

## **SUMMARY OF RESPONSES**

### **ON**

## **Consultation on Fire and Rescue Service and Fire Safety Policy Principles**

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**August 2025**

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## Executive Summary

### 1. Background

The Department of Home Affairs (DHA) undertook a six-week public policy consultation<sup>1</sup> from 21 November 2024 to 02 January 2025, the aim was to understand the public views on the functions that the Fire and Rescue Service should deliver, including Fire Safety, and help shape the policies, objectives and priorities, as well as the means by which they are intended to be achieved.

The input and feedback received to the consultation on the Fire and Rescue Service and Fire Safety in the Isle of Man, as set out in this Summary of Responses document, will be reflected in the strategic work of the Department and form the basis for the new legislation, it may also impact where the Fire Services focus their attention. The consultation seeks to understand what matters most to the Isle of Man public. Feedback was received from broad and varying sources and the responses provide a helpful overview of public opinion on fire and rescue services and fire safety generally.

The DHA priority is balancing the collective objectives of the public and the needs of the Island against the finite funding and resources which the FRS have.

The Department has a commitment to bring forward:

1. the Fire Services Bill, a modernising piece of legislation to clarify the services provided by the Fire and Rescue Service; and
2. the Fire Safety Bill to modernise the fire protection legislation to include all places of work.

### 2. The Consultation

The consultation sought views on draft policy principles that are under consideration to underpin updates to the current Fire Services and Fire Safety legislation. It also sought to gain insight and views on how those principles could take effect in order to support with drafting the legislation.

The consultation is split into two parts; the first part sets out draft policy principles in relation to a Fire Services Bill, and the second part sets out draft policy principles in relation to the Fire Safety Bill. There are common themes in each part, including an overall aim to meet the same standards

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<sup>1</sup> [Fire and Rescue Service and Fire Safety Policy Principles Consultation](#)

that are required in the neighbouring jurisdictions and being proportionate to the needs of the Isle of Man.

The responses received to the policy consultation broadly showed support for the proposals outlined in the consultation, which demonstrated to the Department that the general approach was in line with the demands of the Isle of Man Fire and Rescue Service. In seeking to formally translate that policy position into a legal position underpinned by Regulations and further supported by Guidance, the Department has set out in this document an overview of the policy proposals, and the way in which the feedback to the consultation has been considered.

A detailed summary of the views received and the way in which these have shaped the finalisation of the proposed legislation is contained within the following pages. In summarising the responses received to the consultation, we took the “We Asked, You Said, We Did” approach and we have set out how the feedback provided has been considered. We are grateful for all comments and correspondence received. In summarising responses, it has not been possible to reproduce all commentary, and what is produced is a faithful record of the content of any such comments, paraphrased as needed to maintain anonymity of the consultation respondent. In the graphs where percentages have been calculated, where there has been a decimal, those figures have been rounded up to the nearest whole number.

### 3. The Issues:

The policy principles themselves are set out in the following sections and take the form of a key overarching principle, with additional detail provided. Each principle then has one or more specific questions that the Department sought views on.

#### Part One: Fire Services Bill

- **Principle 1** – There should be transparency and accountability on the services to be delivered by the Isle of Man Fire & Rescue Service (FRS).
- **Principle 2** – The legislation should reflect an equivalent level of service provided by the FRS as is provided in other jurisdictions.
- **Principle 3** – The legislation will support joined up working, particularly with the Island’s wider emergency services.
- **Principle 4** – The legislation should be responsive and flexible to meet the evolving needs of society.
- **Principle 5** – Core services will always be free at the point of need; however the Department will reserve the right to charge.
- **Principle 6** – Transitional Arrangements

#### Part Two: Fire Safety Bill

- **Principle 1** – The legislation should centre on a proportionate risk-based approach to allow more efficient use of resources.
- **Principle 2** – The legislation should set out clear lines of responsibility.

- **Principle 3** – The legislation should be flexible and responsive to emerging risks.
- **Principle 4** – The legislation should reflect the standards in place across England & Wales.
- **Principle 5** – Introduction of the legislation will reduce barriers to inward investment.
- **Principle 6** – The legislation will be suitable to reflect the local context of our small Island community.
- **Principle 7** – Transitional Arrangements

## Submission of responses to the consultation

### Responses the Department received:

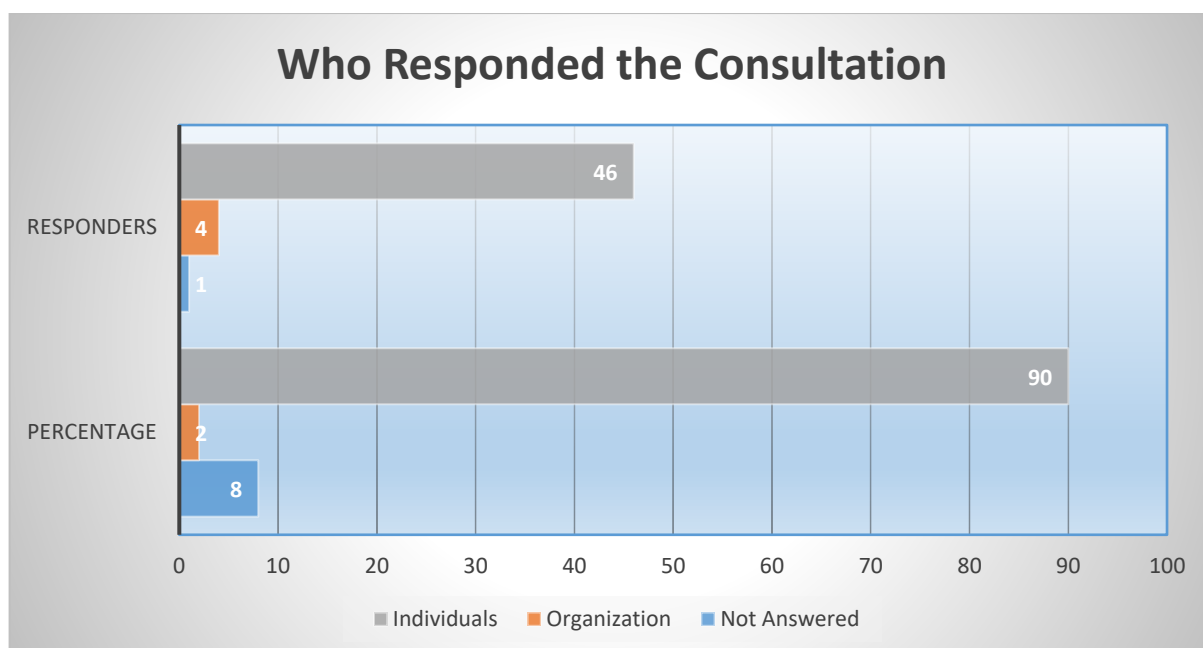


The Department received a total of **51** responses via the online consultation survey. Respondents answered a mix of closed yes/no questions as well as providing free-text comments. While the Department recognises this as a relatively low response rate for a public consultation, all responses have been carefully reviewed and have played a valuable role in shaping the next steps, both in finalising departmental policy and in preparing drafting instructions.

When looking at who responded to the consultation, of the **51** responses: -



- **46** were from individuals
- **1** was on behalf of an organisation/business; and
- **4** did not answer which group they belonged to



## 4. Part One: Fire Services Bill

In respect of Part 1: Fire Service Bill, the responses set out in this submission can be broadly categorised as –

- Agreement that the Fire Service legislation needs to be updated to widen the scope to better reflect the modern-day pressures placed on the FRS;
- Agreement the FRS should be held accountable through a Community Risk Management Plan or something similar;
- The FRS should be measured against a response time standard and that there should be a different response time standard for a whole-time crewed fire engine (staffed 24/7), compared to an on-call crewed fire engine;
- The Island's FRS should be required to provide an equivalent level of service to that found in a neighbouring FRS in the UK and should be sufficiently resilient and prepared to respond on its own to all normal eventualities, without the immediate intervention of UK assistance;
- That local Fire Officers should be trained to National Standards in line with other UK Fire & Rescue Services;
- That the Department's Emergency Services should be trained to the same multi-agency emergency response standards and work collaboratively together;
- That the Island's Emergency Services should be required to share risk information with each other to help improve public safety;
- Legislation should be adaptable and responsive to reflect a changing risk profile and allow resources to be targeted more effectively;
- Core services will always be free at the point of need; however the Department will reserve the right, under a very specific set of circumstances set out in statute, to allow the FRS to levy a charge on a cost recovery basis;
- That a minimum transitional period of approximately 12 months should be required to effectively implement the new Fire Services Bill.

## 5. Part 1 Questions

### **Principle 1**

**There should be transparency and accountability on the services to be delivered by the Isle of Man Fire & Rescue Service (FRS).**

The Fire Services Act 1984, which is currently in operation, does not comprehensively reflect the wide-ranging responsibilities that FRS have and duties that the service carry out. The intention for the new Fire Services Bill is to make clear the roles and responsibilities of FRS and set out the additional work that the service does that isn't already covered in existing legislation.

#### **We asked:**

#### **Questions 1 and 2:**

- 1) Do you think that the FRS should have a statutory duty to be prepared to respond to a full range of foreseeable risks?**
- 2) If you don't think that the FRS should be prepared to respond to a full range of foreseeable risks, broader than just fire related incidents, please explain why?**

We asked respondents which of these five options was the most accurate representation for whether the FRS should have a statutory duty to be prepared to respond to a full range of foreseeable risks – Strongly Agree, Agree, Don't Know, Disagree, Strongly Disagree. We also asked respondents to explain their answers.

#### **You said:**

There was a total of **51** responses received to this question. 1 participant giving no response to this question.

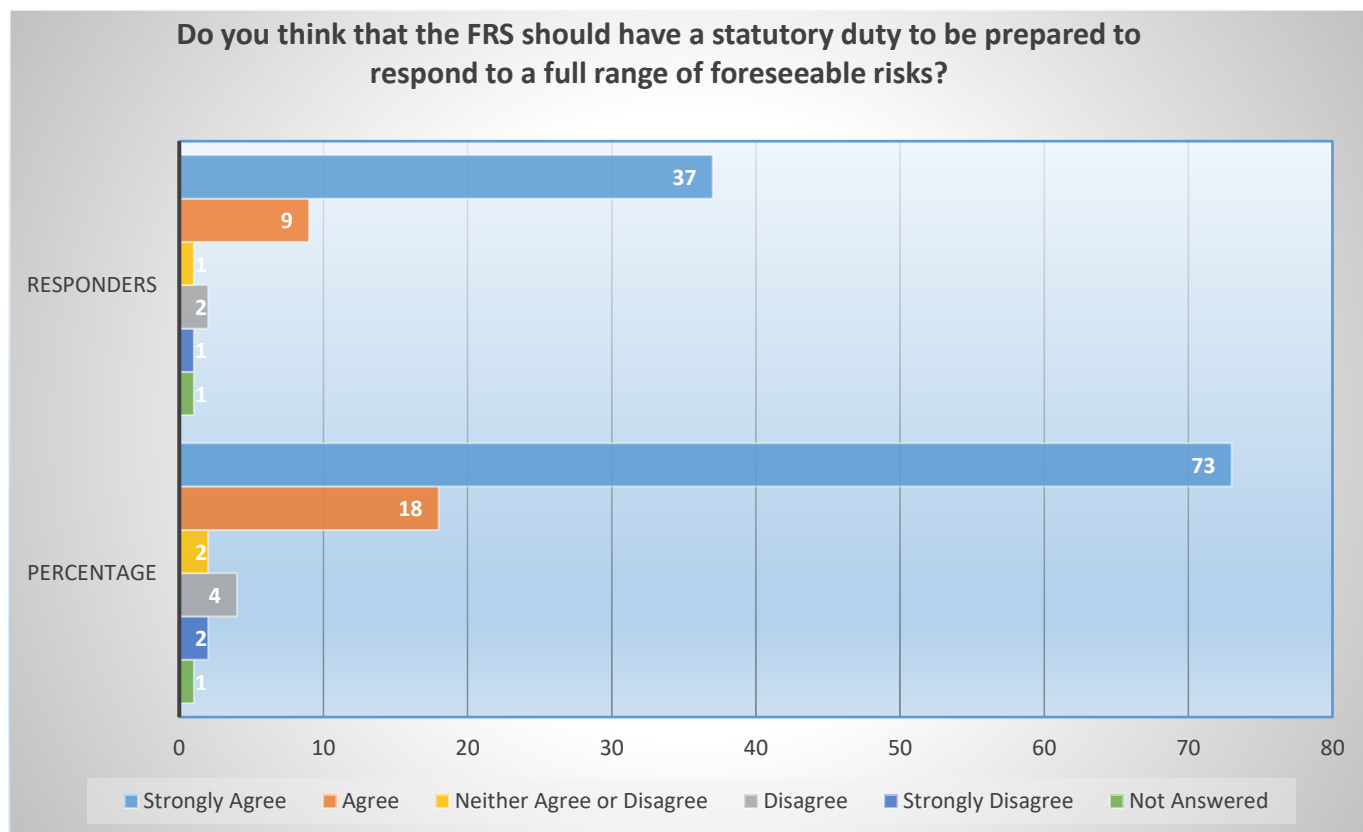
The majority of respondents were supportive of option "Strongly Agree" as indicated by a total of 37 (73%) respondents.

9 (18%) respondents indicated they "Agree"

1 (2%) respondent "Neither Agree or Disagree"

2 (4%) respondents indicated they "Disagree"

1 (2%) respondent indicated they "Strongly Disagree"



The public overwhelmingly expect their FRS to be prepared for a full range of foreseeable risks and for this to be placed on a statutory footing. With those “strongly agreeing” and “agreeing” equating to 91%. A balanced selection of the comments received include:

- *It is imperative that the IOMFRS are able to deal with any type of incident, as we do not have any other alternative available to deal with complicated, specialist or protracted incidents. Limitations that such a small service is able to provide especially when there is a protracted or major incident.*
- *There are other agencies more than capable of carrying out these functions.*
- *The FRS already fulfils a wide range of functions without the appropriate funding to do so. If they don't respond then who will, whilst maintaining a professional approach with full training and resourcing?*
- *If it will save lives they should attend.*
- *Not sure limiting it to foreseeable risks is particularly a good idea, any community risk would be better however perhaps not as a statutory duty, you'd need to be clearer on purpose and why etc? How does this cross with other services, coastguard, civil defence etc?*
- *I agree that the FRS should have its statutory role expanded but I consider use of "full" to be a poor choice. What does "full" actually mean? To me it refers to something that is complete and does not need to be amended whereas risks may change and the range of statutory duties may have to increased or decreased over time. In drafting future legislation or guidance notes I would prefer to see a more general word used, such as "wide" or better still just refer to a "range" of foreseeable risks.*



## **We did:**

The statutory functions of the FRS currently set out in the Fire Services Act 1984 is narrow in scope and does not fully reflect the demands placed on a modern-day FRS. The drafting of a new Fire Services Bill aims to widen and better define the functions of a modern-day FRS, many of which are currently provided on a non-statutory basis. As noted in some of the commentary above, the drafting of new legislation should be drafted in a way which can be responsive to the evolving needs of the Island.

By integrating foreseeable risk, the FRS will be required to evolve and adapt to changes in the built environment, population growth, and technological advancements to ensure service delivery remains fit for the future.

The Department recognises that the Island's FRS must be prepared to manage major incidents independently, as external support would take considerable time to arrive. As a result, identifying foreseeable risks, implementing mitigation strategies, and enhancing preparedness and training for worst-case scenarios are crucial for a small island FRS.

Additionally, the FRS acknowledges the resourcing challenges posed by long and protracted major incidents. To address this, the FRS actively collaborates with other blue light services and support agencies to ensure effective operational response. Inter-agency cooperation is already well established on the island, strengthening overall emergency preparedness and response capabilities.

## **We asked:**

### **Question 3:**

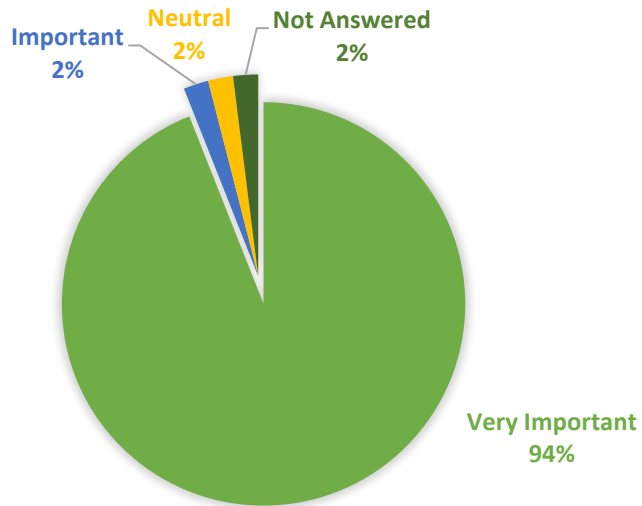
The Department proposes that new legislation should capture those core functions already being delivered by the Fire & Rescue Service. To assist in informing the prioritisation of resources and training please rate how important you feel it is for the Fire & Rescue Service to provide the following core functions? These current core functions consist of those that are existing statutory requirements, those undertaken through identified risk management and some that are requested and contracted by other parties.

We asked respondents to rate how important they felt it was for the Fire and Rescue Service to provide the following core functions. 1 being not very important and 5 being very important.

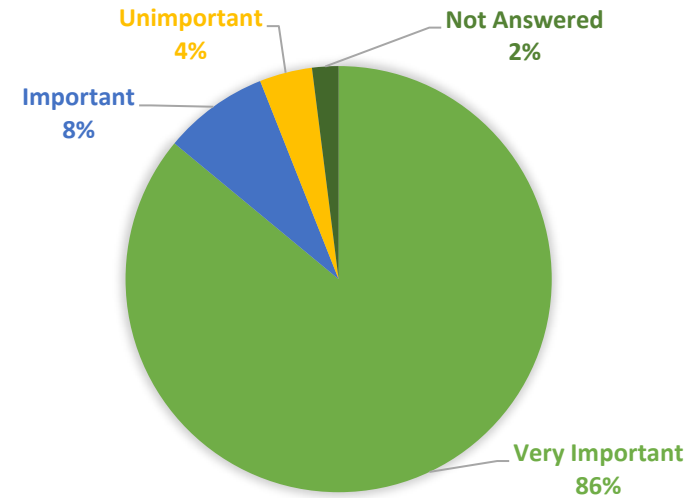
## **You said:**

The following statistics are derived from responses received from each core function: -

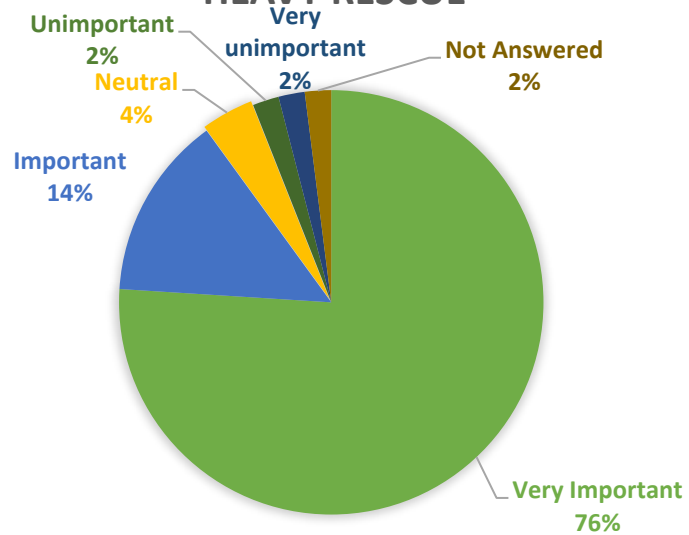
### FIRES



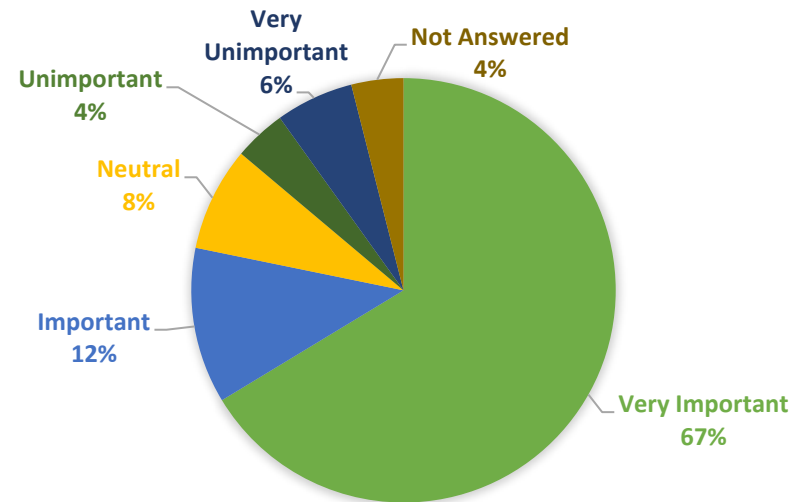
### ROAD TRAFFIC COLLISIONS (RTCS)



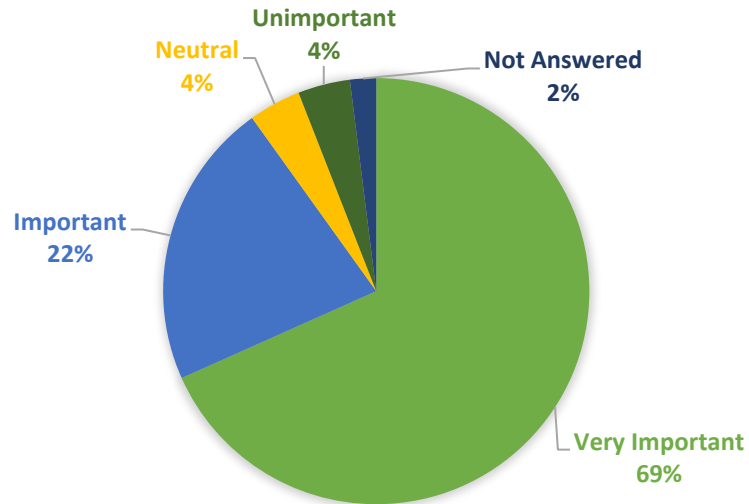
### HEAVY RESCUE



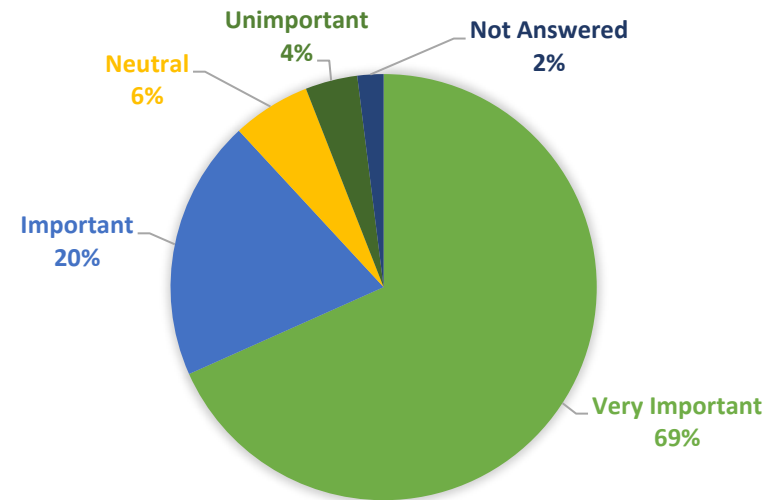
### URBAN SEARCH & RESCUE



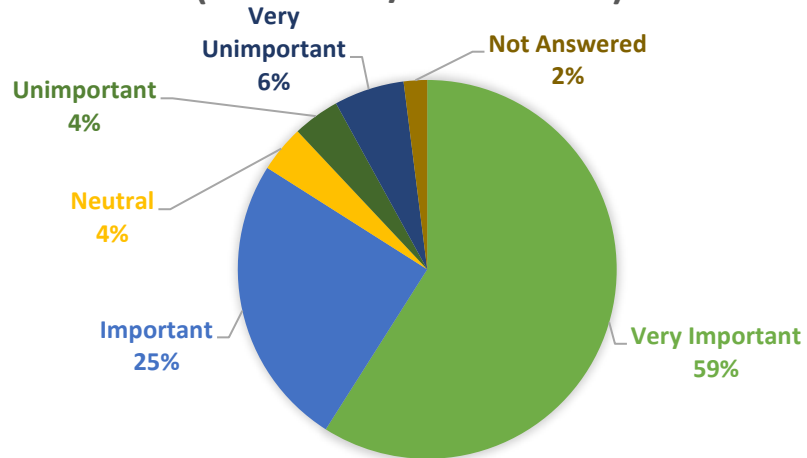
### FIRE PROTECTION



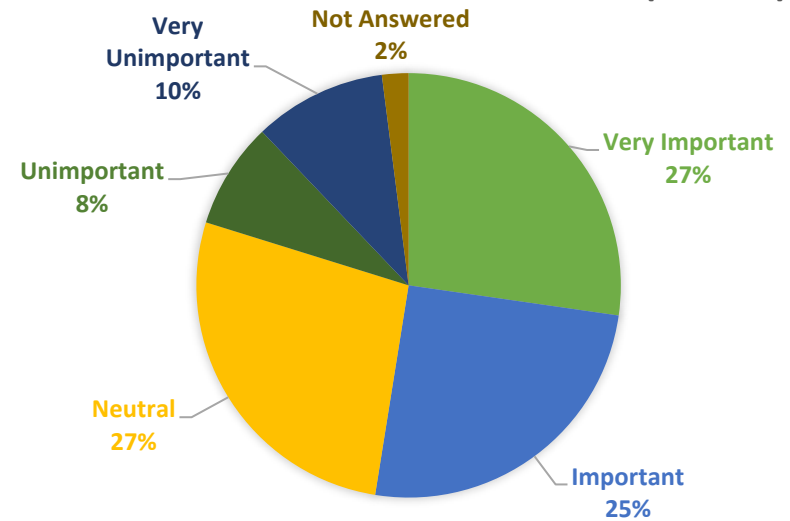
### FIRE PREVENTION



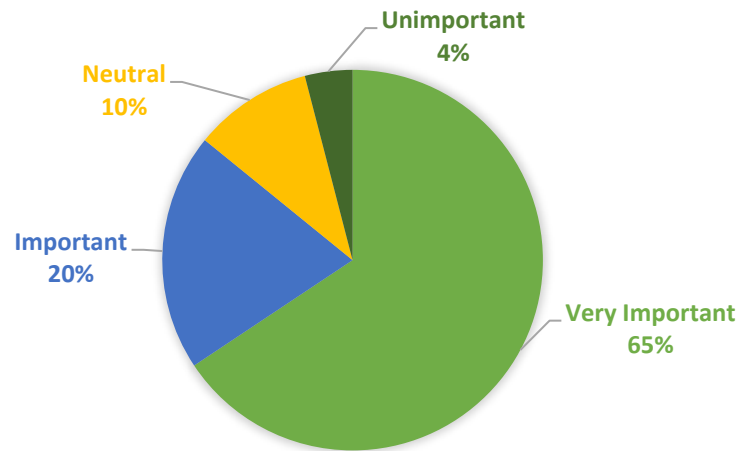
### MARINE FIREFIGHTING (HARBOUR/ALONGSIDE)



