This circular introduces the IRMP action strategy being progressed by the IRMP Steering Group.

IRMP Steering Group Action Strategy

Issued by:
David Harper

Addressed to:
The Chair of the Fire and Rescue Authority
The Chief Executive of the County Council
The Clerk to the Fire and Rescue Authority
The Clerk to the Combined Fire and Rescue Authority
The Commissioner of the London Fire and Emergency Planning Authority
The Chief Fire Officer

Please forward to:
Officers responsible for prevention, protection and response policy

Summary
This circular advises Fire and Rescue Services (FRSs) of work being undertaken by Communities and Local Government’s IRMP Steering Group to support ongoing development of the Integrated Risk Management Planning (IRMP) process.

For further information, contact:
Simon Hunt
Communities and Local Government
FRS Development Division
Allington Towers, Allington Street
London
SW1E 5WY

Direct line 0207 944 5604
Fax 0207 944 5664
E-mail simon.hunt@communities.gsi.gov.uk

General helpline 020 7944 8194
Website www.communities.gov.uk
1.0 Background (see Appendix A)

1.1 Integrated risk management planning underpins the reforms to the fire and rescue service that flowed from the White Paper *Our Fire and Rescue Service* published in June 2003. A definition of integrated risk management planning is at Appendix A. The first Integrated Risk Management Plans (IRMPs) were drawn up by Fire and Rescue Authorities (FRAs) during 2003/04 and, after taking account of the responses to consultation, FRAs started to implement their first year action plans as from 1 April 2004.

1.2 Although all FRAs now have established procedures for producing their annual IRMPs, the government has recognised the need to remain fully engaged with stakeholders on the future development of the IRMP approach. In 2005 it invited a number of key representatives from the fire and resilience community and industry to participate in an IRMP Steering Group.

1.3 The IRMP Steering Group provides the forum for key stakeholders to discuss emerging issues on IRMP and to share experiences to date in the IRMP process and its future development. The Steering Group also acts as a source of expertise on all issues of process raised by the public, business or other stakeholders in respect of IRMP and identifies the need for further advice and guidance.

1.4 Representatives include the Chairs of the Practitioners and Business and Community Safety Forum, CLG, Chief Fire Officers Association (CFOA), Cabinet Office, Confederation of British Industry, Health and Safety Executive, Local Government Association, Fire Protection Association, and the three main uniform representative bodies as well as other key stakeholders from the “fire industry”.

2.0 IRMP action strategy (see Appendix B)

2.1 The IRMP Steering Group at its meeting on the 13th October 2005 established a task and finish group under the Chairmanship of CFOA with the objective of producing an IRMP action strategy for the next 2-5 years to support delivery of IRMPs by:

- Producing an outline strategy by November 2005
- Developing proposals, endorsed by the IRMP Steering Group, to implement the strategy
- Recommending a delivery mechanism for those proposals, including a review mechanism

2.2 Following endorsement of an outline strategy, a detailed strategy was presented to the Steering Group at their meeting on the 21st February 2006. That strategy (summarised at Appendix B) has been welcomed by all members of the Steering Group and is seen as a vital step in identifying how IRMP should continue to be progressed.

2.3 The IRMP process being developed is based upon 5 elements:

- **Scope.** What factors have a bearing upon IRMP locally, regionally and nationally which need to be considered in future plans?
• **Risk Analysis.** What are the issues affecting assessment of the risks which fall within the scope of IRMP plans and their subsequent consequences should the risks materialise?

• **Strategies.** What are the potential, most effective and optimum strategies to prevent, protect and respond to the risks within the IRMP scope, both currently and in the future?

• **Delivery mechanisms.** What are the most effective mechanisms to deliver IRMP strategies currently and in the future?

• **Monitoring and review.** What arrangements should be in place to monitor and review the implementation, effectiveness and consistency of IRMPs, locally, regionally and nationally to inform future IRMP strategy?

### 3.0 Next Steps (See Appendix C)

3.1 The action strategy aims to support the overall IRMP process as follows:

- Research to identify and address current gaps in the understanding and implementation of IRMPs and the underpinning of future advice and guidance; and

- The production and clarification of policy, advice and guidance to support IRMPs

3.2 The results of these research projects are expected in early summer of this year, and a suite of guidance will be published throughout 2007, with the final chapters to be issued by December. A sample draft chapter, on Environmental Protection, is at Appendix C. The guidance chapters will supplement and where appropriate replace relevant existing IRMP guidance notes, and complement the National Framework.

