



ARE YOU CONFIDENT OVER COMPETENCE?

Outlining the importance of competency
in protecting buildings, businesses and
their occupants



Through the Grenfell Inquiry, the Hackitt Review and other initiatives, important ground is covered as we design a framework to combat the ever-present risk of fire. Fires are responsible for causing needless fatalities and significant – sometimes overwhelming – financial costs for businesses and communities.



As outlined in our first paper in this Know Your Building series, a comprehensive fire strategy and sound business continuity plan are needed in order for organisations to have a truly resilient approach to fire safety.

However, another essential element is to ensure that those entrusted with managing fire safety, assessing fire risk and maintaining or installing equipment are competent to perform their roles. This concept of competency lies at the heart of any successful building fire protection strategy. It is a key link in the chain – without it, the chain is broken and safety may potentially be fatally compromised.

Despite all the good work being undertaken, it is the Fire Protection Association's (FPA) view that much more needs to be achieved around competency. It remains a matter of significant concern that there has been until recently no universally accepted definition of what competency looks like for fire risk assessors or building managers, and there is still work to be done in respect of installers or maintainers of life safety fire protection equipment. While there are some UKAS-accredited industry schemes for fire risk assessment (through organisations such as BAFE and Warringtonfire) these are not currently a legal requirement. This needs to change.

There have been some promising developments concerning building safety, with legislation set to mandate that owners of large buildings must appoint a building safety manager, and competency requirements for these post-holders are being proposed through the various working groups of the Competence Steering Group, and described in its report – *Setting the Bar*.

The FPA has been heavily involved in this initiative as it is one of our key policy objectives to ensure competency for all those engaged in the design, construction and management of buildings is set at a high, standardised level.

“COMPETENCY LIES AT THE HEART OF ANY SUCCESSFUL FIRE PROTECTION STRATEGY”

Maintaining a suitable and sufficient fire risk assessment is a cornerstone of fire safety. However, even in the wake of Grenfell, there is no requirement for any specified form of certification and as a result there is currently no mandated registration scheme for fire risk assessors – although this has been proposed. Whilst they are robust and uphold high standards, the independent schemes that exist all have slightly different approaches and requirements.

Across all work relating to fire safety, we suggest there are six competency pillars which underpin good practice. These are:

- Third party approved
- Trustworthy
- Self-aware
- Good knowledge and application
- Demonstrable experience
- Committed to and actively engaged in continued professional development

We explore the issue of competency in more detail in this paper and set out how it can be applied in practice to key areas of work relating to fire safety. If you have any questions or would like to discuss in relation to your own organisation, please do get in touch with the FPA – **our mission is to help organisations with the services that protect people, property and the environment from the consequences of fire.**

*Claire Wright, Head of Training,
Fire Protection Association*

An increased focus on competency is urgently needed

As we have outlined, there is currently no consistent definition of what competency looks like outside of the industry for fire risk assessors, building managers, installers or maintainers of active or passive fire protection systems. Regulatory instruments are lacking in key areas:

- The Regulatory Reform (Fire Safety) Order (and similar legislation in Scotland and Northern Ireland) does not provide guidance, and third-party registers have only been minimally adopted due to the lack of statutory requirement.
- There is not a universal system of standards, and proof of qualification is not required in order to carry out work or provide consultancy. Despite the Hackitt Review recommendations over universal competence, third party assessment and ongoing CPD, they are not currently mandated in law and our fear is that without a further push this will continue to be the case.
- The focus of the Hackitt Review and Grenfell Inquiry recommendations applies predominantly to high rise residential buildings, but there has not been as much focus on wider building types, including commercial properties, where risk of loss of life and/or business failure is significant.

Despite this regulatory vacuum, Responsible Persons face increasing pressure to not only act competently but to provide evidence of their own or others' competency too. Seeking third party accreditation is the principal way to ensure best practice is followed and that the building or its occupants are not put at unnecessary risk.

There are currently around 135 companies offering fire risk assessments which are third-party certified, but we know through our own experience of working with organisations across the UK that there remains a long way to go in ensuring that all involved in this work are competent to do so. We know that over 1,000 fire risk assessors are trained every year in the UK, but not all of them are third-party certified.

