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Independent workplace compliance



WHITE PAPER

COVID-19 contingency planning: Fire safety considerations for workplaces



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In current climate and the rapidly changing situation we find ourselves in with the COVID-19 pandemic, many premises are now vacant, or at minimal occupancy. This has raised questions regarding how fire safety must still be managed.

Some of the more frequent enquiries we are getting from customers and other are covering topics including:

Advice from our Primary Authority partner

Hampshire Fire and Rescue Service, our Primary Authority partner have provided the following general information on "statutory testing during COVID-19 shutdown":

"With this changing world there are compromises to be made and responsibilities to meet, unfortunately legislation and responsibilities aren't relaxed at this time, so it is still as important as ever to maintain systems and manage statutory testing. To help with this please follow the guidance below which will keep you safe and compliant.

1. Where the premises are closed to all, then tests and checks are realistically suspended until the premises are reoccupied. At which point the business should recommence with the routines at the earliest opportunity.
2. Where the premise are closed to the public but employees (regardless of numbers) remain on the premises. The routines continue as normal. Where reduced numbers of employees are present, those who are left must be competent to carry on with these routines.
3. Where the premises are closed to public and employees, but essential management or technician visits are required. To adopt a dynamic risk assessment approach. To check the perimeter before entry, to check the fire panel for operation/fault, to check the MOE for obstruction and final exit, to make sure they have a phone signal to dial 999. I also added that lone working is to be avoided where possible and to practice social distancing as per the current guidance."

Are your premises still occupied or vacant?

If your premises are still occupied it is important that critical life safety procedures, inspections and maintenance regimes remain in place. In some instances, these will need to be reviewed to maintain fire safety compliance for occupation and building safety. For example:

- How will you know, when an evacuation occurs, that your building is empty?
- Are named buddies still at work to assist with Personal Emergency Evacuation Plans (PEEPs)?
- Should a dispersal procedure be implemented on evacuation rather than congregating occupants at a designated assembly point when mass gatherings are not permitted?

If your premises were to become vacant there remains various reasons for you to maintain the fire fighting and fire prevention systems. We must first establish what does vacant mean? Often even an empty building has people visiting them. Before fire exit doors are padlocked shut and lighting systems are switched off, it must be established who could potentially be entering your premises and what harm could come to them, if you have changed security and reduced life safety measures?

Protecting your property from fire damage must also be on the agenda for vacant properties, for example, the risk of a fire from an arson attack may increase. This will mean built in firefighting equipment and remote monitoring of fire and security systems must remain operational and effective. If possible increasing security patrols and testing remote transmission links will help to reduce the risk of arson and guarantee fire or security alerts are raised in an emergency.

Whilst all local Fire and Rescue Services will have every intention of maintaining the same levels of support, their capabilities at any one time - the possible scaling back of fire service due to the effects of the COVID-19 epidemic on operational teams and required support in other areas - may affect response times. So, taking measures to continue to effectively reduce the risks of a fire starting is key.

You therefore need to balance any changes to your current fire management regime against the requirements of, the Regulatory Reform (Fire Safety) Order, your insurance company and local fire and rescue service.

Fire evacuation drills

Even if occupancy numbers are minimal, evacuation drills will still need to be carried out on at least an annual basis. If it is company policy to carry out evacuation drills more frequently (i.e. six monthly), you may wish to review this and scale back in the short term to an annual drill if practicable.

It is important when arranging evacuation drills to adhere to current Government guidance. It may be necessary to delay an arranged drill to a later date to avoid mass gatherings and adhere to social distancing. However, in this instance you should provide a refresh message for occupants to be extra vigilant over this time, reiterate the evacuation procedures to them and include it as a temporary note in the FRA, so you can demonstrate that a plan is in place.

Evacuation procedures should be reviewed to make sure they reflect what current safety procedures are in-place. This should include checking fire action notices around premises are accurate.

Fire wardens

The number of fire wardens may now be greatly reduced with staff encouraged to work from home. You should review as to who is still working within the building and if possible, re-locate any fire wardens who are still in the premises to different areas of the building to provide adequate coverage for an effective clear floor policy.

For some premises it may not be practical to implement a 'sweep' at all. In which case a review of procedures to an 'all out immediately', with everyone taking responsibility to sweep their own area, may be the only option. Alternatively, it may be beneficial to appoint other members of staff and security personnel as the fire wardens. As it may not be possible to provide additional fire warden training, you should consider re-locating all staff to a single floor/area of the building (maintaining correct social distancing), which will alleviate the need of a full building sweep.

Depending on responsibilities it may still be necessary to carry out building inspections to look for and rectify potential fire hazards, where fire warden number are depleted this responsibility could fall to others through for example the security or premises staff. This is essential where there are parts of a building that are empty and that would normally be occupied.

Personal Emergency Evacuation Plans (PEEPs)

Any active PEEPs that are in place for relevant occupants should be reviewed and amended as necessary. Options such as requesting a PEEP owner works from home or relocates to the ground floor (to allow for self-evacuation if possible) would be considered as reasonable.