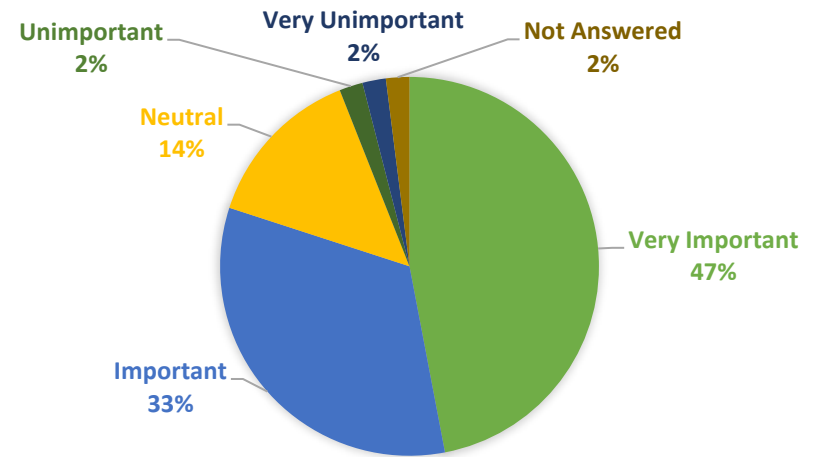
### OFFSHORE MARINE FIREFIGHTING (AT SEA)



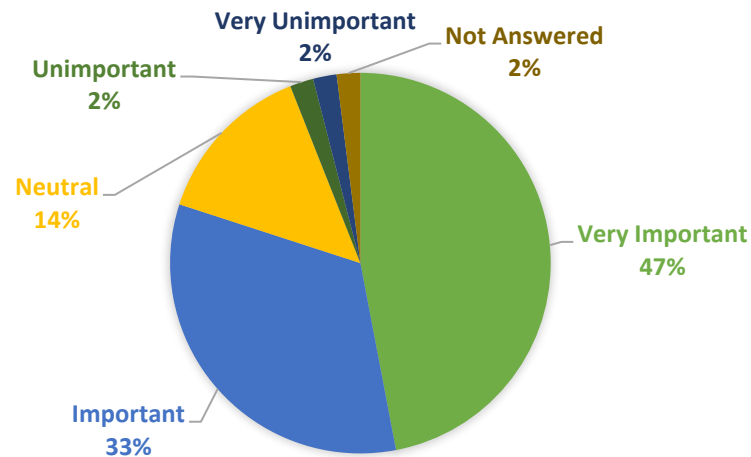
### HAZARDOUS MATERIAL RESPONSE & CHEMICAL IDENTIFICATION



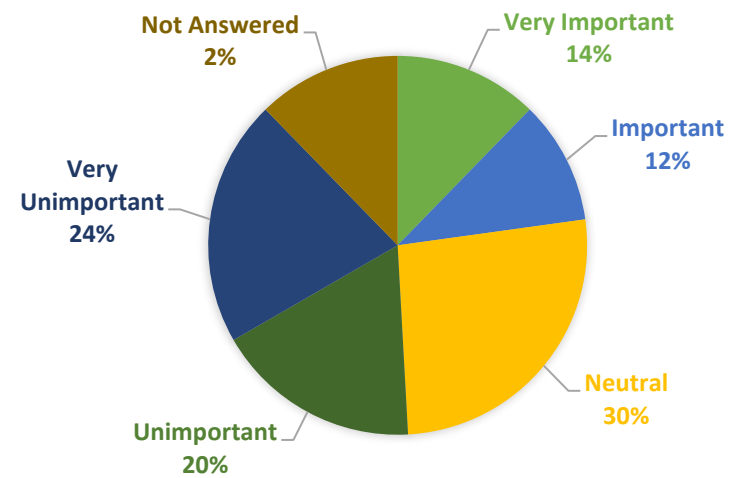
### CHEMICAL, BIOLOGICAL, RADIOLOGICAL AND NUCLEAR (CBRN) RESPONSE



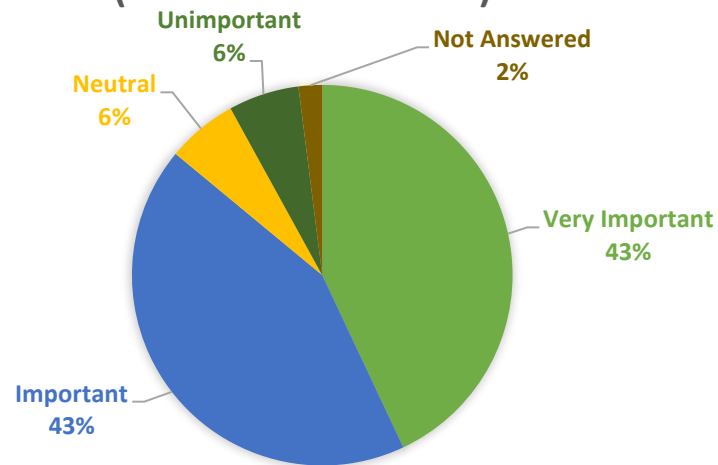
### AUTOMATIC FIRE ALARMS (CAUSE UNKNOWN)



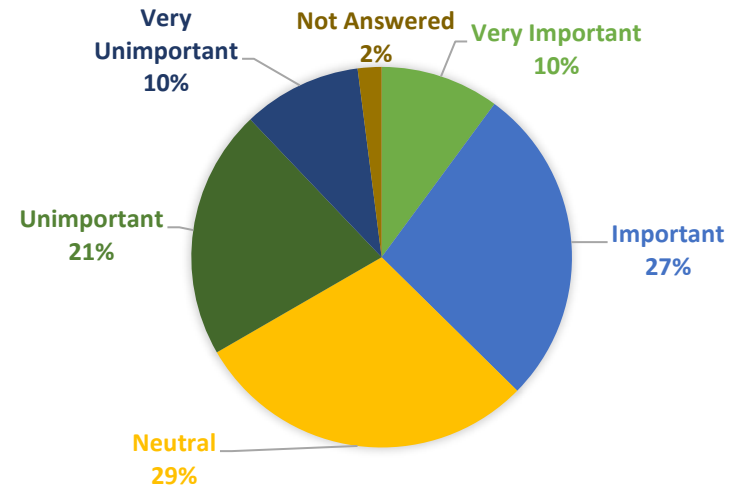
### AUTOMATIC FIRE ALARMS (CAUSE KNOWN)



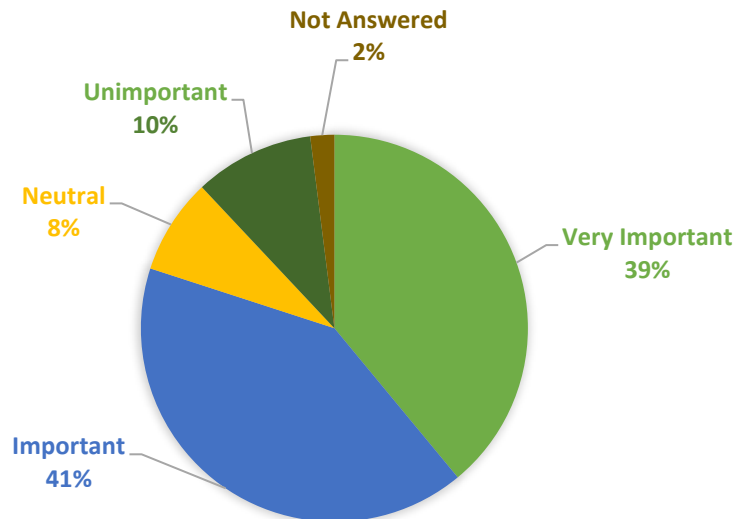
### DOMESTIC FLOODING (EXTREME WEATHER)



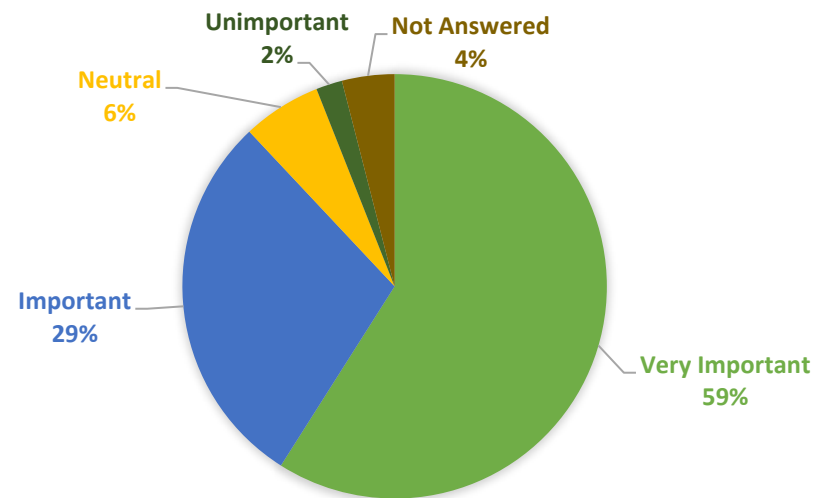
### DOMESTIC FLOODING (NON-WEATHER RELATED)

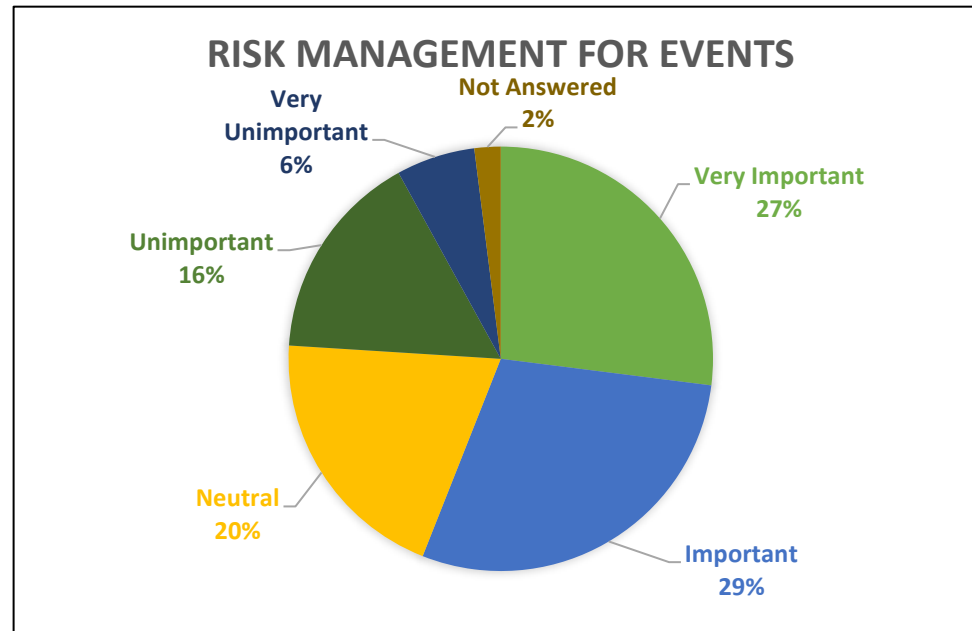


### IRRESPONSIBLE BURNING OFF



### FIRE INVESTIGATION





A balanced selection of the comments received include:

- *All these elements are critical services to be provided and expected by the public.*
- *Domestic flooding can be catastrophic, causing thousands of pounds of damage potentially impacting multiple groups.*
- *Burning off, members of the public when they see smoke these days automatically report a fire which can (if not known by the ESJCR) see a IOMFRS response to controlled burning. The majority of controlled burns have very little impact and are a recognised way to deal with certain materials. Naturally there are those who take advantage and abuse the process. The current legislation (DEFRA) is poorly enforced or not known and understood by the public. Anyone who is found to be in breach of that legislation should be reported fined which should cover any potential IOMFRS costs.*
- *Contracted special events; currently the TT and MGP emergency standby support are provided by IOMFRS having a major negative impact on the service as it takes away critical staff from being available to deal with incidents.*
- *Offshore Marine outside of FRS experience & resource.*
- *Domestic flooding not related to weather, whilst damaging does not require the attendance of the fire service unless structural damage has occurred resulting in a risk to life that would require specialist rescue equipment.*
- *Noting that under IMO Training Conventions, all seafarers must attend fire-fighting courses.*

## **We did:**

The majority of responses indicated that it is important or very important for the FRS to deliver the core functions expected of a modern Fire & Rescue Service.

Public opinion was divided on whether the FRS should respond to domestic flooding. However, historical data shows that these incidents do not place a significant financial burden on the service and the Department will now consider this policy area.

There was strong support for the FRS not responding to non-fire Automatic Fire Alarms (AFAs). However, in practice there are operational factors which will need to be considered when finalising a position.

It is common for callers to contact the FRS before checking whether there is a genuine emergency, and additional information often becomes available while crews are already en-route. In many cases, crews are only moments from arrival when it is confirmed to be a false alarm, making it more practical and operationally appropriate to continue rather than stand down.

In such instances, on-call firefighters are paid for the first full hour, meaning costs are incurred regardless of whether the call is legitimate.

Public feedback supports the FRS recovering costs from premises generating repeated false alarms. The FRS already has an Automatic Fire Alarm policy promoting education and best practice. As a last resort, the FRS can implement a non-attendance policy, with property owners opting for a paid attendance service. It is the Departments intention to transfer these existing provisions to the new Bill.

In respect of wildfire & land management of incidents, the FRS already work closely with representatives from DEFA and plans to collaborate further with the Manx Farmers Union and other interested parties, on land management and controlled burns, to reduce unnecessary operational demand. Recent amendments to the Fire Services Act 1984 enable the Fire & Rescue Service to recover costs for the provision of fire-fighting services in response to a report of a fire or explosion where, in the opinion of the senior brigade officer attending, the incident would not have occurred if the activity that appeared to cause it: (a) had been carried out in a responsible and careful way and with proper regard to, and in accordance with, safe working practices or system; but (b) was not carried out in such a way (deliberately or otherwise).

In respect of the impact of contracted work on FRS operations, it is noted that there is a misconception in the public comments regarding contracted work affecting the FRS operational readiness. Operationally, it is the case that every request for contracted work is assessed to ensure it does not impact statutory duties. All contracts include a withdrawal clause, allowing the Chief Fire Officer to recall FRS resources immediately in an emergency.

The IoM FRS has previously undertaken offshore firefighting with support from the Royal Air Force; however, this provision is no longer available. Across the UK, FRSs have shifted to a Tactical Advisory role rather than providing a direct offshore response. The IoM FRS follows this approach but continues to provide full operational firefighting services to vessels alongside in Manx harbours as part of preparedness work and risk planning.

There are no other Island agencies, including the IoM Coastguard and the RNLI, who are equipped to handle a fire on board a vessel offshore. The FRS will therefore continue to monitor UK National Operational Guidance for future developments.

#### **We asked:**

#### **Question 4:**

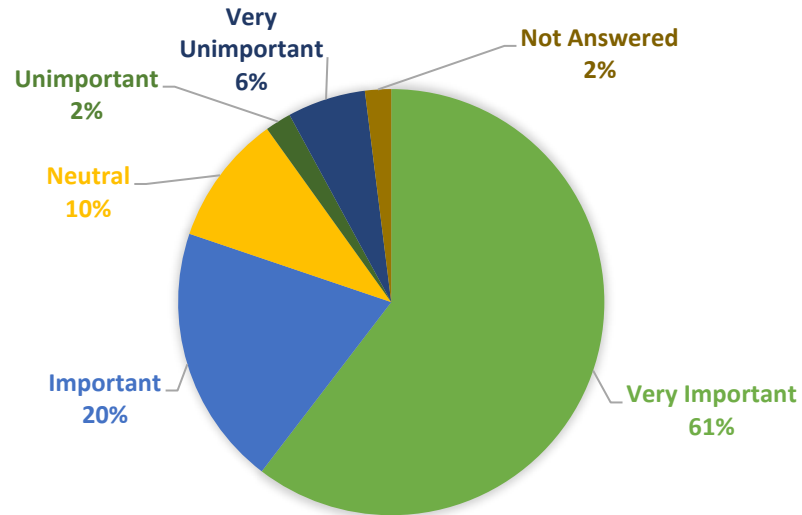
**The Fire & Rescue Service also delivers other ancillary/rescue functions which the Department wishes to reflect in the proposed new legislation.**

**To assist in informing the prioritisation of resources and training please rate how important you feel it is for the Fire & Rescue Service to provide the following ancillary/rescue functions? 1 being not very important and 5 being very important.**

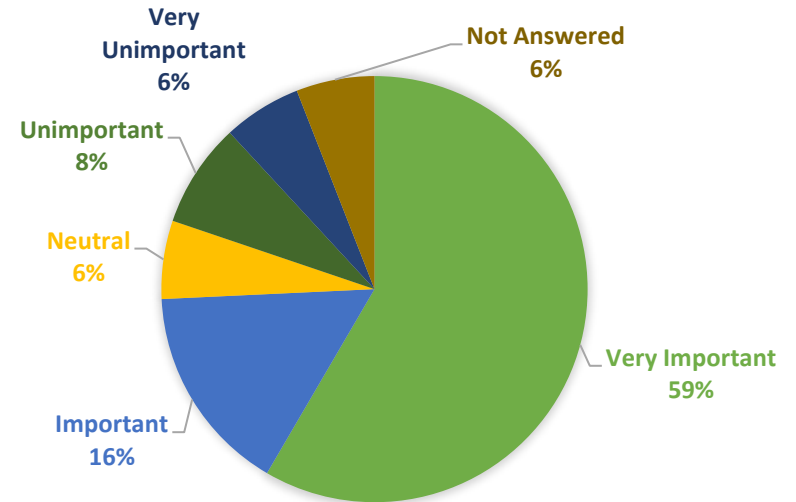
#### **You said:**



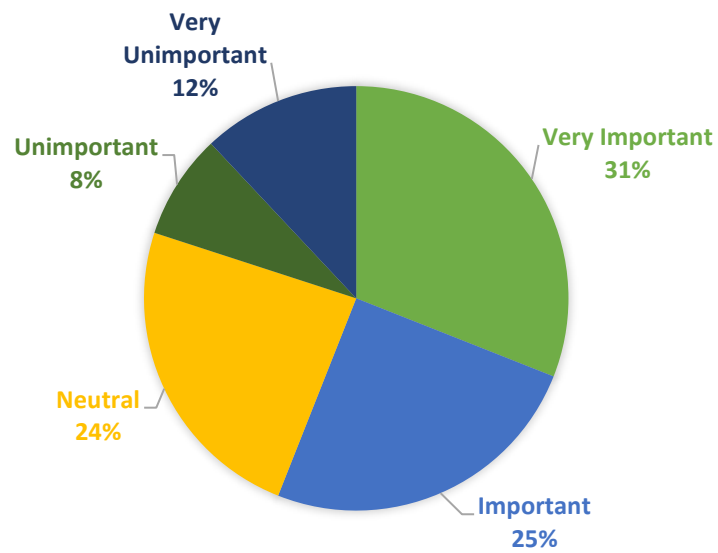
### LINE RESCUE RESPONSE



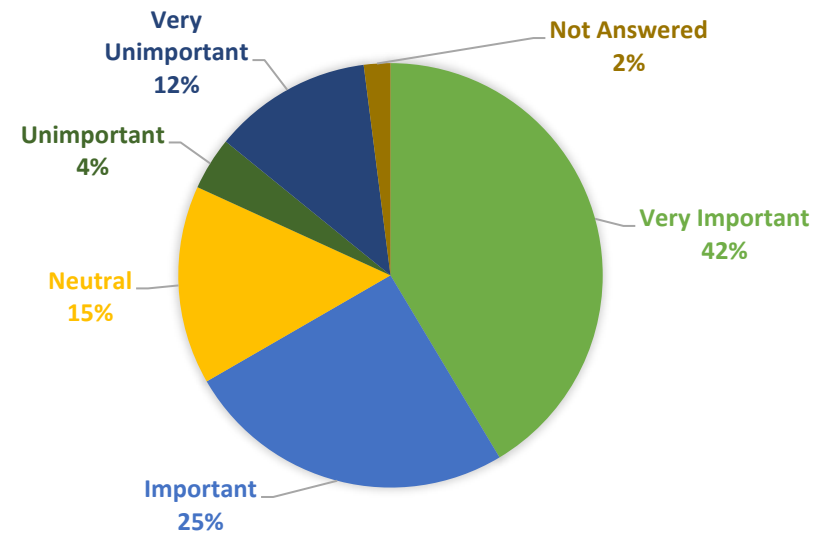
### WATER RESCUE RESPONSE



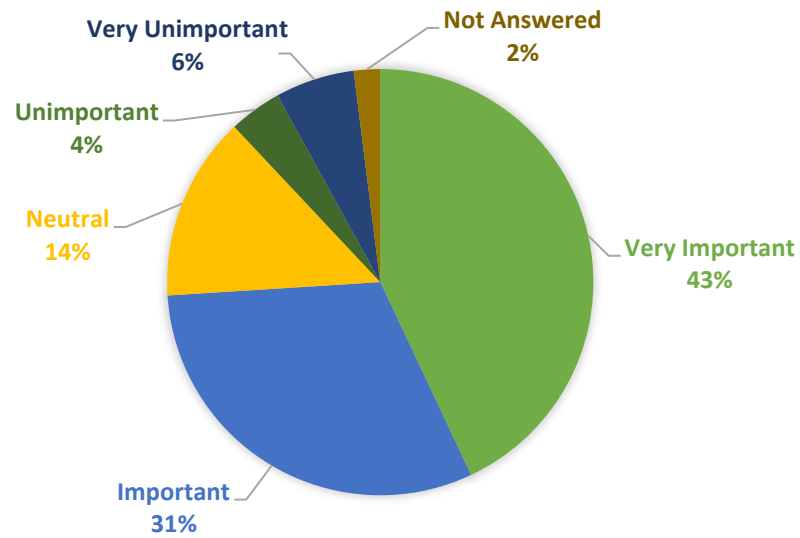
### SEARCH TEAM



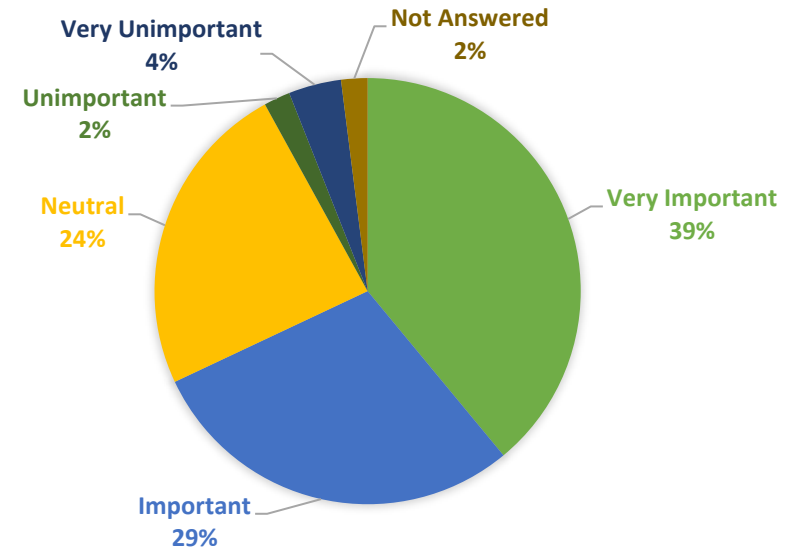
### OFF-ROAD AMBULANCE RESPONSE



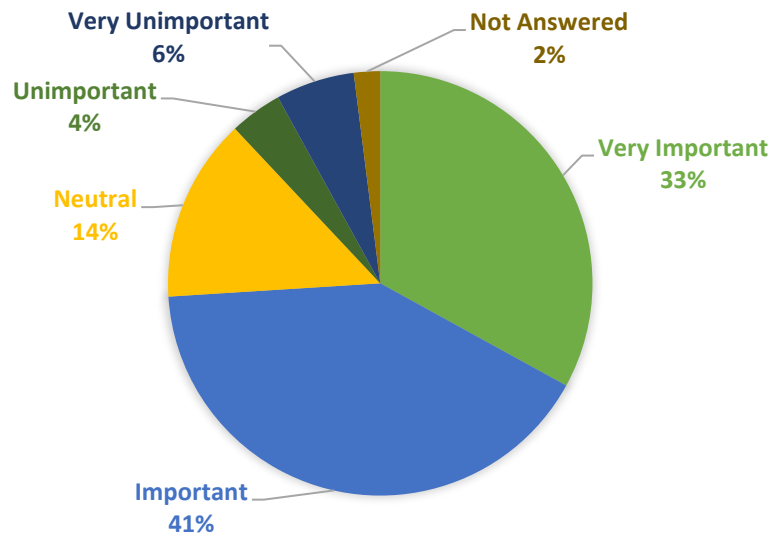
### ASSISTING THE AMBULANCE SERVICE



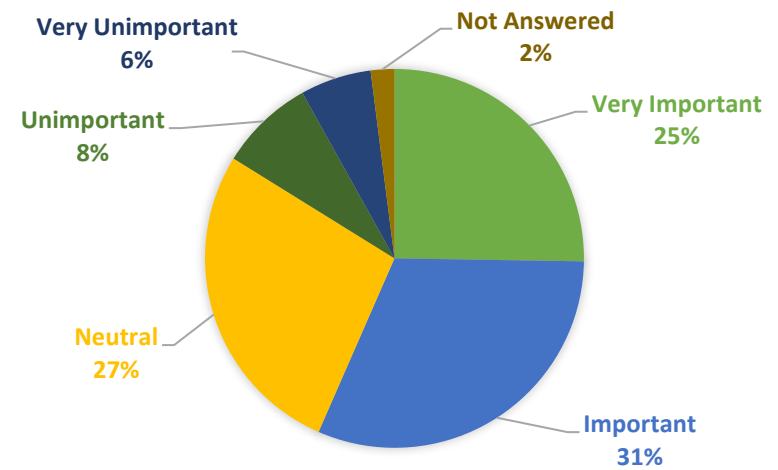
### CPR FIRST RESPONSE



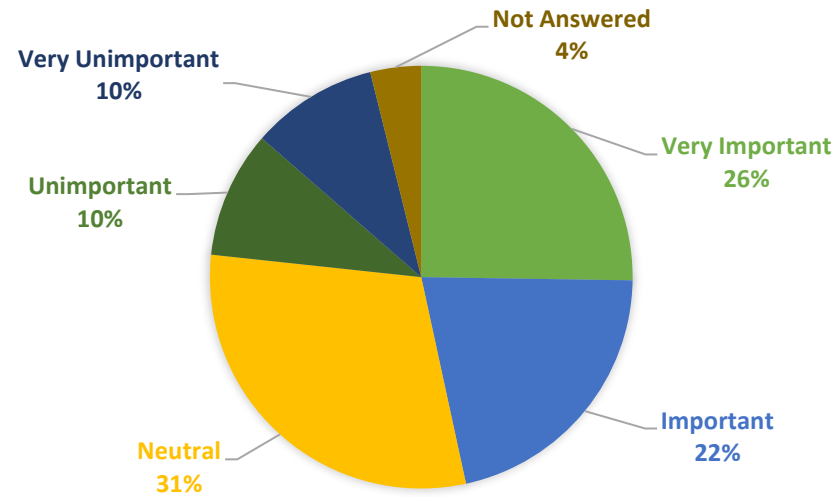
### ENTRAPMENT RESCUE



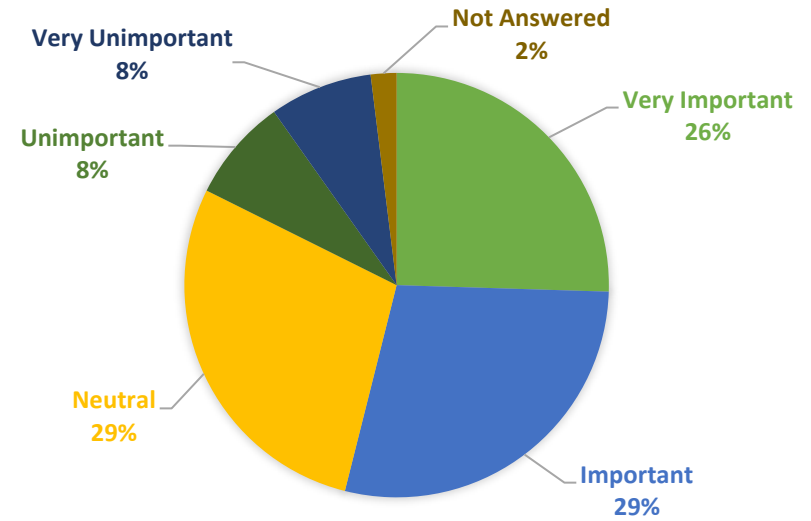
### LIVESTOCK RESCUES (NON-DOMESTIC PETS)



