

Annex 5A: Raising the Bar Consultation Responses for WG5

Question	Comment and response from WG3
Question:41 - With regard to WG5 Fire Safety Enforcement Officers, do you think the analysis is correct?	<i>WG5 comment - One comment made by a tenancy company. The comment could not be understood therefore was not actioned by WG5. No further action</i>
Question:42a - With regard to WG5 Fire Safety Enforcement Officers, has anything been left out?	<i>WG5 comment - Two responses stated that something had been left out. These comments have been addressed in question 42b below. All other responses stated nothing had been left out. No further action</i>
Question:42b - With regards to WG5 Fire Safety Enforcement Officers, has anything been left out?	<p>The standards for enforcement activity must be reviewed. The suitability of the NFCC template for inspection and reporting is flawed, abused and is heavily weighted towards the mitigation for the business regardless of the previous performance of inspection.</p> <p><i>WG5 comment - This aspect should be dealt with by the NFCC Enforcement Working Group rather than WG5.</i></p> <p>WG5 Action - To be forwarded to the NFCC Enforcement Working Group</p>
Question:42b - With regards to WG5 Fire Safety Enforcement Officers, has anything been left out?	<p>The standards for enforcement activity must be reviewed.</p> <p><i>WG5 comment - This aspect should be dealt with by the NFCC Enforcement Working Group rather than WG5.</i></p> <p>WG5 Action - To be forwarded to the NFCC Enforcement Working Group</p>
Question:42b - With regards to WG5 Fire Safety Enforcement Officers, has anything been left out?	<p>Specialist disciplines training with companies for product specifications, manufacture and installation.</p> <p><i>WG5 comment - It is the responsibility of individual FRS to determine appropriate training / CPD for Fire Safety Officers. This aspect will be considered when the National Occupational Standards (NOS) are re-visited. In addition, NFCC is investigating whether CPD can be rolled out to all FRS nationally. Knowledge of products could be enhanced through this mechanism.</i></p> <p>WG5 Action - To be logged for NOS</p>

	revisions and potential national CPD input
Question:42b - With regards to WG5 Fire Safety Enforcement Officers, has anything been left out?	<p>As per NHBC's response to the NFCC consultation on the Competency Framework for Fire Safety Regulators, we consider it may be appropriate to allow for other professional bodies to develop third party registration schemes for Fire Safety Inspectors other than IFE. This would allow for a wider range of options for Fire Safety Inspectors to demonstrate their competence.</p> <p><i>WG5 comment - The revised Framework refers to a professional body as opposed to solely the IFE following consultation with FRS. No further action.</i></p>
Question:42b - With regards to WG5 Fire Safety Enforcement Officers, has anything been left out? Comment	<p>The standards for enforcement activity must be reviewed. The suitability of the NFCC template for inspection and reporting is flawed, abused and is heavily weighted towards the mitigation for the business regardless of the previous performance of inspection.</p> <p><i>WG5 comment - This aspect should be dealt with by the NFCC Enforcement Working Group rather than WG5.</i></p> <p>WG5 Action - To be forwarded to the NFCC Enforcement Working Group</p>
Question:43 - With regards to WG5 Fire Safety Enforcement Officers, do you agree with all the recommendations? Comment	<p>Fire safety officers are very good at what they do but there needs to be more of them. Any "enforcement" needs additional regulation and teeth.</p> <p><i>WG5 comments - the need for sufficient Fire Safety Officers has been highlighted in the Framework but this can not be required by a Competence Framework. This issue has also been highlighted to Government officials by NFCC.</i></p> <p><i>The Framework cannot change legislative sanctions. NFCC have been working with Government on proposed changes to the legislative landscape including appropriate sanctions. No further action.</i></p>
Question:44 - With regards to WG5 Fire Safety Enforcement Officers, are the	Will provide improved clarity

