

Item 7 (iii)



## STAFFORDSHIRE FIRE & RESCUE SERVICES

### Protection Activity

FINAL Internal Audit Report: 2.24/25

4 September 2024

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# AUDIT OUTCOME OVERVIEW

In line with our scope, included at Appendix B, the overview of our findings is detailed below.

**Background / why we did the audit:**

The Risk Based Inspection Programme (RBIP) is the driver for the Service's management of high and very high risk premises, which require regular fire safety inspections. The current RBIP was implemented in February 2024, following a recommendation made as part of an inspection by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) and as such has adopted the methodology advised by the National Fire Chiefs Council (NFCC) in their Definition of Risk project.

As a result of the new reporting methodology, a number of premises were added to the revised RBIP, which require an initial (and subsequent) fire safety inspection. At the time of the audit, this number had reduced to 621, of which 33% still require an inspection, down from 62% during the first quarter of the year.

We have undertaken an audit to review the current RBIP and the Service's approach to conducting fire safety inspections for the premises under each risk category.

**Conclusion:**

A control framework is in place for the oversight and management of Protection Activity across the Service. The Service is continuing to improve and new processes for inspection for property assigned medium, low and very low priority, have recently been implemented. Our audit work has highlighted areas of improvement relating to inspection notice periods and the completion and retention of Audit Forms; resulting in two 'medium' and one 'low' priority management actions being agreed.

**Internal audit opinion:**



**Minimal Assurance**



**Partial Assurance**



**Reasonable Assurance**



**Substantial Assurance**

Taking account of the issues identified, the Authority can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).

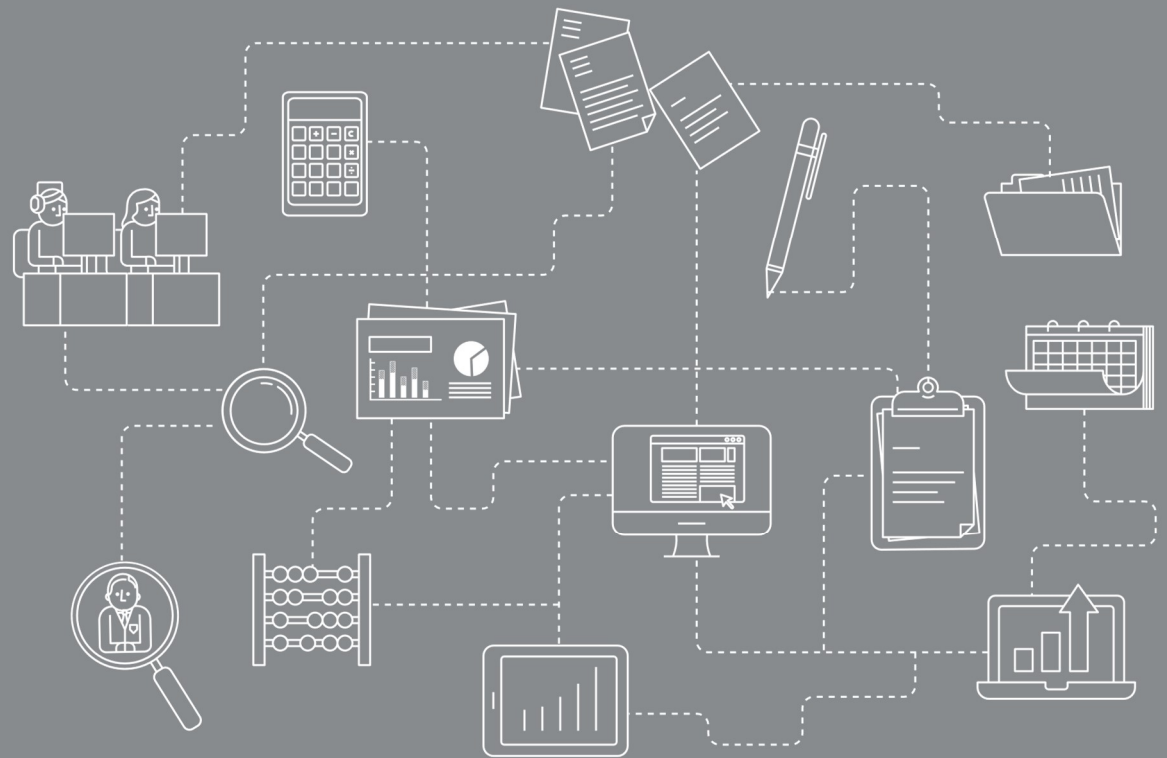
**Audit themes:**

**Audit Inspection Programme (High and Very High Risk Properties)**

We completed testing on a sample of 10 high and 10 very high risk premises, in order to verify whether the fire safety inspections are conducted in line with the process captured in the Protection Officer Process Maps document. Our testing identified some exceptions in relation to notice periods, completion of the required Audit Form, including details of the FSR completing the inspection. (2x Medium, 1x Low)

# Summary of Actions for Management

01



# SUMMARY OF MANAGEMENT ACTIONS

The action priorities are defined as\*:

## High

Immediate management attention is necessary.

