



COVID-19 Scenario Based Guidance Auditing Premises

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Introduction

- 1.1. This document is to provide FRS with some general advice on how they may approach undertaking audits in premises under current and future COVID conditions.
- 1.2. There are some common areas for consideration which can be applied to all premises types and these are presented below. Where there are factors which are specific to particular premises, they are presented in their own sections.
- 1.3. The guidance does not constitute legal advice. Fire and rescue services' legal duties will remain those specified by law, in particular article 26 of the Regulatory Reform (Fire Safety) Order 2005, during the COVID-19 pandemic, but if any fire and rescue services consider that difficulties arise in relation to compliance with those duties, they should take legal advice.

General Advice – All Premises

The advice included below is applicable to all premises types and all activities.

Undertaking Visits

Where a physical audit is necessary, to capture data or undertake an audit of the common areas for example, the following should be considered:

- 2.1. A full risk assessment should be carried out to determine the level of risk to staff and public. It is recommended the Protection Model Risk Assessment is used as a starting point. This should determine control measures that need to be put in place.
- 2.2. Any premises that is operating should be COVID safe and be able to demonstrate how they are achieving that.
- 2.3. The risk assessment should take into account government guidance and any local lockdown restrictions. As such the arrangements may not be uniform across the FRS geographic area.
- 2.4. Visiting at times when the environment is quieter, for example visit licensed premises before or at opening time rather than a Saturday afternoon.
- 2.5. Restricting visits to specific areas – plan the areas you will need to see in advance.

- 2.6. Ensuring only a minimum amount of staff attend and spend a minimum amount of time there.
- 2.7. Any physical visit should pay due regard to the current recommendations on the use of [PPE for frontline FRS workers](#) and any other additional service policy or other relevant advice.
- 2.8. Any visit should be conducted in line with the service's risk assessment to ensure the visit can take place safely, with reassurances received from the 'responsible person' that the premises is COVID Secure.
- 2.9. It will be useful for FRS to be familiar with the [government guidance specific to the premises type](#) being visited.

Alternative Audit Actions

- 3.1. FRS should make contact with the premises to establish:
 - It is open for business
 - It is COVID Secure
 - The measures that have been put in place to achieve COVID Secure status. Knowledge of these measures can be used in conjunction with the Protection Model Risk Assessment to fully understand the risks involved.
- 3.2. The information should inform the benefits of an audit against the risks to staff and public from COVID transmission.
- 3.3. The use of telephone for general conversations and email, rather than physical letters for correspondence.
- 3.4. Arrange for the delivery of the required documentation via email or other electronic form, prior to audit.
- 3.5. Face to face meetings can be held using video conferencing or similar. There are several technical solutions that will allow this. Where this is used, ensure your organisation can support the tools needed within their IT provision.
- 3.6. Where detailed images or videos are required (to check on ongoing work for example) then email or larger storage solutions like Dropbox can be used for video sharing. Existing sites such as YouTube can be used for this purpose as videos can be set to private for additional security.
- 3.7. Consider the use of desktop appraisals as set out in [NFCC guidance](#). All audits completed this way will be classified as a completed audit for Home Office statistical purposes.
- 3.8. Consider undertaking audits activity with other regulators in order to reduce the number of visits which may allow for COVID transmission. Note that other regulatory activities may take place at times which are not conducive to the safety of FRS staff – for example, Licensing inspecting during busy periods (see 2.4)
- 3.9. Contact any other regulators who also undertake inspections on the premises to determine if any other audit activity has taken place and what the outcomes were.

Effects on RBIPs and Other Activities

- 4.1. FRS should be aware that any deferment and the inability of departments to complete audits in some cases, will have a knock-on effect on RBIP performance.
- 4.2. Where a desktop audit has been carried out and where sufficient data has been gathered for FRS to satisfy that no immediate action is required, these desktop assessments can be closed and counted as short audits in the RBIP outputs. This is no requirement to undertake a physical visit prior to the audit being regarded as complete unless the information gathered suggests a physical audit is warranted. Consideration should be given to the amount of work this will require balanced against the need to audit other higher risk premises.
- 4.3. FRS are also undertaking other critical work such as the Building Risk Review and contributing to the BSF regime via consultations and workshops. This may be affected where there are significant work backlogs or the opening of premises means access to high risk premises is available again. Further prioritisation of workloads may be required to secure the capacity and capability to achieve these tasks.