Given the lack of centrally shared information, it is difficult to compile accurate data on how much fire safety work is being procured or conducted by individuals or contractors without appropriate competence. The FPA conducted its own research which suggests there is a significant problem – although we believe that the true picture is likely to be much worse:

Almost a quarter of those responsible for fire safety in their organisation do not have accredited training or qualifications

Nearly a fifth (18%) either don't check the competency of contractors to do the job (11%) or don't know if it's checked (7%)*

There have been encouraging and positive developments around codifying the competencies required of building safety managers. But this is only the start. It is imperative that we also reach the position of common, consistent and agreed competencies for fire risk assessors within a regulated system of third-party certification with registers publicly available. **The Fire Sector Federation approved code of practice, published in 2020, is a positive step towards this, but we won't see change overnight, and we must continue to focus on raising standards.**

*FPA research (2020): survey of 1,000 people responsible for fire safety in their buildings

Applying competency in practice

The best way to gain assurance when sourcing fire safety contractors or products is through third-party certification.

It gives peace of mind that suppliers have been independently verified, are regularly audited or certified and are competent to undertake the work needed. It also assures they are working to relevant standards and best practice.

Third-party certification can be issued to either an individual, company, or product (such as fire doors). For Responsible Persons such as facilities managers or, in the near future, building safety managers, becoming a competent and accredited fire risk assessor - or employing one - should be an important consideration.

The FPA is supportive of all recommendations made in the Hackitt Review in relation to universal competence, third-party accreditation and ongoing training and assessment.

We believe that a competent person should be part of an approved register, have relevant experience and know the limits of their competency. They should always allocate sufficient time to carry out work, and should always ask to see relevant paperwork e.g. fire strategy, previous risk assessments and external cladding surveys prior to carrying out work.

Checking contractors' competency

It is an important part of a Responsible Person's duties to ensure that any contractor employed to carry out any work relating to fire safety (or indeed any aspect of building safety) is appropriately qualified. No one would employ a gas engineer without checking they were on the Gas Safe Register, for example – the same should apply to fire





safety. Whether it's employing a fire risk assessor, a sprinkler system installer, fire alarm installer or fire door installer, it's essential that they are competent.

One of the first questions a Responsible Person should ask any prospective service provider, therefore, is: “are you third-party accredited?” They should ask for evidence of this, or they should be easily checkable via the website of the accrediting body. A competent fire risk assessor needs to be easily identifiable, even to someone who knows relatively little about fire safety.

It is also advisable for those responsible to check with their insurance provider and follow any specified guidelines before commissioning any work to be undertaken. In some cases where property protection and business continuity factors are a major issue, insurers may require additional measures to those identified as being necessary for life safety, in line with their own higher standards, before accepting the insurance risk.

The worst-case scenario of using an unapproved contractor or product is that, in the event of a fire, the damage may not be covered by the insurer. The building owner may be deemed to be culpable whereas if a third-party certified individual or product is used, the building owner or manager is able to demonstrate they have taken the highest possible precautions in the event of a fire. By using a certified contractor, clients should expect high levels of traceability, accountability and record-keeping.

Third-party certification

Certification is an independent confirmation by a third party that a product, service or installer meets an appropriate standard. It is different from a one-off test or inspection because approval via certification helps ensure through regular audits that the product or service continues to comply with the standards, which are subject to periodic revision and update throughout the life of the service outcomes, product or installation.

“ONE OF THE FIRST THINGS A RESPONSIBLE PERSON SHOULD ASK A CONTRACTOR FOR IS EVIDENCE OF CERTIFICATION”.

In the UK, accreditation of certification bodies is undertaken by the United Kingdom Accreditation Service (UKAS), which is the sole national accreditation body recognised by government to assess organisations that provide services such as fire risk assessments and certification, testing, inspection and calibration services against recognised standards. UKAS works to ensure that recognised standards are implemented correctly and in a uniform manner by the accredited organisations. UKAS is, in turn, periodically audited by its international compatriots to assure the quality of its services.