3.3 Further Circulars will keep FRSs informed of progress. No action needs to be taken at present.

**David Harper**

**Fire and Rescue Service Development Division**
Appendix A

IRMP Definition

The IRMP Steering Group has been mindful of changes in legislation since the inception of Integrated Risk Management Planning as part of the modernisation agenda such as the Fire and Rescue Services Act and elsewhere including revised civil protection legislation. To reflect the impact of these drivers upon the IRMP process the IRMP Steering Group has developed and endorsed a definition of IRMP which this circular also draws attention to.

The IRMP definition endorsed by the IRMP Steering Group is:

“Integrated Risk Management Planning (IRMP) is an holistic, modern and flexible process, supported by legislation and guidance, to identify, measure and mitigate the social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, industry, the environment and heritage. FRA’s when establishing local options for risk reduction and management within annual Action Plans, must take account of the duties and responsibilities outlined in the National Framework, the section 9 Emergency Services Order, the Civil Contingencies Act, and the Regulatory Reform (Fire Safety) Order.

This places emphasis on flexibility and partnership, working on local, cross border and regional planning for prevention and intervention activities to save and protect life and to reduce the economic and environmental impact of fire to the community. Through this partnership approach IRMP should deliver a proportionate response, that is evidenced based, which will ensure efficiency”
Appendix B

IRMP Action Strategy

1.0 CLG are of the view that IRMPs are best planned and implemented at a local level based upon local needs, but consider that the action strategy could help to ensure consistency in approach and quality in the way that IRMPs are produced. This would also capture and build upon the sound work done in many FRAs since the inception of IRMP. The action strategy is the fundamental driver for additional advice and guidance being developed to support the IRMP process in light of the emerging challenges and good practice being developed in FRAs as IRMP matures.

2.0 A detailed action strategy has been produced to support the overall IRMP process with the issues and proposals falling into two main opportunities.

- Research to identify and address current gaps in the understanding and implementation of IRMPs and the underpinning of future advice and guidance; and.

- The production and clarification of policy, advice and guidance to support IRMPs.

3.0 Within the overall action strategy the steering group have endorsed three key workstreams to be progressed, the results of which will be circulated to FRSs as the respective work is completed.

**Key Priority 1. Development of national policy and reporting mechanism.**

4.0 This should include future policy expectations and reporting mechanisms. These will lead to a wider understanding of the central role of IRMP. Key deliverables will be:

- A detailed, quantified vision for IRMP and its outcomes for the next 3-5 years

- A detailed strategy for achieving the vision, divided into work packages which may be lead by different stakeholders

- Reporting and review mechanisms for monitoring progress

- A long term view of the role of IRMP for the future

- A broad communications strategy for IRMP

5.0 West Midlands FRS on behalf of CFOA is co-ordinating the policy element of this workstream on behalf of the IRMP Steering Group. It is envisaged that this work will capture and provide good practice on approaches to themed areas within the scope of IRMPs, taking cognisance of existing policy developments within CFOA, CLG, FRSs and other members of the IRMP Steering Group. The outcome of this process will supplement and where appropriate replace relevant existing IRMP guidance notes and complement the National Framework.
6.0 The overall focus will be to set out the policy expectations of how the aims and objectives of IRMP translate into delivery orientated around the phases of scope, risk analysis, strategy and delivery mechanism and monitoring and review.

7.0 The current areas of IRMP policy guidance being developed over the summer 2007 for the IRMP Steering Group are:

- Road safety
- Flooding
- Environmental Protection
- Heritage
- Community Safety
- Local Area Agreements
- Equality and Diversity
- IRMP and the Civil Contingencies Act
- Wildfire

8.0 The focus of the guidance will be to identify, measure and mitigate the social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, industry, the environment and heritage. The guidance developed will be published and circulated to FRs in due course. An outline example of the approach being developed for Environmental Protection is provided at Appendix C.

**Key Priority 2: Collaboration with the Cabinet Office and the Civil Contingencies Secretariat on identifying and improving the interactions between the Civil Contingencies Act (CCA) and IRMP.**

9.0 Key deliverables will be:

- Guidance on the scope of IRMP and CCA
- The development of common terminology for emergency responders
- Common terminology for risk assessments

**Key Priority 3. Research to underpin and drive forward the evidence base for IRMP.**

10.0 Research is seen as key to providing the evidence base for IRMP. While some research may be sponsored by Government, other avenues are also being explored including:

- The Research Councils
- Stakeholder contributions
Research endorsed by the Steering Group

11.0 Within the overall suite of research endorsed by the Steering Group CLG have commissioned a number of research projects to improve the evidence base for IRMP. This includes subjects such as:

- Research and the production of advice on which legislation is relevant for IRMP which will assist in defining the scope of IRMPs. This research will also provide advice on aspects of corporate social responsibility, should FRSs wish to include non statutory matters within the scope of their IRMPs (such as water safety, road traffic collision reduction etc).