Fire system testing and maintenance

The measures introduced to help combat COVID-19 are affecting different organisations in different ways. This is particularly true for premises, their levels of occupancy and activities being carried out in them, however safety, security and compliance must be maintained. So, where these changes occur, any decisions concerning amendments to your fire plan and arrangement must be approached with informed consideration and caution. You may also need to discuss these with your insurance company and as relevant fire and rescue service.

A combination of maintenance, external statutory inspection, formal internal inspection and pre-user checks will be standard controls for life safety equipment within your premises. Listed below are some fire safety maintenance tasks and considerations for a building with a changed occupancy:

- **Fire Alarm (weekly test and servicing)**
 - Audible test should still be carried out even if occupancy numbers are low. If the premises is empty, this can be scaled back, but the fire alarm panel will still need checking for faults and should be routinely tested. Fire alarm system servicing must take place, but you could consider a 100% test rather than the typical quarterly regime.

- **Emergency lights (monthly/ annual testing)**
 - This should still be carried out as usual. This is to make sure that should you have anyone within your premises, that their escape routes are suitably illuminated in the event of building power failure and during an emergency there is sufficient lighting to assist the emergency services.
- **Sprinkler systems (weekly test and servicing)**
 - Check with your insurance provider first before amending any maintenance schedules. This firefighting system will be critical for your property protection and you may have no option but to continue with the usual testing and service regime.
- **Fire door checks (quarterly/six monthly inspections)**
 - If the doors are not in frequent use, checks could be reduced. An annual check would be most suitable for a vacant premises. These should be inspected, and defects noted rectified, prior to reoccupation. Your fire doors are an important part of life safety and preventing the spread of smoke and flames from one area of a building to another.
- **Property inspections (i.e. escape routes)**
 - If the premises is occupied, this should still be carried out as usual. Before closing a building, all escape routes should be checked to confirm they are clear. If the building is vacant, external inspections may be required for safety and security purposes. This should include checks of the final exit doors fastenings and security fastenings to make sure all final exit door can be used in an event of emergency and so that they are securely shut preventing unauthorised access. Additionally, inspection of the external staircases and gangways should take place to make sure that they are in a suitable condition and no slip or trip hazards are present, which would cause a delay in a building emergency evacuation and that no combustible materials have been left close to the premises.
- **Dry/wet risers and hose reels (annual service)**
 - The annual service should still be carried out as usual. The safe decommissioning of hose reels could be recommended, where these are now not commonly used. However, confirmation by your fire risk assessor, local fire and rescue service and insurance company must be sought.
- **Fixed firefighting equipment (i.e. water mist, dry powder, or fixed foam)**
 - The designated servicing should still be carried out as usual. The only time this may alter is if the equipment being protected is no-longer in use (e.g. an Ansul system in a kitchen or a comms room that has been electrically isolated). Check with your insurance provider first before amending any maintenance schedules.
- **Gas suppression system (annual service)**
 - The annual service should still be carried out as usual. Check with your insurance provider first before amending any maintenance schedules.
- **Fire dampers or smoke vents (quarterly test)**
 - The servicing and testing should still be carried out as usual from a property protection viewpoint and to assist those fighting a fire retrospectively.
- **Fire extinguishers (annual service)**
 - The annual service should still be carried out. If visual inspections are conducted, these can be scaled back if the premises is unoccupied. You may also be able to reduce numbers of extinguishers if high risk areas, such as kitchen facilities are no-longer operational.
- **Fire Hydrants (annual servicing)**
 - The annual service should still be carried out as usual.
- **Lightning protection (11-monthly servicing)**
 - The 11-monthly service should still be carried out as usual.

Training and Competence

Staff who are temporarily covering additional tasks and roles, must have received relevant training to undertake the role safely. They may not be in a situation where they will be receiving the level of supervision that a trainee would have ordinarily, so please make sure that they have support. Whilst we are all pushed, it is important for staff to know that they need to ask if they are unsure and not to “do their best” in this difficult situation. Whilst this is an emergency situation, you must not bypass the requirement to complete certificated training for your staff.

Additional information

Assurity Consulting will continue to take guidance from authoritative sources including Public Health England, the Health and Safety Executive and the Government regarding COVID-19. As further information becomes available so we will update this guidance as required. Sources of information include:

1. COVID-19: General advice (GOV.UK)

<https://www.gov.uk/guidance/wuhan-novel-coronavirus-information-for-the-public>

2. COVID-19: Advice for employers and businesses (GOV.UK)

<https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-covid-19#what-to-do-if-a-member-of-staff-or-the-public-with-confirmed-covid-19-has-recently-been-in-your-workplace>

3. Coronavirus (COVID-19): latest information and advice (HSE)

<https://www.hse.gov.uk/news/coronavirus.htm>

4. Your local Fire and Rescue Service website may also provide further information

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