



Strategic Intentions COVID-19 - Protection

21st December 2021 – Issue 8

1. Introduction

- 1.1. In applying this strategic intention and the associated guidance, Fire and Rescue Services (FRS) should be aware of the current COVID-19 management measures in place relevant to their respective government and local government areas.
- 1.2. This document has been updated in line with Government [COVID-19 Response: Autumn and Winter Plan 2021](#) guidance updated on 9th November 2021 and, more specifically the announcement that England has moved to Plan B of that document.
- 1.3. The Autumn and Winter Plan 2021 provides to sustain progress made under the previous Recovery Roadmap document while ensuring the NHS does not come under unsustainable pressure. The devolved administrations are responsible for 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 or specific restrictions will depend on the specific plans set by those respective administrations.
- 1.4. The advice outlined in the Autumn and Winter Plan 2021 and, specifically, those related to Plan B is broadly similar to which FRS have had to deal with previously. FRSs will, therefore, be able to make use of their learning during that time to ensure Protection work can be undertaken in a safe and effective way.

2. Delivering Protection services

- 2.1. This document provides a strategic framework setting out considerations for FRS to safely carry out Protection activities which may have been, or will be, temporarily disrupted due to COVID-19.
- 2.2. Its purpose is to ensure that the management of activities protects the safety of both staff and the public and does so by way of common sector specific risk assessment, in accordance with current government guidance. It compliments existing FRS activities and their associated risk assessments and decision-making processes; it does not supersede them.
- 2.3. The ability to deliver Protection services and the associated assessment of COVID-19 related risk should take into account the changing circumstances, including Government restrictions, new COVID risks (such as new variants) and the success of initiatives such as the vaccination programme.

3. Protection

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

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

3.2. This document replaces the following NFCC guidance note:

- Strategic Intention Covid-19 – Protection (6th April 2021 – Issue 7)

3.3. It is also accompanied by:

- Scenario Based Guidance – Protection (Issue 4) which provides additional practical advice on implementing the measures in this strategy.
- Protection Model Risk Assessment (Issue 5).
- Various sector and risk specific guidance documents as published on the [NFCC COVID-19 webpage](#).

4. Fire Safety and COVID-19

4.1. As the restrictions in place due to COVID-19 change, so will the risk to persons from fire.

4.2. It is a requirement that FRSs continue their regulatory and legislative duties during the COVID 19 pandemic. Therefore, FRSs should be undertaking their normal range of activities unless a suitable risk assessment determines that the COVID risk is intolerable. This document, along with the accompanying guidance is provided to give FRS a practical decision-making framework enabling the safe discharge of their duties.

4.3. The risk assessment of delivering protection activities is based upon:

- Restricting the spread of COVID-19;
- Minimise staff and public risk to COVID-19;
- Demonstration that an effective assessment of risk has been undertaken, showing a physical (or suitable alternative) visit is appropriate against the assessed risk from COVID-19.

4.4. The model risk assessment that accompanies this document is designed to give FRS a starting point on which they may wish to base their own risk assessments.

4.5. The changing of any restrictions may result in a potential increase in fire risk in regulated buildings. FRS can use this information to better target their resources to attempt to mitigate any increase in risk.

4.6. The nature of the engagement with premises will include a range of techniques. These will need to be assessed on a case-by-case basis.

4.7. Whilst working in and travelling to Protection settings, all staff should adhere to the updated guidance for first responders, such as effective use of PPE and Infection Prevention Control Measures to reduce the transmission of the virus and ensure that premises are undertaking the required measures to be COVID-Secure.

5. Fire Safety Complaints or information about risks to relevant persons from fire

- 5.1. Any complaints or information received that indicates that there may be a significant risk to relevant persons should be robustly assessed and filtered by a suitably competent Protection Officer to determine the level of response required. Reference should be made to the FRS policy on the matter and 'Reducing Contact' section of this document as well as the Model Risk Assessment, Scenario Based Guidance document and the other various guidance provided on the NFCC COVID-19 webpage.

6. Prohibition or Restriction Notices (Article 31)

- 6.1. Where dangerous conditions exist and/or a serious risk to life in event of fire is identified, or information is received indicating this is the case, the FRS should respond commensurate with the risk. While this will most likely involve attending a premises, consideration should be given to the measures available in 4.7 above and 7.1 below. A range of alternative methods of contact may be used to establish the level of risk prior to attending, by way of ensuring staff are suitably protected from the risk of COVID-19.