## Medium

Timely management attention is necessary.

## Low

There is scope for enhancing control or improving efficiency.

Ref	Action	Priority	Responsible Owner	Date
1	The Responsible Person will be contacted and provided with an inspection date that gives a minimum notice period of 28 days in all cases.  Once this notice period has been given, the Responsible Person can agree an earlier or later date with the FSR.	Low	Ian Read, Head of Prevent, Protect and Partnerships	30 November 2024
2	Completed Audit Forms, including fire safety inspections conducted via telephone, will be held centrally.	Medium	Ian Read, Head of Prevent, Protect and Partnerships	30 November 2024
3	The name and service number of the FSR carrying out the inspection will be confirmed and included on the Audit Form. This will ensure robust record keeping is maintained for all inspections completed by FSRs.  In the event that an inspection is brought to the attention of the Service, the FSR responsible for conducting the inspection is easily located.	Medium	Ian Read, Head of Prevent, Protect and Partnerships	30 November 2024

\* Refer to Appendix A for more detail

# Detailed Findings and Actions

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## DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all audit testing undertaken.

### Audit Inspection Programme (High and Very High Risk)

<b>Control</b>	Audits are completed for all properties classed as 'very high' and 'high risk' in line with the procedural guidance.	<b>Assessment:</b>	
		<b>Design</b>	✓
		<b>Compliance</b>	×
<b>Findings / Implications</b>	We undertook testing on a sample of 20 'high' and 'very high' risk premises in order to verify:		
	<ul style="list-style-type: none"><li>• The Responsible Person has been contacted with a minimum of 28 days' notice;</li><li>• The nationally recognised Audit Form has been fully completed by an FSR, confirming the outcome of each article;</li><li>• The information is run through the CFRMIS database, which totals up the scoring and automatically provides an opinion (satisfactory, unsatisfactory) and a re-inspection frequency; and</li><li>• An outcome letter is issued to the Responsible Person with confirmation of the audit outcome.</li></ul>		
	Our testing has identified the following exceptions:		
	<b>Responsible Person being contacted with a minimum of 28 days' notice</b>		
	<ul style="list-style-type: none"><li>• In 13/20 cases, the Responsible Person was contacted with less than 28 days notice.</li></ul>		
	Sufficient notice should be provided in line with the Protection Officer Process Maps document, to allow the Responsible Person to collate the necessary documentation in time for the audit.		
	<b>Audit Form completion</b>		
	<ul style="list-style-type: none"><li>• In 3/20 cases, the audit was conducted during COVID-19, and therefore a telephone audit was conducted. During the fieldwork stage of the audit, the Protection Lead was unable to provide the Audit Form for these audits and had contacted the IT department for advice. These Audit Forms were not forthcoming; and</li><li>• In a further nine cases, the Audit Form did not confirm the name of the FSR conducting the audit. The Protection Lead advised that this information should be completed in all cases and has since provided the names for completion. However, this information should be captured on the Audit Form in all cases as good governance and to ensure that robust record keeping is maintained for all inspections carried out by FSRs.</li></ul>		



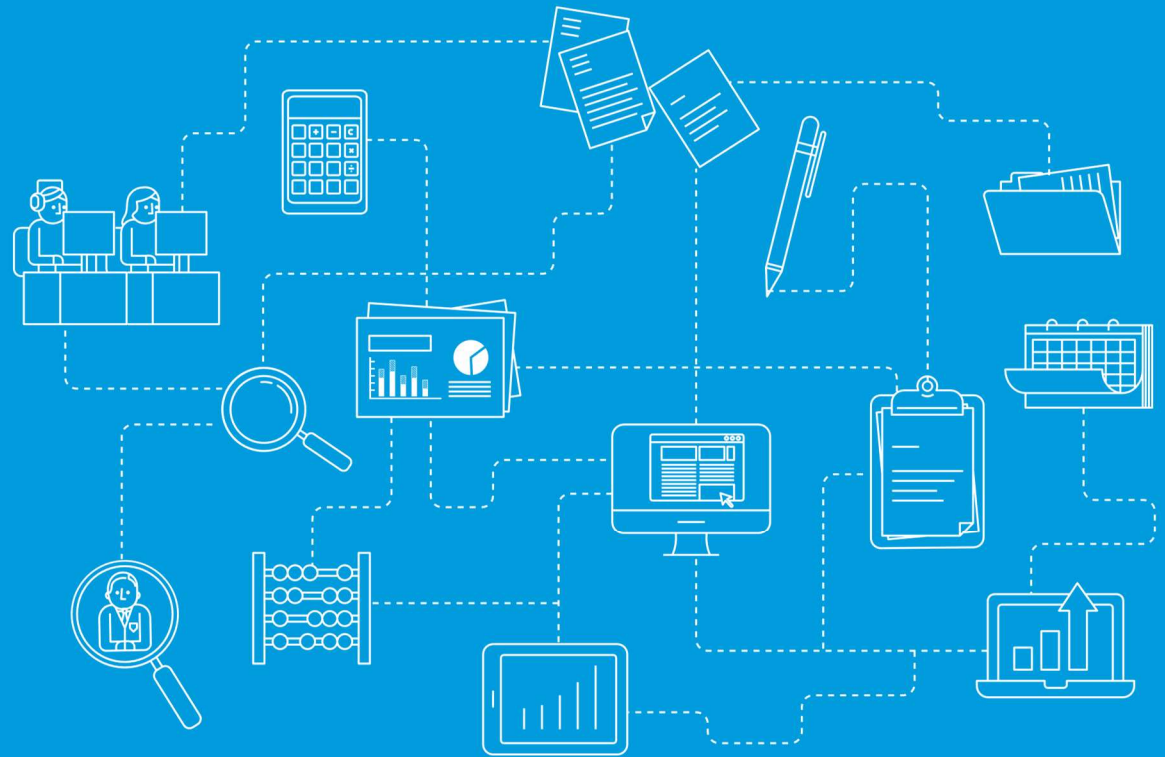
### Audit Inspection Programme (High and Very High Risk)