recommendations likely to affect...	<i>WG5 comment - No further action</i>
Question:44 - With regards to WG5 Fire Safety Enforcement Officers, are the recommendations likely to affect...	If they are implemented, we will be better <i>WG5 comment - No further action</i>
Question:44 - With regards to WG5 Fire Safety Enforcement Officers, are the recommendations likely to affect...	The implementation of the recommendations will lead to a more competent workforce. This will come at a cost in some FRS where changes to organisational and personnel structures may be required. In addition, there will be a potential cost increase in meeting the initial requirements and then maintaining them. In lieu of any legislative changes, there are not likely to be any significant impacts on the regulatory function carried out by FRS. <i>WG5 comment - It is noted that there may be increased costs for some FRS. NFCC have been working with Government officials to identify what this might look like as part of the changes to the regulatory framework going forward. In the Framework it has been highlighted that FRS rather than individuals should (ideally) cover these additional costs. No further action.</i>
Question:44 - With regards to WG5 Fire Safety Enforcement Officers, are the recommendations likely to affect...	Additional costs for training and accreditation. Possible future changes to include more building types in scope. <i>WG5 comment - It is noted that there may be increased costs for some FRS. NFCC have been working with Government officials to identify what this might look like as part of the changes to the regulatory framework going forward. In the Framework it has been highlighted that FRS rather than individuals should (ideally) cover these additional costs. No further action.</i>
Question:45 - With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?	Wider use of PAS scheme to engage enforcing authorities across the country <i>WG5 comment - This is not something that can be specified in the Framework. NFCC have previously promoted PAS to FRS at national level. No further action</i>
Question:45 - With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?	Regulation and changes to this happening. <i>WG5 comment -New and revised legislation will be brought forward in due course.</i>

	<p><i>NFCC have been working with Government officials on the proposed changes. Further amendments may need to be made to the Framework and NOS as a result. No further action at this time.</i></p>
<p>Question:45 - With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?</p>	<p>Implementation and further detailing of the framework.</p> <p><i>WG5 comment - The Framework was published for use in February 2020. Competency Framework for Fire Safety Regulators No further action</i></p>
<p>Question:45 - With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?</p>	<p>Finalisation of the Framework</p> <p><i>WG5 comment - The Framework was published for use in February 2020 Competency Framework for Fire Safety Regulators No further action</i></p>
<p>Question:45 - With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?</p>	<p>More guidance on what should be used as CPD. Additional funding for training and development. Private sector pay competitive for Fire Officers. Could lead to retention and therefore recruitment challenges for FRS.</p> <p><i>WG5 comment - The Framework includes an appendix on what formal and informal CPD may include. NFCC have been working with Government officials to consider what additional funding may be needed to facilitate the new legislation and also highlighting issues with FSO recruitment and retention due, in part, to pay scales. No further action</i></p>
<p>Question:45 - With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?</p>	<p>Clear and simplistic guidance on common competence across the sector with potential to lead to a national pay structure for enforcement officers.</p> <p><i>WG5 comment - The Framework should give some clarity on common competence across FRS however, a national pay structure for FSOs is outside the remit of WG5. No further action</i></p>
<p>Question:45. - With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?</p>	<p>Product and product interaction knowledge to be a requirement of any training.</p> <p><i>WG5 comment - this will be included as a consideration when the NOS are revised</i></p>

	<p>WG5 Action - to be considered when the NOS are revised.</p>
<p>Question:45. With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?</p>	<p>We would like to see Government investment in public sector resources to fully facilitate the recommendations of WG5</p> <p><i>WG5 comment - This is beyond the control of WG5. NFCC have been working with Government officials to review what financial assistance FRS may require to support the new legislative regime which includes increased competence. No further action.</i></p>
<p>From individual written consultation responses</p>	<p>There is a pressing need for competence requirements on the part of AHJ (authorities having jurisdiction) such as the fire and rescue authorities and building control bodies; their level of competence should be no less than fire safety practitioners within the private sector. Member companies report serious issues in relation to consistency of requirements and understanding of key principles. Given the influence of these bodies, both in the eyes of the public and their legal powers, their competence should set a benchmark. Priority should be given to the resolution of this issue.</p> <p><i>WG5 comment - The revised Framework provides more robust guidance to FRS on developing and maintaining competence of FSOs. Implementation will be driven by the Framework being issued as a Fire Standard and oversight of this standard by the Inspectorate. NFCC are currently looking at whether CPD packages can be provided nationally which would assist in quality and consistency of approach across the sector. No further action</i></p>