



COVID-19 – Protection Risk Based Desktop Appraisal

6th April 2021 – Issue 6

Risk Based desktop approach to considering fire risk in premises

1. Introduction

- 1.1. This advice note¹ 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 (FSO) during the COVID-19 pandemic. It contains areas for consideration that may be used to augment the existing work being carried out across the UK FRS.
- 1.2. On 22nd February 2021, HM Government published their '[COVID-19 Response – Spring 2021](#)' document. This contained an overview of the current national picture with regard to COVID infections, hospitalisations, deaths, economic impact, vaccine response and other elements. It also contains a roadmap which outlines the staged approach to coming out of the current lockdown.
- 1.3. This roadmap outlines a 4-step approach to relaxing the current national lockdown restrictions. This roadmap will be applied in a uniform way across England. The devolved administrations are setting out separate plans for Scotland, Wales and Northern Ireland. While the general approach in this document will still be relevant, specific elements such as timescales will depend on the specific plans set by those administrations.
- 1.4. This guidance is reviewed and amended as necessary by the NFCC Protection Policy and Reform Unit. Please ensure that you have the most up to date version, all NFCC COVID-19 guidance can be found [here](#).
- 1.5. This note is designed to assist FRSs in taking a risk-based approach to all Protection activity in accordance with the 'NFCC Strategic Intention COVID-19 – Protection Issue 7' document, available via the above link. In all circumstances, it is the responsibility of the individual FRS to assess attendance at any premises.
- 1.6. This approach represents a means to initially appraise the risk via a remote structured methodology (telephone/desktop). FRS can then reference a number of broad fire

¹ *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.*

safety points in order to build their own approach. If any doubt exists regarding the advised methodology, the **FRS should seek its own legal advice**.

- 1.7. **This information note is intended for the use of competent fire safety regulators, to apply professional judgement when considering premises risk in event of fire.**
- 1.8. **It is the responsibility of the individual FRS to assess whether the approaches set out in this document are suitable on a case-by-case basis.**
- 1.9. Where there is any doubt as to the provision of appropriate fire safety precautions and/or the RP's level of compliance with the FSO, a physical visit to the premises should be undertaken, with due regard for the need to protect your staff and the public from exposure to COVID-19.

2. Recording Activity

- 2.1. 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 COVID related desktop appraisal or similar. This will assist the FRS in reporting on their own activities during the COVID pandemic.
 - **Option 2:** Where desktop appraisal activity 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**'. The HO request the number of these audits be noted in the Notes box on the return.
Note: This only applies during the COVID-19 pandemic as a short audit would involve a visit to the premises.
- 2.2. **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.**
- 2.3. Where FRS undertake physical visits based upon their normal auditing procedures, they will still be recorded in the normal way using the full or short audit categories (where they are carried out).
- 2.4. The use of desktop appraisals may assist FRS to maintain their protection activities and the use of the options above may allow FRSs to demonstrate their activities via HMICFRS and HO annual returns, where they have had to restrict their normal activities during the COVID pandemic.
- 2.5. This activity, coupled with a review of its effectiveness, may assist in future national decision-making regarding resourcing protection departments.

3. Proposal for desktop approach

- 3.1. 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](#). 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.
- 3.2. 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.
- 3.3. 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 PPRUAdmin@nationalfirechiefs.org.uk.
- 3.4. Whichever recording proforma an FRS chooses to use, 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. The FRS may use the standard of information provided to determine whether a physical visit should be undertaken.
- 3.5. 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.
- 3.6. 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.
- 3.7. **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.**

4. Further information

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

PPRUAdmin@nationalfirechiefs.org.uk