

**TO:** Mayor Savage and Members of Halifax Regional Council

**SUBMITTED BY:**

Original Signed by 

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Jacques Dubé, Chief Administrative Officer

**DATE:** October 8, 2021

**SUBJECT:** Action Plan Response to Fire Inspection Program Audit

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## **ORIGIN**

On September 28, 2021, Regional Council passed the follow motion: THAT Halifax Regional Council:

1. Request a staff report from Halifax Regional Fire and Emergency Services outlining an action plan to address the recommendations within the September 13, 2021 Management of Fire Inspection Program Audit Report, and that this report be complete within 60 days and;
2. Request a staff report providing Regional Council a six month update on actions addressing the recommendations within the September 13, 2021 Management of Fire Inspection Program Audit Report.

## **LEGISLATIVE AUTHORITY**

Administrative Order 2018 -006 – OP 10:

(1) Pursuant to Section 14 of the Fire Safety Act, the Fire Chief is appointed as a Local Assistant to the Fire Marshal within the Municipality.

(2) Within the Municipality, the Fire Chief may,

- (a) establish a system of fire-safety inspections of land and premises situate within its jurisdiction, as required by the regulations, to provide for compliance with the Fire Safety Act, the regulations, and the Fire Code;
- (b) approve other local assistants to the Fire Marshal and appoint municipal fire inspectors and investigators to carry out fire safety inspections and fire cause determination; and
- (c) appoint a Division Chief of Fire Prevention to execute the responsibilities of Halifax Regional Fire & Emergency related to fire safety inspections, fire cause determination, public education, and Fire Code enforcement.

## **RECOMMENDATION**

It is recommended that Halifax Regional Council:

1. Approve the Action Plan Response to Fire Inspection Program Audit as set out in this staff report; and
2. Direct the Chief Administrative Officer (CAO) to assess the resources needed for full implementation of the Response to the Fire Inspection Program Audit as part of the 2022/2023 Budget and Business Planning Process.

## **BACKGROUND**

*The Management of the Fire Inspection Program Audit – September 2021* (the Audit) was a performance audit of the management of the fire inspection program. The stated objectives of the audit were to:

- assess whether Halifax Fire has processes to ensure appropriate oversight of the fire inspection program; and
- determine whether Halifax Fire is appropriately managing its legislated fire inspection processes.

The Audit period was April 1, 2016 to March 31, 2021 and included interviews with management and staff, a review of internal policies and procedures, observation of activities and operations, data analysis, and examination of documents on a sample basis.

The cumulation of this audit found that HRFE is not meeting its legislated fire inspection obligations and determined the Fire Inspection Program needs significant improvement. In addition, the Audit noted that there was poor communication between HRFE and Planning and Development. The Audit provided 14 recommendations; all of which HRFE management has accepted.

## **DISCUSSION**

The Action Plan included with this report identifies the approach and immediate next steps to meet the 14 recommended goals from the Audit.

The Nova Scotia Fire Safety Act contains a requirement for all Municipalities to develop a system of fire inspections. The organizational structure and resource allotment to the Fire Prevention Division are inadequate to ensure a timely completion of inspections. The Action Plan includes steps to alleviate this deficiency.

Progress on some of the recommendations will be contingent on resources such as technology support and data and collaboration from other business units. Given the sizable number of action items identified as potential requirements to realize the 14 recommendations set out in the Audit, further time to refine, prioritize and work with P&D and PCIT will be required for timelines and resources required to be identified. HRFE management intend to prioritize the work required as more context becomes available, and will provide further details on the prioritization of the action plan at the six month update to Regional Council.

## **FINANCIAL IMPLICATIONS**

Given the significant gap between the percentage of completed legislative inspections and what is required, it is evident that additional resources to meet mandated inspections will be required. This report does not include a request for additional funding for resources, however the Action Plan does include steps to explore this in preparation for a future request.

The Audit outlined a number of systems that will require updating, such as ensuring HRM's new permitting system which is not presently communicating new property data into HRFE's system. This action plan includes actions to implement the systems the auditor has recommended. The work required to implement these systems may require funding.

### **RISK CONSIDERATION**

There are no significant risks associated with the recommendations in this Report. The risks considered rate Low.

### **COMMUNITY ENGAGEMENT**

No community engagement was required.

### **ENVIRONMENTAL IMPLICATIONS**

No environmental implications were identified.

### **ALTERNATIVES**

Halifax Regional Council could chose to refuse the Action Plan in part on in whole; or provide amendments to the Action Plan.

### **ATTACHMENTS**

Attachment 1: Action Plan Response to Fire Inspection Program Audit

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A copy of this report can be obtained online at [halifax.ca](http://halifax.ca) or by contacting the Office of the Municipal Clerk at 902.490.4210.

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# Action Plan Response to Fire Inspection Program Audit

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Halifax Regional Fire & Emergency  
October 8, 2021

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# Recommendations

## Recommendation 1

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*“Halifax Fire should develop and implement detailed plans, with timelines, to meet fire inspection obligations.” (Reference: p.4)*

### Action Plan for Recommendation 1:

1. By way of an updated Mandate Letter and “My Action Plan” (HRM’s tool for Performance Planning), clear direction on fire inspection obligations will be given to the Deputy Chief, Assistant Chief and Division Chief of Community Risk Reduction.
2. Continue with organizational structure change, including a proposal for new positions designed to address Fire Prevention’s need to meet legislative requirements as well as need to address concerns around planning application and infrastructure development.
3. Collaborate with Planning and Development (P&D) to separate and delegate labour related to building code and fire code **[COMPLETE]**.
4. Restart *Fire Safety Maintenance Inspections* (FSMI) program with timelines for implementation **[COMPLETE]**.