Whenever products are specified or an installation is planned, reference should also be made to the relevant standards for the product or form of installation. There is no legal requirement to follow a British Standard in the UK, but the Regulatory Reform (Fire safety) Order (article 11) states that a company must have a suitable system of maintenance to ensure that all fire safety measures are covered and reported. This means a company can choose any standard suitable for the system they use, or part of it, or create their own, as long as it's documented in their fire strategy. For these reasons, the FPA advises that these decisions should be made with the guidance of a qualified professional.

Certification doesn't just cover competency of individuals, but also safety of products. Where this is the case, the products concerned must be used in precisely the same configuration as that in which they were tested, without any modification. For example, a fire door tested to provide 30 minutes fire resistance may not provide this level of protection if fitted with door furniture different from that

present when the door was tested. Where any form of modification is considered, the manufacturer or supplier of the product must be consulted.

The role of the fire risk assessment

Although the Regulatory Reform (Fire safety) Order 2005 is not prescriptive as to the content or format of a fire risk assessment, section 9(7) introduces 'prescribed information' to be included, which is:

- The significant findings of the assessment including general fire precautions that have been or will be taken
- Any group of persons especially at risk

In addition, the assessment must address:

- Various matters in relation to dangerous substances (such as under Dangerous Substances and Explosive Atmospheres Regulations – DSEAR)
- Various matters in relation to young persons

It is good practice for each assessment to include an overall fire risk rating regarding life safety for the premises. This is often a 'low', 'medium' or 'high' indication supported by a simple form or matrix. Property protection issues can be considered and rated in a similar manner although are not required by legislation to be included as part of the fire risk assessment process. The FPA, however, does consider property protection matters when undertaking fire risk assessments.





While there is a legal requirement for a fire risk assessment to be carried out, there is no guidance on the precise information that must be recorded or the way it has to be set out. Despite this, competent assessors would be expected to record details across a wide range of aspects including fire detection and alarm systems, electrical equipment and gas installations, fire compartmentation, cladding and the risk of fire spread, fire safety signs and notices, and evacuation procedures and means of escape. While there is no direct government guidance on the format of fire risk assessments, there is a Publicly Available Specification, PAS79, published by BSi which provides a suggested approach and format.

Good practice also recommends that assessment reports be validated by a second qualified assessor prior to issuing the document to the client. Both the assessor and the validator should sign and date the document.

Making competency count

Needless to say, for fire risk assessments to have their intended and full impact, building owners or those responsible for the fire safety of a building must ensure that the general fire precautions described in the assessment are maintained and they must act upon any recommendations made. Failure to do so negates the whole purpose of conducting an assessment and could make those responsible culpable for any ensuing fire incidents.

In some cases, for example, recommendations might include the installation of sprinkler systems in certain building types such as large and high-risk buildings, which are a proven way of protecting lives and limiting asset loss. These can

“FOR FIRE RISK ASSESSMENTS TO HAVE IMPACT, THOSE RESPONSIBLE MUST ACT UPON THE RECOMMENDATIONS MADE”

be complex to install, but their implementation can save far greater costs in the event of a fire. It is widely accepted that correctly installed and maintained sprinkler systems provide a better than 99% chance of controlling or actually extinguishing a fire.

At the FPA, we can advise organisations across key fire prevention areas such as **sprinkler systems, fire risk assessments, fire strategy, BS 8414 Cladding Testing**, a wide variety of fire **safety training**, and specialised matters such as **DSEAR risk assessments**.

We are committed to helping building owners, managers and Responsible Persons maximise the effectiveness of their fire safety approach.

Ensuring the competency of all involved with fire safety is a key element of this – we are determined to help build on existing certification schemes to drive wider adoption, greater consistency and, ultimately, legal requirements around competency in all fire safety work and management.



For more information visit


 www.thefpa.co.uk/know-your-building

 [the-fire-protection-association](https://www.linkedin.com/company/the-fire-protection-association)

 [FPA_tweets](https://twitter.com/FPA_tweets)

Contact

Fire Protection Association
London Road
Moreton-in-Marsh
Gloucestershire
GL56 0RH

 +44 (0)1608 812 500

 enquiries@thefpa.co.uk

 www.thefpa.co.uk



Fire Protection
Association