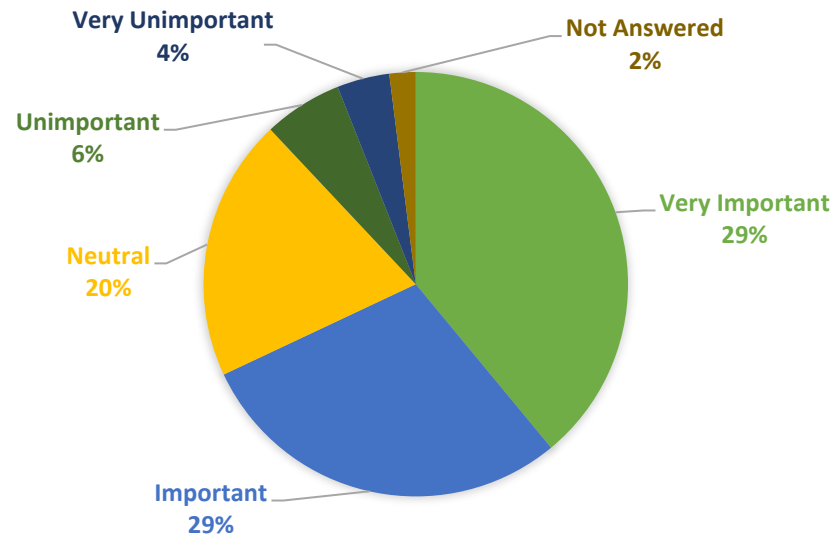
### RESCUING DOMESTIC PETS



### FLOODING INCIDENTS (COMMERCIAL)



### LIFT RESCUES



A balanced selection of the comments received include:

- *Other agencies better placed to provide support to these ancillary functions.*
- *Public money should not be spent on things like livestock and domestic animal rescue*
- *Specialist rescues and supporting other emergency services are crucial and a core function of the IOMFRS.*
- *Call for a full review is the duplication of specialist roles within the services to identify correlation and duplication of skills required by services and where appropriate skills lay. Also, for sharing of resources and skills need to provide a more efficient use of resources which will also lead to a cost savings.*
- *Given finite size of emergency services in the Island, it is crucial they support each other when one is stretched. (example of when one emergency service is in a position to support and assist when resources are stretched or when time is critical for a positive outcome)*
- *Concerns as to IOMFRS staffing ratios and training provision.*
- *Fire investigation and training in this field highlighted as important.*
- *Building owners/responsible person should have responsibility for dealing with non-emergency flooding in commercial premises and lift rescue.*

### **We did:**

The majority of responses indicated that it is considered important or very important for the FRS to deliver the rescue functions typically expected of a modern Fire & Rescue Service.

A key strength of the FRS is its ability to provide an immediate response across the Island. However, during prolonged incidents, or those requiring significant personnel, resources can become stretched. In such cases, the FRS relies on resilience partners such as the Civil Defence, to support operational delivery.

The FRS remains committed to collaborating and training with partner agencies to ensure the best possible outcomes for service users, and this will be reflected within the new Bill.

While limited work has already been undertaken, the FRS would support a strategic review of the island's emergency responders to ensure we are achieving the best possible outcomes for service users, value for money and to minimise any potential duplication across Government services.

It is clear that the public recognise that the island's resources are limited and that the blue light services will need to utilise the resilience services as and when required.

The FRS will always attend incidents where there is a risk to life. However, certain incidents, such as commercial flooding, could potentially be managed without FRS intervention. Public opinion on this matter is mixed. Some respondents believe the FRS should respond to these types of incidents regardless of their commercial nature, others feel that alternative solutions are available to business owners, as these situations rarely present an immediate life risk. The Department will consider this feedback.

## **We asked:**

### **Question 5:**

**Are there any other core or ancillary functions you would like to see the Fire & Rescue Service deliver?**

## **You said:**

A balanced selection of the comments received include:

- *The provision of advice and prior agreement for firework displays and the like.*
- *Risk assessments of hospitality venues and hazardous retail outlets e.g. petrol/gas stations.*
- *Duties to obtain/provide information and wider powers of investigation in the event of serious incidents.*
- *Inter-service response driving instruction.*
- *The provision of education around fire prevention and safety from a young age onwards, is extremely important.*

## **We did:**

The majority of responses indicated that there were no additional functions the public expected the FRS to deliver.

Some of this feedback will be addressed through the Fire Safety Bill and will be covered later in the report.

Whilst the legislation covering the sale and control of fireworks does not sit directly with the FRS and is managed through the Department of Home Affairs; the FRS will continue to provide general safety advice around fireworks.

The new Fire Services Bill will introduce greater provisions for Preparedness, requiring the FRS to develop operational response and salvage plans for different types of premises. Additionally, the collation of risk information will help identify foreseeable risks, and inform the Community Risk Management Plan, allowing the FRS to align resources and training to risk.

Collaboration opportunities with blue-light partners remain under continuous review to explore whether services can be delivered more effectively. Shared resources, such as response driver training, is an active area of discussion. It is proposed that the draft Bill will set out a statutory duty for blue light services to collaborate and share information.

The FRS's Prevention Strategy outlines additional services that will be delivered across the island's community. A Safe and Well program will be introduced, aimed at reducing harm and accidents in the home, whether fire-related or not. Under the new Fire Safety Bill, it is proposed that the FRS will have a formal responsibility to carry out protection activities and collaborate with partners to achieve the best outcomes for the community.

The proposed legislation will have core elements as standard. From there certain functions as directed by Tynwald can be brought in as a requirement to be carried out by the FRS.

We will continue to use staff and resource for a multitude of different tasks, and where necessary, any additional equipment, training, and operational assuredness will be considered. As we are a predominantly on-call service, every call out results in additional costs. With additional roles and responsibilities will come the need for additional funding to compensate our on-call staff for the time spent on such callouts.

### **We Asked:**

#### **Community Risk Management Plan**

##### **Question 6:**

**Do you agree that the FRS should be held accountable through a Community Risk Management Plan or something similar? Respondents gave answers to five options; strongly agree, agree, don't know, disagree and strongly disagree.**

**And;**

**If you don't agree please explain why and suggest an alternative way of measuring FRS performance?**

### **You said:**

There was a total of **51** responses received to this question. 2 participants giving no response to the question.

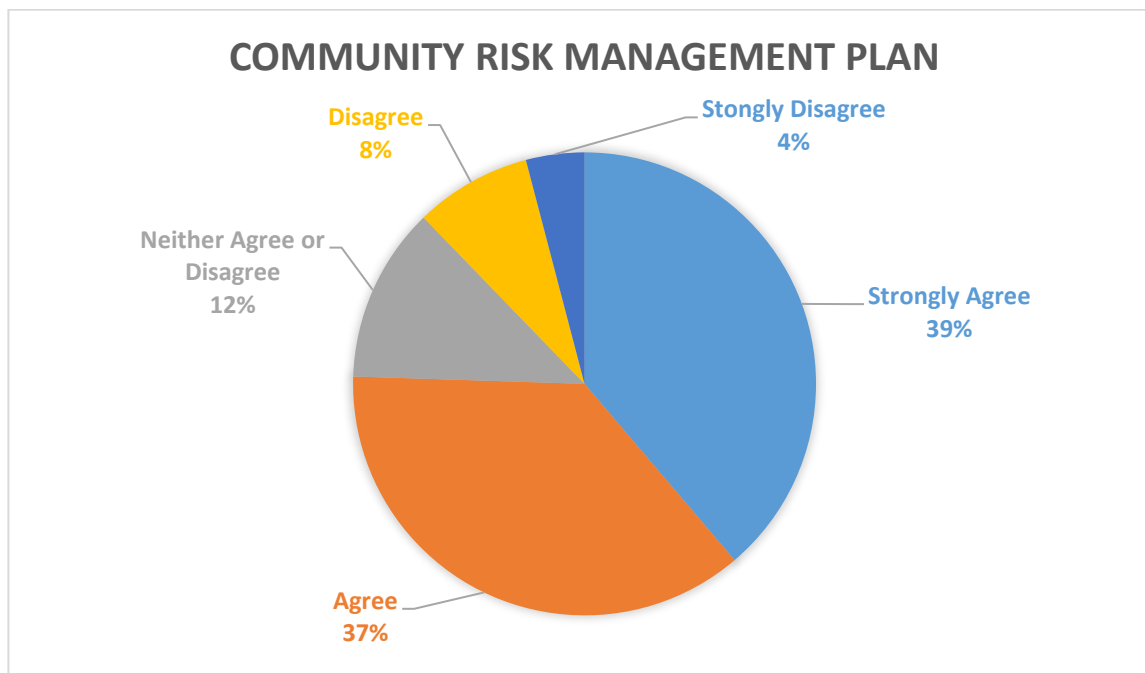
The majority of respondents were supportive of option "Strongly Agree" as indicated by a total of **19** respondents.

**18** respondents indicated they "Agree"

**6** respondents "Neither Agree or Disagree"

**4** respondents indicated they "Disagree"

**2** respondents indicated they "Strongly Disagree"



76% strongly agree or agree, with 12% disagreeing or strongly disagreeing. A balanced selection of the comments received include:

- *It is imperative that the service and DHA is held accountable and to ensure that its function is suitable and effective, but there has to be consequences and accountability to ensure that however this undertaken it works. The IOMFRS must be benchmarked and meet national UK FRS standards.*
- *Sounds like mire paperwork that detracts from real jobs*
- *They shouldn't be held accountable due to the risk plan being a collaborative plan with many other services and departments*
- *In a busy area, such as Cornwall, is totally different to the IOM where day after day, firemen do nothing. They are a luxury this island cannot afford!*
- *Sounds bureaucratic - a simple "Mission Statement" would suffice.*

#### **We did: -**

Public feedback has overwhelmingly supported the introduction of a Community Risk Management Plan (CRMP), recognising it as a vital tool for holding both the FRS and the Department accountable for how the Service protects the island's population.

The CRMP is intended to be a dynamic and evolving document, not an additional layer of management bureaucracy. Recently, the Department has supported the FRS to commission its first Community Risk Management Plan. This plan will be developed using local operational data and foreseeable risk information, ensuring that the right resources are in the right places, at the right times, to meet the island's specific needs.

The CRMP will support evidence-based decision making and will guide future planning in areas such as resource allocation, training and procurement, shifting the focus from tradition to risk-informed strategies.

The Department intends to make the continual review and update of the CRMP, reflecting changes in island's risk profile, a statutory function under the new legislation.

## **We Asked:**

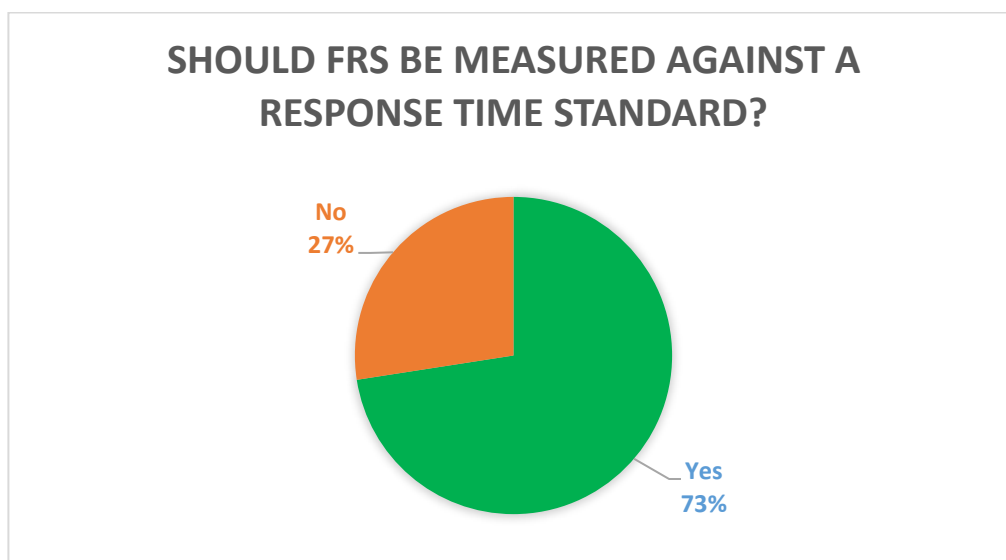
### **Emergency Response Time**

#### **Questions 7 and 8:**

- 7.1 Do you think the FRS should be measured against a response time standard?**
- 7.2 If not, explain your answer.**
- 7.3 If you answered yes to Q7, would you agree that there should be a different response time standard for a whole-time crewed fire engine (staffed 24/7), compared to an on-call crewed fire engine? (staffed on a return to duty basis when required)?**
- 7.4 If you think the response time standard should be the same for all Fire Service responses, please explain why?**
- 7.5 Please indicate an overall response time for**
  - 7.5.1 whole-time response**
  - 7.5.2 on-call (retained) response.**
- 8. If you answered YES to Question 7; do you think response times should change depending on the type of emergency call the FRS are attending?**

## **You said:**

### **Q7.1 Do you think the FRS should be measured against a response time standard?**

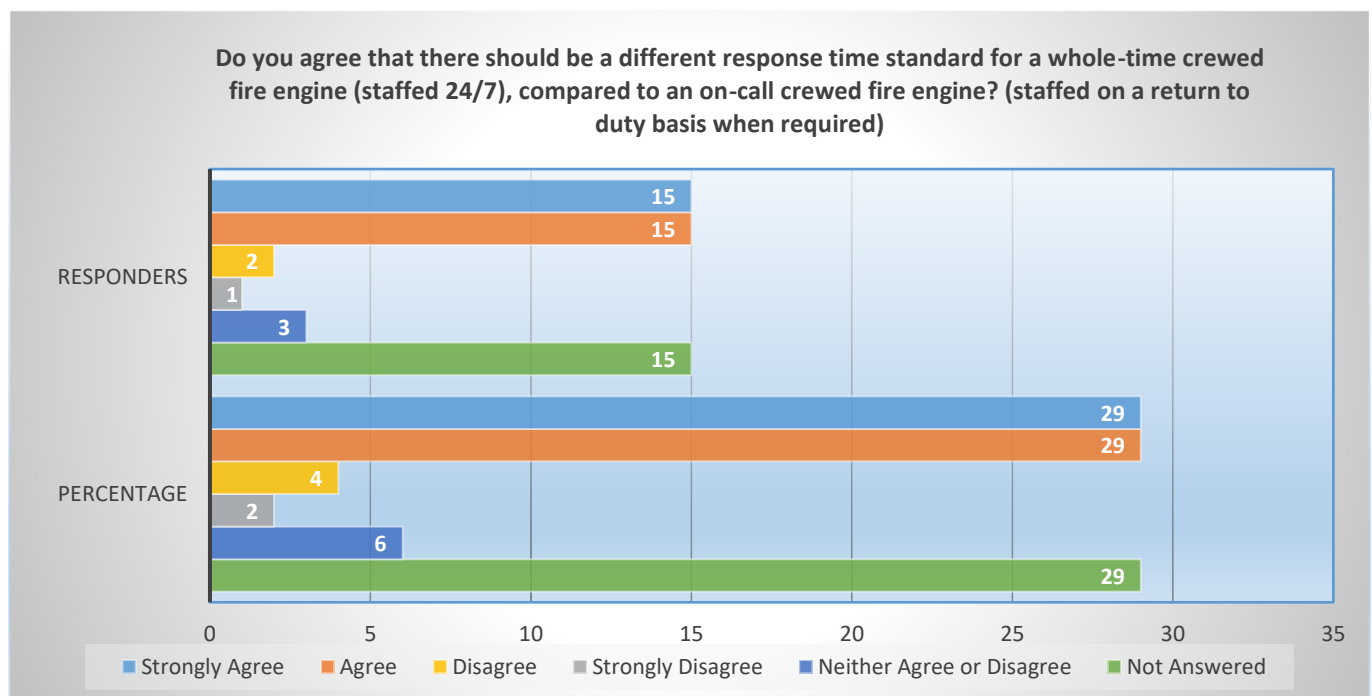




## Q7.2 A balanced selection of the comments included: -

- *Speed of response to a 999 call as a metric would not add value. More important as a metrics would be an analysis of their causes and understanding if the risks highlighted were being managed.*
- *Time is critical for any efficient and effective outcome.*
- *There could be many factors that add to a delayed response time such as traffic conditions, location of incident, weather etc.*
- *Monitoring response times may have unintended consequences, including putting general public and FRS personnel at risk, noting unavoidable variables such as environmental and traffic factors.*
- *Attendance times outside those proposed should be examined as part of an internal response review process whereby influencing factors can be identified, reviewed and where necessary rectified on a case-by-case basis.*
- *We are overall, a country island, and DATA surely does not justify Full Time persons, who are paid to sleep. Compare times to similar areas, i.e. Peak District, where the service is carried out by retained personnel.*
- *Too many variables to account for. Particularly the requirement for a duty crew to train whilst being ready to go.*
- *They should be managed against the response time in conjunction with the ESJCR. If initial dispatch is delayed this must be taken into consideration.*
- *Too much time & effort spent "measuring" Another management invention.*
- *Confidence that the FRS will respond to any call out as quickly as is possible without a target to meet.*

## Q7.3 If you answered yes to Q7, would you agree that there should be a different response time standard for a whole-time crewed fire engine (staffed 24/7), compared to an on-call crewed fire engine? (staffed on a return to duty basis when required)?

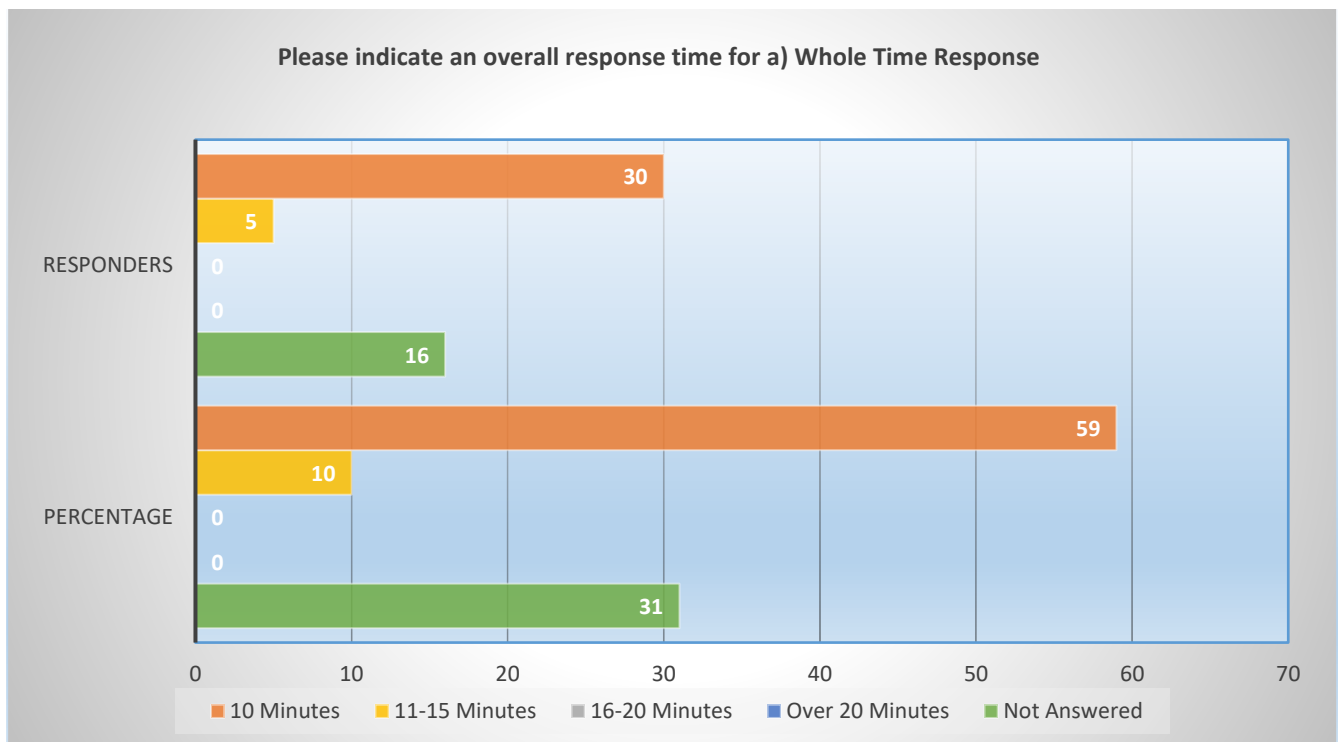


58% strongly agree or agree, with 6% disagreeing or strongly disagreeing.

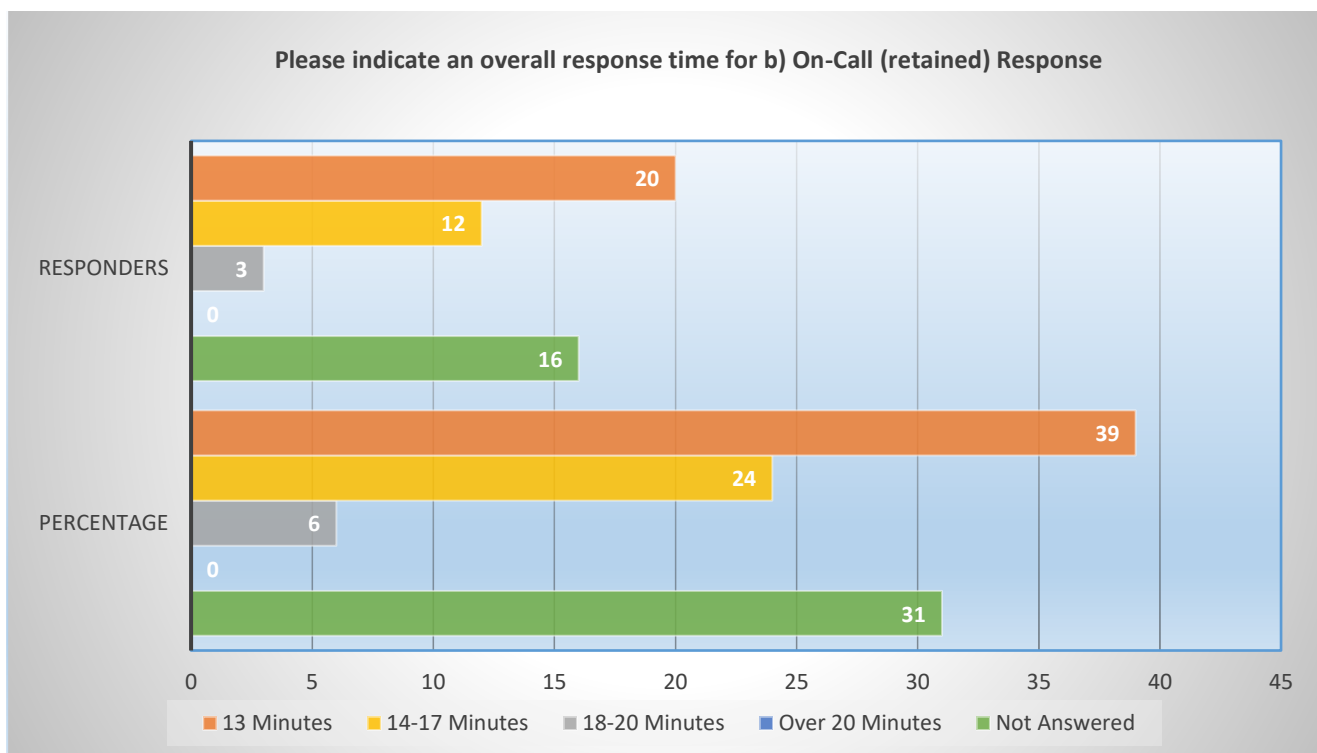
### Q7.5 Please indicate an overall response time for:

#### a) whole-time response

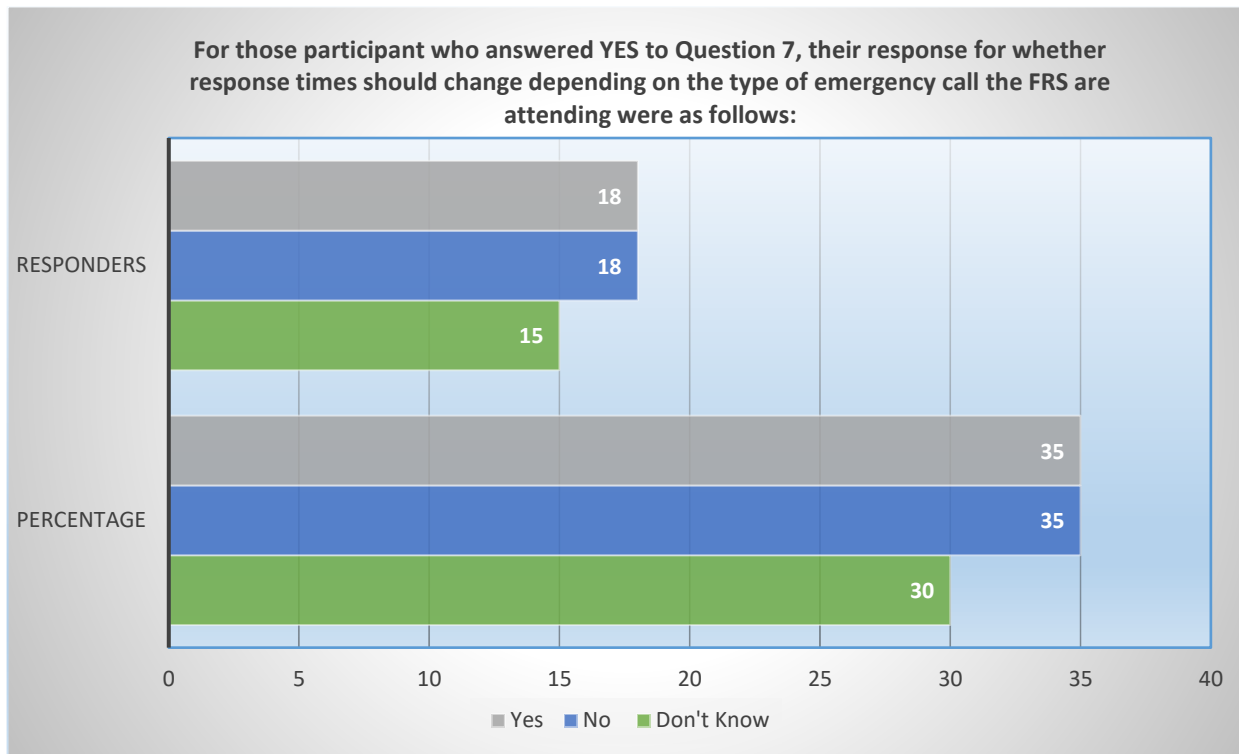
The key performance indicator for a whole-time response is currently 10 minutes @ 80% of calls.



