

Date: 20th August 2020

Crown Premises' Fire Safety Inspectorate
Fire and Resilience Directorate
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INFORMATION NOTE: INTRODUCTION OF FIRE SAFETY INSPECTIONS IN CUSTODIAL PREMISES USING COVID-19 PROTECTIVE PROCEDURES

The Crown Premises' Fire Safety Inspectorate (CPFSI) is resuming planned inspections at custodial premises. This means that inspections must also be carried out at the workplace and performed in a safe and controlled manner.

Inspections will be carried out in accordance with our generic risk assessment for inspecting safely in custodial premises in which there are no persons currently self-isolating or displaying active symptoms of COVID-19.

This is available on <https://www.gov.uk/government/groups/crown-premises-fire-safety-inspectorate>. A current version has also been provided to HMPPS.

Our inspection approach has been remodelled to achieve the same efficacy whilst observing the appropriate precautions to prevent inspectors from introducing or being perceived to introduce a risk of COVID transmission:

1. Prior to any inspection, inspectors will make contact with the prison to confirm that it is an inactive COVID site and that suitable COVID-19 safe working procedures are in place.
2. Prior to an inspection we will provide the maximum period of notice possible, but normally not less than 28 days (to allow establishments to secure the necessary resources. E.g. escorts, socially distanced spaces etc.)
3. Should enquiries establish that occupants are self-isolating or have symptoms of COVID-19, or suitable COVID-19 working procedures are not in place, the inspection will not go ahead.
4. The inspection will normally take place over a two-day period, with three or four inspectors in attendance.
5. We will normally ask for electronic copies of key items of documentation to be sent to us in advance so that we can complete most of our assessment of fire safety management before we arrive, but this will not always be the case and we may agree to receiving the documentation after the visit. The list of key documents will be identified in the appointment letter and are also listed at the foot of this information note.
6. We will provide a briefing ahead of the inspection using social distancing – this can be in the fresh air, by telephone or in a suitable space in the building - and we will also use it to confirm how we will jointly mitigate the risk of COVID-19 infection during the inspection.
7. We will then provide a debrief of our inspection findings afterwards, again using social distancing, telephone or a platform such as Skype or Microsoft teams
8. We will establish a co-ordinated inspection plan that limits exposure time for inspectors on residential wings and unnecessary burden on the prison regime. This plan will also incorporate the arrangements laid out in the CPFSI/HMPPS inspection protocol.
9. We will establish a suitable location for inspectors to reside in a socially distanced environment to review documentation, exchange inspection findings and collate information.

10. We will establish a schedule for inspecting residential areas, meeting and speaking with staff and relevant departments (including works department) in a suitable socially distanced environment.

In combination, this approach will allow us to conduct all elements of an inspection safely and provide a full briefing and debrief, as would be our process in more normal times.

CPFSI will provide a pragmatic response to matters which have arisen because of the disruption to normal operation caused through COVID-19 and will engage with attempts to seek solutions to novel issues.

There are a number of authoritative reports and guidance documents in circulation which focus on working safely in buildings during the COVID pandemic. None of these provides specific guidance on how to conduct inspections safely, so we have amalgamated guidance and information from a range of such documents into an approach based on the following principles:

- We expect and have planned for inspectors to use social distancing and hygiene as the primary means of avoiding people transmitting COVID to others.
- Where it is uncertain that social distancing can be fully achieved, other measures should be employed to increase protection instead (<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres>) including the use of face-coverings and (in agreed circumstances) PPE.
- Medical opinion ([https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(20\)30918-1/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(20)30918-1/fulltext)) is that the wearing of face-coverings has very limited benefit for the wearer (i.e. is an altruistic act) but is quite effective at preventing spread from an infected person to others.
- PPE can be used to enable people to work who cannot carry out their work from home but want to better protect those for whom they have caring responsibilities or who are vulnerable people in their household.

Our activity takes us continually between different workplaces, so we need to use face-coverings where social distancing is difficult to achieve in order to prevent any weakness in social distancing or hygiene at those sites to create the potential for inspectors to become transmitters of infection.

Inspectors cannot be certain at the start of inspections whether two metres' separation is achievable in all the spaces we may need to pass through or visit, so we will carry and use face-coverings - and request the person accompanying us to do the same - if we feel that it is needed to achieve the level of protection for us and for others that is provided by social distancing elsewhere.

Where an inspector needs to protect vulnerable people at home, we will notify the site in advance that they will be using PPE for that purpose.

CPFSI can offer out-of-hours inspections where departments or local officers request it but we will otherwise inspect during normal working hours.

If you have a question about the information in this note or need clarification on any related matter, please email cpfig@homeoffice.gov.uk or contact us by telephone at 0300 1233911.

List of electronic copies of key documents to be provided in advance of an inspection:

- CPFSI Pre-Inspection Information form.
- Fire Risk Assessments for all residential accommodation blocks.
- Details of the automatic fire detection systems (AFD) present in residential accommodation blocks.
- Details of interim measures implemented within any residential accommodation block to compensate for any lack of fire safety provision
- Details of the type and location of the fire-fighting equipment present in residential accommodation blocks
- Details of the smoke control systems present in residential accommodation blocks.
- Establishment fire safety policy
- Establishments fire procedures (e.g. contingency plans)
- Supporting policies and procedures (e.g. M.O.U with the Fire and Rescue Service)
- Staff training records for fire, including RPE training figures for initial and in-date.
- Prisoner induction process
- Any Personal Emergency Evacuation Plans in place for prisoners or staff
- Details of interim measures implemented within any building to compensate for any lack of fire safety provision
- Cell fire response plan, including evidence of time-based evacuation drills
- Existing action plans based on previous inspection findings by the Crown Premises' Fire Safety Inspectorate.

List of additional key documents that inspectors would normally need to view during an inspection, so that the inspection can be completed without a further visit:

- Floor Plan of the prison.
- Existing action plans or internal investigation reports relating to fires within the last two years.
- Details of adjudications and sanctions awarded for acts of fire-setting or tampering with fire safety equipment.
- Incident/near miss information in relation to fires (e.g. RIVO reports) within the last two years
- Health and Safety and SMT minutes of meetings
- Accommodation Fabric Check records from the last week
- Copies of Early Warning and Defect Notices issued or received by HMPPS in relation to this prison over the last 12 months
- Records of meetings with the site manager over the last 12 months
- Records of the risk information provided by the site manager to prison managers and the Service Delivery Manager over the last 12 months
- Records of the internal assurance processes undertaken over the last 12 months to evidence and assess the actual performance of tests of fire safety systems, fittings and equipment carried out by the prison's fire adviser.

- Records of the assurance processes you have followed over the last 12 months to evidence the actual performance of your FM Provider in delivering adequate testing, maintenance and remedial works to fire safety systems, fittings and equipment.
- A current list of known or suspected gaps in the asset register relating to fire safety systems, fittings or equipment, and details of where the asset register in use is currently disputed with the FM Provider.
- Records which demonstrate that defective fire safety systems, fittings and equipment have been correctly and promptly reported to the Help Desk for corrective action by the FM Provider
- Installation and commissioning certificates for fire alarm, fire-fighting systems, smoke control systems etc.
- Test and maintenance records for all fire safety systems including fire alarms, emergency lighting, sprinkler system, smoke ventilation system
- Testing and maintenance records of fire-fighting equipment (extinguishers, water mist)

Requests for additional information items may be required during the inspection.