<b>Management Action 1</b>	<p>The Responsible Person will be contacted and provided with an inspection date that gives a minimum notice period of 28 days in all cases.</p> <p>Once this notice period has been given, the Responsible Person can agree an earlier or later date with the FSR.</p>	<b>Responsible Owner:</b> Ian Read, Head of Prevent, Protect and Partnerships	<b>Date:</b> 30 November 2024	<b>Priority:</b> Low
<b>Management Action 2</b>	<p>Completed Audit Forms, including fire safety inspections conducted via telephone, will be held centrally.</p>	<b>Responsible Owner:</b> Ian Read, Head of Prevent, Protect and Partnerships	<b>Date:</b> 30 November 2024	<b>Priority:</b> Medium
<b>Management Action 3</b>	<p>The name and service number of the FSR carrying out the inspection will be confirmed and included on the Audit Form. This will ensure robust record keeping is maintained for all inspections completed by FSRs.</p> <p>In the event that an inspection is brought to the attention of the Service, the FSR responsible for conducting the inspection is easily located.</p>	<b>Responsible Owner:</b> Ian Read, Head of Prevent, Protect and Partnerships	<b>Date:</b> 30 November 2024	<b>Priority:</b> Medium



# Appendices

## 03



## APPENDIX A: CATEGORISATION OF FINDINGS

### Categorisation of internal audit findings

#### Low

There is scope for enhancing control or improving efficiency.

#### Medium

Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.

#### High

Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*	Non-compliance with controls*	Agreed actions		
			Low	Medium	High
Protection Activity	0 (9)	1** (9)	1	2	0
<b>Total</b>			<b>1</b>	<b>2</b>	<b>0</b>

\* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

\*\* Non compliance with the control resulted in three management actions.

## APPENDIX B: SCOPE

### Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following objectives:

#### Objective of the risk under review

That there is a detailed risk based inspection programme (RBIP) in place to deal with high risk premises based upon the new methodology adopted by the Service as drafted by the National Fire Chiefs Council (NFCC). To review progress made by the Service to deliver the RBIP audits and ensure a framework is in place for governance and oversight of delivery.

### When planning the audit, the following were agreed:

#### Areas for consideration:

- A Risk Based Inspection Programme Policy and Guidance document is in place. We will ensure the documents have been based on National Guidance and that prescribed methodologies have been correctly applied;
- Roles and responsibilities have been defined and documented for the Protection Team and fulfilling the Inspection Programme;
- Training has been provided to staff members within the Protection Team and required accreditation obtained as per the NFCC Competence Framework for Fire Safety Regulators;
- A Risk Based Inspection Programme has been developed for all applicable properties within the County;
- The Protection Team has been split into three sub teams: 1) North Protection Team, 2) South Protection Team and 3) Central Protection Team based on the property location. We will review the allocation process for inspections;
- Programme audit inspections are completed for all properties classified as 'very high' and 'high' risk. The audit schedule has been developed based on risk classification and historical data for the premises;
- A sample of inspections from the Programme will be selected and tested to ensure they have been carried out in line with procedural guidance;
- Where a property has been classified as 'very low', 'low' or 'medium' risk, an audit may only be carried out if a complaint is received, a fire recorded or the premises is identified via operational crews carrying out a compliance check. (Due for implementation mid 2024);
- Progress made by the Service to deliver the RBIP audits and reduce the number of overdue new premises;
- A dedicated system is in place for managing, logging and monitoring the Inspection Programme. The system has been linked to the Service's Information Management System (CFRMIS) based on property UPRN; and
- Management information and performance data for the Inspection Programme is produced and reported.

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**Limitations to the scope of the audit assignment:**

- We will not confirm compliance with guidelines, legislation and statutory requirements;
- We will not comment on the outcomes of Inspection Audits;
- We will not provide assurance to confirm the intended outcomes of the Risk Based Inspection Programme will be realised;
- Testing will be completed on a sample basis;
- The results of our work are reliant on the quality and completeness of the information provided to us; and
- Our work will not provide an absolute assurance that material errors, loss or fraud do not exist.

**Debrief held** 19 August 2024  
**Draft report issued** 23 August 2024  
**Responses received** 29 August 2024

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