- Research and production of advice on the availability, selection and use of risk assessment techniques, tools, data and guidance within FRSs, and other Cat 1 and 2 responders, to support the obligations of the Civil Contingencies Act and risk analysis for IRMPs

- Research to consider the development of risk based performance measures and reporting of outcomes to support the risk based planning process.

12.0 The results of these research projects are expected in early summer of this year.
Appendix C:

Outline Approach To Environmental Protection Using the IRMP Methodology

Scope

Legislative

1. The Fire and Rescue Services Act 2004

The Fire and Rescue Services Act, Section 7 places a duty on all Fire and Rescue Services to:

(1) Make provision for the purpose of:
   (a) extinguishing fires in its area
   (b) protecting life and property in the event of fires in its area

Section 9 of the FRS Act gives the Secretary of State power to confer on a fire and rescue authority functions relating to emergencies, other than fires and road traffic accidents (collisions).

Section 11 of the FRS Act gives Fire Authorities the power to respond to other eventualities. This includes an event or situation that causes or is likely to cause:

- One or more individuals to die, be injured or become ill
- Harm to the environment (including the life and health of plants and animals)

2. The Civil Contingencies Act 2004

One of the aims of the Civil Contingencies Act 2004 is to improve the UK’s ability to deal with the consequences of major disruptive incidents by improving the planning process at a local level.

The definition of an emergency within the act includes “an event or situation which threatens serious damage to the environment”.

The definition of an emergency is concerned with consequences rather than with cause or source. A spillage of a single drum containing chemicals into a watercourse in itself may not appear to be an emergency, however should serious damage to the aquatic environment and/or threats to public drinking water ensue, the event would be deemed to be an emergency within the definition of the Act.


Discharges into controlled waters are covered by the Water Resources Act 1991.

Section 85 of the Act makes it an offence for a person to cause or knowingly permit any “poisonous, noxious or polluting matter” to enter “controlled waters”, including groundwaters.
Section 89 relates to the Statutory defences to the offence of polluting controlled waters as follows:

A person shall not be guilty of an offence under Section 85 if:

- The entry is caused or permitted, or the discharge is made, in any emergency in order to avoid danger to life or health;
- That person takes all such steps as are reasonably practicable in the circumstances for minimising the extent of the entry or discharge and of its polluting effects and;
- Particulars of the entry or discharge are furnished to the Authority (Environment Agency) as soon as is reasonably practicable after the entry occurs.

All three criteria must be in place for the defence to apply.

These three Acts are the most pertinent, however it should be borne in mind that a number of other pieces of environmental legislation may also have relevance to FRS operational activity. These include The Groundwater Regulations; Hazardous Waste Regulations; Pollution Prevention and Control Regulations; COMAH Regulations and Water Framework Directive.

National Policy

1. The Fire and Rescue Service National Framework 2006-08

Paragraph 1.1 Since April 2003 every Fire and Rescue Authority has been required to produce a local IRMP that sets out the authority’s strategy, in collaboration with other agencies, for:

Reducing the commercial, economic and social impact of fires and other emergency incidents;

Safeguarding the environment and heritage (both built and natural)


In 2003, the Local Government Association for England, the Welsh Local Government Association and the Environment Agency agreed and signed a joint agreement, ‘Working Better Together’.

Local authorities and the Environment Agency have powers and duties that complement each other in protecting the environment and protecting and enhancing the quality of life for local communities. Working Better Together is designed to ensure a close working partnership exists in order to deliver a series of environmental outcomes.

A series of individual protocols have been formulated one of which, Protocol number 8, relates to Fire and Rescue Service issues.
The protocol surrounding the partnership between the Environment Agency and Fire and Rescue Services has three sections under Part 1:

- Section 1 describes the aims of the protocol, roles and responsibilities, shared environmental outcomes and the arrangements for joint working between the FRS and the EA
- Section 2 sets out the review arrangements for the protocol
- Section 3 details the areas of mutual interest between the FRS and the EA in 5 separate annexes. These annexes detail the principles, legislation and procedures that must be adopted in relation to these areas of mutual interest, one of which refers to IRMP's/ Risk Reduction Plans.

