting compliance and proactively reducing risk.

We commit to developing and refining our Primary Authority offer to ensure we provide consistent and quality advice to support to our partners.



Our commitment to supporting compliance is embedded within our proactive inspection programmes and we will arrange and undertake inspections in a way that minimises disruption; sets out clearly what

the inspection will involve; and identifies sources of relevant guidance. We will document the outcome of all our inspections with clear information and advice and, where appropriate, make clear the difference between legal requirements and good practice.

We commit to providing clear advice and information before carrying out programmed inspections and when confirming the outcome.



The proposed changes in fire and building safety legislation will have significant implications for housing providers and businesses across Greater Manchester. We will work with our neighbouring Fire and Rescue Services in the North West to take a consistent approach to providing advice and support to help those we regulate prepare for these changes.

We commit to working with others to prepare for legislative change by providing guidance and support.



The skyline of Greater Manchester is changing, with more than 600 occupied high rise residential buildings and hundreds more planned over the next 15 years through the Places for Everyone strategy. Following the fire at Grenfell Tower in 2017, GMFRS has played a key role in the Greater Manchester High Rise and Building Safety Task Force to inspect buildings, take action to ensure the safety of residents and support stakeholders to respond to emerging evidence about the risks in buildings and changing Government advice. The safety of residents has and will continue to be at the heart of our activity. GMFRS has actively worked to shape the policy landscape working with Government and partners to influence the new regulatory regime.

We commit to continuing to support residents, and the GM High Rise and Building Safety Task Force, actively preparing for the implementation of the Building Safety Regime.



4. Influencing safety in the built environment

In addition to our statutory enforcement duties GMFRS is committed to promoting safety, working with and supporting partners regulating existing and new buildings.

GMFRS will seek to influence the safe design of new developments at the planning stage, liaising with local authorities to ensure commercial and residential developments are accessible by our appliances, and our firefighters can access water in the event of a fire.

GMFRS will continue to influence the safe design of new buildings by responding to consultations from Building Control Bodies in accordance with national guidance and, where appropriate, contribute our expertise at the design stage. Our responses will ensure we promote compliance with the Fire Safety Order and limit the need for future regulatory intervention in new buildings. We will ensure we have a competent workforce to contribute to the Gateways proposed as part of the new Building Safety Regime.

GMFRS will continue to support wider public safety objectives by responding to statutory licensing consultations and actively participating in multi-agency approaches to large scale events. We will focus our resources and expertise where we can have the most impact on public safety and ensure guidance and information is available to individuals holding temporary events.

We commit to continuing to influence safety in the built environment by using our expertise to respond to a range of consultations from our partners.



In addition to our work to support compliance, we will work with our partners across GM to reduce the risk for vulnerable residents by taking a co-ordinated approach to ensuring that accommodation in regulated premises is safe from fire and embedding prevention in the provision of specialised housing. We will work with the GM Health and Social Care Partnership to co-produce a GM standard for fire safety in supported housing.

We commit to working with our partners to develop and deliver new approaches to promoting fire safety compliance and fire prevention activity.



GMFRS is committed to supporting the work of the National Fire Chiefs Council and supports a range of working groups and actively contributes to the work of NFCC to influence policy and technical standards. We will continue to play an active role at a national and regional level to share expertise and good practice, develop evidence based interventions and contribute to consultation responses.

We commit to playing an active role in the work of the National Fire Chiefs Council to influence and improve safety in the built environment.



5. Regulating effectively

GMFRS carries out a wide range of regulatory roles in meeting its statutory duties to protect the public, individuals and the environment. These duties are mainly met by carrying out programmed inspections of premises, responding to complaints, issuing licenses and offering advice. We undertake our regulatory activity in line with our Enforcement Policy and Standards and in line with the provisions of the Regulators Code. We are committed to ensuring our regulatory activity is delivered in a way that is accessible, effective, targeted and proportionate.

GMFRS has a duty to enforce the Fire Safety Order and this involves inspecting buildings to ensure they are safe for the public. We carry out inspections proactively as part of our risk based inspection programme and reactively in response to complaints, intelligence or as part of co-ordinated work with our partners. Following an inspection we can offer advice to support ongoing or improved compliance or take enforcement action where fire safety standards are poor and put people at risk.

Our inspection activity is focussed on protecting the public and we use the full range of our enforcement powers, including prosecution, to secure compliance with the law and to ensure those who have duties under it are held to account where they put people at risk. We have invested in training for our Fire Safety Regulators to ensure they have the knowledge and skills to inspect and enforce effectively. We will continue to develop our staff to ensure we continually improve our approach to inspections to deliver positive outcomes.