7. Reducing Contact

- 7.1. Reducing contact either between members of the FRS or FRS and the public has the effect of reducing the opportunity for COVID to spread. This is especially important where new variants of COVID have been reported to be more transmissible between people, however, there is no requirement for greater levels of PPE. There are measures that FRS can take to reduce contact, regardless of the situation:
- Use of telephone or email to make the initial contact, depending on urgency;
 - Desktop appraisals;
 - Sending still images or video electronically;
 - Use of video conferencing or similar live streaming;
 - Electronic documents to replace letters;
 - Enhanced website information;
 - Serving of notices electronically;
 - Reduction in staff numbers to carry out visits or other inspection activities (for operational crews);
 - Reduction in time spent in high risk areas;
 - Selection of audit times where there are fewer people in attendance.

8. Buildings with a temporary change to simultaneous evacuation strategy

- 8.1. These will generally include purpose-built blocks of flats but may include other premises where a similar temporary measure has been implemented. These buildings pose a specific temporary risk and should, using this suite of documents as a reference, continue to be regularly contacted/visited to ensure the fire risk is mitigated in accordance with the temporary measures. Please refer to the COVID-19 – Simultaneous Evacuation Guidance on the [NFCC website](https://www.nationalfirechiefs.org.uk). This also includes those premises being evaluated under, or as a result of the Building Risk Review.

9. Moving Landscape of Risk

- 9.1. While the recovery roadmap's aim was to ensure that there would be no more restrictions in place, apart from those put in place on an individual basis to remain COVID-Secure, we have seen that the risk is fluid and can, and will, change. The risk from regulated buildings will also continue to change.
- 9.2. The Government and devolved administrations will continue to provide detailed guidance for different kinds of premises relevant to any prevailing restrictions. FRS should ensure they are aware of these and take them into account when considering their risk assessments. These can be found at [GOV.UK](https://www.gov.uk) and NFCC will communicate them in the form of revisions to existing documentation which will be found on the [NFCC COVID page](#).
- 9.3. While any restrictions will be part of an ongoing review process, FRS should be prepared to accommodate additional measures should they be required. They can do this by reviewing the measures, they have already taken during previous lockdown periods and having a plan in place to reinstate or revise them, accordingly.
- 9.4. There may continue to be buildings which are being used outside the normal expectations of their fire safety provision, such as those housing the homeless, those in immigration quarantine or where care provision is being offered for patients discharged from hospital but not able to return home. Advice relating to this can be found on the [NFCC COVID-19 webpage](#).
- 9.5. Consultation with other regulators for premises such as care providers, licensed venues, sporting stadia and housing is recommended so that a coordinated approach to auditing and enforcement is in place.

10. Risk Based Inspection Programme

- 10.1. FRS should continue to review the effects of the pandemic on their RBIP and put appropriate plans in place to return to regulate in those premises in a risk-based manner but may not have been able to do so previously.

11. Statutory Consultations

- 11.1. These should continue but be subject to Services' advice to staff on remote working and maintaining appropriate distancing in the workplace. Examples of alternative ways of working/engaging/communicating are given in the 'Reducing Contact' section of this document. Inspecting officers should engage with their statutory partners to discuss any measures that may affect the ability to conduct such consultations. Further control measures can be found in the Model Risk Assessment.

12. Other enforcement activities

- 12.1. Prosecution investigations and statutory notice follow ups should continue following FRS procedures and the general advice in this suite of documents. There may continue to be some delays in cases being dealt with by the courts due to COVID-19.

13. Recording Audits

- 13.1. FRSs should consider the measures presented in this suite of documents and the NFCC Risk-Based Desktop Approach to Considering Fire Risk in Premises guidance.



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Doing so, may allow audits to be carried out in a safe and controlled manner in all cases.

- 13.2. Some FRSs may wish to allocate the audit activity an 'requires confirmation' status¹ and not formally complete the audit until further activity has been completed.
- 13.3. As a measure specific to the COVID-19 pandemic, the use of the short audit process methodology may allow, in some circumstances, completed appraisals to be recorded as detailed in the Desktop Appraisal guidance. It is for the FRS to determine whether such an approach is appropriate on a building-by-building basis. The guidance should be consulted for further information.
- 13.4. **Additional Guidance**
- [NFCC Protection COVID-19 Guidance](#)
 - [HM Government Coronavirus Main Hub Page](#)
 - [Guidance for First Responders](#)

¹ This is an example. It any appropriate category or marker that works with the FRS recording system and procedures could be used.