



COVID-19 – Protection – Recovery Roadmap

6th April 2021 – Issue 1

Advice and guidance to Fire and Rescue Services to support government recovery roadmap

1. Introduction

- 1.1. This advice note¹ is to provide advice and guidance to Fire and Rescue Services (FRSs), when planning their regulatory activities under the Regulatory Reform (Fire Safety) Order 2005 (FSO) during the COVID-19 pandemic. Specifically, this provides guidance that reflects the Government's recovery roadmap which aims to ease restrictions in England².
- 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 document provides an overview of that plan in the context of undertaking regulatory activities under the FSO which will have been impacted during the pandemic.
- 1.4. The advice offered in this document will refer to the guidance which has already been made available on the NFCC COVID page. As with those documents, this guide will be reviewed and amended as necessary by the NFCC Protection Policy and Reform Unit (PPRU).
- 1.5. The general approach which FRSs should be undertaking during the COVID pandemic remains unchanged from that set out by the Strategic Intentions document which states that:

“Services should adopt a risk-based approach to undertaking auditing and other Protection activities. Carrying out duties under the Regulatory Reform (Fire Safety)

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.

² The devolved administrations are setting out separate plans for Scotland, Wales and Northern Ireland. While some of the guidance in this document may be relevant, it will depend on the specific plans set by those administrations.

Order 2005 (FSO) should take place with due regard for the need to protect your staff and the public from exposure to COVID-19.”

1.6. This is the first issue of this document and does not supersede any previous guidance.

2. Roadmap Principles

2.1. The Government will ease the restrictions at the same time across the whole of England which will remove the previous situations where FRSs found different COVID Tiers across their Service area, each of which required different responses.

2.2. While the easing of restrictions details have been issued, these are dependent on the data supporting moving from one step to another. This will require each of the ‘four tests’ being met. The dates offered in this document, therefore, are subject to change.

3. Roadmap Steps

3.1. Step 1

These steps are initially due to take effect from 8th March 2021.

- Schools and colleges are open for all students and practical Higher Education Courses.
- Recreation or exercise outdoors with household or one other person. No household mixing indoors.
- Wraparound childcare.
- Stay at home.
- Funerals (30), wakes and weddings (6)

The following steps are due to take effect from 29th March

- Rule of 6 or two households outdoors. No household mixing indoors.
- Outdoor sport and leisure facilities.
- Organised outdoor sport allowed (children and adults).
- Minimise travel. No holidays.
- Outdoor parent & child groups (up to 15 parents).

These measures will open educational establishments which may have been previously closed or operating in a reduced capacity – this includes schools which may have sleeping accommodation. In addition, student accommodation which may have been vacant will be used again. These bring clear challenges for both the Responsible Persons (RPs) of those premises and of regulators. The elements that need to be considered by FRSs are covered in the following documents and are available at the [NFCC COVID webpage](#):

- Student Accommodation – Issue 3
- Advice to Premises – Issue 7
- Schools Guidance – Issue 6

Outdoor sports facilities will be open again. These may contain areas such as changing facilities and support buildings. It is expected that such premises will be compliant with guidance issued by the relevant national sports governing bodies and through a review of their fire risk assessment.

3.1.1. FRS Actions

The specific actions undertaken by FRS at Step 1 will be dependent on factors such as the risk presented by specific premises and the resources available. The following actions are presented as suggestions for consideration:

- 3.1.2. Educational Establishments that are now open again will be operating with all pupils having made a return, with a variety of COVID measures in place. Contact should be made with schools and colleges to determine if fire safety measures may have been compromised and if activities such as fire drills and maintenance are occurring.
- 3.1.3. Student residential accommodation occupancy levels will grow, increasing the risk in these premises. Consideration of audits of these premises where there are specific COVID measures in place or their general risk levels warrant it, should be undertaken.
- 3.1.4. Outdoor sports and leisure facilities may utilise buildings or have compromises to means of escape. Engagement with some of these premises may be required to understand the measures being put in place and, therefore the risk to relevant persons.
- 3.1.5. The next step represents a substantial increase in the risks to the public from fire and, potentially, non-compliance with the FSO. Plans should be put in place to engage with known high-risk premises such as large shopping centres, some hotels and guest houses prior to 12th April to provide advice and determine if there are likely to be issues that will require the attention of the FRS or alternative considerations by the RP to ensure neither COVID 19 measures nor fire safety measures are compromised. In addition, a plan should be put in place for appropriate auditing of premises which may have re-opened after some time.
- 3.1.6. Where premises involve other regulatory partners, they should be contacted to form a joint understanding the approach each will take to their activities and, where possible, form plans for joint working in those premises.
- 3.1.7. Putting a communications plan in place that provides information on a targeted basis for premises which may represent high levels of risk or non-compliance should be undertaken.