The key performance indicator for an on-call response is currently 13 minutes @ 80% of calls.



**Q8. For those participants who answered YES to Question 7, their response for whether response times should change depending on the type of emergency call the FRS are attending were as follows: -**



A balanced selection of the comments received include:

- *AFAs should be considered non-false alarm until verified.*
- *Risk to life calls should always take priority.*
- *Incidents should be categorised by trained professionals as direct or indirect 1 (high risk loss of life), 2 (moderate risk loss of life) 3 (low risk loss of life).*
- *For known non-life risk incidents response driving should be managed as it inherently places the public at risk.*
- *A risk-based approach is sensible, where the service can potentially save life then they should response as quickly as possible. Where it's possible to reduce financial loss / limit damage then it should be a priority. Where the response is not time critical then a lesser response is appropriate.*
- *In principle, high-risk calls should be treated with greater urgency than no-life-risk calls. However, I must concede that it may not be obvious that the situation is quite minor from the initial call.*

### We did:

While some concerns were raised regarding response time metrics, it is important to clarify that the proposal to set response times and capture related data is distinct from establishing formal performance standards. The Department does not propose defining a fixed journey time within the response standard. Instead, the aim is to use this standard as a reference point to support overall performance improvements, particularly in areas such as call handling, dispatch, and prompt mobilisation from fire stations.

Journey times will naturally vary depending on factors such as distance, road conditions, and traffic. However, implementing a response standard allows for more effective, data-driven analysis of fire station locations in relation to incident demand. This insight is crucial to ensuring resources are positioned strategically to provide the best possible service to the community.

In addition, call handling and dispatch performance form part of the wider performance framework. FRS officers work closely with the Emergency Services Joint Control Room (ESJCR), reviewing performance data and identifying areas for improvement on a monthly basis.

The Department intends to collect data to measure the FRS performance against an agreed standard, aligned to with similar predominantly rural or significantly rural areas in England and Wales. This standard will act as a key performance indicator (KPI). While journey time is a component of overall response performance, it is one of several factors that will be analysed to support continuous service improvement.

By adopting this benchmark, the Department will be better placed to evaluate the effectiveness of operational service delivery and ensure that FRS resources are strategically located to meet foreseeable risks and community needs.

The FRS has already introduced response provision measures, recognising that not every 999 call necessitates a full blue light response, a change that directly reflects feedback received from the public. The FRS has adopted two response modes: -

- A Category One Response is where the nature of the incident warrants the use of Emergency Response Driving techniques and the justified use of legal exceptions under the Road Traffic Act. Examples are (but not limited to) a confirmed fire, road traffic collision, an incident where someone is trapped or in imminent peril, loss or damage to property or the environment. When attending these types of incidents, blue lights and audible warnings will be used.
- A Category Two Response is where the nature of the incident does not warrant Emergency Response Driving techniques and the associated legal exemptions. Examples are (but not limited to) dispatched to a special service call that does not involve the entrapment or imminent peril to life and/or potential loss or damage to property or the environment.

The Department, (through the Emergency Services Joint Control Room) is also exploring new call handling and dispatch technologies to enhance the categorisation of responses. These advancements could improve efficiency, ensuring the Fire & Rescue Service can respond more effectively to incidents based on risk and urgency.

## **Principle 2**

**The legislation should reflect an equivalent level of service provided by the FRS as is provided in other jurisdictions.**

The Fire Services Act 1984 does not comprehensively support or reflect the type of services a modern-day Fire & Rescue Service is expected to deliver and provides no assurance as to how the FRS draws on prevention, protection, and response activities to reduce risk across the community. Updating our legislation allows for assurance and accreditation to be given to the Department and FRS officers respectively, and will ensure that training meets the same standards as required in the UK (with similar legislation), and is proportionate to the needs of the Isle of Man. It will also provide greater accountability to communities for the services the FRS provides.

The existing Isle of Man Fire legislation is out of step with its counterpart in the United Kingdom and there are no formal accredited training pathways under the Fire Precautions Act 1975 (as amended). This means if FRS staff wish to be trained to the most up-to-date legislation in this area, they have to do so in the UK, under UK legislation and practices which don't correspond with the Island's current Fire Precautions legislation.

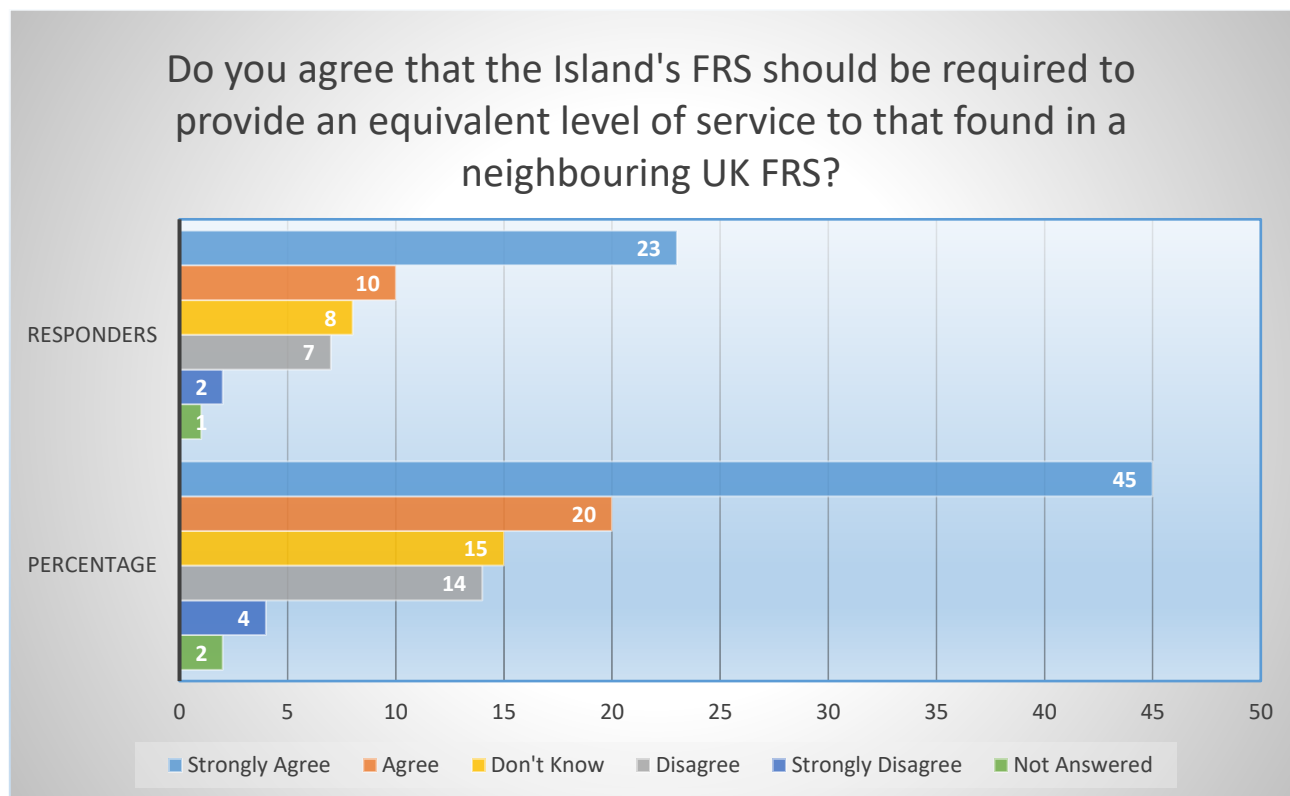
### **We asked:**

#### **Question 9:**

**Do you agree that the Island's FRS should be required to provide an equivalent level of service to that found in a neighbouring FRS in the UK?**

**If you don't agree, please explain why?**

### **You said:**



65% strongly agree or agree, with 18% disagreeing or strongly disagreeing.

A balanced selection of the comments received include: -

- *The IOM still has to work within both national, international standards and regulations which are controlled by resources outside of the IOM, so absolutely they should be working to the same standards and levels in place across the United Kingdom.*
- *Provided the requirements within the UK are gold standard.*
- *It should be better than in the UK, and I believe it is.*
- *We have no national resilience ability given our geography. We must provide a better level of service than the UK, ensuring adequate balance of staffing.*
- *Heavily dependent on the funding available to the Service, who already achieve a great deal compared to larger services with much more substantial resources.*
- *As highlighted the service should reflect Manx needs however basing this on best practice from neighbouring jurisdictions is preferable as you have highlighted already.*
- *We are an island and cannot utilise neighbouring brigades.*
- *Just look at the Grenfell Towers incident; is that a standard to aim for? I think not. As a Manxman, it annoys me that our Government seems to wish to follow the UK Standards slavishly. We really need to look further - and look for "best practice" in comparable jurisdictions. For example, Guernsey has much closer parallels than the UK to Manx needs.*

## We did:

The Department intends to establish, through legislation, the core functions of a modern-day Fire & Rescue Service. While the FRS maintains strong collaborative links with UK fire services, the Department recognises that external assistance, if available, would take significant time

to reach the island. It is therefore essential that the island's FRS is equipped to independently meet foreseeable challenges.

To support this, the Department believes the FRS should develop and maintain a Community Risk Management Plan (CRMP) that identifies foreseeable risks across the island. The CRMP will serve as the foundation for decisions regarding resource allocation, training, and procurement, ensuring they are strategically aligned to risk. It will also help identify service response deficiencies and enable collaborative solutions with the Department, other government agencies, and the wider UK fire sector.

In tandem, proposed reforms to the island's fire protection and prevention legislation aim to reduce risk across the community by improving how resources are prioritised and deployed.

Where possible, the Department expects the Island's FRS to follow National Guidance and recognised best practice, aligning as closely as appropriate to comparable UK Fire & Rescue Services. Adherence to national standards not only provides a robust framework for training local officers to current best practice but also ensures the island has access to relevant guidance materials.

Since the publication of the Grenfell Inquiry reports, significant improvements have been made across the UK sector in both protection and operational delivery. These reforms will continue, with the anticipated establishment a National College of Fire to drive sector-wide consistency and excellence.

By aligning with National Guidance, the island can continue to benefit from mutual assistance arrangements, including those in place with the UK's National Resilience Centre, should additional support ever be required. This may be in the form of virtual assistance.

In some areas, the island is already ahead of UK and Channel Island partners. For example, the island's House in Multiple Occupation (HMO) and Flat Regulations go beyond the requirements of many UK jurisdictions, reflecting the island's unique challenges and limited operational capabilities.

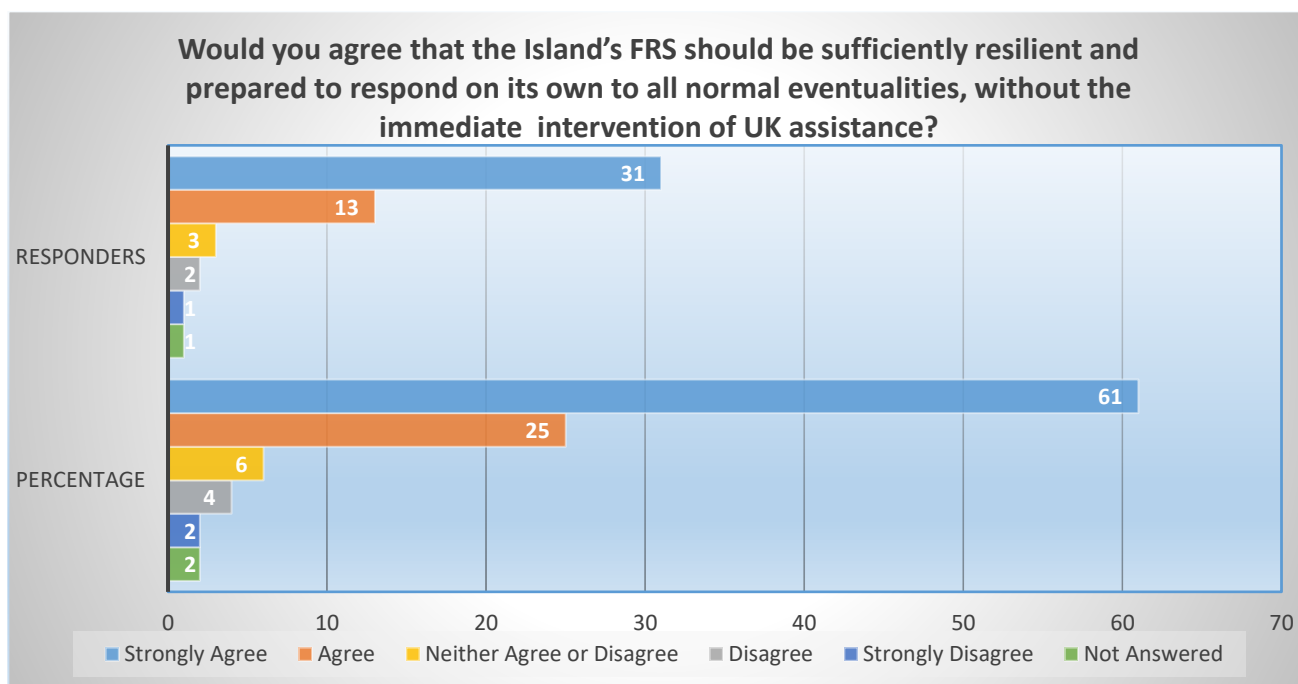
## **We asked:**

### **Question 10:**

**Would you agree that the Island's FRS should be sufficiently resilient and prepared to respond on its own to all normal eventualities, without the immediate intervention of UK assistance?**

Please explain your answer.

## **You said:**



86% strongly agree or agree, with 6% disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

- *Need to be as self-sufficient as possible. UK would priorities own services before assisting IOM.*
- *This should be a risk-based decision. The costs of resilience need to be balanced against the likelihood of the relevant incident occurring. A degree of proportionality will need to be applied to ensure that any service provided by the FRS is capable of being balanced against the budget available.*
- *This is not worded correctly as we can never anticipate serious major incidents and be in a position to deal with major incidents sufficiently. We should however be able to deal with serious realistic worst-case scenarios based on the known risks on the Island. There is no such thing as immediate intervention from the UK as any response would require transport to the Island which could take hours or even days to facilitate. These basic facts must be considered when looking at any changes.*
- *We do not have the ability to call upon other services like the UK do from other counties and further specialist teams.*
- *We are a sovereign nation and should have our own resources to be able to look after ourselves.*
- *We have to be able to bring any reasonable incident to a close without the assistance of a UK service as it would take too long for them to arrive.*
- *Staffing levels dictate the size of response and can fluctuate depending on circumstances (leave/sick/maternity/training/qualifications) it would not take an unimaginable situation to be very stretched leaving some areas without cover.*
- *We have unreliable travel links, and we should and must ensure we have sufficient resources and staff to deal with normal conditions, and larger scale incidents. There should and must be sufficient levels of resources at all levels in line with National Operating Standards. If we don't give the Fire Service adequate resources, then whoever makes those decisions should take full responsibility.*
- *I agree with the statement, all normal eventualities.*
- *Remember Summerland!*
- *I broadly agree with this statement, but I do not believe it is proportionate for the Isle of Man to have the same response capabilities as the UK due to the risks on the island being much lower.*



- *This is an open door to endless expenditure. Common sense should dictate level of resources.*
- *Assistance from the UK, or wherever, may well be needed if an incident is sufficiently complicated, large or prolonged but that assistance is secondary to the ability to provide an initial adequate response from IoM resources.*

## We did:

Public feedback strongly supports ensuring the island's FRS remains resilient and fully prepared to respond independently to all normal eventualities, without relying on immediate UK assistance. While the island has well-established assistance arrangements with Merseyside FRS and the National Resilience Centre, the Department recognises that any requested UK resources would take a significant period to arrive. However, some specialist assistance can be provided remotely, such as specialist advice via phone or other digital means.

To strengthen local resilience, the Department intends to make it a statutory requirement for the island's FRS to develop and maintain a Community Risk Management Plan. This plan will identify foreseeable risks and demonstrate how the FRS will mitigate these risks through Prevention, Protection and Response activity. By proactively assessing risk, the FRS can align its service delivery, training and procurement strategies to ensure readiness for eventualities.

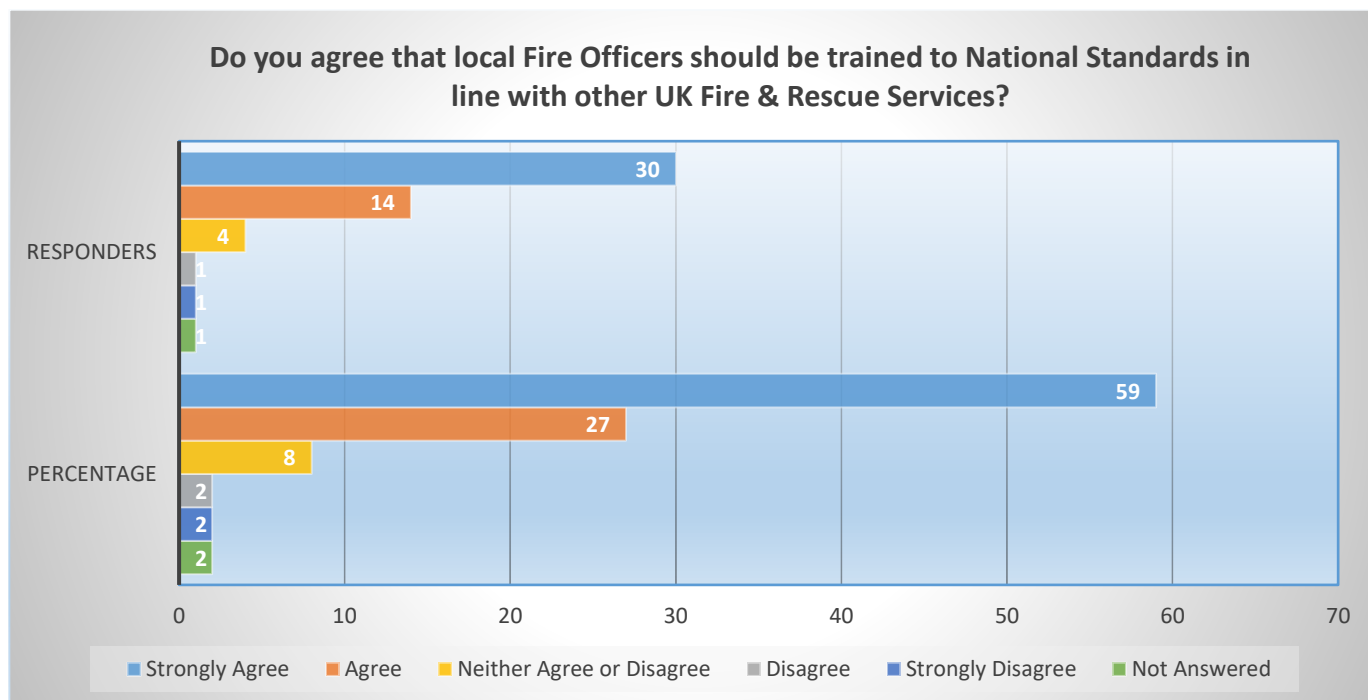
Additionally, new Fire Service legislation will go beyond operational updates and enhance Fire Protection and Fire Prevention Legislation. These measures will play a critical role in risk management by improving public awareness, training and building safety regulations. The department also intends to maintain, and further develop local fire protection regulations that reflect the limited capabilities of an island FRS.

## We asked:

### Question 11:

**Do you agree that local Fire Officers should be trained to National Standards in line with other UK Fire & Rescue Services?** Please explain your answer:

## You said:



86% of people either strongly agree or agreed with 4% either disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

- *The competence of Fire Officers should be standardised, and it should be a transferable skill such that trained staff can easily transfer to/from the Island and perform in the same way as their colleagues.*
- *Of course all should be trained to the national standards.*
- *We use the UK national standards for guidance and mimic their policies in so many fields so should train to the same level.*
- *If FRS Staff come over to assist surely they need to know they will be operating in accordance with National Standards.*
- *Not sure I totally agree with the UK standard so find it hard to either agree or disagree.*
- *National standards are set after a large amount of Research and developed. This is learning from previous events and incidents to ensure they don't happen again.*
- *Maybe minor modifications to suite local conditions and geographical location.*
- *Trained to a required standard, as determined by DATA held on the island, not based on the busiest stations in the UK.*
- *There needs to be some recognition of the unique situation.*
- *We are not the UK.*
- *Presumably you are referring to the UK's National Standards? If so than what is needed is something entitled Isle of Man National Standards that would be written based on the UK's version but with relevance to the Isle of Man.*
- *I would prefer training with comparable jurisdictions (e.g. Guernsey), or organisations whose practices we intend to implement (e.g. Denmark). Maybe there are better standards to follow in the USA? Personally, I am not very impressed by the UK anymore.*

## We did:

The National Fire Chiefs Council (NFCC) is the professional voice of UK fire and Rescue Services. It provides leadership, guidance, and support to fire and rescue services across England, Scotland, Wales, Northern Ireland and the Crown Dependencies.

The NFCC sets national direction for fire and rescue services, ensuring consistency and best practice, working with the UK Government and devolved administrations to shape fire and rescue policies. It provides national standards on firefighting, community risk management, fire protection, and prevention.

The Department recognises that National Standards ensure that firefighters receive consistent, high-quality training and have access to the best equipment and procedures, reducing risks to both them and the public. Standardised procedures enable the IOMFRS to work seamlessly with other UK Fire & Rescue Services during large-scale incidents, mutual aid operations, or national emergencies.

Fire services must comply with health and safety laws, building codes, and fire safety regulations to ensure that they operate within legal frameworks, avoiding liabilities and potential legal challenges. Adhering to national standards ensures that training is up-to-date, relevant, and transferable, allowing firefighters to maintain and develop their skills in line with industry best practices.

If IOMFRS do not follow recognised national standards, the service would need to develop its own, but without a clear benchmark for alignment. Training would become increasingly insular, limiting access to best practices, specialist expertise, and evolving industry guidance. This could lead to inconsistencies, reduced interoperability with other services, and increased risks in both firefighting operations and legal compliance.

A fire service that aligns with national standards demonstrates transparency, professionalism, and accountability, ensuring public trust in its ability to protect lives and property effectively. Using standardised procedures and equipment, allows for cost savings, interoperability, and better procurement strategies across fire and rescue services.

While some members of the public suggested the FRS explore models from countries such as Denmark or the United States, it is important to note that these operate under different regulatory frameworks. For example, the United States uses the National Fire Protection Association (NFPA) standard for firefighting. Although these are occasionally referenced in the UK for background research or comparative insight, they are not compatible with British Health and Safety legislation.

Moreover, UK training providers do not accredit to NFPA standards, making it impractical to adopt them as a formal training or operational framework.

With these assumptions in mind, the Department proposes that the IOMFRS should adopt National Standards and follow NFCC guidance. These standards are continuously evolving to reflect emerging risks, technological developments, and changing operational challenges,

helping ensure the FRS remain resilient and adaptable to new threats. The Department recognises, however, that not all UK standards will be directly transferable to the Isle of Man due to local context and operational differences. In such cases, the Department believes the IOMFRS should develop locally appropriate standards, aligned as closely as possible to national best practice, while being tailored to suit the island's specific needs and circumstances.

### **Principle 3**

**The legislation will support joined up working, particularly with the Island's wider emergency services.**

In modernising the legislation under which the FRS operates, working practices will be more compatible with those of other emergency services in operation on the Island. FRS officers will be trained to respond within a multi-agency scenario, to the same standards as seen in neighbouring jurisdictions, ultimately better supporting responses to such scenarios.

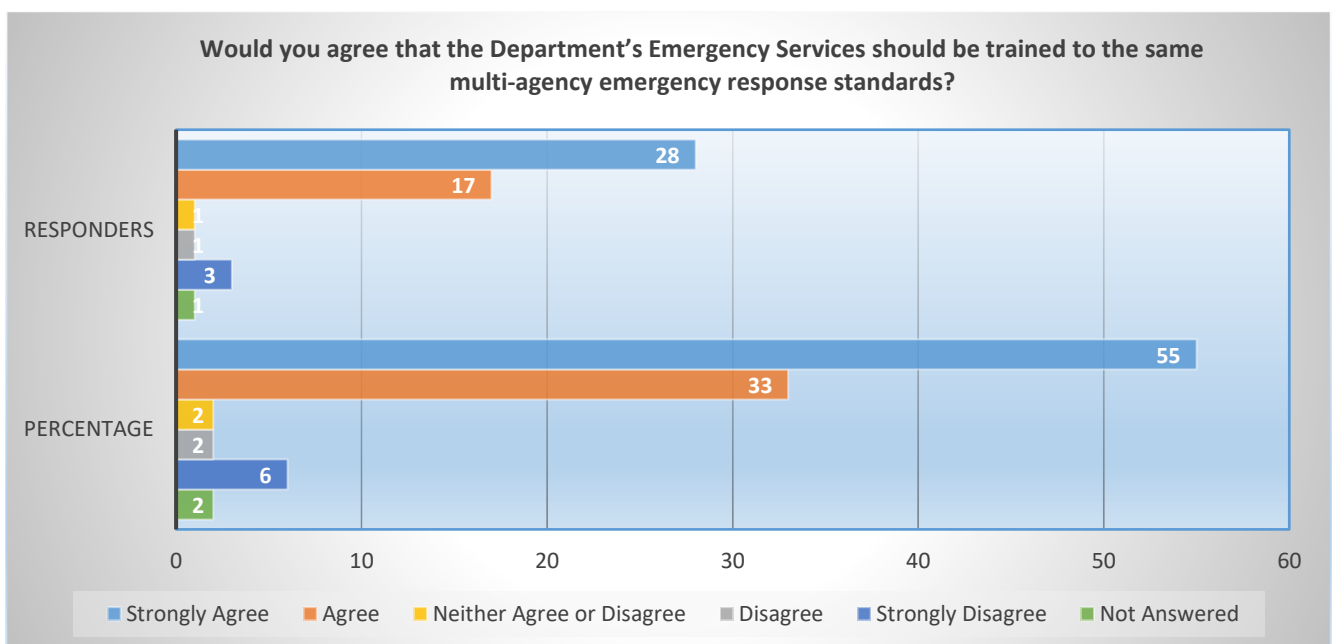
**We asked: -**

#### **Question 12:**

**Would you agree that the Department's Emergency Services should be trained to the same multi-agency emergency response standards?**

If you don't agree, please explain why?