We commit to targeting our inspection activity to address risk and using the full range of our enforcement powers to protect the public.



To focus our resources effectively on risk, we will train our frontline crews to carry out fire safety visits to simple and low risk premises. This will enable us to support small businesses to comply, inspect more premises, and focus our specialist Fire Safety Regulators on higher risk premises.

We commit to training our firefighters to undertake fire safety checks in simple and low risk premises.



Inspections form part of our regulatory activity but are limited in scope to the premises being visited. For some types of premises, particularly higher risk premises, there may be large property portfolios operated by a single organisation or business. This is particularly prevalent in relation to hospitals, residential care homes and high rise residential and other blocks of flats. An inspection of individual premises or a small sample of portfolios is not necessarily the most effective way to ensure compliance with fire safety requirements. GMFRS will work with our partners to deliver more comprehensive arrangements to support compliance and ensure we are effectively regulating fire safety, adopting a 'safety case' approach based on assessing fire safety management supported by sample inspections. This will support preparation for the implementation of the Building Safety Bill.

We commit to developing new approaches to regulation of higher risk accommodation.



GMFRS has responsibilities for the regulation of the storage of petroleum and explosives and these functions are carried out under the Health and Safety at Work Act 1974. The effective regulation of petroleum and explosives is essential for the protection of the public and firefighters, as a failure to ensure storage of petroleum or explosives is done safely has the potential to cause significant incidents.

GMFRS issues certificates for the storage of petroleum and inspects sites which are storing petroleum. We work with site operators to ensure that petroleum is stored safely and fire safety risks managed. We have developed a risk based inspection programme to focus our inspections on risk, and we have increased the number of Fire Safety Regulators trained to carry out these inspections.

GMFRS regulates the storage of explosives and year round sales. We refined our application processes for Explosives Storage Licences and developed a risk based inspection programme for inspections. All premises where explosives are stored are visited by Firefighters to gather risk information. We have a range of powers to

tackle unsafe storage of explosives and use these when public safety is jeopardised. These inspections are undertaken by Fire Safety Regulators trained to utilise powers to seize or detain explosives. GMFRS will strengthen our partnership working to take a more targeted approach to inspection tackling harm caused to our communities by underage sales and anti-social behaviour.

We commit to working with partners to ensure effective regulation of the storage, sale and use of fireworks and other explosives.



6. Investigating fires to influence risk reduction

GMFRS has the power to investigate fires to determine the cause, origin and the development of fire. Understanding the cause of fires is fundamental to preventing fires in homes and commercial businesses. The impacts of fire can be devastating in terms of property loss, disruption and, in a small number of cases, injuries and fatalities.

GMFRS is investing in our capability to ensure all fires are effectively investigated by frontline officers, and for complex cases by specialist Fire Scene Investigators. We have committed to increasing our competence and capability to undertake fire investigations through training for all Crew and Watch Managers and re-establishing a 24 hour provision of specialist Investigators.

We commit to ensuring all fires are investigated and complex fire investigations are undertaken by specialist Fire Scene Investigators.



Our Fire Scene Investigators play a crucial role in identifying risk factors that contribute to fire and fire damage and ensuring we can share this information with partners and other stakeholders to reduce the risk to our communities and the built environment.

Our Fire Safety Regulators may undertake inspections following significant fires in regulated premises. We will develop a more structured approach to co-ordinated investigations following fires and proactively share information on how to reduce fire risk.

Our Prevention teams utilise information from fires to inform and develop evidence based prevention interventions to reduce harm to our communities. We will ensure evidence about the causes of fires is shared consistently to inform campaigns, safety advice and targeted interventions.

We commit to sharing information about the causes of fire with key stakeholders to reduce risks in our communities.



A small number of fires result in fatalities which are devastating to those who lose a loved one. Fire Scene Investigators play a vital role in supporting HM Coroners to investigate deaths through Inquests and identify opportunities to prevent future deaths. We will ensure we continue to provide a professional and comprehensive fire investigation capability and co-ordinate information and reports to HM Coroners for fire related fatalities.

A small number of fires are caused deliberately every year. These range from outdoor fires related to antisocial behaviour, to targeted attacks. GMFRS is committed to providing information to support Greater Manchester Police (GMP) to carry out investigations when fires are related to criminal activity and providing evidence in court cases. There are changes planned to the standards required when carrying out fire investigations that may become involved in the criminal justice system. These standards are set by the Forensic Science Regulator and will require any service providing fire investigation evidence to the criminal justice system to be accredited to the ISO-17020 standard. GMFRS has committed to working towards achieving ISO-17020 accreditation to ensure we can continue to support and participate in multi-agency investigations led by GMP.