## Recommendation 2

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*“Halifax Fire should document and prioritize risks to the Fire Prevention Division’s operations and take steps to mitigate as appropriate.” (Reference: pp. 5 - 6)*

### Action Plan for Recommendation 2:

1. Use HRFE’s Operational Risk Registry to document and prioritize risks to operations and building risks.
  - a. Work with Planning & Development to understand abilities in data collection and reports to assist in determining risk locations and management
  - b. Communicate risks to Regional Council if there are insufficient resources to mitigate risks as appropriate.
  - c. Review all relevant action steps associated with the audit recommendations and prioritize based on risk.

### Recommendation 3

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*“Halifax Fire should develop and implement a system of fire inspections, including how often buildings should be inspected. Scheduling and monitoring processes should also be developed and implemented to ensure fire inspections are completed as planned.” (Reference: pp. 6 - 7)*

#### Action Plan for Recommendation 3

1. Determine, document, and record a ‘starting point’ date for inspections.
2. Work with internal resources and PCIT to develop a system that will identify buildings that are due for inspection.
3. Work with internal resources and PCIT to develop a system that will identify the status of all inspection case files.
4. Revisit policy that outlines frequency of fire inspections.

### Recommendation 4

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*“Halifax Fire should establish a regular update process to ensure it has a current and accurate inventory of inspectable buildings.” (Reference: p. 8)*

#### Action Plan for Recommendation 4

1. Work with Corporate GIS group to explore and implement best practices for managing building information.
2. Work with Corporate GIS group as well as other internal and external resources to develop and implement a process to ensure accurate inventory of inspectable buildings.

### Recommendation 5

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*“Halifax Fire should work with People, Communications and Information Technology; and Planning and Development to determine how to transfer property data from HRM’s new Permitting, Planning, Licensing, Compliance solution to update HRFE’s system.” (Reference: p. 8)*

#### Action Plan for Recommendation 5

1. Continue to work with P&D and PCIT to complete the data flow and reporting processes between FDM, GIS and P&D’s new Permitting, Planning, Licensing, Compliance solution

## Recommendation 6

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*“Halifax Fire should issue orders-to-comply, where appropriate, and maintain key correspondence related to fire inspections, for an appropriate retention period.” (Reference: p. 10)*

### Action Plan for Recommendation 6

1. Determine if HRFE’s computer system can be modified to show extension due dates, and if not, determine other process to achieve this recommendation.
2. Create and distribute daily reports to identify case status including any approved extensions.

## Recommendation 7

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*“When follow up of limited-scope inspections must be escalated to fire inspection staff, Halifax Fire should determine and communicate follow-up timelines and monitor completion dates.” (Reference: pp. 11 - 12)*

### Action Plan for Recommendation 7

1. Create policy with timelines and completion dates for limited scope inspections.
2. Determine if HRFE’s FDM system can be enhanced to identify pending report referrals, and if not, determine other process to achieve this recommendation.

## Recommendation 8

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*“HRFE should develop and implement a quality assurance process to monitor that fire inspections are properly completed and documented. This should include developing guidance to promote consistency across inspection staff, which should help facilitate the quality assurance process.” (Reference p. 13)*

### Action Plan for Recommendation 8

1. Develop process documentation for staff to outline the requirement for complete inspection reports.
2. Develop, document, and track a regular quality assurance process to sample a percentage of completed inspection reports.

## Recommendation 9

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*“HRFE should update its fire inspection policies and procedures and establish a regular review process to maintain them going forward.” (Reference p. 13)*

### Action Plan for Recommendation 9

1. Create a subcommittee to do a thorough review of our current policies and operational guidelines and update as appropriate.
2. Revisit frequencies of inspections.

## Recommendation 10

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*“HRFE should establish expectations for fire inspection staff productivity and provide staff with guidance on how to prioritize inspections and other duties.” (Reference p. 14)*

### Action Plan for Recommendation 10

1. Set targets and service standards for fire inspection staff on all work packages assigned.
2. Provide reports and/or processes for staff to identify priority and time available for each task assigned to them.
3. Modify FDM to identify and assign inspections.

## Recommendation 11

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*“HRFE should develop concrete plans, with timelines, for fire inspection staff to receive sufficient training in a timely manner.” (Reference p. 15)*

### Action Plan for Recommendation 11

1. Request resources for a new Professional Standards Specialist to develop an internal training program and continuous training modules.
2. The Professional Standards Specialist will oversee and instruct the training program.

## Recommendation 12

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*“HRFE should develop performance indicators for the Fire Prevention Division, establish targets, and regularly monitor against them.” (Reference pp. 16-17)*

### Action Plan for Recommendation 12

1. Create realistically obtainable KPIs using a structured reporting system.
2. Generate monthly KPI reports.
3. Expand existing KPI on legislative compliance to reflect the individual occupancy types.

## Recommendation 13

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*“HRFE should work with Planning and Development to address concerns regarding HRFE's involvement in planning applications.” (Reference pp. 17)*

### Action Plan for Recommendation 13

1. Request resources for a Plans Examination Specialist to work with Planning and Development to provide input on planning applications.
2. Plans Examination Specialist (if approved) to liaise with P&D staff and provide guidance and input on revisions to municipal engineering and planning standards.

## Recommendation 14

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*“HRFE should develop a complete list of dry hydrant needs and determine how it will prioritize capital funding for these.” (Reference p. 18)*

### Action Plan for Recommendation 14

1. Prevention staff to work with Operations and Performance and Safety divisions to identify a complete list of dry hydrant needs.
2. Determine how to prioritize capital funding for the maintenance and installation of dry hydrants.