Additional Specific Advice

While the above advice can be applied to most situations, there are some additional considerations in some circumstances. The sections below add additional points that FRS should consider.

Vulnerable Persons

- 5.1. There are those who are more vulnerable to COVID within the community. The government have identified these as:
 - People at high risk (clinically extremely vulnerable)
 - People at moderate risk (clinically vulnerable)
 - Others disparately affected (these will be most commonly encountered)
- 5.2. Those at moderate or high risk are likely to be encountered in specific situations where access is controlled. The risk assessment should always attempt to identify whether members of these groups are present during audit/enforcement activity and appropriate measures put in place.
- 5.3. Those who are disparately affected by COVID are likely to be more commonly encountered as there are no additional government measures currently in place to offer additional protection. FRS must be aware of these groups and take account of their degree of vulnerability as part of their risk assessment.

Care/Specialist homes for Adults

- 6.1. The additional advice in this section includes both care homes and hospice facilities. While the specific nature of such premises is not identical, they offer similar levels of risk and are broadly comparable in the way such risks are mitigated. These premises types are likely to already feature at the forefront of most RBIPs. They are classed as high risk due to the risk profile of the occupants and the extent to which successful physical fire precautions and management controls need to be applied to keep the residents safe.
- 6.2. The current pandemic has introduced significant restrictions on the ability of the FRS to interact with these buildings, especially the undertaking of physical audits. In order to cope with the prolonged lockdown period, care homes have put in place a [variety of measures](#) to allow the various aspects of their provision to function. The CQC has issued advice to care homes including visitor restrictions [on their website](#). FRS should engage with the care facilities in the first instance to understand the current control measures in place and discuss ways in which safe physical visits can be undertaken.
- 6.3. Despite this, the fire risk presented by care homes, already identified as high via the RBIP, may have increased during this time for several reasons. These include:
- Increases in use and storage of O2 and other flammable/dangerous substances.
 - Agitation among residents with cognitive issues who no longer receive visitors or may be isolated for health reasons or have suffered mental harm during the COVID pandemic
 - Increase in isolation of residents who may have or be suspected of having COVID
 - Reduction in maintenance of fire safety measures
 - Reduction in available staff who may be ill or isolating
- 6.4. Additional information may be available from CQC to determine if any other audit had taken place and what the outcomes had been. Services should also make themselves familiar with the [Government guidance on working in care homes](#).
- 6.5. Given the high level of risk these premises represent, they should still be engaged with and every reasonably practicable measure undertaken to carry out audit or inspection.

Children's residential care

- 7.1. These premises are often small in scale with a high ratio of staff to residents. The main risk within these premises is from the actions of the resident. High levels of staffing will normally be tasked with actioning a variety of management fire safety matters.
- 7.2. There may be an increase in risk within these homes during the COVID pandemic for the following reasons:

- The lower amounts of social interaction and their inability to undertake planned activities or undertake family visits may increase or introduce a higher risk of fire setting within these environments in certain children. This may be especially so where local lockdowns are introduced.
 - Reduction in maintenance of fire safety measures
 - Reduction in available staff who may be ill or isolating
- 7.3. When contacting premises, it should be established whether the premises is COVID Secure and what control measures are in place. They should work with the premises to ensure any physical visits are conducted in a safe way.
- 7.4. The premises should review their fire risk assessment has been reviewed to reflect changes in risk. In addition, OFSTED can be contacted to determine if any other audit activity has taken place and what the outcomes were.
- 7.5. FRS are also advised to make themselves familiar with the published guidance on [isolation for residential educational settings](#) which covers a range of settings including home and living arrangements.
- 7.6. Given the high level of risk these premises represent, they should still be engaged with and every reasonably practicable measure undertaken to carry out audit or inspection.