**You said: -**



88% of people are strongly in agreement or agree with 8% either disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

- *If it can be demonstrated how this would contribute to making better use of the emergency services and generating improvement in responses and efficiencies.*
- *It is not required.*
- *All emergency services should be trained in this, not just DHA's. That said, all emergency services should come under DHA.*
- *It's got to help in an emergency.*

### We did: -

Public feedback overwhelmingly supports for the island's emergency services to be trained to a common multi-agency response standard. The Department recognises the island's limited emergency service capabilities and acknowledges that UK support would take considerable time to arrive in the event of a major incident. Therefore, building local resilience is essential, ensuring that emergency services can effectively support each other in a crisis.

To achieve this, the Department believes that all emergency services should be trained to the same incident command standards. This will enhance interoperability, improve safety for both the public and responders, ensure legal compliance, increase operational efficiency, and strengthen public confidence through the delivery of a consistent and professional emergency response.

The island's emergency services have already adopted the Joint Emergency Services Interoperability Principles (JESIP), which support effective coordination between agencies during multi-agency incidents. The Department is committed to further embedding JESIP across all emergency responders, Government Departments and resilience partners, to ensure a cohesive and structured response to major incidents.

Adopting nationally recognised standards such as JESIP also provides reassurance to national resilience partners who may be called upon to assist during a crisis. The Department will continue to build on the progress made, ensuring consistent multi-agency training and coordination, and will look to further develop the National Risk Register (NRR) so create a shared understanding of risk across all responders and key partners.

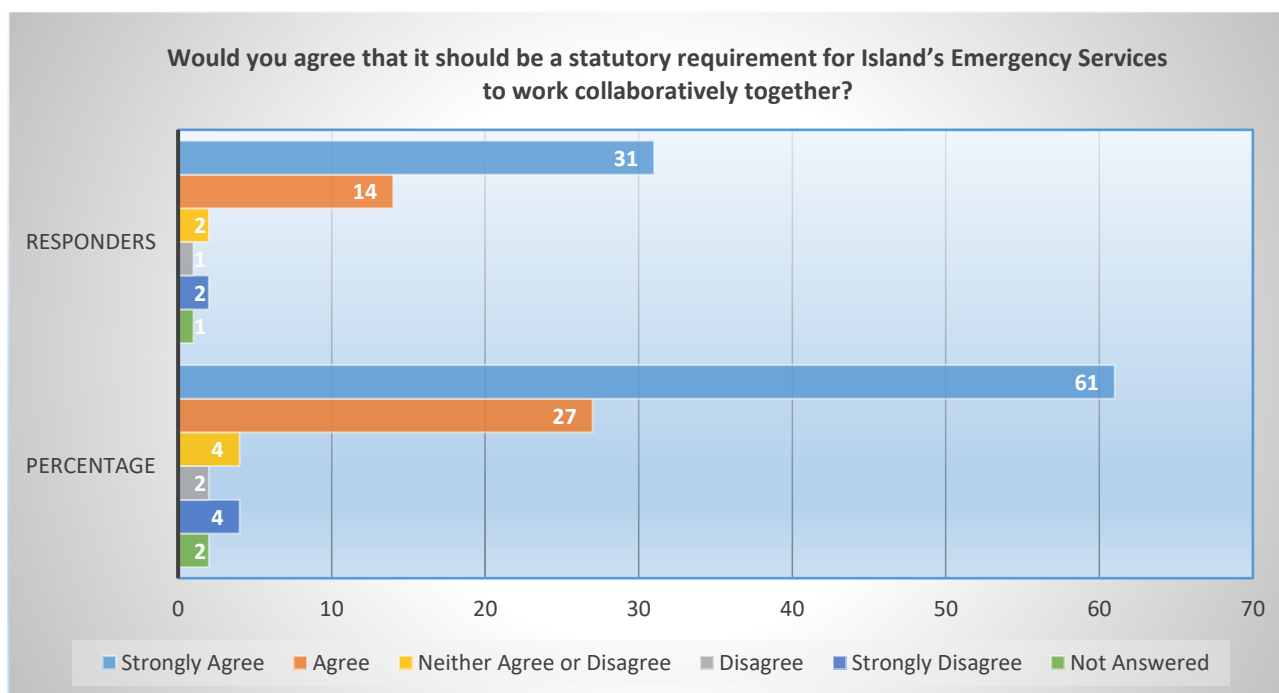
### We asked: -

#### Question 13:

**Would you agree that it should be a statutory requirement for Island's Emergency Services to work collaboratively together?**

Please explain your answer.

### You said: -



88% of people either strongly agree or agree, with 6% strongly disagreeing or disagreeing.

A balanced selection of the comments received include:

- *To have such an obligation will avoid any conflicts of interest, e.g. if a budget holder feels their particular service would prefer not to fully participate in a particular response event.*
- *For a small jurisdiction where the emergency services wear many hats, true teamwork is extremely important.*
- *This should improve efficiency and avoid the risk of misunderstandings with resultant improvement in outcomes.*
- *Whilst good collaboration already exists between the Island's Emergency Services this is entirely reliant upon the character and willingness of individual officers within the services. Providing a statutory requirement will not only remove the "should we", "shall we" vagueness of the current situation but will also provide a clear authority and responsibility to work together.*
- *It happens everywhere else and is the most efficient way of dealing with incidents, why would we consider being anything different unless it's to save money.*
- *Some situations are bound to occur where it would be better to have more than one service.*
- *We are a small community, and our services share a control room. Working together should be fairly easy to implement. Making this a requirement might motivate that.*
- *They would see a combined response.*
- *What a silly question.*
- *As highlighted, operational resilience is a challenge with limited staff and resources so any cross-service backup is clearly an advantage. In event the Ambulance service is not available, utilising another service with staff who are qualified in first aid for example could save a life.*
- *The legislation should make clear which organisations are covered by the term "Island's Emergency Services".*

- *I do agree with the principle, but is this something that requires legislation? Poor co-operation is usually caused by personality clashes - which require proper attention, not legislation.*

### We did: -

The comments are broadly supportive of a collaborative approach. The Department also believes that the island's emergency services should work together effectively to deliver the best possible outcomes to the community, either through statutory provisions or an emergency services framework. Any provisions should also consider broader partnerships with national and local government agencies to enhance resilience and coordination. The Department will give further consideration to the feedback received and determine which emergency services, resilience partners, and key stakeholders should be included in the proposed statutory requirement.

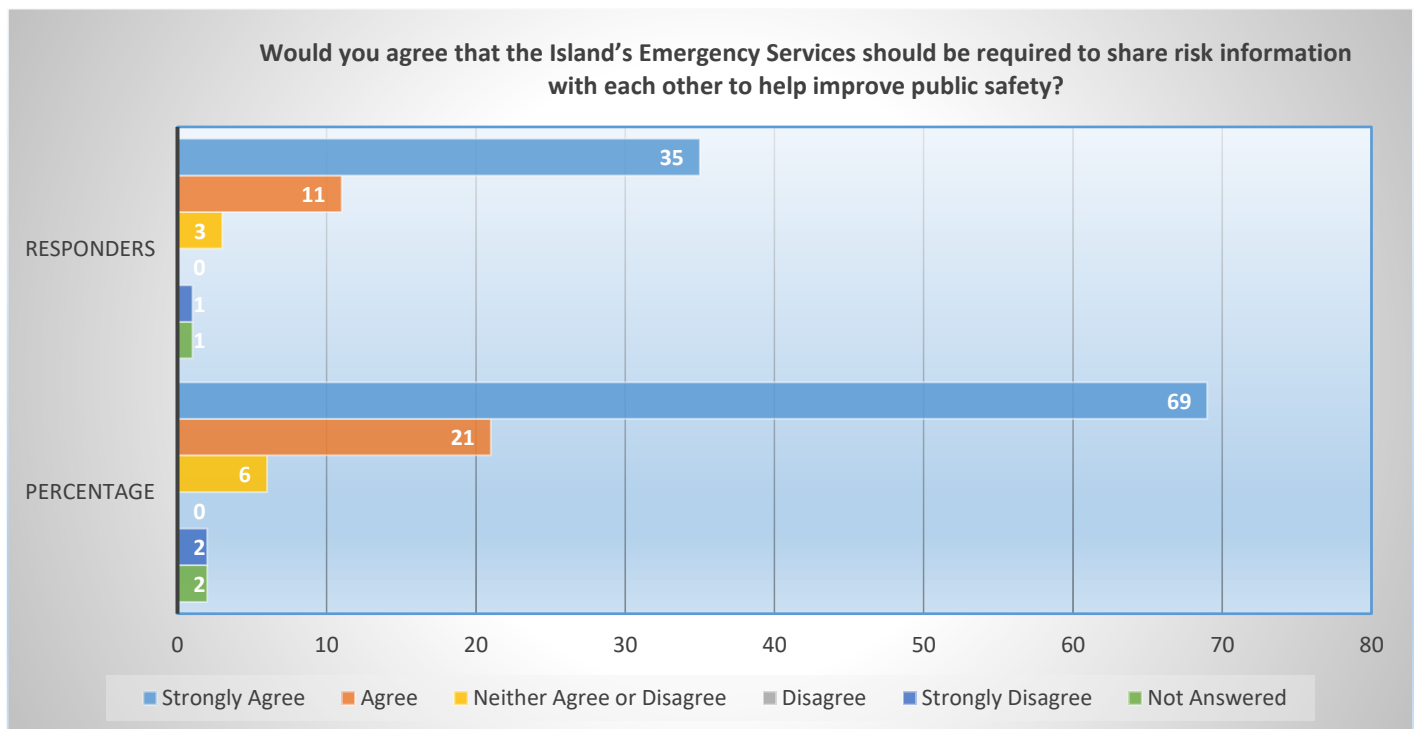
### We asked: -

#### Question 14:

**Would you agree that the Island's Emergency Services should be required to share risk information with each other to help improve public safety?**

**If you don't think the emergency services should share risk information, please explain why?**

### You said: -



90% of people either strongly agreeing or agreeing with 2% strongly disagreeing.

A balanced selection of the comments received include:

- *If it can be shown how sharing risk information enables them to better keep the public safe.*
- *This is a legal requirement under certain legislation (Health and safety management regulations) however data protection legislation has made the sharing of information almost impossible due to the complexity of regulations.*
- *Yes. We could also start by sharing SSRI information internally.*
- *Better for all.*
- *Sharing is fine - as long as it does not become an excuse for endless "ho-hum" meetings and time-wasting.*

#### **We did: -**

Public feedback supports the sharing of risk information to help improve public safety. While information sharing between emergency services already occurs during a crisis, the Department aims to strengthen this by developing an improved framework that enables proactive data sharing as part of routine preparedness activity. This will enhance situational awareness and create a shared understanding of the island's risk profile.

The application of GDPR can be perceived as a barrier to sharing risk-critical information before an emergency arises. By developing clear provisions for information sharing, the Department hopes to remove any doubt and provide legal clarity around what can be shared and when.

Given that the island's three blue light services already operate through a shared Emergency Services Joint Control Room, the Department sees as an ideal opportunity to enhance collaboration through a secure, centralised platform.

To support this ambition, the Department will assess whether information sharing should become a statutory requirement, either through regulation or as part of broader emergency services framework, with the ultimate aim of improving public and responder safety.

### **Principle 4**

**The legislation should be responsive and flexible to meet the evolving needs of society.**

Currently, FRS operate under the Fire Precautions Act 1975 (as amended) and Fire Services Act 1984 – both of which are now out of step with similar legislation currently in use in England and Wales. The Department's current legislation does not readily allow for updates to reflect the changing risks facing our community and subsequently changes to the operating models and services to be able to adapt to those risks. By bringing a new Fire Services Bill, this will reflect the activities of a modern FRS, and provide clarity on the role of the FRS.



The intended approach to enable the service to keep operational practices appropriate to the current needs of society, is to allow under primary law for Regulations, Orders, and Guidance to be enacted as needed.

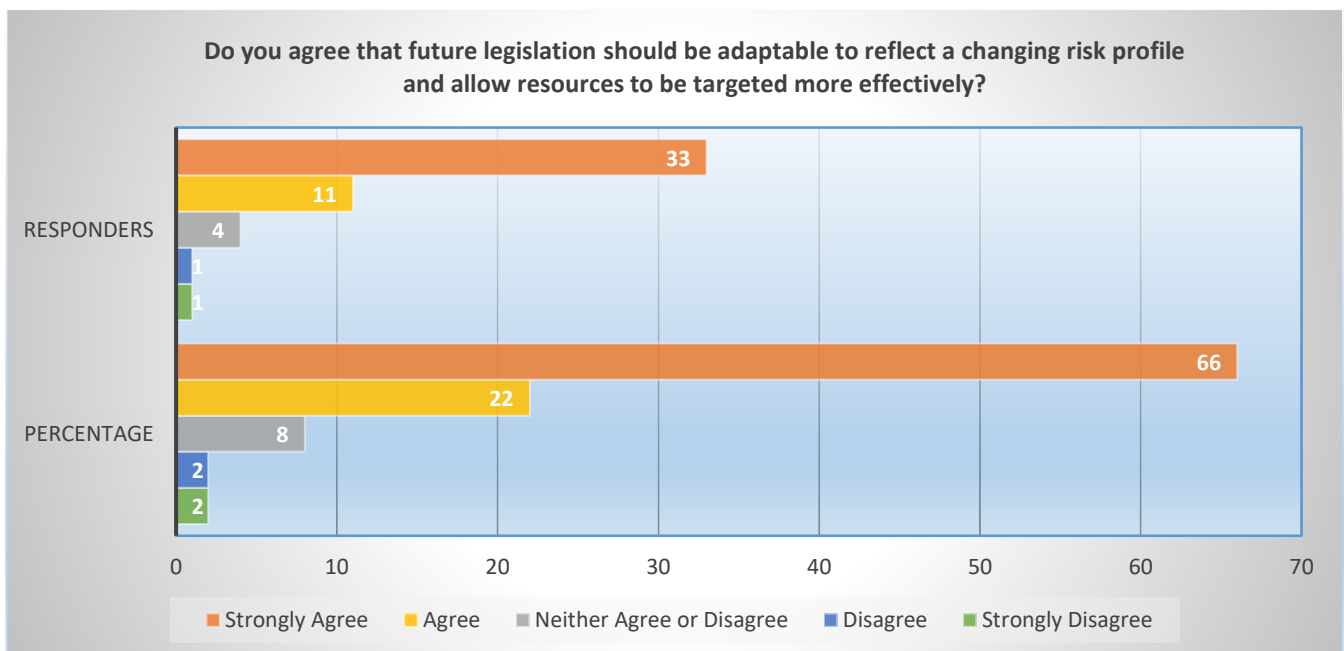
#### We asked: -

#### Question 15:

**Do you agree that future legislation should be adaptable to reflect a changing risk profile and allow resources to be targeted more effectively?**

**Please explain your answer?**

#### You said: -



86% of people either strongly agreed or agreed, with 4% either strongly disagreeing or disagreeing.

For those respondents who gave commentary to support the option they selected, the following themes and suggestions were drawn out:

- *Society and risks change over time. Service should be flexible enough to adapt to emerging risks.*
- *Risks rarely change; the level of risk however does. New manufacturing processes being undertaken or businesses starting up providing new facilities can impact on the responses and resources needed. One good example of risk that has not been addressed is the increased use of EV's and the lack of both understanding and being able to deal with a fire involving one may have.*
- *This is common sense.*
- *The island is too far often stuck in time, and we do not move forward to manage future risks or modern technology's.*

- *Hard to agree or disagree with such a very broad and all-encompassing statement.*
- *It is important to adapt to newer risks as the island develops. Failure to do this could result in members of the public and emergency services being places at greater dangers.*
- *There is a risk this can be used to cut services without suitable scrutiny or review so while minor change by secondary legislation is sensible where it impacts safety or delivery of a service then it should be subject to suitable review first.*
- *I think fire safety should be built into building regs to preserve life and fire building inspection on design and materials should not lie with building control, safety over profit.*
- *In a small jurisdiction such as the IoM, "flexibility" is essential in any case. Does it really need legislation?*

## **We did: -**

The Department intends for new legislation to contain provisions to make changes to legislation through secondary instruments, ensuring that the primary Act can be updated to stay aligned with other legislation and remain future proof, with any secondary instruments still being subject to the appropriate level of scrutiny through a prescribed Tynwald process. This approach supports the broad agreement to having adaptable legislation.

A less rigid legislative framework will allow for more effective and efficient use of limited fire protection and prevention resources, being targeted at the highest risk areas to maximise risk reduction and to provide a greater emphasis on prevention, targeting resources as and when they are required towards the Island's most vulnerable.

Furthermore, it will also allow for responsive targeted fire safety campaigns, following national trends and local incident data analysis, thus allowing the FRS to adapt more effectively to national changes in legislation, following enquiries such as the Grenfell disaster and the Manchester Arena Inquiry. Fundamentally, recognising the broad operational capabilities of a modern FRS and provide assurance that appropriate preparedness activity is undertaken.

## **Principle 5**

**Core services will always be free at the point of need; however the Department will reserve the right to charge.**

Core services provided by FRS have always been and will remain free to the service user at the point of need. However, FRS have encountered issues in the past specifically in relation to unnecessary or avoidable call outs which officers have to attend in the same manner as they would any genuine emergency, they do so with no fee to the service user, other than in some circumstances by agreement. Such callouts have a negative effect on the ability to deal with legitimate calls and impact further on operational training, preparedness work and the delivery of prevention activity.

This principle will not affect attendance in response to a genuine 999 call.

## We asked:

### Question 16:

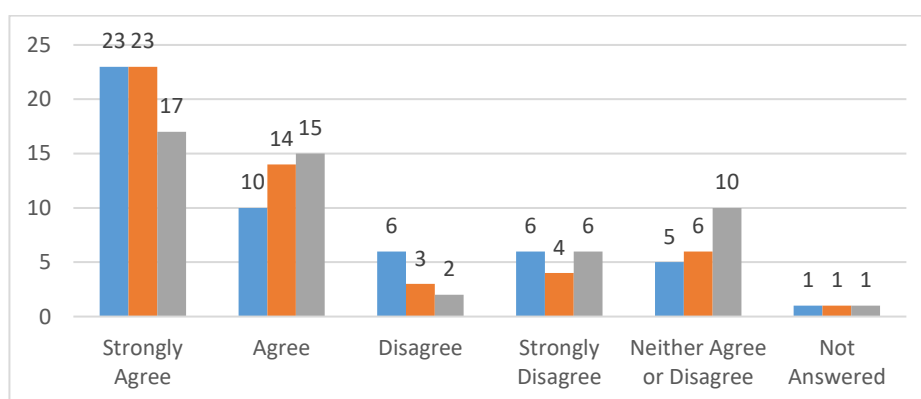
**Would you agree that under certain circumstances it is appropriate for the FRS to levy a charge on a cost recovery basis for demand that:**

- **is deemed to be deliberate or reckless;**
- **is optional (such as providing services at private or commercial events); or**
- **could be met by a private provider?**

**If you disagree or strongly disagree, would you suggest whether there are any occasions where it would be appropriate for the FRS to levy a charge for providing certain services?**

## You said:

### Participant's Responses: -



- "Deliberate" or "reckless" is denoted in **blue**;
- "Optional" is denoted in **orange**; and
- "Could be met privately" is denoted in **grey**.

For those respondents who gave commentary to support the option they selected, the following themes and suggestions were drawn out (not including commentary provided by those respondents who chose to remain anonymous or not have their responses published):

- *Charging for any sort of service, could lead to people not calling for help when needed, and possibly to further injury or worse if they try and deal with it themselves. It's a public service paid for by taxes.*
- *How does the FRS propose to collect payment or deal with non-payment? Will they want to have the powers to take legal action against non-payment.*
- *The draft legislation is very badly worded and does not provide any system to protect the public from the IOMFRS operating fairly without a clear framework.*
- *Maybe needs an independent binding arbitrator for some circumstances where invoicing is disputed.*
- *In general, the optional services are great both for awareness of the issues that the FRS and as such hopefully reduce risks. However, there should be some discretion to, at least say for a contribution.*

- *A lot of 'management time' would be needed for this. And funding for legal costs.*
- *"Deliberate or reckless" acts should surely lead to prosecution; in which case, the Fire Service costs should be included there.*
- *Where events are "for profit" then I fully support charging. Where an event is a community or charity event then it feels right that this would be covered as it would for general community risk.*

## **We did:**

Public feedback generally supports the FRS having the ability to recover costs in certain circumstances. However, some concerns were raised around the potential for this to discourage members of the public from calling the FRS, and questions were asked about how any cost recovery framework would be implemented.

The FRS has long held the ability to recover costs under the Fire Services Act 1984, and recent amendments to the Act have further clarified this position. There is no evidence to suggest that cost recovery provisions deter the public from requesting assistance in an emergency.

In fact, the FRS has operated a well-established cost recovery framework for over a decade, applying charges where appropriate, particularly in cases involving misuse of resources or contractual, non-emergency activity. This framework has proven effective and is supported by clear policy guidance. The policy objective of cost recovery is to ensure that FRS resources are used effectively, prioritising genuine emergency response while allowing the Service to recover costs in instances of avoidable or inappropriate demand. The Department is committed to ensuring that emergency services remain free at the point of need for genuine emergencies.

To support this, the Department intends to fully implement the recent amendments to the Fire Services Act 1984 and carry forward these provisions into the new legislation. The updated framework will focus on three key areas of demand where cost recovery is considered appropriate, and will be underpinned by:

- A transparent policy document;
- A fair and proportionate charging model;
- A clear appeals process for any decisions made in relation to causation.

This approach will support the effective use of resources, protect the integrity of emergency response, and ensure accountability in line with public expectations.

The three key areas of demand are:

### 1. Special Service Requests

The FRS is often requested to provide risk mitigation at major events, such as deploying firefighters as part of an event organiser's risk assessment. As this is contractual work, the FRS will recover full costs where it chooses to provide this service. This does not

affect the FRS's attendance at community and charity events, which will continue free of charge as part of the service's prevention strategy.

## 2. Persistent False Automatic Fire Alarm Calls

A high percentage of automatic fire alarm activations turn out to be false alarms. To reduce unnecessary demand, the FRS has long worked with property owners to minimise false alarms.

In cases where false alarms persist and no solution can be found; the FRS may introduce a non-attendance policy for specific building types following extensive engagement with the property owner. However, property owners may opt to maintain FRS attendance on a user-pays basis while implementing remedial measures, at this point the FRS would enter a contractual arrangement with the property owner to fully recovery costs.

Buildings with sleeping accommodation will always receive a FRS response overnight and all genuine emergencies will continue to receive a full attendance at no cost.

## 3. Deliberate or Reckless Fires

The FRS is sometimes called to avoidable incidents caused by deliberate or reckless behaviour, incurring significant costs to the FRS. In such cases, the Department deems it appropriate to recover costs if the responsible party has failed to act with due care, in line with safe working practices or systems of work. Cost recovery provisions will not apply to domestic premises.

# **Principle 6 – Transitional Arrangements**

**The FRS, in bringing updated legislation, would seek to make provision for a transitional period between the legislation being enacted and the deadline for the requirement to evidence compliance.**

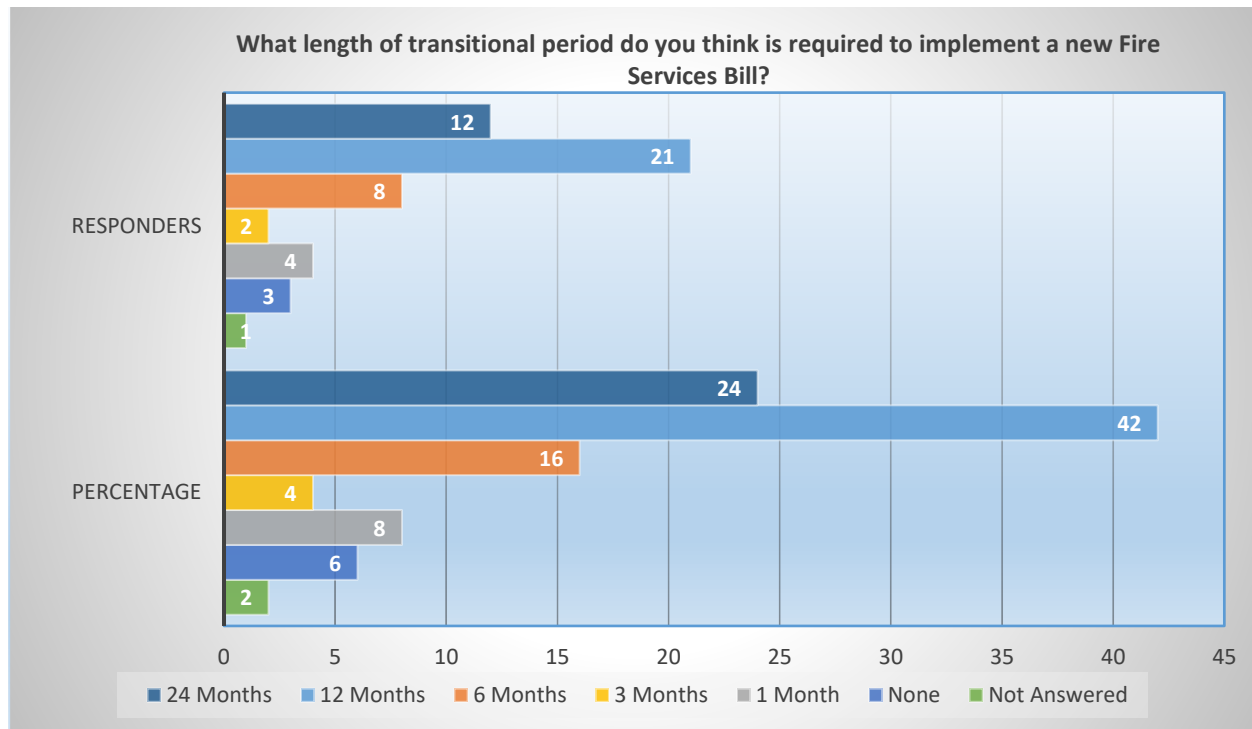
This means, in practice, that the current existing legislation under which the service operates would continue, whilst operational preparations are made for the enactment of any new Bill, ensuring that all service users captured under the new regime are appropriately supported and provided education prior to the move to operate under a new regime.