**Government Public Service Agreements**

Nationally, the Government is committed to deliver various Public Service Agreement (PSA) targets on Environmental issues, attainment of which depends on the control of diffuse pollution. For example, the Government is committed:

- to bring 95% of Sites of Special Scientific Interest (SSSIs) into favourable condition by 2010;
- to raise compliance with river quality objectives to 91% (compared to 86% in 1999); and
- to bring about continued improvements in bathing water quality to ensure at least 97% compliance with the mandatory coliform bacteria standards for English bathing waters.

The Environmental Protection Strategy Directorate of Defra provides environmental evidence and analysis in order to contribute to Defra’s PSA Target 1:

- to promote sustainable development across Government and the country as a whole as measured by positive trends in the Government’s headline indicators of sustainable development.

The Water Framework Directive is a particularly important new Directive and will require River Basin Management plans to be developed that ensure good status’ can be achieved in the UK’s river basins by 2015. To ensure that this is achieved a programme of measures will need to be in place. The partnership could be seen as part of that process particularly where incidents threaten good status.

**Local Policy**

Local working arrangements have been established between Fire and Rescue Services and the Environment Agency to allow for local flexibility as to how the Protocol No. 8 is implemented.

Regional Liaison Groups can further assist the process and such groups enable co-operation and information sharing as required by the Civil Contingencies Act 2004.
Corporate Social Responsibility

Whilst FRSs have a legal responsibility to ensure that effective arrangements are in place to deal with an incident that could adversely affect the natural environment through both planning and response, a moral responsibility also exists to ensure that the quality of life of the public is improved through sustainable development. A widely used international definition of this approach is:

“Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.”

Risk Analysis

CLG have commissioned research to produce advice to Fire and Rescue Services on the availability, selection and use of risk assessment techniques, tools, data and guidance within FRSs and by other Category 1 and 2 responders to support the obligations of the Civil Contingencies Act and risk analysis for IRMPs. A deliverable from this project will include risk analysis for the protection of the environment.

In the emergency and non emergency phases of an incident, FRS intervention can significantly reduce the impact that spillages or firewater run-off containing environmentally damaging materials may have on the environment. Such actions can also provide significant public health benefits. Public drinking water is drawn from rivers, lakes, lochs and groundwater, FRS activities to protect these waters will help safeguard public drinking water supplies and consequently public health, thereby fulfilling the duties under Section 7(1)(b) of the FRS Act.

FRS pollution prevention and control activities can therefore be associated with the FRS stated aim of protecting public safety. This philosophy should be borne in mind when prioritising environmental protection as an objective within the Authorities strategic, systematic and dynamic risk assessment process.

There are also significant cost benefits to the UK when FRS personnel implement first aid measures such as sealing a leak, blocking a drain or using a ‘controlled burn’ strategy. It is quite simply more expensive to clean up pollution from the environment than from a reservoir of containment provided by the service.

Figures from the Environment Agency indicate that:

- The Environment Agency attends an estimated 39% fewer incidents as a consequence of FRS attendance. The time saved by the Environment Agency can be used for other important environmental protection work.

- There is a reduction in the severity of pollution incidents attended by the FRS. This can be directly linked to the speed of response that the FRS can achieve.

- The Environment Agency classify incidents utilising a Common Incident Classification Scheme (CICS) methodology ranging from Category 1 which are incidents which have the potential to have a major impact on the environment to Category 4 incidents which have no significant impact on the environment.
The current cost of pollution incidents, to UK plc is estimated at £136million. Although it is not possible to quantify without further study any reduction in this figure due to FRS intervention, the reduction in the severity of incidents highlighted above suggests that this figure is likely to be significant.

**Strategies**

The FRS attends incidents that have the potential to pollute air, land and water. Pollution of the water or aquatic environment is considered to be the most vulnerable to pollution from emergency incidents and the aspect of the environment that the FRS can protect most readily. Consequently pollution prevention and control measures in the FRS concentrate primarily in the protection of the aquatic environment and to a limited extent, protection of the land and air quality.

The development of pollution planning is seen as a core function in an Integrated Risk Management Plan that is designed to improve the safety of the community.

**Delivery Mechanisms**

(a) Undertake a review of local working arrangements between the Fire and Rescue Service and the Environment Agency in accordance with the LGA/Environment Agency ‘Working Better Together’, Protocol number 8 on Fire and Rescue Service Issues.

(b) Establish planning arrangements for incidents that may have an adverse effect upon the environment. Such arrangements would include plans detailing the specific measures required for sites that constitute a significant risk to the environment in accordance with Sections 7(2)(d) and 9(3)(d) of the Fire & Rescue Services Act 2004 and the Civil Contingencies Act 2004.