Repurposed Premises

- 8.1. During the COVID period, there have been several alternative uses for buildings which have involved the use of buildings either entirely outside their normal usage or for purposes specifically for dealing with COVID.
- 8.2. These have included housing the vulnerable as part of a temporary care facility, providing accommodation for the homeless and the provision of accommodation for those entering the UK and requiring asylum processing or Border Force immigration quarantine.
- 8.3. For general accommodation cases, the buildings used are hotels or hostels which are already used to having an unfamiliar sleeping risk. These premises can generally follow their normal fire safety protocols.
- 8.4. There may be residents who may stay longer than normal or are not used to staying in this environment which may bring additional risk such as smoking or cooking in rooms along with a subsequent disablement of the fire detection in some cases.
- 8.5. FRS should identify and liaise the RPs of such premises to ensure they understand any change in risk and have suitable measures, via a fire risk assessment in the first instance, to deal with any issues.
- 8.6. The provision of the buildings will have involved other agencies and FRS should identify the relevant partner and work closely with them to assist in appropriate regulation.
- 8.7. Where care provision is being provided, there may be additional risk from vulnerable people, non-ambulant residents, increase in medical gases such as oxygen and other medical supplies.

- 8.8. FRS should ensure that the requirements of the temporary use of the building rather than its normal use is met.
- 8.9. Buildings may need to have their risk level re-assessed as a result of any alternative use which may mean an audit or physical visit will have to be undertaken.
- 8.10. While these buildings should be operating as COVID Secure locations, appropriate assessment of risk should take place and the measures outlined by the NFCC guidance as a whole, used as a basis for safe working.

Hospitals

- 9.1. Hospitals represent a wide variety of risks and are generally considered to be high risk premises under the FRS IRMP and therefore the RBIP. Hospitals have been at the centre of COVID care and admitted patients include those suffering from COVID as well as those with other medical care requirements.
- 9.2. The provision of health care during the pandemic has been dynamic including the creation of new hospitals and mobile testing locations. This has created a complex landscape of health care provision. FRS should have direct contact with the NHS trusts in their areas in order to fully understand:
 - The range and location of premises being used for health care.
 - Levels of risk from fire that each of the premises represents.
 - The progress of health care efforts.
 - The effects that COVID have had on the risk levels and what measures are in place to deal with them.
 - Any future planning that is underway to cope with changes in clinical care that may affect safety.
- 9.3. With regard to temporary hospitals, FRS should consult the [guidance already issued by the NFCC](#) which provides a wide range of advice to support the implementation of such facilities. While many of these facilities are not currently in use, they should still have had a high level of engagement with the NHS and should understand the risks that such premises represent should they be required for use again in the future.
- 9.4. For all hospitals, the following general advice applies:
 - Establish a single point of contact within the NHS Trust where possible which can enable information sharing across the range of hospital activity from clinical care to estates. Many FRS will already have such arrangements in place. Commonly this will be the Fire Safety Manager.
 - Contact CQC/HSE to determine if any other audit activity has taken place and what the outcomes were.
 - Contact with the Authorising Engineer (Fire) for the Trust (where applicable) may be beneficial to understand fire safety matters of a more complex nature.
- 9.5. As well as existing guidance for PPE within the FRS, the current [government guidance for PPE](#) use should be referred to and, in any case, the hospital will advise on specific additional PPE requirements.

- 9.6. Given the high level of risk these premises represent, they should still be engaged with and every reasonably practicable measure undertaken to carry out audit or inspection.