## **We asked:**

### **Question 17.**

**What length of transitional period do you think is required to implement a new Fire Services Bill?**

## You said:



42% of people thought that a 12-month transition period would be appropriate, with 24% stating a 24 month and 12% stating 6 months. A balanced selection of the comments received: -

- *Time would be needed to provide training both to Fire service staff and partner agencies. In addition a raising awareness campaign would be needed for the IOM as a whole.*
- *Where it is proposed that charges will be introduced for certain services, the charge-payers will need to budget for this eventuality. Those affected may also wish to implement technical improvement to avoid the circumstances where a charge may arise, e.g. they may wish to update their alarm and detection systems.*
- *Government does not work effectively or efficiently experience would demand at least 24 months for sufficient changes to be implemented. This would also allow for funding which would be required to be provided.*
- *The transition should be as short as possible but should be given sufficient time to enable adjustment to new practices and the involvement of other emergency services in sharing of information.*
- *The new FRS Bill will formalise much of the PPR that is already undertaken by the FRS but certain proposals around formalising collaboration and the sharing of information with others will take longer to implement. Full and detailed formalisation of any proposed Mutual Aid arrangements will be hugely complex and will involve a number of parties across a number of Services and will also take time to implement.*
- *Many affected by a change are small businesses and operators who, under the current economic climate may need time to adapt. This also allows for accurate and suitable advice to be provided; too little time would over stretch the already limited resources of FRS.*

- *A Year is a reasonable time for new procedures to be put in place and for them to become familiar to residents, staff, etc. However, some flexibility may be required if structural or equipment changes are needed with the consequent need for finance or contractors to undertake the work.*
- *Time should be taken to make sure the new bill is tailored for our island needs and not just adapted from flawed UK bills. We are a proud island, and the bill should suit all our needs.*
- *The longer the better - because the IoM Government is particularly poor at letting people know about new regulations that will affect them. So if it is 12 months or 24 months, there will need to be a concerted effort to explain the changes.*

## **We did:**

It is clear from the feedback that whilst the public are keen for the new legislation to be introduced in a timely manner, there is support for a transition period of between 12 – 24 months to ensure that all those affected by the legislation are prepared and brought along in a considered, informed and intentional manner. The Department will work closely with the FRS and undertake responsible and effective stakeholder engagement to ensure that the implementation of the legislation is successful.

## 6. Part Two: Fire Safety Bill

In respect of Part 2: Fire Safety Bill, the responses set out in this submission can be broadly categorised as –

- Broad agreement that the future fire safety legislation should be based on a risk-based approach;
- 73% agreeing that the FRS is the appropriate authority to promote and regulate fire safety in the Isle of Man (noting that ultimately, determinations to prosecute will sit with the Attorney General's Chambers);
- The proposed scope of the fire safety legislation should cover all building types (with the exception of domestic dwellings) in the Island and not just those presently designated under the Fire Precautions Act 1975;
- Private fire risk assessors should be regulated to ensure a minimum standard;
- Broad agreement that a single agency should have responsibility for the fire safety in the Island – however amongst those who did not agree to full responsibility resting with a single agency, there was a broad range of those who stated that responsibility should be split between other agencies;
- Agreement on importance of FRS providing fire safety advice and education to the public;
- Agreement that the future of fire safety legislation should be based upon foreseeable risk and be adaptable to emerging threats;
- Agreement that the proposed legislation should be similar to our closest neighbouring jurisdictions, however the Isle of Man's specific demographic differences should be taken into account;
- Agreement that the Island's fire safety officers should be trained to the latest fire safety standards;
- Agreement that the Island's fire safety legislation is more aligned with neighbouring jurisdiction in order to support economic growth and development, however it was noted that best practices should be drawn from a range of different jurisdictions and not solely England and Wales;



- Agreement that where appropriate, the Department should update and retain any existing regulations which can be harmonised with the proposed new primary legislation, specifically those regulations that reflect the Island's specific needs.
- Agreement that the period of transition should sit between 12 – 24 months, acknowledging that implementation success will be dependent upon effective engagement and support between the Department and all stakeholders.

## 7. Part 2 Questions

### **Principle 1**

**The legislation should centre on a proportionate risk-based approach to allow more efficient use of resources.**

The FRS continues to perform under the existing Fire Precautions Act 1975 (as amended) with limited resource and scope, however the introduction of new primary legislation focusing on a risk-based approach would support better targeted use of limited resources to ensure greater risk reduction across all areas of the Island and not just in specific designated areas. It will allow officers to deliver an agile protection and prevention response aligned to risk.

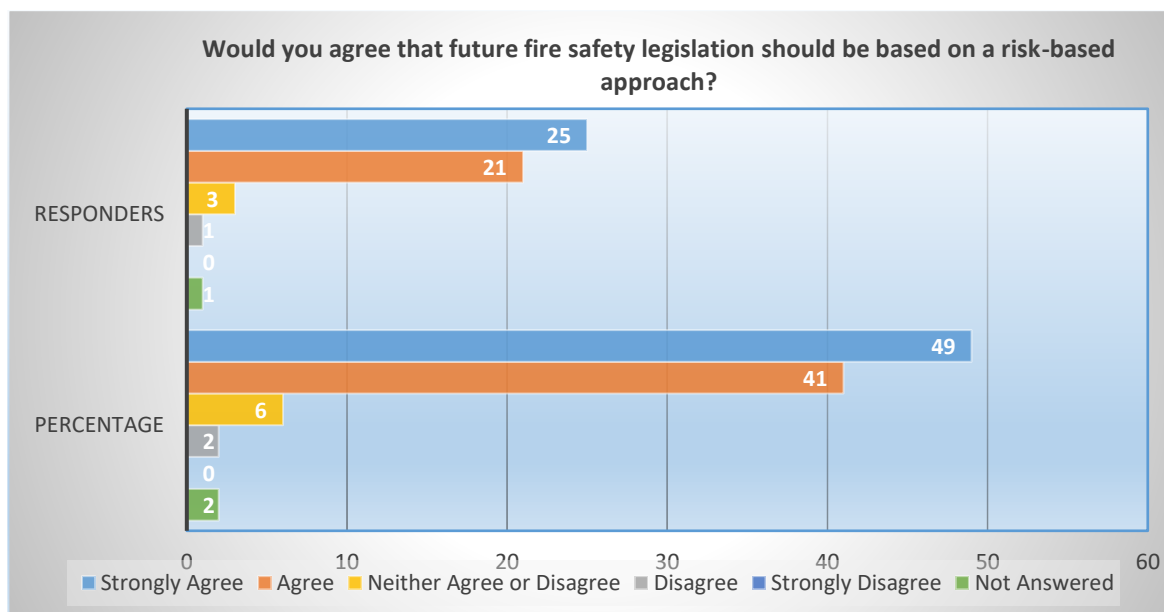
#### **We asked:**

#### **Question 18.**

**Would you agree that future fire safety legislation should be based on a risk assessment approach?**

**If you don't agree that future Fire Safety legislation should be based on a risk assessment approach, please explain why and suggest an alternative approach?**

## You said: -



90% of people “agree” or “strongly agree” that fire safety legislation should be based on a risk-based approach, with 2% either “disagree” or “strongly disagree”.

A balanced selection of the comments received include:

- Strongly agree with a risk-based approach, however it would require significant changes to the operational structure of the fire safety department. Places of work are currently covered by the HSW which is a reactive approach not preventative or educational. This change would require a significant increase in manpower and a huge increase in workload to oversee all the aspects of Fire safety. It is an opportunity to civilianise the roles as current officers are multi role officers which means they cannot provide the full attention that this change would need.*
- A structural change would be required to allow for advice, inspection and prosecutions to be separated. Training of staff and providing them with the necessary back-office support both physical and IT would be a costly change. These changes come at great cost to Government at a time when they are stopping spending within Government departments. What cost analysis have been carried out for any of the proposed changes in this consultation??*
- I think it should be based on the islands response and resources not risk. A lot of risk assessment approach is UK based on huge resources. The island need to Taylor there's to building design, safety and loss of life and fire safety. Put life before cost.*

## We did: -

Some concerns were raised during the consultation regarding the potential need for additional staff if the Department were to adopt risk-based fire safety legislation, as well as the associated cost of reskilling existing fire safety officers. The Department believes there are mitigations to these potential outcomes.

While the proposed new Act would extend legal vires to include all building types (excluding domestic properties), and therefore increase the number of premises in scope, the

Department expects the FRS to implement a proportionate, risk-based auditing regime. This means prioritising high-risk premises in order to deliver the greatest reduction in risk with the resources available.

Adopting this approach will enable the FRS to target its limited fire safety resources where they can have the most significant impact, thereby enhancing public safety without requiring disproportionate increases in staffing.

To support this, the FRS is already reviewing the operation of its Fire Safety Department, and a digital transformation project is underway. This aims to modernise the inspection and audit process through digitisation, unlocking efficiencies and improving productivity.

Additionally, the FRS is actively upskilling its officers to operate in a modern, risk-based environment using nationally recognised auditing techniques. By aligning with the model used in England and Wales, the Service is able to provide staff with a clear and structured professional development pathway. At present, there is no alternative training route that offers the same level of accreditation or operational relevance.

The Department is also working closely with other Government Departments that hold fire safety responsibilities. It will carefully consider public feedback regarding whether a single agency should have overall responsibility for fire safety across the island.

#### **We asked:**

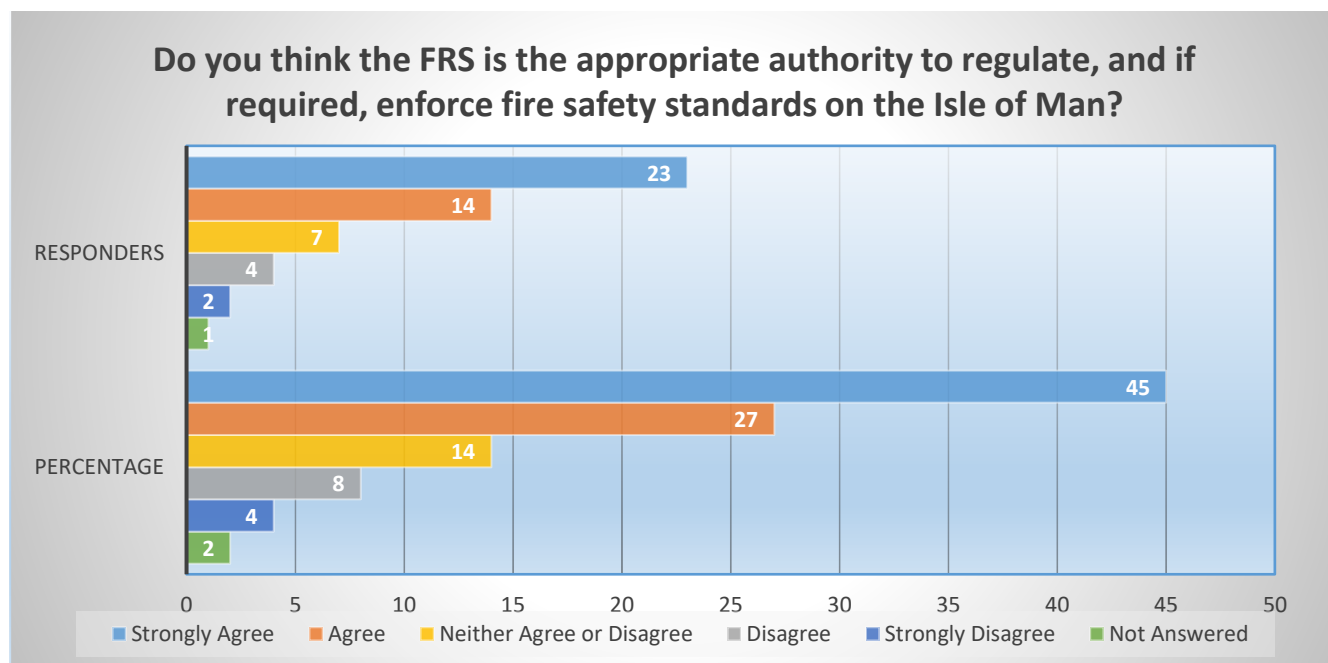
#### **Question 19:**

**Do you think the FRS is the appropriate authority to regulate, and if required, enforce fire safety standards on the Isle of Man?**

**If you don't agree, please suggest who should regulate fire safety on the island?**

## You said: -

### Participant's Responses: -



73% strongly agree or agree with 12% disagreeing or strongly disagreeing and 12% neither agreeing nor disagreeing.

A balanced selection of the comments received include:

- *A new approach is needed by a new department with a clean sheet to provide a more suitable system, any legislation should allow for failings to be dealt with by spot fines (which could be challenged) rather than full prosecutions that take up valuable court and AG's time. Prosecutions should only be used for the most serious of cases.*
- *Fire Service enforcing itself. Will they enforce when their own organisation fouls up?*
- *Fire standards regulation should be independent of the FRS, but the FRS should have a consultative role.*
- *Maybe need an independent review panel option?*
- *You cannot be judge and jury in your own court. Access to the UK system, if there is one.*
- *Why would this not be part of building control for example?*
- *The FRS is the obvious organization to investigate and report on relevant incidents or potential breaches of regulations, but it should not have the final word on whether or not enforcement is needed. Instead the FRS should have a formal route to enforcement via an investigation to establish the facts and then a reference to the AG's Chambers.*

## We did: -

Whilst there was strong public support for the FRS to act as the lead authority for fire safety on the island, the accompanying free-text comments presented a range of views. The

Department notes that Building Regulations are primarily designed to ensure safe construction of a building. Once a structure is deemed to be structurally compliant, it is signed off by Building Control, thereby limiting their remit of responsibility.

In contrast, the proposed fire safety legislation is intended to go beyond the construction phase by auditing how a building is managed and used over its lifespan to ensure ongoing safety for occupants and the wider public. It is for this reason that the Department believes the FRS is the most suitable authority to regulate, and where necessary, enforce fire safety standards in the Isle of Man.

The Department is working closely with other Government Departments that currently hold fire safety responsibilities and will continue to consider whether a single agency model would provide clearer accountability and great efficiency in managing fire safety across the island.

Some respondents questioned whether the FRS should have an enforcement role. The Department believes that the enforcement function would align closely with the existing approach. Where a non-compliance is identified and cannot be resolved through advice or education, the FRS would refer the matter to the Attorney General's Chambers for review. The Attorney General would then determine whether formal legal proceedings are in the public interest.

The Department believes that this framework provides sufficient separation for the FRS from determining whether a prosecution should proceed.

The Department is also considering the potential introduction of fixed penalty notices (on-the-spot fines) for minor fire safety contraventions. This could offer a more proportionate and efficient means of addressing low-level non-compliance, without resorting to lengthy formal legal processes.

#### **We asked:**

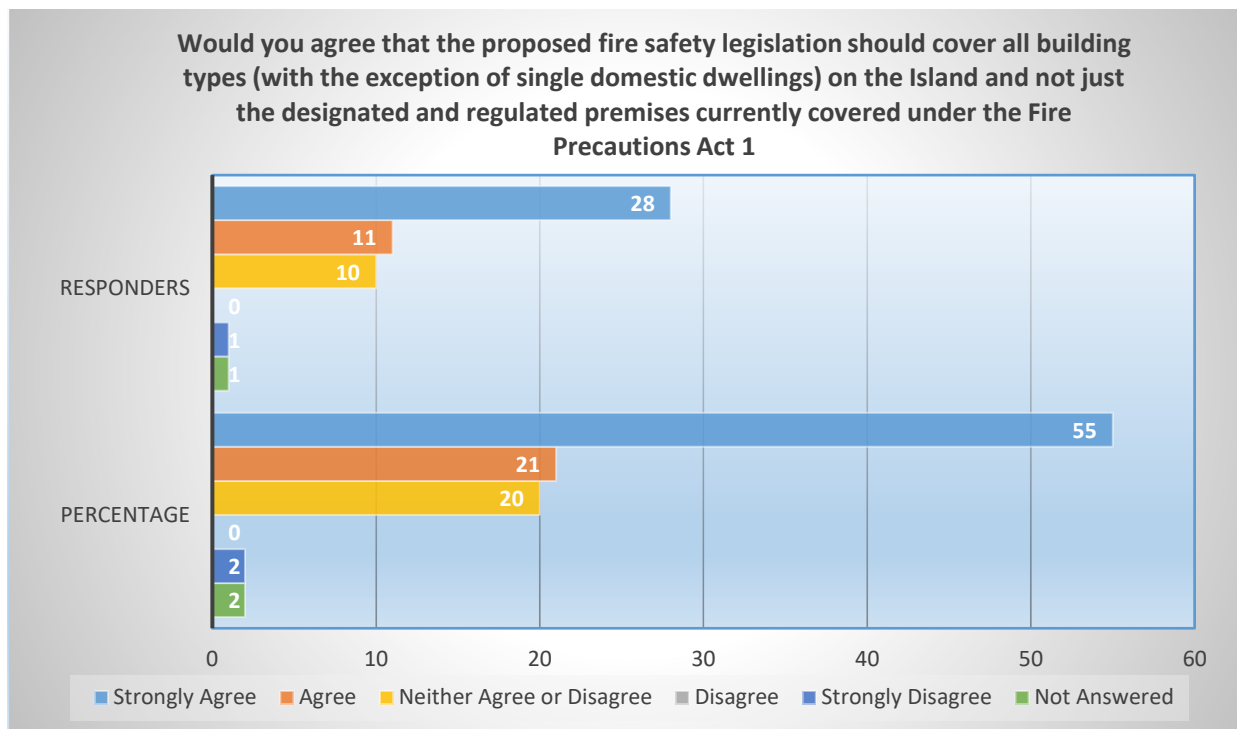
#### **Question 20.**

**Would you agree that the proposed fire safety legislation should cover all building types (with the exception of single domestic dwellings) on the Island and not just the designated and regulated premises currently covered under the Fire Precautions Act 1975?**

**If you don't agree that future fire safety legislation should be broader and cover all building types on the Island; please explain why and suggest what types of buildings, you think should be covered?**

#### **You said: -**

#### **Participant's Responses: -**



76% either “strongly agree” or “agree”, with 2% strongly disagree. Only one comment was received and can be captured as follows: -

- The legislation will put the responsibility onto the owners / responsible persons to ensure that Fire safety meets the requirements. This is a huge cultural change to the people of the IOM, it's took the UK over ten years to implement and businesses to put in place the necessary documentation and update their premises to the required standard. This change will cost people a lot of money to put in place, we do not currently have many independent organisations providing independent fire safety advice to facilitate this change.*

## We did:

While there was strong public support for fire safety legislation to apply to all building types (with the exception of single domestic dwellings), some concerns were raised about the potential impact on property owners and responsible persons, particularly regarding compliance costs.

For many, however, the introduction of risk-based fire safety measures should not represent a significant change. A large number of premises are already subject to fire risk assessment under existing health and safety legislation. What the Department proposes is therefore not a new concept but rather an extension of existing responsibilities under a clearer and more modern legislative framework.

Importantly, the proposed legislation will be scalable and proportionate to the type of premises and its associated risk profile. For example, the fire safety requirements for a small single-room retail unit will differ significantly from those for a six-storey hotel. This risk-based approach is designed to ensure that fire safety measures are appropriate and practical for each setting.

The consultation also outlines proposed transition periods. During these periods, the Department would expect the FRS to provide comprehensive guidance, training, and technical support to help property owners and responsible persons understand and comply with the new requirements. This transition period will also provide the FRS with an opportunity to engage with the private fire safety sector to establish the appropriate qualifications or accreditations required for fire safety auditing.

The Department recognises that the current Fire Precautions Act 1975 is outdated and applies only to a limited number of building types. Furthermore, it requires routine inspections of these premises regardless of their actual risk level. The Department does not believe this is the most effective use of FRS resources.

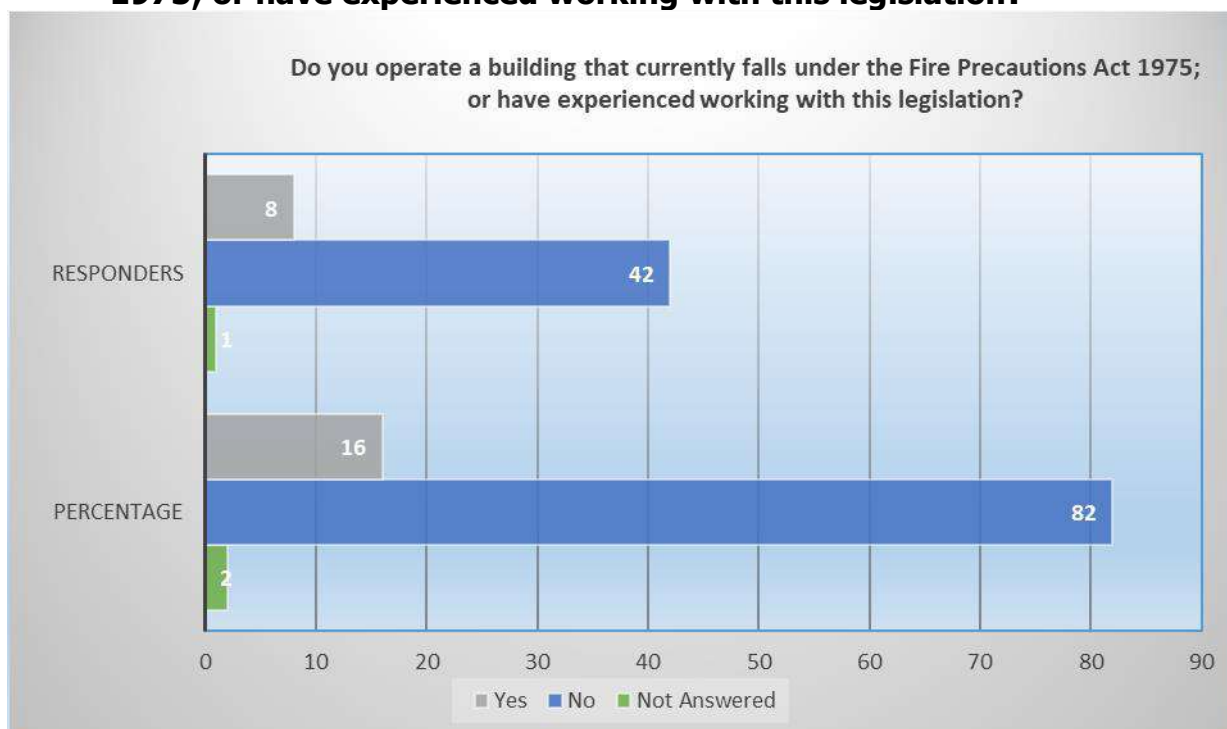
Under the proposed legislation, nearly all building types would fall within the scope of fire safety regulation. The FRS would be tasked with identifying and prioritising those premises that present the greatest risk to public and firefighter safety in the event of a fire. This shift will allow the FRS to allocate resources more efficiently and effectively.

The Department believes this modern, risk-based approach will enhance community safety by ensuring that fire safety efforts are targeted where they are most needed and by enabling the FRS to respond more dynamically to emerging risks.

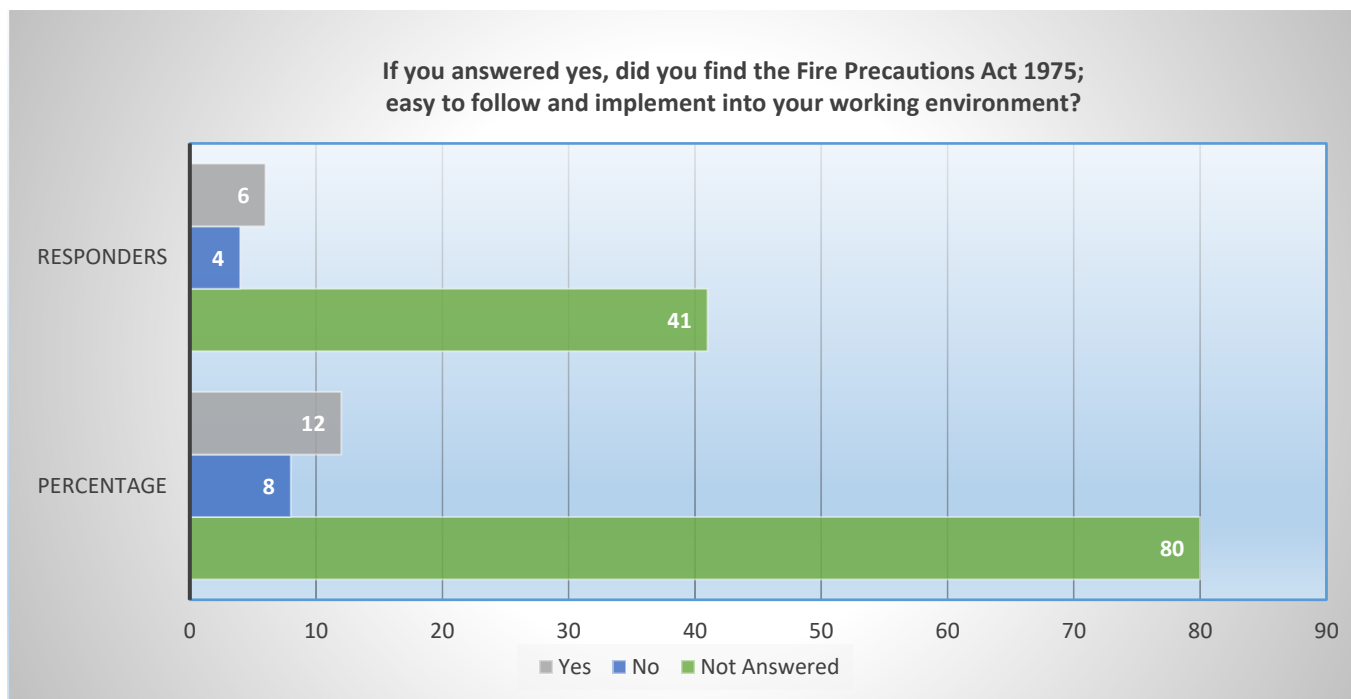
## We asked:

### Questions 21:

#### 21. Do you operate a building that currently falls under the Fire Precautions Act 1975; or have experienced working with this legislation?



#### 21.1 If you answered yes, did you find the Fire Precautions Act 1975; easy to follow and implement into your working environment?



## 21.2 If you answered no, please explain what challenges you experienced?

### You said:

- As a Fire safety officer with years of experience I have a very good understanding of the current legislation, it is a very powerful Act, however it does not meet the requirements of today's approach to fire safety. With the current fire certificates issued it is the IOMFRS that hold the responsibility of ensuring that those properties meet the requirements of the fire certificate and not the owners / responsible persons. The certificates do not allow for changes in standards or regulations, so a property issued with a fire certificate in 1975 does not have to update any system unless they carry out material or structural changes. This is a ridiculous situation which is why the UK dropped fire certificates years ago.*

### We did:

The response to this question demonstrates that whilst most people found it easy to follow and implement the Fire Precautions Act 1975 into their working environment, the Department is aware of how crucial it will be to facilitate a smooth transition from the prescriptive legislative approach in the 1975 Act to the proposed new risk-based legislation. In order to support full compliance with the new legislation, the FRS propose to support all those affected by the changes through a series public briefings and information sessions. The FRS also plan to introduce a new website which will host full guidance documentation and media to help and facilitate with full compliance, which will continue to provide ongoing support past the initial implementation and roll-out.