3.2. Step 2

These steps are due to take place no earlier than 12th April 2021.

- Indoor leisure (including gyms) open for use individually or within household groups.
- Rule of 6 or two households outdoors. No household mixing indoors.
- Outdoor attractions such as zoos, theme parks and drive-in cinemas.
- Libraries and community centres.
- Personal care premises.
- All retail.
- Outdoor hospitality.
- All children's activities, indoor parent & child groups (up to 15 parents).
- Domestic overnight stays (household only).

- Self-contained accommodation (household only).
- Funerals (30), wakes, weddings and receptions (15).
- Minimise travel. No international holidays.
- Event pilots begin.

This step represents the reopening of sections of the indoor economy, the vast majority of which will be regulated under the FSO. There are a range of premises types that FRS should be aware of, the most numerous being retail premises.

The ability for people to travel and take domestic holidays will increase the use of accommodation such as hotels etc., where there is no sharing of sleeping or catering facilities.

Hospitality venues will also open and the previous requirement for a 'substantial meal to be served with alcoholic drinks and curfews, will no longer be required.

It is recommended relevant partners such as those involved in the regulation of licensed premises, should be contacted at an early stage to develop suitable plans for undertaking inspections and joint enforcement action where necessary.

FRSs should also consider the information contained in the following guidance:

- Protection Advice to Premises – Issue 7

3.2.1. FRS Actions

The specific actions undertaken by FRS at Step 2 will be dependent on factors such as the risk presented by specific premises and the resources available. The following actions are presented as suggestions for consideration:

- 3.2.2. The actions which were suggested in sections 3.1.5 and 3.1.6 should be considered as part of the measures for this step.
- 3.2.3. Putting a communications plan in place that provides information on a targeted basis for premises which may represent high levels of risk or non-compliance should be undertaken.
- 3.2.4. Retail premises will likely form a large part of the risk from reducing COVID restrictions. Consideration, in the first instance, where possible, should be given to activities such as re-assurance and compliance visits rather than full audits to cover a large number of premises in a short timescale.
- 3.2.5. The premises which will be open in Step 3 should be considered and plans put in place to deal with these in advance. Indoor entertainment premises and, potentially, large events will require coordination with other regulators. The use of Event Safety Advisory Groups at an early stage, or widening their scope, may assist with early engagement and dealing with compliance issues prior to the events occurring.

3.3. Step 3

These steps are due to take place no earlier than 17th May 2021.

- Indoor entertainment and attractions.
- 30-person limit outdoors. Rule of 6 or two households (subject to review).

- Domestic overnight stays.
- Organised indoor adult sport.
- Most significant life events (30).
- Remaining outdoor entertainment (including performances).
- Remaining accommodation.
- Some large events (except for pilot events) - capacity limits apply.
 - .1. Indoor events: 1,000 or 50%.
 - .2. Outdoor other events: 4,000 or 50%.
 - .3. Outdoor seated events: 10,000 or 25%.
- International travel - subject to review.

This step involves a range of additional premises coming into use. Particularly accommodation which couldn't open in the previous step such as hostels or some B&Bs, alongside indoor entertainment ranging from cinemas to children's play areas. These premises will require the same approaches as used previously for premises which are reopening and are outlined in existing guidance.

With large events which includes both indoor and outdoor venues, beginning to restart, it is recommended that early consultation with the appropriate partners (e.g. Local Authorities for sports stadia) is undertaken although the reduced capacities should mean that general risk levels will be reduced pending and COVID secure measures that might be required.

It is worth noting that up to, and including, this step, there will still be rules on the extent that people can mix, and bubbles will still be in force as there will be more chances for the virus to spread at social events such as weddings, funerals and the larger events.

3.3.1. FRS Actions

The specific actions undertaken by FRS at Step 3 will be dependent on factors such as the risk presented by specific premises and the resources available. The following actions are presented as suggestions for consideration:

- 3.3.2. The actions which were suggested in sections 3.2.4 and 3.2.5 should be considered as part of the measures for this step.
- 3.3.3. Putting a communications plan in place that provides information on a targeted basis for premises which may represent high levels of risk or non-compliance should be undertaken.
- 3.3.4. This step involves many of the key remaining premises types which are regulated under the FSO. Some of the significant event involving larger venue, although still operating at reduced capacities, will still require the normal legislative oversight and the use of existing processes and protocols in the management of these will still be appropriate
- 3.3.5. The use of premises for 'life events' will mean hotels and other hospitality venues will be broadening their operations, potentially widening their scope. Working with licensing authorities and making early contact with these premises is advised.