We commit to obtaining ISO-17020 accreditation and continuing to support the criminal justice system.



7. Supporting safe and effective operational response

The Fire Plan commits to ensuring GMFRS staff are trained to recognise the wide range of factors that can increase fire risk and improving how we collect and use accurate risk information to ensure a safe and effective response to emergencies.

Through our protection functions we will help improve firefighter safety and share information to support effective firefighting. This will be done through embedding a 'one GMFRS' approach to the collection and use of information about building risks.

We commit to investing in digital solutions to ensure information about building risk is collected once and utilised across the service.



GMFRS has a water team responsible for ensuring adequate water provision for firefighting operations. We will continue to proactively inspect and maintain hydrants to ensure they are available for firefighting use. We will share information with businesses and the public about the importance of hydrant availability and support United Utilities to tackle damage to, and abuse of, water hydrants. Our firefighters have been trained to undertake hydrant maintenance when carrying out operational risk visits and our Water Team will continue to support this approach.

We commit to supporting safe and effective response by ensuring adequate water supplies are available for firefighting operations.



8. Measuring Success

The objectives of the Fire Plan are to:

1. Reduce deaths, injuries and damage caused by fire and other threats to our communities.
2. Deliver the best value to the public with the least impact on the environment.
3. Develop and maintain a diverse, high-performing, and healthy workforce.

The ultimate aim of this strategy is to reduce the risk and impact of fires in the built environment .

To help achieve these outcomes, the aims of this strategy are to:

1. Ensure we continually review, and respond to emerging risks in the built environment to target our resources effectively; support risk reduction; and provide an effective emergency response.
2. Support businesses and organisations across Greater Manchester to ensure they can access clear information and guidance about their responsibilities and how we regulate.
3. Improve our engagement with businesses to support compliance in a targeted manner.
4. Work with stakeholders and partners nationally, locally and regionally to influence and effectively embed changes to legislation.
5. Continually review our approach and the effectiveness of our interventions in improving the safety of buildings.
6. Invest in new technology and digital solutions for capturing and sharing building risk information.
7. Invest in our workforce to ensure they have the skills and knowledge to deliver excellent services.

Protection activity will continue to be monitored and reported in line with a number of associated Key Performance Indicators (KPIs) in line with the GMFRS corporate reporting framework.

What we do:

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| Provide a fast, safe, and effective response | Help people reduce the risks of fires and other emergencies | Help protect the built environment |
| Use resources sustainably and deliver the most value | Develop a culture of excellence, equality, and inclusivity | Integrate our services in every locality with those of partner agencies |

How we do it:

| | | |
|---|--|---|
| We commit to supporting the annual Strategic Assessment of Risk by identifying emerging risks in the built environment. | We commit to ensuring that knowledge of risks relating to building construction is made available to our Firefighters through training and sharing knowledge and information about building risks. | We commit to partnership working to improve information sharing relating to building risk and the development of digital solutions for capturing building risk information. |
| We commit to improving our business engagement to offer information in a range of ways which are inclusive and easily accessible. | We commit to thematic targeting of advice and information aligned to our risk based inspection programmes. | We commit to developing and refining our Primary Authority offer to ensure we provide consistent and quality advice to support to our partners. |
| We commit to providing clear advice and information before carrying out programmed inspections and when confirming the outcome. | We commit to working with others to prepare for legislative change by providing guidance and support. | We commit to continuing to support residents, and the GM High Rise and Building Safety Task Force, actively preparing for the implementation of the Building Safety Regime. |
| We commit to continuing to influence safety in the built environment by using our expertise to respond to a range of consultations from our partners. | We commit to working with our partners to develop and deliver new approaches to promoting fire safety compliance and fire prevention activity. | We commit to playing an active role in the work of the National Fire Chiefs Council to influence and improve safety in the built environment. |
| We commit to targeting our inspection activity to address risk and using the full range of our enforcement powers to protect the public. | We commit to training our firefighters to undertake fire safety checks in simple and low risk premises. | We commit to developing new approaches to regulation of higher risk accommodation. |
| We commit to working with partners to ensure effective regulation of the storage, sale and use of fireworks and other explosives. | We commit to ensuring all fires are investigated and complex fire investigations are undertaken by specialist Fire Scene Investigators. | We commit to sharing information about the causes of fire with key stakeholders to reduce risks in our communities. |
| We commit to obtaining ISO-17020 accreditation and continuing to support the criminal justice system. | We commit to investing in digital solutions to ensure information about building risk is collected once and utilised across the service. | We commit to supporting safe and effective response by ensuring adequate water supplies are available for firefighting operations. |

Underpinned by our values:

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| Excellence | Respect | Professionalism in our role | Inclusive | Honesty |
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