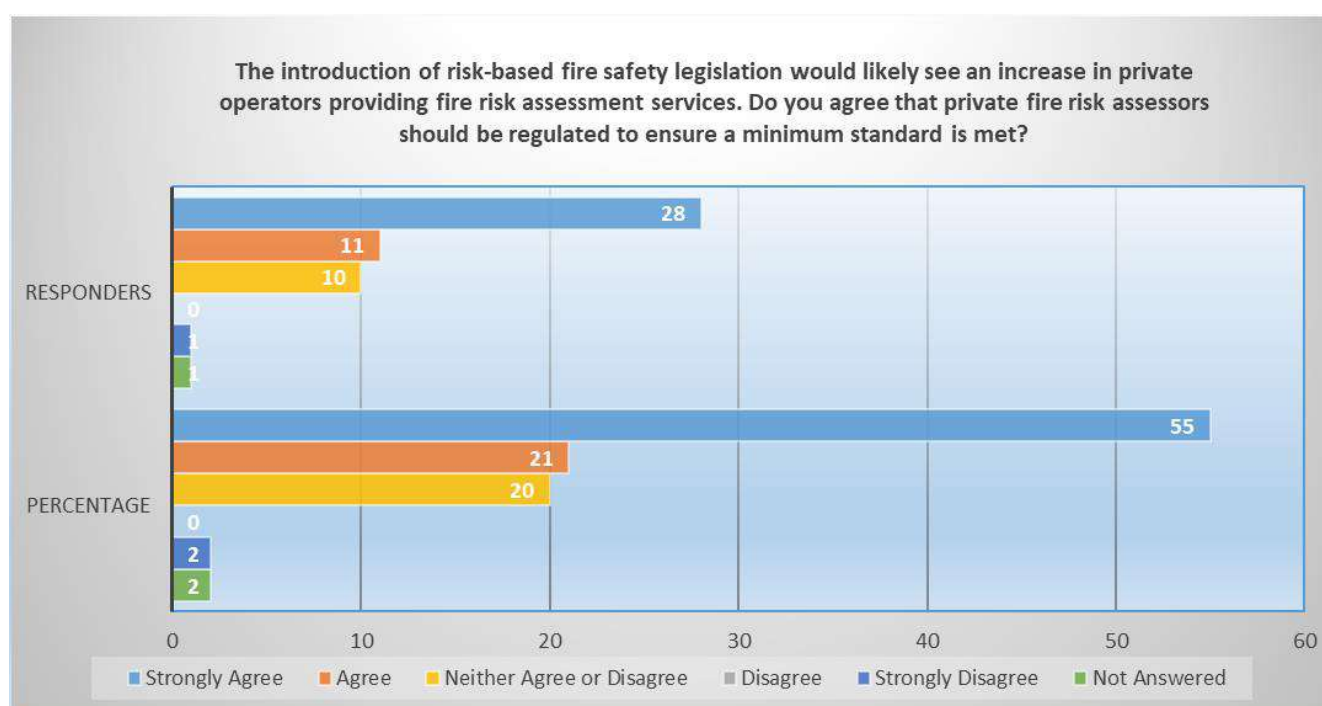
## We asked:

### Question 22:

**The introduction of risk-based fire safety legislation would likely see an increase in private operators providing fire risk assessment services. Do you agree that private fire risk assessors should be regulated to ensure a minimum standard is met?**

**If you agree that private risk assessors should be regulated, to what standard do you think this should be?**

## You said:



76% either "strongly agree" or "agree", with 2% disagree. Only one comment was received and can be captured as follows: -

A balanced selection of the comments received include:

- *Should be qualified and authorised to do so.*
- *To the same standard that would be expected previously required for fire service.*
- *The principle of proportionality should be adopted.*
- *Yes they MUST be regulated by an independent body so that they can prove competency in the advice that they give and ultimately charge services for.*
- *British Approvals of Fire Excellence (BAFE) registered to the SP205 Life Safety Fire Risk Assessment Scheme AND registered with the Institute of Fire Safety Managers on the Tiered Fire Risk Assessors Register (TFRAR).*
- *Financially liable for obvious errors.*

- *I think the FRS should set the standards and those offering the services need to be authorised and must have adequate insurance in place.*
- *If private companies are able to do this then they should be licenced through the FRS.*
- *National standards with FRS auditing.*
- *Fire risk assessors Register.*

### **We did:**

The feedback supports establishing a regulatory mechanism for fire risk assessors on the island, stating that any regulations introduced should be proportionate to the level of risk being assessed.

The Department intends to monitor the British Standards Institution (BSI) as it develops a proposed standard for fire risk assessors in the UK and will consider this process in shaping future regulations.

## **Principle 2**

### **The legislation should set out clear lines of responsibility.**

At present, the existing legislation doesn't accurately reflect the parties which ought to be responsible/accountable for the varying obligations as required. Updating the legislation to clearly set out who is responsible for each discrete obligation will not only support the FRS in managing compliance but also support the service user to understand what is required of them under law.

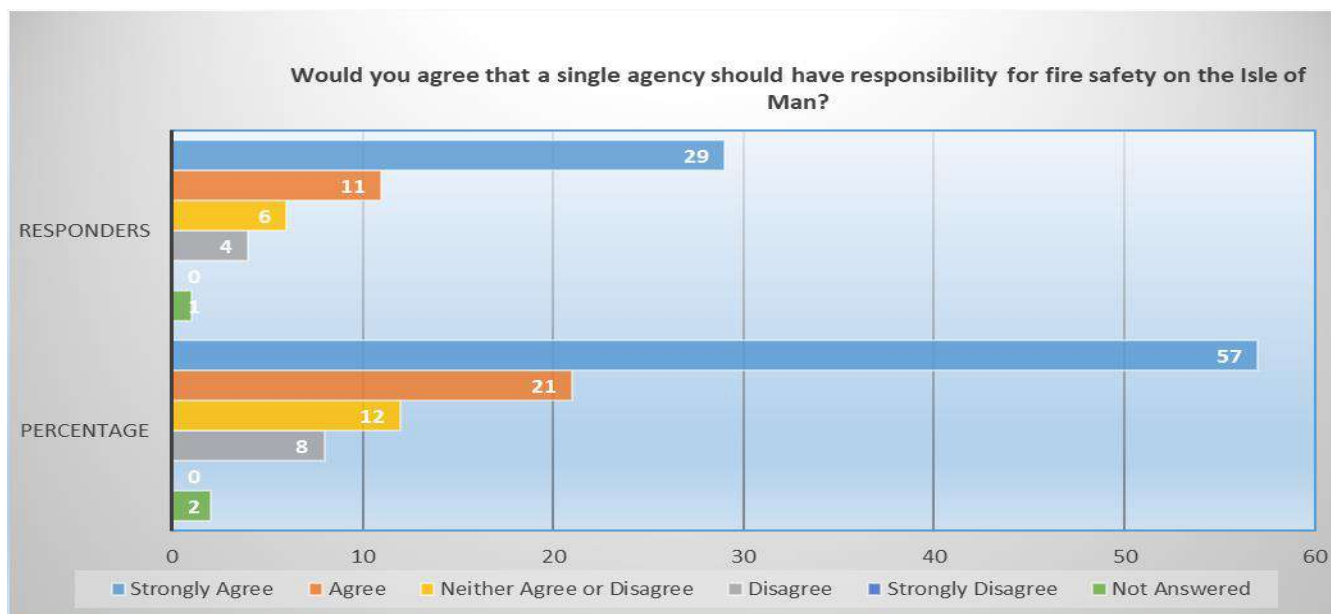
At present, there are also multiple pieces of legislation setting out public responsibilities when it comes to fire safety/health and safety – the legislation should be comprehensive, consistent and enable a simplified process.

### **We asked:**

#### **Question 23:**

**Would you agree that a single agency should have responsibility for fire safety on the Isle of Man?**

## You said:



78% strongly agree or agree, with 8% disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

- *Confusion arises with multiple agencies having different areas of responsibility for one organization.*
- *This will ensure ownership lies in a single authority and remove the risk of double/different interpretation of standards.*
- *Yes to keep standards the same, this is not the case a good example being Building control: Three different organisations apply standards and legislation differently.*
- *A single agency will mitigate duplication and/or confusion.*
- *Importance of maintaining standards, consistency and uniformity.*
- *Importance of co-operation with Building Control*
- *We are too overly regulated by differing organisations, 3 building controls on island as one example, ridiculous. Keep Fire Safety with the experts, i.e. FRS.*
- *Single agency ensures that a level of standard is the same across all areas.*
- *Split responsibility is costly and inefficient*
- *Too complex a subject for one area. Think approved doc A,B, & S.*
- *2 opinions are better than 1 and will eliminate a monopoly and give room for different opinions.*

## We did:

The Department proposes to review public feedback with cross Government partners and determine a collective position. The intention is for new legislation to clearly define the role of a responsible person for any building that falls under the legislation and will set out what is expected from them.

The new legislation will look to clarify which agency is responsible for fire protection and prevention on the Island and reduce the burden on individuals who have responsibility for fire safety. This will be achieved by reducing bureaucracy and streamlining processes through a single agency. Appropriate fire safety guidance and education material will be provided to responsible persons to assist them with compliance.

### We asked:

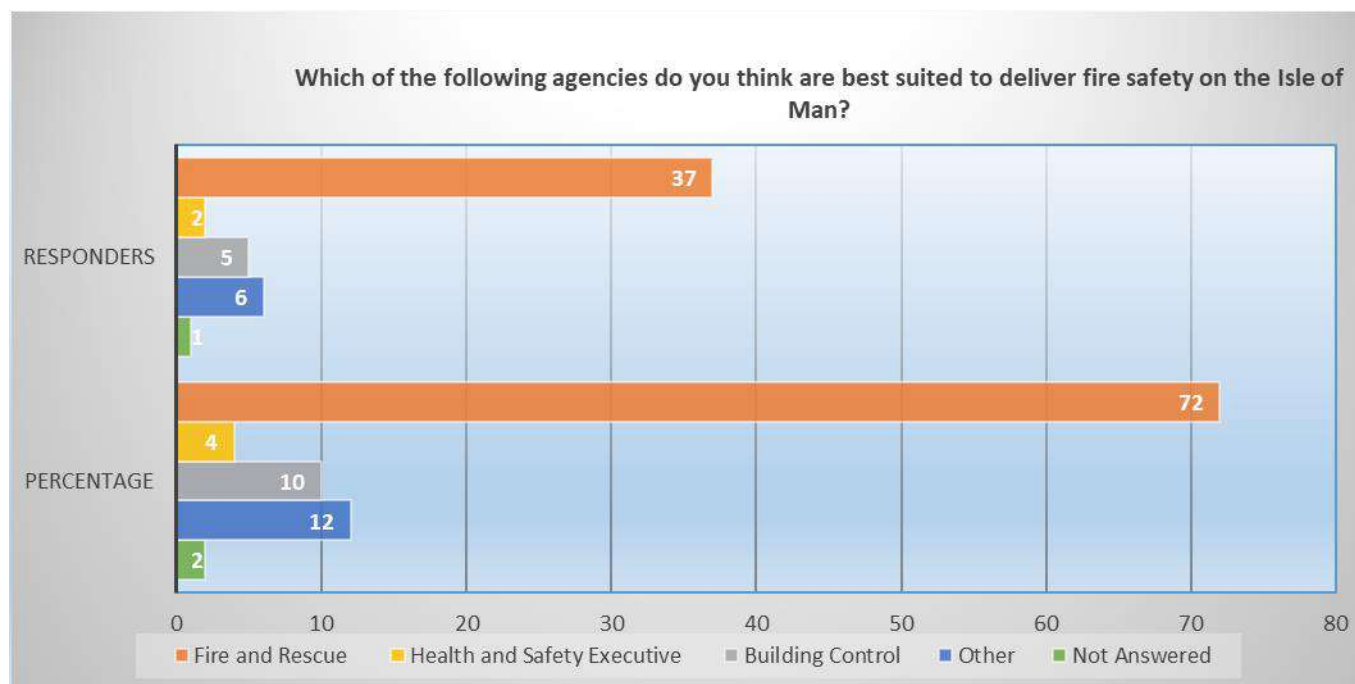
#### Question 24:

**Which of the following agencies do you think are best suited to deliver fire safety on the Isle of Man? (please tick one)**

***Fire & Rescue Service***  
***Health & Safety Executive***  
***Building Control***  
***Other***

**Please explain your answer?**

### You said:



72% agree that the Fire & Rescue are best suited to deliver fire safety on the Isle of Man.

A balanced selection of the comments received include:

- *Combination of all 3 working collaboratively.*
- *FRS, who should draw on specialist services of other agencies if appropriate.*
- *HSE are generally concerned only with occupational health and safety, and the consequences to the public of employers' act and omissions. Many of the FRS issues relate to residential and other activities outside of HSE's mandate. Building Control by definition are constrained to the built environment.*
- *I have put 'other' as depending on how Government decides to structure any future legislation and police it would depend on who is best suited to oversee and enforce that legislation. Currently all three Government departments deal with enforcement and the application of standards. There has always been a close working relationship between all three departments.*
- *A combination of experts in all appropriate areas.*
- *I would only want the fire and rescue service dealing with any fire related issues/topic with my premises.*
- *FRS is the agency at "the coal face" and best placed to deliver fire safety.*
- *The FRS should be the main delivery for fire safety as it will be able to focus and ensure the areas that are deemed high risk are focused on to prevent incidents from happening. Building control and H&S should still have an input into the matter.*
- *Maybe with input from other services multi agency approach with FRS ultimately responsible.*
- *All of the above, working collaboratively together.*
- *Fire and rescue service should manage the fire safety, as they understand the rules and risks. Any of the other departments should support the fire service with their services.*
- *Fire services should be the point of responsibility, but it should be noted that a channel should be maintained with health and safety executive and building control.*

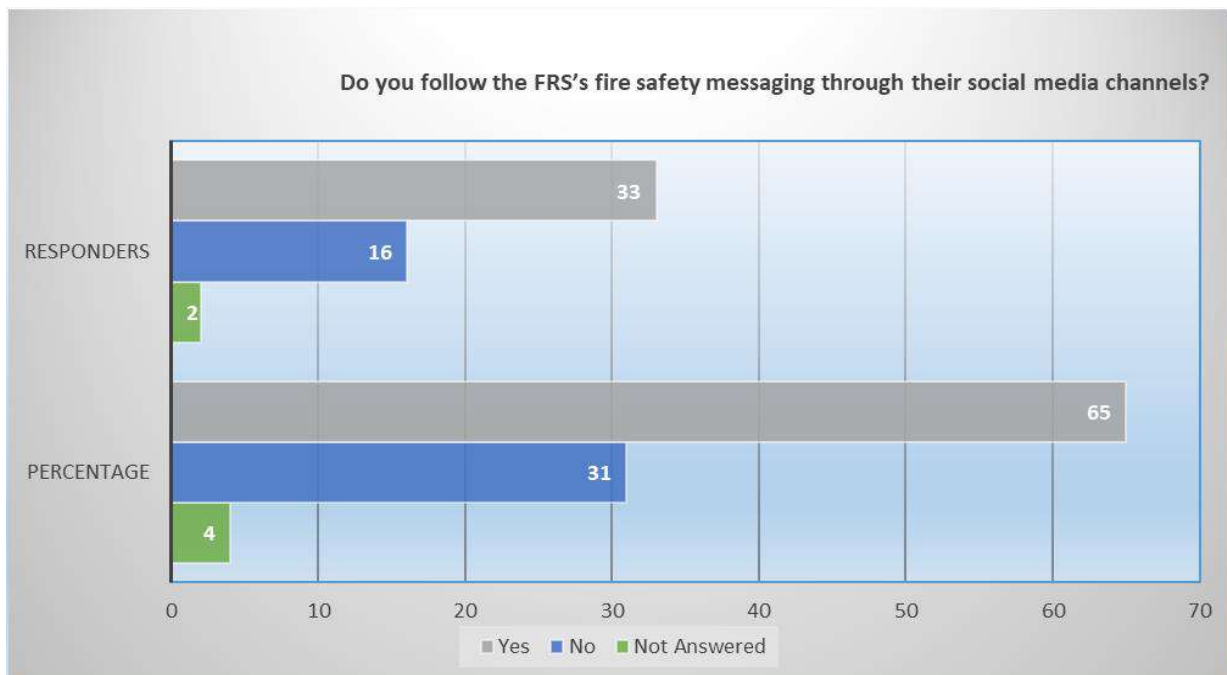
### **We did:**

The Department will engage with other government partners to review public feedback to help determine a collective position. However, the department would like to see a collaborative approach and alignment of legislation across all partners.

### **We asked:**

#### **Question 25.**

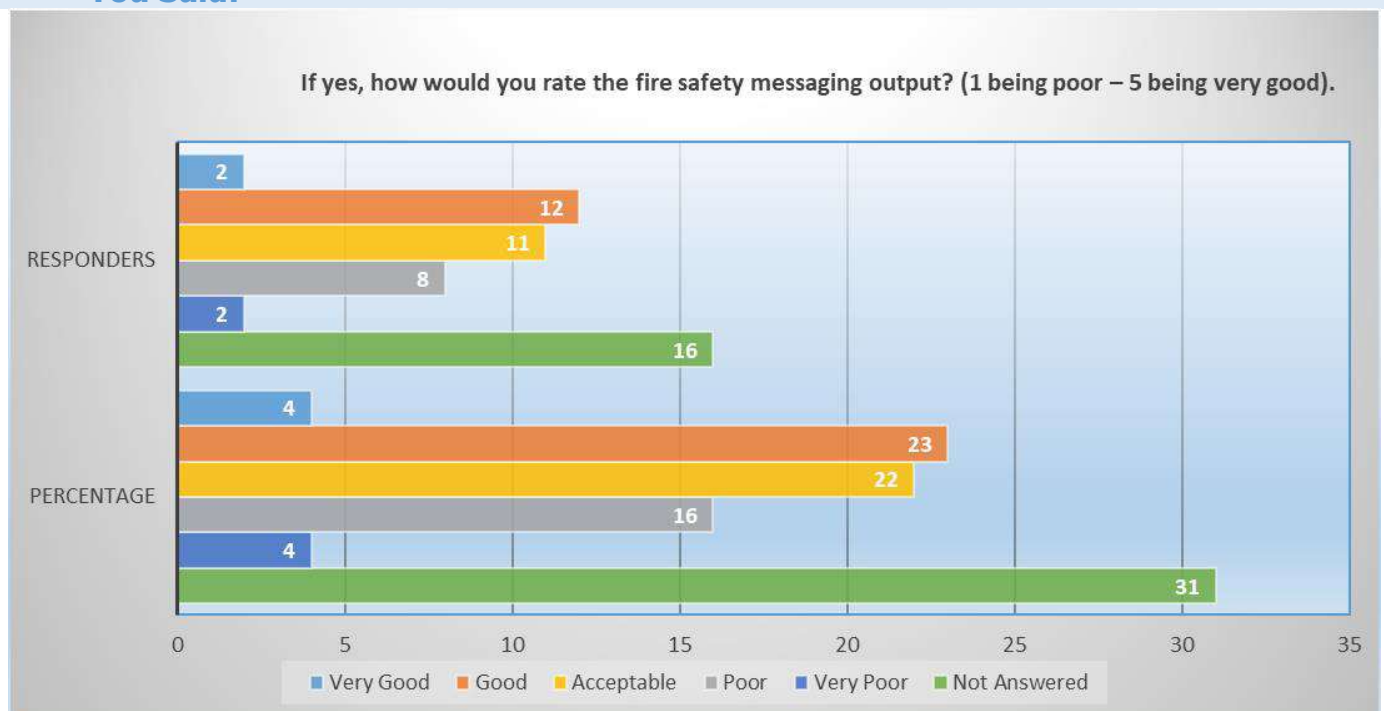
**Do you follow the FRS's fire safety messaging through their social media channels?**



**If yes, how would you rate the fire safety messaging output? (1 being poor – 5 being very good).**

**If you answered no to Q25, please explain why not?**

**You Said: -**



The comments were all aligned in highlighting the fact that not everyone uses or has access to social media.

## We did:

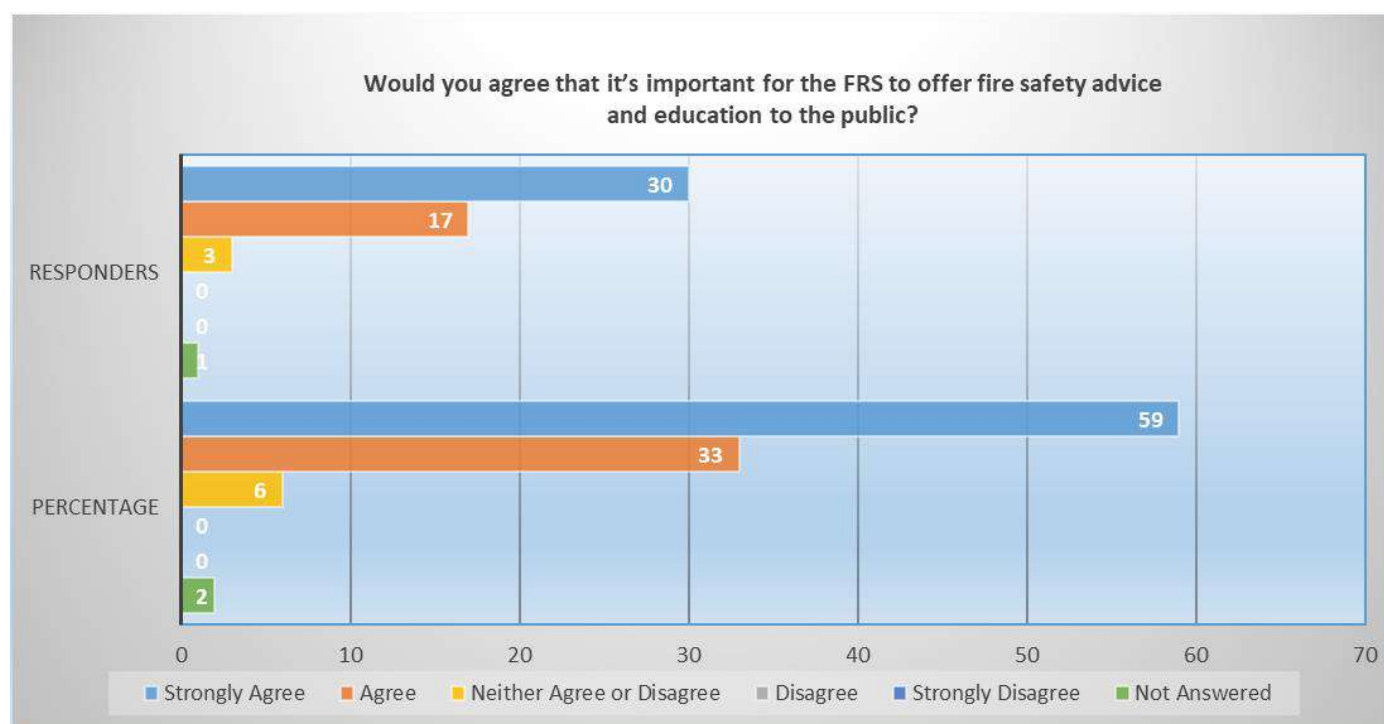
The FRS is committed to engaging with the public through a variety of channels, including social media, as part of its ongoing digital transformation programme. Enhancements to the FRS website will improve accessibility and make it easier for the public to interact with the service. Prevention and safety awareness campaigns will also become more immersive, delivered across multiple platforms including digital media, face-to-face engagement, and written materials.

## We asked:

### Question 26:

**Would you agree that it's important for the FRS to offer fire safety advice and education to the public?**

## You said: -



92% strongly agree or agree, with 0% disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

- *Keeps people safe and prevents avoidable fires.*
- *Prevention is always better than cure....*
- *The majority of the public are unaware of the requirements of fire safety in the workplace and generally. Education is key after all you don't know what you don't know...*
- *Fire Safety advice has improved safety over the years so why not continue?*

- *This is a huge area of work for the FRS and has been at the hub of their Prevention and Protection ethos for many years. Advice and Education is extremely wide ranging and is particularly resource intensive. Whilst face to face education was the traditional method of education, the availability and indeed the necessity of the internet as a communication tool has challenged modern Fire Safety Officers to acquire new skills and talents to reach their audiences. This is an area of Fire Safety that has been under resourced for many years and is an area where the deployment of non-uniformed expertise could greatly assist.*
- *A firm/individual could offer this service at a cheaper rate than overpaid firemen.*
- *This is part of reducing risk and load on the service.*

### **We did:**

Public feedback overwhelmingly supports the need for the FRS to provide fire safety advice and education. The Department expects the fire safety department to continue offering goodwill fire protection advice as part of its core service. However, the Department also intends to introduce a statutory provision requiring the FRS to deliver enhanced prevention advice and guidance, an area not currently set out clearly in existing legislation.

As previously outlined, the Department expects the FRS to adopt a blended approach to the delivery of protection and prevention services. While in some cases this may involve officers providing advice in person, the FRS should also embrace technological advances to deliver information more efficiently and to reach a broader audience.

The Department vision is for the FRS to become a more prevention focused organisation, thereby strengthening its preparedness and resilience work across the island.

## **Principle 3**

### **The legislation should be flexible and responsive to emerging risks.**

The existing legislation is outdated and no longer fit for purpose, particularly in comparison with the legislation and standards in place in the United Kingdom.

The Department proposes that the Fire and Rescue Service is supported by modern, fit for purpose legislation, which allows the service to operate and respond appropriately to emerging risks. Additionally, the intended approach for updating the primary legislation is to incorporate provisions for Regulations, Orders and guidance to be made under it, which will allow the FRS to respond flexibly and in a timely manner to emerging risks.

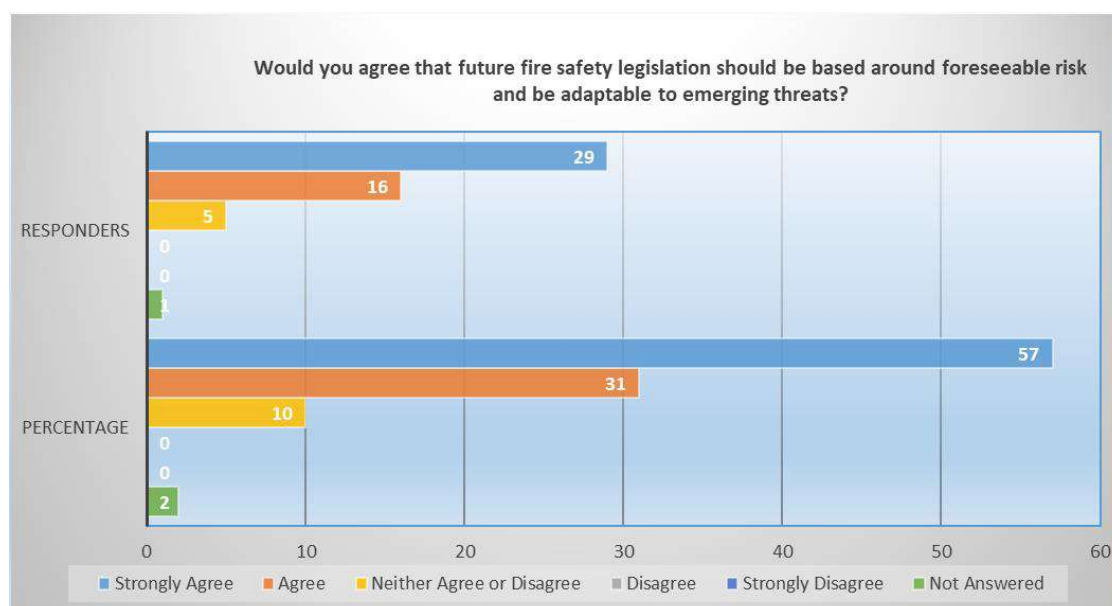
### **We asked:**

#### **Question 27:**

**Would you agree that future fire safety legislation should be based around foreseeable risk and be adaptable to emerging threats?**



## You said: -



88% strongly agree or agree, with 0% disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

- *Clearly it is sensible to address foreseeable risks but there needs to be the flexibility to deal with what is currently unforeseen. Unforeseen in this context could be existing but unrecognised (e.g. cladding at Grenfell) or it could be new technology (e.g. most fire legislation was written before the proliferation of rechargeable lithium batteries used by both legal and illegal transportation systems).*
- *Commons sense that we are able to amend requirements in a speedy and efficient manner.*
- *The emergence of new building materials, fuels and Battery Electric Vehicles will bring new risks and challenges.*
- *New legislation to be reactive to new and freshly emerging risks.*
- *Yes to the first half of the statement but find second half too broad/vague.*
- *To ensure that the fire service can move with times. Rather than being stuck in old ways to ensure the latest guidance and safety measures are followed to protect are community.*
- *Future proofing.*
- *The world and economy is always changing. The services need to be supported and response responsive to changes.*

## We did:

Public feedback overwhelmingly supports the principle that fire safety legislation should be based around foreseeable risk and be adaptable to emerging threats. The Department intends for new legislation to be more agile and responsive, enabling fire protection and prevention resources to be targeted using a risk-based approach, rather than being restricted by pre-determined building types. This flexibility will allow the Fire and Rescue Service to respond more effectively to changes in the built environment and deliver maximum risk reduction with finite resources.