3.4. Step 4

These steps will take place no earlier than 21st June 2021.

- No legal limits on social contact.
- Nightclubs to reopen.
- Larger events
- No legal limit on life events (e.g. weddings)

This step effectively removes the final restrictions, and all regulated premises will be open in an unrestricted manner. It is likely that, at this point, any previous guidance which related to undertaking enforcement during the pandemic will no longer be required and the RP must ensure the premises fire risk assessment is again reviewed and updated.

3.4.1. FRS Actions

At this point, FRS will likely be operating in a way similar to that in place before the pandemic. There will likely still be the need to consider specific COVID security measures however so risk assessments and working practices should take this into account.

3.4.2. FRS will likely have been continuously reviewing their pandemic response, but this will be a good time to undertake FRS specific reviews of what has worked and what hasn't.

3.4.3. While it is the hope that moving to Step 4 will be a permanent action, it is also possible that these measures may not have desired effect. Although it is not clear exactly what any reintroduction of restrictions might look like, plans should be drafted to ensure that FRS are able to reinstate previous methods of working, taking into account the work carried out in 3.4.2.

4. COVID-Secure Premises

4.1. The Government had previously issued guidance that allowed businesses to operate within the boundaries of the restrictions in place at the time.

4.2. The purpose of the measures outlined in that guidance was to make the premises COVID-Secure and often introduced measures that restricted access to, or movement around, a premises. In some cases, this could have an effect on the fire safety measures.

4.3. Even when we have reached Step 4, depending on the scientific advice available, there will likely be the need for some degree of measures to ensure the risk of infection is still managed.

4.4. The Government is going to issue revised guidance as necessary so that COVID-secure conditions can be maintained. While NFCC will continue to update guidance where these measures are likely to have an impact on fire safety, FRSs should continue to monitor the issuing of any new Government guidance.

5. The need to review Fire Risk Assessments

- 5.1. The FSO is the current fire safety legislation in England and Wales, throughout the COVID-19 pandemic there has been no relaxation in this law. This legislation places the responsibility of ensuring there are adequate fire safety measures in place in the event of fire on the Responsible Person as defined in the legislation. The Responsible Person has a duty to make a fire risk assessment which is suitable and sufficient in identifying the required fire safety measures, and where deficiencies are identified, suitable temporary mitigation measures until the deficiencies are addressed.
- 5.2. The fire risk assessment should be reviewed in relation to any changes emerging from enacting any specific COVID-19 procedures that may affect fire safety. The fire risk assessment is specific to a premises and should assess the balance between the risk from fire and risk from COVID-19, whilst maintaining suitable and sufficient fire safety measures. Assistance is available from the Health and Safety Executive on [carrying out a COVID-19 risk assessment](#) which some Responsible Persons may find helpful.

6. Care homes and specialist housing

- 6.1. Care homes and other specialist housing have been a potential 'high risk' premises during the pandemic. Firstly, from the risk they represent from a fire safety perspective with such premises normally featuring in the high-risk categories of FRS RBIPs. Secondly, they have represented a high COVID risk to the residents and staff, which are particularly vulnerable should they catch the virus and to spreading it further.
- 6.2. These premises have represented a challenge to FRSs in terms of access due to the risk of COVID spread and the inherent risk to relevant persons from fire.
- 6.3. These premises are highly reliant on staffing to undertake evacuation and ensure general safety but are also prone to having high staff turnovers or use transferred or agency staff which can make a consistent approach to safety, difficult.
- 6.4. Outbreaks in care homes have been falling steadily since the beginning of January. That coupled with the vaccination programme specifically targeting the vulnerable residents should result in a reduced level of COVID risk in these environments.
- 6.5. Starting at step 1, single visitors will be allowed into care homes, with this expanding in step 2.
- 6.6. As a result, and where appropriate, FRSs should be looking to proactively undertake more Protection activity in these premises types.

7. Long term considerations

- 7.1. The virus, over the long term is expected to become endemic meaning it will reach a stable and, hopefully, manageable level.
- 7.2. It will likely always pose more of a risk to vulnerable groups. This may mean that certain regulated premises will always need to be treated in a way that manages that risk and yet allows proper regulation to take place.
- 7.3. FRS should undertake reviews of the effectiveness of their actions during the pandemic period, including the recovery roadmap. They should share any significant

learnings with the NFCC PPRU and put plans in place to deal with similar events that may occur in the future.

8. Further information

- 8.1. The NFCC Protection Policy and Reform Unit want to hear from any services who are involved in these projects to share information and further inform best practice.
- 8.2. If you have any feedback or questions with regards to this document, please contact the PPRU using the email address below.

PPRUAdmin@nationalfirechiefs.org.uk