



## COVID-19 – Protection – Risk Based Desktop Appraisal

2<sup>nd</sup> November 2020 – Issue 4

### **Risk Based desktop approach to considering fire risk in premises**

This advice note<sup>1</sup> is to provide information and consistency for Fire and Rescue Services (FRSs), when appraising risk in premises regulated under the Regulatory Reform (Fire Safety) Order 2005 (RR(FS)O 2005) during the COVID-19 pandemic. It contains areas for consideration that can be used to augment the existing work being carried out across the UK FRS.

This guidance is reviewed and amended as necessary by the NFCC Building Safety Programme Team. Please ensure that you have the most up to date version, all NFCC COVID-19 guidance can be found [here](#).

This note is designed to assist FRSs in taking a risk-based approach to all Protection activity and determine whether attendance to premises is necessary, in accordance with the 'NFCC Strategic Intention COVID-19 – Protection Issue 5' document dated 16th October 2020, available via the above link. It is the responsibility of the individual FRS to assess attendance at any premises in all circumstances

This approach is not proposed as a tool to assess remote enforcement activity but as a means to initially appraise the risk via a remote structured methodology (telephone/desktop), referenced against a number of broad fire safety points on which individual FRSs can build their own approach. If any doubt exists regarding the advised methodology, the FRS should seek its own legal advice.

**This information note is intended for the use of competent fire safety personnel, to apply professional judgement when considering premises risk in event of fire.**

In recognition of the continued important and vital Protection work being carried out by FRSs, the Home Office (HO) have, as an exception, offered two options for recording 'non-attendance activity' as a recorded return, during the COVID-19 pandemic:

- **Option 1:** Where a remote desktop appraisal of the premises fire safety measures has been carried out, this activity can be recorded in the FRS HO returns as 'other fire safety activity' in FS2. The desktop activity and time taken is recorded and saved against the premises record in the FRSs database with a code that defines it as non-

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<sup>1</sup> *The purpose of this non-statutory guidance is to provide fire and rescue services with general advice to assist with a consistent, standardised approach across all services. 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.*

fire safety audit activity, but can be reported and counted as 'other fire safety activity', in the HO annual return.

- **Option 2:** Where this has been carried out and recorded in accordance with the principles of the CFOA Short Audit guidance (see below), and there are no outstanding fire safety issues, this activity can be recorded in FRS HO returns as a short audit (see note below).

*Note: This only applies during the COVID-19 pandemic as a short audit should involve a visit to the premises.*

**It is up to the individual FRS to determine which of the two above options, if any, is the most suitable recording option for them.**

The use of desktop appraisals may assist FRS to maintain their protection activities and the use of the options above will allow FRSs to demonstrate their activities under audit from HMICFRS and HO annual returns.

This activity, coupled with a review of its effectiveness, may assist in future national decision-making regarding resourcing protection departments.

### **Proposal for desktop approach**

It is proposed FRSs use the underlying principles of a professional qualitative judgement on the adequacy of fire safety approaches, detailed in the Chief Fire Officers (CFOA) Short Audit guidance which can be located [here](#). Although the short audit process is generally for low risk premises, in this current climate, this could be adapted for any premises. Whilst it is acknowledged FRSs will not be carrying out a short audit, the principles and framework the guidance provides in supporting a managed/guided conversation to assess tolerable risk (page 13) should be applied.

Many FRSs already use the short audit process or are familiar with, and have a knowledge of, its guiding principles. To record this interaction, FRSs can use existing short audit recording processes or their own suitable proforma. Sections of note include the questions to consider (page 10) and the recording proforma (page 19) which are considered appropriate for this use. It is up to individual FRSs to decide if they wish to use this or a different proforma, for example existing audit forms could be used for this purpose

FRSs that do not currently use the short audit process and do not have systems or recording mechanisms in place, but wish to follow these principles should contact the NFCC Building Safety Programme Team at [BuildingSafetyTeam@nationalfirechiefs.org.uk](mailto:BuildingSafetyTeam@nationalfirechiefs.org.uk).

Whichever recording proforma a FRS chooses to uses, it should be acknowledged that the outcome of the information obtained is reliant on the accuracy and adequacy of information supplied by the Responsible Person (RP) and the conclusions will be dependent on the quality of the information provided.

FRSs should assess the risk that premises present through factors such as their size, height, use, occupancy profile and existing fire safety measures. It is essential as many sources of

information are investigated and obtained to allow the consideration of risk to be as accurately informed as possible.

FRSs should also consider:

- Information gathering as outlined in the 'Reducing Contact' section of the Protection Strategic Intention document.
- Any previous history information the service has on the premises.
- Any information from other sources e.g. Local Authority, Care Quality Commission etc.

**Where FRSs contact premises during this time every effort should be made to provide them with advice and support to mitigate the risk of fire. FRSs should also take this opportunity to remind the RP they remain legally responsible for fire safety in their premises and they should keep their fire risk assessment under review to take into account the effects of managing COVID risk, acting on any findings. FRSs may consider doing this in writing.**

### **Further information**

If you would like further information or clarification of any of the above, then please contact the team at the address below.

[BuildingSafetyTeam@nationalfirechiefs.org.uk](mailto:BuildingSafetyTeam@nationalfirechiefs.org.uk)