The proposed new legislative framework will also support more agile and impactful fire safety campaigns, driven by national trends and underpinned by local incident data analysis.

The Department will expect the FRS to place greater emphasis on prevention, with the ability to dynamically deploy resources where and when they are most needed.

By providing more flexible regulations, the Department believes that the FRS will be better positioned to respond to evolving national threats and emerging risks, such as the transition from traditionally fuelled vehicles to electric alternatives, and to implement changes arising from national inquiries in a more efficient and timely manner.

## **Principle 4**

### **The legislation should reflect the standards in place across England & Wales.**

The key focus in bringing new primary legislation in this space will always be improvement on the current levels of fire safety seen on the Island, and a sustainable manner in which to maintain this.

The FRS aim to operate consistently in the context of our small Island community, with standards in place across England & Wales, specifically in relation to the provision of fire safety. To do so, new legislation needs to consider what frameworks are currently in place in these jurisdictions and appropriately apply these on Island.

This alignment will also enable our Fire Safety Officers to share and receive learning resources and understanding with colleagues outside the Island.

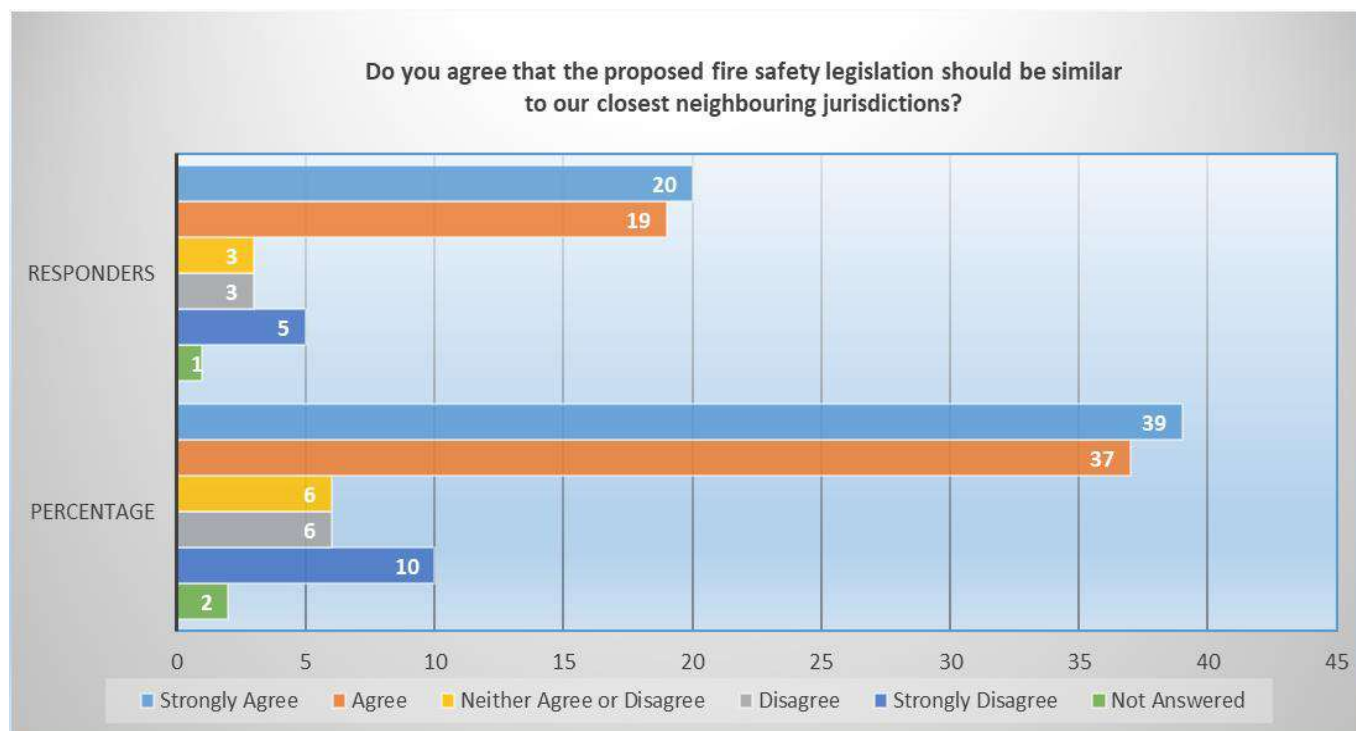
### **We asked:**

#### **Question 28.**

**Do you agree that the proposed fire safety legislation should be similar to our closest neighbouring jurisdictions?**

**If you don't agree, which other jurisdiction or standard should the department consider?**

### **You said: -**



76% strongly agree or agree, with 16% disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

- The UK have the experience and a model that can be followed easily, which companies and business will recognise and will be able to implement existing practices. (This may actually encourage businesses to set up here). It will also allow local officers to train in the UK, and facilitate 3rd party providers who have existing governing bodies. No need to reinvent the wheel.*
- Noting that other jurisdictions don't always get it right.*
- We are not the same as the UK. The island is ran differently, infrastructure etc.*
- It should be appropriate not just a copy of that enacted in nearby jurisdictions as that may be inadequate as demonstrated by Grenfell.*
- The department should consider the legislation that most meets the requirement of the Isle of Man. I would have thought legislation in an Island like Jersey etc. would be better suited. It is no good having legislation that doesn't suit our demographic, size or ability to maintain the legislation.*
- Use the neighbouring jurisdiction as a base line and then add in our needs as an island, as our risk will be higher due to resources.*
- Scotland, Denmark and Guernsey were all mentioned as jurisdictions to draw from.*

## **We did:**

The majority of responses supported the approach to maintain similarity with neighbouring jurisdictions. By developing legislation aligned with that of our closest neighbours, the Department believes there are significant opportunities to adopt best practice from other jurisdictions and incorporate learning from recent recommendations. This approach will enable the FRS to build guidance based on proven frameworks and align its training

requirements with opportunities already available across the UK, such as joint training programmes and secondments with other Fire & Rescue Services.

The FRS is currently engaging with representatives from England, Wales, Scotland, Northern Ireland, and other Crown Dependencies to identify and adopt best practice models.

By mirroring the legislative frameworks of neighbouring jurisdictions, the Department also sees potential for greater collaboration and resource sharing, including access to specialist assets such as fire engineers and peer review. The Department will however, pay particular attention to the Island's specific demographic individuality when looking to develop the legislation, which speaks to the feedback received.

In addition, aligning with existing UK legislation may help to reduce barriers to inward investment, by providing greater clarity and consistency for developers and businesses operating across jurisdictions.

### We asked:

#### Question 29:

**Do you agree that the Island's fire safety officers should be trained to the latest fire safety standards?**

**If you disagree or strongly disagree, please explain your answer.**

### You said: -



94% strongly agree or agree, with 0% disagreeing or strongly disagreeing.

A balanced selection of the comments received include:

*It's imperative that officers understand changes in standards the latest techniques and technologies to help give advice and provide solutions for complex buildings. They must be able to recognise when trades are not applying or working to the relevant standards.*

- *Better training leads to better decision making.*
- *To ensure they have the best possibly knowledge and understanding to deal with matters and to ensure we promote the highest levels of safety and standards.*

## **We did:**

The responses overwhelmingly supported that fire safety officers should be trained to the latest standards and the Department recognises the importance of this. To achieve this, the Department will expect the Fire and Rescue Service (FRS) to follow relevant national guidance and maintain a commitment to continual development in line with evolving practices and learning within the wider fire sector.

While the new Act will be tailored to reflect the Island's specific context, the Department believes the FRS can effectively utilise existing training materials, and accredited training providers to ensure compliance with the latest fire safety standards and fire standards.

The Department is encouraged to see that the FRS has already begun transitioning towards risk-based fire safety legislation, with fire safety personnel actively engaged in upskilling to align with anticipated legislative changes. This change also allows the FRS to access readily available training courses and appropriate training materials.

## **Principle 5**

### **Introduction of the legislation will reduce barriers to inward investment.**

The Island's current fire safety legislation is not consistent with neighbouring jurisdictions and can cause confusion with those wishing to develop on the Island. The responsibility for fire safety sits across several government departments, and local authorities. The current Fire Precautions Act 1975 (as amended) only covers approximately 5% of the total number of registered commercial businesses on the Isle of Man. It is the intention for the new legislation to apply to the widest possible range of buildings/premises on the Island so that they are subject to a single regulator, which will ultimately support economic development thus reducing barriers to inward investment.

## **We asked:**

### **Question 30:**

**Do you have any comments on this principle?**

## You said: -

A balanced selection of the comments received include:

- *Standardisation is a good thing as it avoids misunderstandings.*
- *Fire safety have historically (a legal requirement under the FS Act) always provided advice even on buildings that do not come under designated premises. This is not new.*
- *Totally agree. If the IoM government's economic and population plans are to be achieved then there should be a seamless approach to legislation, policies and procedures.*
- *Only that if this is to help new development then they will be paying and it will not be retrospectively charged on existing across the island.*
- *Ensures that any developers or business have an understanding are the fire regulations in place on the island to ensure they can conform to them.*
- *As stated above, responsibility should lie with owners/employers, and cost should not be a burden on taxpayers.*
- *Having similar legislation to neighbouring jurisdictions may make it easier as investors would understand legalities; already, rather than learning an alien structure.*
- *I agree provided there is not a blind following of England and Wales. Other jurisdictions should be considered.*

## We did:

The Department will work closely with the Fire and Rescue Service to introduce modern fire safety legislation that aligns with regulations in neighbouring jurisdictions, while also reflecting the unique context of the Island.

Future legislation will be informed by best practice and proven approaches, drawing from a range of jurisdictions, not solely England and Wales.

The new Act will remove outdated requirements such as fire certificates, which are now unfamiliar to UK developers seeking to invest in the Island. This change will help streamline the regulatory process and support a more efficient and effective fire safety framework.

## **Principle 6**

**The legislation will be suitable to reflect the local context of our small Island community.**

Any new legislation, specifically new primary instruments that shape the way in which the FRS operate, must be proportionate to the needs of our small Island community and the maintenance of its safety. It is expected that the new legislation would reflect the risk assessment model for workplace safety already adopted by most businesses and align with

health and safety legislation, thereby, having minimal impact but ensuring consistency in safety standards.

As such, to ensure that the FRS are able to continue to respond in the most effective manner, the FRS and the Department will closely monitor the implementation of any new legislation, to ensure it functions well for both the service user and the services provided by FRS.

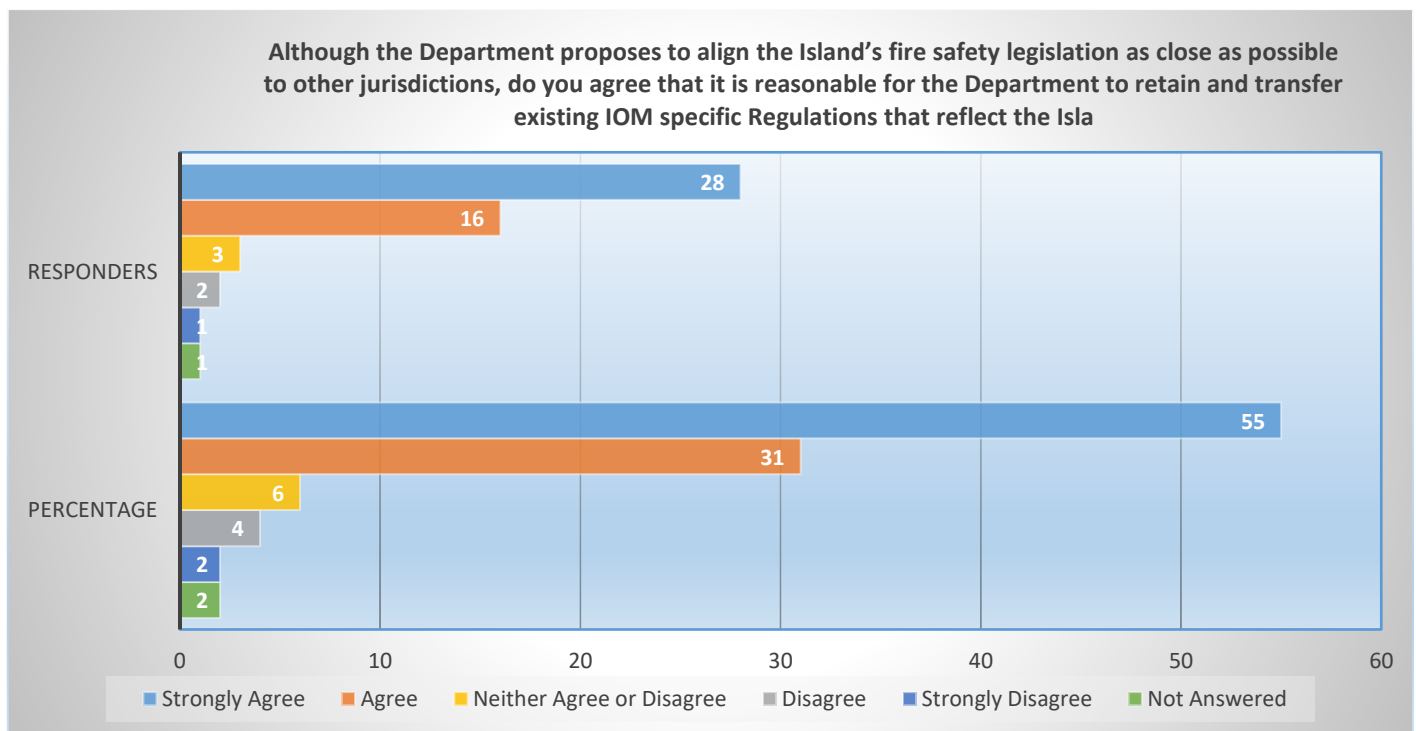
### We asked:

#### Question 31:

**Although the Department proposes to align the Island's fire safety legislation as close as possible to other jurisdictions, do you agree that it is reasonable for the Department to retain and transfer existing IOM specific Regulations that reflect the Island's limited operational resources?**

**If you don't think that this is a reasonable approach, please explain why.**

### You said: -



A balanced selection of the comments received include:

- We have better legislation for flats and HMO's although some elements are totally unnecessary and badly thought out. (Example separate domestic smoke detector in HMO's, and self-closures on internal flat doors).*
- Provided that the IOM specific regs are gold standard.*

- *I don't think that you can have risk-based legislation alongside prescriptive legislation works.*
- *Flats legislation should sit under a landlords bill and fire safety standards could be applied to all rental accommodation, not owning your home is a factor that indicates a person is more likely to have a fire so this data should be used by the fire service when making decisions about how they allocate resources to make people safe and what ways legislation can make people safe from fire.*

## **We did:**

Public feedback overwhelmingly supports the Department's intention to retain and transfer specific Isle of Man regulations that reflect the Island's limited operational resources, whilst aligning future fire safety legislation as closely as possible with neighbouring jurisdictions.

Some public concern was raised around how the Department plans to blend prescriptive and risk-based legislation. This is an important area, and the Department has already included it in the drafting instructions to explore how prescriptive requirements may be incorporated under supporting regulations.

The Department believes it is essential that fire safety legislation is tailored to the island's context, particularly its geographic isolation and the Fire & Rescue Service's limited operational capacity.

Unlike fire services in the UK, the Isle of Man FRS cannot rely on immediate mutual aid from neighbouring fire authorities or draw on shared regional resources. The Island operates a maximum of twelve standard firefighting appliances, and there are no readily available reinforcements in the event of a major incident.

In specific circumstances, the absence of additional built-in fire suppression measures presents a real risk of overwhelming the FRS, potentially resulting in a catastrophic incident that exceeds the Island's response capability.

Some of the Island's critical national infrastructure also carries a higher level of strategic importance due to its uniqueness. For example, the Island has only one major trauma hospital, any significant disruption to this facility would have profound implications for public safety and day-to-day life.

To mitigate these risks, the Department intends to retain and update provisions from the *Fire Precautions (Fixed Fighting Systems) Regulations 1999*. These regulations are designed to reflect the Island's operational realities and will be revised to address new and emerging risks, such as the increased fire loading in large multi-storey car parks.

In addition, the *Fire Precautions (Houses in Multiple Occupation & Flats) Regulations 2016* will be updated and incorporated into the new legislative framework. These regulations play a vital role in protecting vulnerable residents, particularly those living in higher-risk rental accommodation.

The Department will continue to work closely with legislative drafters to ensure a proportionate and effective balance, blending modern, risk-based approaches with targeted prescriptive requirements where necessary to meet the Island's unique fire safety needs.



## **Principle 7 – Transitional Arrangements**

**The FRS, in bringing any new primary legislation, would seek to grant a transitional period between the legislation being enacted and the deadline for the requirement to evidence compliance.**

This means, in practice, that the current existing legislation under which the service operates would continue, whilst operational preparations are made for the enactment of any new Bill, ensuring that service users affected are appropriately supported and provided education prior to the move to operate under a new regime.

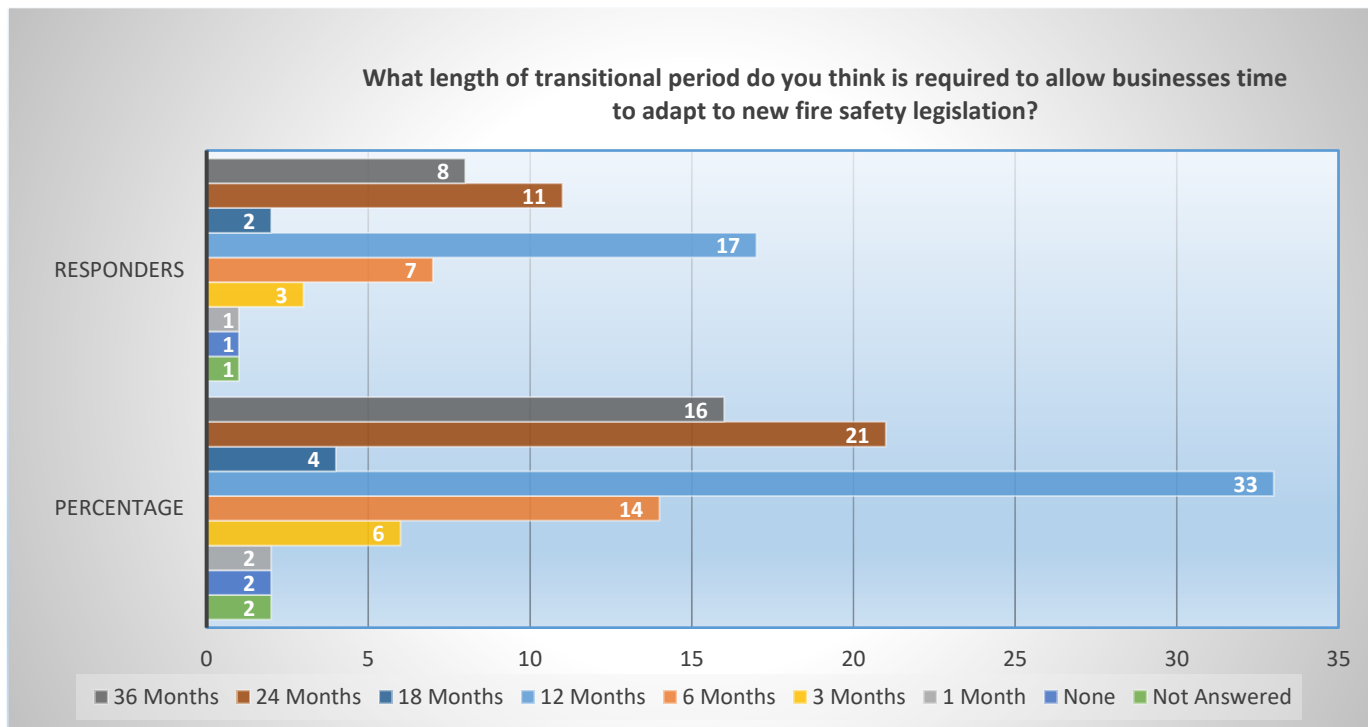
### **We asked:**

#### **Question 32:**

**What length of transitional period do you think is required to allow businesses time to adapt to new fire safety legislation?**

### **You said:**

#### **Participant's Responses: -**



## We asked:

### Question 33:

**What additional support would you like to see made available to help building owners and those members of the public who have responsibility for fire safety within their properties?**

## You said:

A balanced selection of the comments received include:

- *If the seminars are properly publicised that should deal with most issues. A helpline that runs for the duration of the transitional period, and a little beyond, would assist.*
- *Staff training will be needed and workshops to provide owners and responsible persons with advice on how to meet and apply the required standards to each business or property. There will need to be a significant transitional period.*
- *Accessibility to documents. Improved website.*
- *Computer based learning for stakeholders plus downloadable documents including specimen policies and procedures adaptable to buildings and building owners.*
- *Hold Seminars and give advice and training. Also give basic fire risk assessment forms and training in how to do it.*
- *Flexibility to see that not all cases will fall in the tick boxes.*
- *Ensure that the fire service offers a supported service during the transition period to help and support business as they change over should they have any issues.*
- *Good web-based information and FAQ availability, self-assessment educational material for appropriate GAP analysis in first instance.*
- *Support from the Fire Safety department.*
- *Help and guidance from all government departments and if required government financial support.*

## We did:

It is clear from the feedback that whilst the public are keen for the new legislation to be introduced in a timely manner, there is support for a transition period of between 12 – 24 months to ensure that all those affected by the legislation are prepared and brought along in a considered, informed and intentional manner.

The Department intends to engage with local businesses and those holding Fire Certificates ahead of the implementation of the new Act. Guidance and support will be provided to help them develop their own Fire Risk Assessments. Over time, the FRS will transition premises currently operating under Fire Certificates onto a Fire Risk Assessment based approach.

To assist with this transition from prescriptive to risk-based legislation, the FRS plans to hold a series of seminars to explain the legislative changes and support stakeholders throughout the

process. This work has already begun, with the development of a new website aimed at improving public access to guidance documents and self-help video's.

A dedicated support team will be established to provide advice and respond to queries during the transition period.

The Department is committed to ensuring that everyone affected by the changes receives the necessary support to achieve and maintain compliance.

### We asked:

#### Question 34:

**Is there anything else you think the Department should consider when developing the proposed legislation?**

### You said:

A balanced selection of the comments received include:

- *I would like to see a full financial impact assessment on both DHA and the IOMFRS as well as the financial implications this will have on businesses. There are some huge costs involved in both setting up the changes needed with staff, training, back office, IT support and the implications to Government to bring up to standard their own places of work. This should not be a barrier to change, as this should have occurred years ago.*
- *We should ensure that we don't just blindly copy legislation and procedures from other jurisdictions unless they are the best available and completely fit all of our requirements.*
- *Not to rely solely on social media to message the public. The Island has a large population of elderly people and not all will be plugged into social media.*
- *Ensure it can be easily adaptable in a timely manner. For example Grenfell, tragedy as we know, and so is the speed of response to updating legislation.*
- *Staffing levels to ensure it can be implemented efficiently and maintained.*
- *Avoid any further inter-departmental duplication and rivalry.*
- *Prosecution and enforcement of any change and new legislation should be a last resort. Instead proactive engagement to give advice and support must be resourced and widely available.*
- *It needs to take in the limitation of their geographical location, the resources they have on the island and that we should have high standards of safety, education and prevention.*

### We did:

The feedback was varied and provided the Department with some useful reminders and points for consideration.

In respect of the financial aspect of the proposals, the comments received were largely mindful of the need for a balanced and efficient approach to financial impacts. As with all new primary legislation, a financial impact assessment is required to ensure that full potential financial consequences of the legislative proposals including costs, revenues and overall economic impact on Department and stakeholders, are weighed up and balanced against identified needs.

As part of the legislative development process, the Department alongside the FRS will continue to work with our finance business partner in the development of a financial impact assessment to ensure that the proposals align with sustainability objectives.

As well as plans for developing effective means of proactive communication with the public (outside the sphere of social media) to support education and compliance, there will be wider consideration as to the benefits and implications of alignment with other forces to support resilience and efficiencies. There will also be a considered approach to joined-up working practices with our Island's other emergency responders.

## 4 NEXT STEPS

The Department proposes to use the responses received through this consultation to further refine and finalise the policy principles that will underpin the development of comprehensive drafting instructions for new primary legislation, namely, the Fire Service Bill and Fire Safety Bill.

Alongside this legislative development, the Department intends to carry out a financial impact assessment to understand the implications of introducing the new legislation. An implementation strategy, informed by the consultation responses, will also be prepared to ensure the island is fully prepared for enactment, including appropriate support for those affected by the changes.

As this work progresses, the Department expects the public will begin to see tangible organisational changes. This will include improved access to Fire & Rescue Service information and guidance through a dedicated website and enhanced social media presence.

In addition, the Department is developing opportunities for members of the community who may be affected by the changes to meet in person with representatives from the Fire and Rescue Service to raise any concerns or seek further clarification.


The development of this new legislation will modernise how the Island's Fire and Rescue Service works to keep the community safe. It will also enable closer alignment with fire and rescue partners in the UK, opening up greater opportunities for collaboration, shared training, and information exchange. Following major incidents such as the Grenfell Tower fire, the fire sector across the UK is evolving rapidly. This new legislation will not only reflect those changes but will be designed to adapt over time in response to the Island's changing risk profile.

The Department wishes to thank all respondents to this consultation for their time, insights, and valued contributions.




# Isle of Man Government

*Reiltys Ellan Vannin*

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