High Risk Non-Domestic

- 10.1. There are many types of high-risk premises across the UK FRS which may need to be audited as part of a getting back to work scenario or as part of their IRMP. Many of these, in a commercial setting, will be open or preparing to open as part of the UK lockdown measures. Others will have been remaining open as they perform essential work or are not yet eligible to open under the current government guidelines.
- 10.2. Given the range of premises types and hazards which make these buildings high risk, it is difficult to offer specific advice. NFCC have already issued guidance to FRS with regards to [Advice to Businesses](#) which remains valid and is regularly reviewed.
- 10.3. Where premises remain closed or are preparing to open, it may be easier to undertake a physical audit with the assistance of the RP due to the lower risk of interacting with others.
- 10.4. Where a premises is open as normal, the FRS should satisfy themselves that any fire safety matters have been risk assessed by the RP and those that are risk critical can be dealt with before reoccupation. The measures used to achieve this can be found in the general advice section above.
- 10.5. In order to be COVID Secure, the building may have been subject to modification or alteration in order to facilitate new social distancing restrictions. These may create fire safety deficiencies (such as one way systems or limited access and egress) which will need to be addressed.
- 10.6. Given the high level of risk these premises represent, they should still be engaged with and every reasonably practicable measure undertaken to carry out audit or inspection.

High Risk Residential Buildings

- 11.1. The government has made it clear that, despite the outbreak of COVID-19, there is to be no slowdown in the effort to deliver the Building a Safer Future agenda. FRS are undertaking a variety of work relating to this including the Building Risk Review. This involves work that can be done in a number of ways, including remotely or on-site in ways that present acceptable risk to staff or the public.
- 11.2. A number of sites undergoing remediation have been closed due to concerns that the work cannot continue and maintain the level of social distancing that is required. These works are now being restarted and, in addition, it is expected that sites which had not started works, do so as soon as possible. The government is providing some assistance to this via an appointed PMO.
- 11.3. In some cases it may be necessary to agree a modified inspection plan, for example splitting up estates into single buildings, where it is necessary to reduce exposure over time or the control measures in place on site or from the FRS require it.

- 11.4. In some cases, information for the purposes of data gathering can be gained from other sources such as internet and map searches, as well as the RP.
- 11.5. Given the high level of risk these premises represent, they should still be engaged with and every reasonably practicable measure undertaken to carry out audit or inspection.

Specialised Housing

- 12.1. The term specialised housing can be used to represent a wide range of premises types, from traditional sheltered housing which were formed of purpose-built blocks of flats, to converted private houses to large, assisted living developments. The extent to which the FSO applies in these premises will differ but the risk presented by the residents of such premises is a constant. FRS will already have details of the locations and types of such housing and will certainly form part of their RBIP.
- 12.2. Given the range of specialised housing and the wide range of vulnerabilities that they represent, it is important that contact is made with the RP when audit activity is required. Given that there are a range of RPs and that care provision (where it is available) may be a contracted function, there will be differing approaches to COVID management.
- 12.3. FRS should make contact with the RP to establish the building's current status and gather information on the effects COVID has had and continues to have. An updated fire and COVID risk assessment will be expected from the RP.
- 12.4. Where the provision of care or other services is not carried out by the RP, the provider should also be contacted to understand the COVID management functions that are in place and to arrange audits.
- 12.5. The physical areas which need to be inspected during audit activity will vary but normally be restricted to the common areas, which will vary greatly in extent from one premises to another. It may be a simple common staircase or a complex circulation space with atria and common areas such as restaurants and lounges. There may be restrictions in such common areas which could affect the means of escape from the building or pose other fire safety hazards at the interfaces of these facilities with other common areas.
- 12.6. All physical audit visits should be undertaken on a risk assessed basis. This needs to take into account the movement of residents in these common areas and the extent to which any such areas are open under the current circumstances. The Protection Model Risk Assessment accompanying this document should be referred to.

All Other Premises Types

- 13.1. Given the huge range of premises types, it is not possible to prescribe guidance for every situation. The focus has been on those commonly identified as high risk or that may be of special attention due to the COVID pandemic.
- 13.2. Where additional guidance on other premises types is required, this document will be amended, or new guidance documents will be provided.

- 13.3. Where there is no guidance in this document for a specific premises type, the 'General Advice' section should be referred to.
- 13.4. If further advice is required, contact the NFCC Building Safety Programme Team via BuildingSafetyTeam@nationalfirechiefs.org.uk.