(c) In order for FRS personnel to effectively deal with incidents that have the potential to pollute the environment, it is essential that they have access to appropriate information regarding:

<table>
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<th>CICS Category</th>
<th>Overall %</th>
<th>FRS in attendance %</th>
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<tr>
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<td>28.3</td>
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<tr>
<td>4</td>
<td>53.9</td>
<td>70.6</td>
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</tbody>
</table>

- Potential pollution sources
- The sensitivity and vulnerability of the environment in their station area
- The pathways that any pollutant will follow before it enters the environment, for example groundwater directly by soakaway, or indirectly via surface water
- Areas at a site where containment can be effectively undertaken

Such planning arrangements would be established in liaison with the Environment Agency and where appropriate, the Highways Agency, Water Undertakers and other professional partners, an example being the HSE at COMAH sites.

(d) Review operational procedures in order to ensure that they are consistent with the procedures and guidance set out in the Fire and Rescue Service Manual on Environmental Protection.
IRMP Steering Group Action Strategy

(e) Develop training strategies in accordance with the environmental competencies described in the Integrated Personal Development System (IPDS) role maps and the Fire and Rescue Service Manual on Environmental Protection. A structured approach should be adopted to environmental training that would be delivered centrally, regionally, at FRS training centres and local fire stations and include all FRS roles from Firefighter to Brigade Manager.

(f) Establish partnership arrangements with other agencies and other FRSs in order to offer the best possible level of service and to share information and co-operate as required by the Civil Contingencies Act 2004.

(g) The concept of the controlled-burn tactic has developed and involves a restricted or controlled use of water or foam on fires to reduce potential environmental impacts of chemicals and contaminated firewater runoff. The Environment Agency publishes guidance on pollution prevention and Pollution Prevention Guide 28, (PPG 28) relates to controlled burn tactics. The guidance details the Environment Agency policy/position on controlled burns and sets out circumstances when it believes a controlled burn may be appropriate. Consideration should be give to adopting the recommendations contained within PPG 28, where appropriate, in order to determine the Best Practical Environmental Option, (BPEO) for dealing with incidents that have an impact upon the environment.

(h) The use of firefighting foam at incidents and for training purposes should be closely monitored. FRS's should ensure that foam products are used which are the least damaging to the environment.

Initiatives

1. The protocol between the Local Government Association and the EA was agreed in 1999 and has been recently revised and re-issued as Protocol No. 8 in the ‘Working Better Together’ series. This has resulted in an excellent partnership arrangement between the two agencies.

2. The partnership arrangements are given strategic direction by the National Strategy Group (FRS and Environment Agencies) which is comprised of representatives of CFOA, the UK Environment Agencies, the Local Government Association, Chief Professional Advisors Unit and it’s counterparts in Scotland and Wales. The National Operational Group provides support and advice to the Strategic Group.

3. The Environment Agency has supplied pollution control equipment to FRSs in the form of ‘Grab Packs’. The purpose of these packs is to provide equipment on front line fire appliances, thereby enabling rapid intervention in dealing with a variety of spills and leaks.

4. The Agency has also funded the provision of more specialised equipment for use at larger incidents. The majority of FRSs carry this equipment on a special appliance, commonly termed an Environmental Protection Unit.

5. Lancashire FRS have developed Operational Incident Plans in conjunction with the EA that include information which will result in a more effective response to incidents at sites for which such plans have been produced.
6. Highways related incidents form the majority of occasions on which grab pack equipment is used. Cumbria FRS, the EA and Amey Mouchel have entered into a joint partnership for dealing with incidents on the county’s major trunk roads. Amey Mouchel have the responsibility for the motorway network and the majority of trunk roads in Cumbria on behalf of the Highways Agency. This initiative is being developed to include other areas.

**Monitoring and Review**

Where monitoring and review processes relating to the reduction in pollution due to FRS intervention are not in place, these arrangements should be implemented to evaluate the efficacy of the FRS environment protection strategy.

Within local partnership agreements between the FRS and EA, arrangements should be established to monitor the number of incidents FRS attend at which pollution control measures are instigated. A comparison can be made with incidents that the FRS did not attend and the consequences of implementing pollution control actions can be measured through a cost/benefit analysis.

FRSs should ensure that robust and accurate recording and reporting systems of pollution control activities are in place which will enable FRS’s to quantify the effectiveness of their activities and monitor the type and quantities of equipment used. It is also important that the costs of the equipment are recovered wherever possible from the polluter. An example reporting and recording form is included in the FRS Manual on Environmental Protection. Such recording systems will allow for accurate recording to central and local government and local communities as well as identifying training needs, where appropriate. Consideration should be given to the development of a performance management system pertinent to Environmental Protection.